CENTENNIAL
at TEJON RANCH

Centennial Project

Consolidated Final Environmental Impact Report

Volume 1

State Clearinghouse No. 2004031072
Specific Plan No. 02-232
County Project No. 02-232-(5)
General Plan Amendment No. 02-232
Zone Change No. 02-232
Vesting Tentative Parcel Map No. 060022
Conditional Use Permit No. 02-232
Development Agreement No. RPPL2016003940

Lead Agency:

County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, California 90012

November 2018

Consolidated
Final Environmental Impact Report

Centennial Project

Los Angeles County, California

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2.0-C.Rev	Mitigation Monitoring and Reporting Program (Revised)
4.0-A.Rev	Centennial Specific Plan (Revised)
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1.0 INTRODUCTION

1.1 PURPOSE

As defined by Section 15050 of the California Environmental Quality Act (CEQA) Guidelines, the County of Los Angeles (County) is serving as "Lead Agency" for the preparation of the Environmental Impact Report (EIR) for the Centennial Project (Project). This Consolidated Final EIR presents the environmental information and analyses that have been prepared for the Project pursuant to CEQA, including comments received addressing the adequacy of the Draft EIR, and responses to those comments. The purpose of this Consolidated Final EIR is to: (1) respond to all comments received by the County regarding the environmental information and analyses contained in the Draft EIR during the official comment period, as required by CEQA; (2) while not required, respond to all further correspondence and testimony received by the County after the close of the official comment period but before the scheduled December 11, 2018 Board of Supervisors hearing; (3) provide in one place all clarifications, corrections, or minor revisions to the text, tables, figures, and appendices of the Draft EIR and Final EIR generated either from responses to comments or independently by the County, including those identified in the Final EIR published in May 2018, and those identified subsequent to publication of the Final EIR but before the scheduled December 11, 2018 Board of Supervisors hearing. Section 15132 of the CEQA Guidelines lists the required contents of the Final EIR:

(a) The Draft EIR or a revision of the Draft EIR

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

(d) The County's responses to significant environmental points raised in the review and consultation process.

(e) Any other information added by the County as Lead Agency.

This Consolidated Final EIR, in addition to the remainder of the record, will be used by the County of Los Angeles' Board of Supervisors in the decision-making process for the Project. The Draft EIR text has not been modified to reflect these clarifications, except as shown in Section 4.0 of this Consolidated Final EIR.

Section 15097 of the State CEQA Guidelines states that the lead agency shall adopt a program for monitoring or reporting on the revisions that it has required for the project and the measures it has imposed to mitigate or avoid significant environmental effects. The Project's Mitigation Monitoring and Reporting Program (MMRP), describes the mitigation program to be implemented by the County for the proposed Centennial Project. A draft of the MMRP was included in Appendix 2.0-C to the Draft EIR. A revised version of the MMRP was included in the Final EIR as Appendix 2.0-C.Rev. A further revised MMRP has been prepared for

consideration by the Board of Supervisors and has been provided as Appendix 2.0-C.Rev to this Consolidated Final EIR. The revised MMRP reflects changes and additions to mitigation measures generated in response to comments or independently by the County.

The County has reviewed all comments and has determined that no substantial new environmental issues have been raised and that all issues raised in the comments have been adequately addressed in the Draft EIR and/or in Responses to Comments (Section 2.0), Responses to Correspondence Received and Public Testimony Given After Close of Official Draft EIR Public Comment Period (Section 3.0), and/or the Clarifications and Revisions to the EIR (Section 4.0).

1.2 ENVIRONMENTAL REVIEW PROCESS

Draft EIR

Upon completion of the Draft EIR, notice of the public review period was given in accordance with Section 15087 of the State CEQA Guidelines. In May 2017, a Notice of Availability (NOA) was prepared and distributed to the State Office of Planning and Research, Los Angeles County Clerk, responsible and trustee agencies, organizations, interested parties, and all parties who requested a copy of the EIR in accordance with CEQA. The County decided to provide a voluntary extension beyond the CEQA-mandated 45-day public review period to provide ample opportunity and time for the public to review the Draft EIR. Thus, comments on the Draft EIR were accepted during a 60-day public review period extending from May 18, 2017 through July 17, 2017.

The NOA was distributed to the mailing list and email list prepared for the Notice of Preparation (NOP) for the scoping stage of the proposed Project before issuance of the Draft EIR and was augmented to include individuals requested to be added to the list, as well as individuals who had provided comments on the NOP. The NOA and Draft EIR were posted on the County's website for viewing and downloading at http://planning.lacounty.gov/case (type "Centennial" into the case archive search box).

Hardcopies of the Draft EIR were available for public viewing at the County of Los Angeles Department of Regional Planning located at 320 West Temple Street, Los Angeles, California, as well as the following locations:

Lancaster Regional Library
601 West Lancaster Boulevard
Lancaster, California 93534

Valencia Public Library
23743 West Valencia Boulevard
Santa Clarita, California 91355

Castaic Library
27971 Sloan Canyon Road
Castaic, California 91384

Old Town Newhall Library
24500 Main Street
Santa Clarita, California 91321

Frazier Park Library
3732 Park Drive
Frazier Park, California 93225

Bakersfield Library, Southwest Branch
8301 Ming Avenue
Bakersfield, California 93311

Canyon County JoAnne Darcy Library
18601 Soledad Canyon Road
Santa Clarita, California 91351

Stevenson Ranch Library
25950 The Old Road
Stevenson Ranch, California 91381

San Fernando Library
217 North Maclay Avenue
San Fernando, California 91340

Quartz Hill Library
5040 West Avenue M-2
Quartz Hill, California 93536

The Hearing Examiner's Meeting included a presentation overview of the Project and the conclusions of the Draft EIR on June 29, 2017, at 6:00 PM at Gorman Elementary School located at 49847 Gorman School Road in Gorman, California 93243. At this public meeting, the Hearing Examiner presented the case to the community and received testimony from the community on the Project and the Draft EIR. The public hearing was also advertised in the local newspapers (*The Signal* and *Antelope Valley Press*) on May 17, 2017, and a public notice was posted on the Project site on May 25, 2017. Hearing Examiner Staff Summary for the public hearing was posted online on June 15, 2017.[1]

Subsequently, in July 2017, in response to requests from the public to provide an additional extension of the public review period, a *Notice of Time Extension of Public Comment Period for the Centennial Project Draft Environmental Impact Report* (Notice) was posted online[2] and emailed to all persons and parties who specifically requested a time extension. This Notice extended the Draft EIR public review period from July 17, 2017, through August 16, 2017. This 30-day extension was in addition to the original 60-day Draft EIR public review period, resulting in a combined 90-day comment period. All written comments received on the Draft EIR from May 19, 2017 through August 28, 2017 are responded to in this document.

In summary, the County conducted all required noticing and scoping for the proposed Project in accordance with Section 15083 of the State CEQA Guidelines and conducted the public review for the Draft EIR in compliance with Section 15087 of the State CEQA Guidelines. The extension of the public review period until August 16, 2017, exceeded the requirements of CEQA.

During the comment period, written comments on the Draft EIR were received by the County of Los Angeles Chief Executive Office. The County reviewed all comments and determined that no substantial new environmental issues were raised and that all issues raised in the comments were adequately addressed in the Draft EIR and/or in the Responses to

1 Los Angeles, County of. 2017 (June 15). Hearing Examiner Staff Summary: "Centennial Specific Plan Project." Los Angeles, CA: County of. http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-staff-report.pdf.

2 Los Angeles, County of. 2017 (July 13). Notice of Time Extension of Public Comment Period for the Centennial Project Draft Environmental Impact Report. Los Angeles, CA: County of. http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-hearing-time-extension.pdf.

Comments and Draft EIR Clarifications and Revisions, which are located in Sections 2.0 and 3.0 of the May 2018 Final EIR, respectively.

Final EIR

The Final EIR for the proposed Project, dated May 2018, consists of the following documents:

- Draft EIR and Technical Appendices dated May 2017
- Responses to Comments and Draft EIR Clarifications and Revisions, which include:
    - A list of all persons, organizations, and public agencies that commented as well as the verbatim comments received on the Draft EIR;
    - Responses to written comments on the Draft EIR, as well as to oral comments received at the Hearing Examiner's meeting on June 29, 2017; and
    - Other information beyond the scope of CEQA provided by the County for context and information to the decision makers, agencies, and the public.

The Appendices to the Final EIR include a combination of new documents generated either from responses to comments or independently by the County, and revisions to technical appendices that were a part of the Draft EIR, as summarized below.

- Appendix A, Form Letters, includes all comment letters that were prepared by an unknown source and made available to the public for submittal to the County. These form letters include comments that are repetitive but were provided by different senders. A total of 2,204 commenters submitted these form letters via email.
- Appendix B, NOP Comment Letters.
- Appendix 5.7-D, Ranch-wide Management Plan, is a publicly available document that was requested to be included in the Final EIR for ease of reference.
- Appendix 5.7-E, Tejon Ranch Conservancy Ranch-Wide Agreement, is a publicly available document that was requested to be included in the Final EIR for ease of reference.
- Appendix 5.7-F, Environmental Management Practices for Golf Courses Fact Sheet, is a publicly available document that was requested to be included in the Final EIR for ease of reference.
- Appendix 5.10-C, Centennial Specific Plan Supplemental Traffic Study, is a new analysis that was prepared in response to a comment letter received.
- Appendix 5.11-E, Supplemental Information Concerning Centennial Air Quality Analysis, is a new analysis that was prepared in response to a comment letter received.
- Appendix 5.12-C, Centennial Traffic Noise Study Addendum, is a new analysis that was prepared in response to a comment letter received.

- Appendix 2.0-C.Rev, Mitigation Monitoring and Reporting Program (Revised), includes revisions to the Draft EIR Appendix 2.0-C.
- Appendix 5.7-A.Rev, Plant and Wildlife Compendia (Revised), includes revisions to the Draft EIR Appendix 5.7-A.
- Appendix 4.0-A.Rev, Centennial Specific Plan (Revised), includes revisions to the Draft EIR Appendix 4.0-A.

Three of the above-listed Appendices (Appendices A, 2.0-C.Rev, and 4.0-A.Rev) have been revised since the publishing of the May 2018 Final EIR. The May 2018 versions of these appendices have not been reproduced in this Consolidated Final EIR but are available on the County's website for viewing and downloading at http://planning.lacounty.gov/case (type "Centennial" into the case archive search box).

Consolidated Final EIR

The Los Angeles Regional Planning Commission considered the EIR and the requested Project entitlements (Specific Plan No. 02-232, General Plan Amendment No. 02-232, Zoning Change No. 03-232, Development Agreement No. RPPL2016003940, Vesting Tentative Parcel Map No. 060022, Conditional Use Permit No. 02-232, and Environmental Review No. 02-232) at three public hearings. The first hearing was held on June 6, 2018 and included a presentation of an overview of the Project and the conclusions of the EIR. The Regional Planning Commission received testimony from the community on the Project and the EIR, and asked for further information to be presented at a second hearing. The second hearing was held on July 11, 2018 and it included presentation of minor EIR clarifications and responses to the Regional Planning Commission's requests, as well as testimony from the community on the Project and the EIR heard by the Regional Planning Commission, and a request for further information to be presented at a third hearing. The final hearing was held on August 29, 2018, during which final EIR clarifications and information were presented to the Regional Planning Commission and the Regional Planning Commission heard and considered testimony from the community. On August 29, 2018, the Regional Planning Commission voted to recommend approval of the requested Project entitlements, certification of the EIR, and adoption of CEQA Findings and a Statement of Overriding Considerations to the Board of Supervisors.

This document, the Consolidated Final EIR, has been prepared to provide the Board of Supervisors and the public a single document containing responses to all comments received during the official Draft EIR comment period and subsequently, as well as all clarifications, corrections, or minor revisions to the text, tables, figures, and appendices of the Draft EIR and Final EIR. These clarifications, corrections, or minor revisions have been identified from responses to comments or independently by the County and include those identified in the Final EIR published in May 2018 and those identified subsequent to publication of the Final EIR but before the scheduled December 11, 2018 Board of Supervisors hearing.

The Appendices to this Consolidated Final EIR are as follows:

A	Form Letters
B	NOP Comment Letters
5.7-D	Ranch-wide Management Plan
5.7-E	Tejon Ranch Conservancy Ranch-wide Agreement
5.7-F	Environmental Management Practices for Golf Courses Fact Sheet
5.10-C	Centennial Specific Plan Supplemental Traffic Study
5.11-E	Supplemental Information Concerning Centennial Air Quality Analysis
5.12-C	Centennial Traffic Noise Study Addendum
2.0-C.Rev	Mitigation Monitoring and Reporting Program (Revised)
4.0-A.Rev	Centennial Specific Plan (Revised)
5.7-A.Rev	Plant and Wildlife Compendia (Revised)

Three of the above-listed Appendices (Appendices A, 2.0-C.Rev, and 4.0-A.Rev) have been revised since the publishing of the May 2018 Final EIR. The May 2018 versions of these appendices have not been reproduced in this Consolidated Final EIR but are available on the County's website for viewing and downloading at http://planning.lacounty.gov/case (type "Centennial" into the case archive search box).

1.3 NEXT PROCEDURAL STEPS

This Consolidated Final EIR and related documents, as well as the Regional Planning Commission's recommendations, will be provided to the Board of Supervisors. The Consolidated Final EIR and requested Project entitlements will then be available for consideration on the December 11, 2018 Board of Supervisors agenda. Consideration of recommendations relating to the proposed Project will be publicly noticed as required by state law.

Members of the public can view searchable agendas for scheduled Board of Supervisors meetings and access agenda-related County information and services directly on the following website: http://bos.lacounty.gov/Board-Meeting/Board-Agendas. This site has an email notification service enrollment process for copies of future Board of Supervisors agendas. The Final EIR document was posted in May 2018 and this Consolidated Final EIR will be posted for viewing and download with the previously posted Draft and Final EIRs prior to the County's consideration of the EIR and Project recommendations on the County's website: http://planning.lacounty.gov/case (type "Centennial" into the case archive search box).

1.4 FORMAT OF CONSOLIDATED FINAL EIR

Section 2.0 – Responses to Comments: Section 15088 of the CEQA Guidelines requires that the lead agency evaluate comments on environmental issues received from persons and agencies that reviewed the Draft EIR and prepare a written response addressing the comments received during the official comment period. In Section 2.0, Response to Comments, which were received during the 90-day official Draft EIR comment period ending August 16, 2017, of this Consolidated Final EIR, each comment letter received has been

categorized and labeled in alphabetical order, then divided into sequential numbered comments (i.e., category A, Letter A.1, Comments A.1-1, A.1-2, A.1-3 etc.). A copy of each numbered comment letter and a lettered response to each comment are provided in Section 2.0. A list of agencies and interested parties who commented on the Draft EIR during the official comment period is provided below in Section 1.5. In addition to the 91 comment letters listed in the table set forth in Section 1.5, 2,204 commenters submitted a form letter comment via email. The response to these form letters is also provided in Section 2.0 of this Consolidated Final EIR. All form letters were included as Appendix A to the Final EIR. For continuity, this section, 2.0, is reproduced exactly as it appears in the Final EIR.

Section 3.0 – Responses to Correspondence Received and Public Testimony Given After Close of Official Draft EIR Public Comment Period: Following publication of the Final EIR, the County continued to receive correspondence from the public addressing the Project and the EIR. While not required by CEQA, responses were prepared to every piece of correspondence received subsequent to publication of the Final EIR. In Section 3.0, each of these subsequent pieces of correspondence has been categorized and labeled in alphabetical order, then divided into sequential numbered comments (i.e. category F, Letter ADD-F.1, Comments ADD-F.1-1, ADD-F.1-2, ADD-F.1-3, etc.). A copy of each numbered piece of correspondence and a lettered response to each item of correspondence are provided in Sections 3.1, 3.3, 3.5, and 3.7 of this Consolidated Final EIR. A list of agencies and interested parties who have submitted Project or EIR-related correspondence to the County subsequent to publication of the Final EIR is also included. Section 3.0 also provides responses to all public testimony heard by the Regional Planning Commission at each of its three hearings on the Project and the EIR, in Sections 3.2, 3.4, and 3.6.

Section 4.0 – Clarifications and Revisions to the EIR: Section 4.0, Clarifications and Revisions to the EIR, includes all additions or corrections to the Draft EIR text, tables, and figures (Section 4.1), and corrections to the Final EIR (Section 4.2), generated either from responses to comments and Regional Planning Commission requests, or independently by the County. The clarifications and revisions to the EIR contained in the following pages are in the same order as the information appears in the EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by double underlining (<u>underline</u>) where text has been added. Further changes identified subsequent to the publication of the May 2018 Final EIR but before the December 11, 2018 Board of Supervisors hearing have been identified as such.

Finally, Section 4.3, Conformed and Annotated Draft EIR Section 5.21, *Climate Change*, of this Consolidated Final EIR, compiles into a single document all revisions made to Chapter 5.21 of the Draft EIR following the May 2017 publication of the Draft EIR for clarification and ease of reference. All such revisions made <u>after publication of the Draft EIR and prior to publication of the Final EIR</u> were initially disclosed in Final EIR, Section 3.0, *Draft EIR Clarifications and Revisions*. All such revisions made <u>after publication of the Final EIR</u> are also shown in Section 4.1 of this Consolidated Final EIR. The conformed and annotated version of Chapter 5.21 compiles all such revisions into a single document.

Section 4.3 of this Consolidated Final EIR also sets forth a series of annotations that explain the conclusions of the *Updated Greenhouse Gas Calculations for the Centennial Project Final Environmental Impact Report* (the "Updated GHG Report") presented to the Regional Planning Commission at its August 29, 2018 hearing and to the Board of Supervisors at its December 11, 2018 Project hearing.

Draft EIR revisions are provided to clarify, refine, and provide supplemental information to the Draft EIR, and are incorporated as part of this Consolidated Final EIR. Changes made in the Final EIR and further changes made since publication of the Final EIR do not constitute substantial new information that requires recirculation of the Draft EIR pursuant to Section 15088.5 of the State CEQA Guidelines. The California Environmental Quality Act (CEQA) requires recirculation of an environmental impact report (EIR) only when "new significant information is added to the EIR" after the EIR is circulated for public review but before the EIR is certified. CEQA Guidelines § 15088.5 (a); see also CEQA § 21092.1. "Significant new information" can include the following disclosures: (1) a new significant environmental impact that would result from the project or from a new proposed mitigation measure; (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the project's environmental impacts, but the project's proponents decline to adopt it; or (4) when a draft EIR is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines § 15088.5[a]) However, "new information" added to the EIR is not "significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." (CEQA Guidelines § 15088.5[a]; *Laurel Heights Improvement Assn. of San Francisco, Inc. v. Regents of the Univ. of Cal*. [1993] 6 Cal.4th 1112, 1129; *Center for Biological Diversity v. Cal. Dept. of Forestry and Fire Protection* [2014] 232 Cal.App.4th 931, 949) When the Legislature drafted the requirements for recirculating an EIR, the Legislature intended to balance the goal of promoting meaningful public participation with the goal of protecting against endless rounds of revisions and recirculation. (*Laurel Heights* at 1132) "Recirculation was intended to be an exception, rather than the general rule." (*Id*.)

Recirculation is not required when new information is added that "merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." (CEQA Guidelines § 15088.5[b]) The response to comments received on the Draft and Final EIRs include additional information to clarify information or make minor modifications to the EIR. Recirculation of the Draft EIR is not required because the new information added to the EIR through these modifications clarifies or amplifies information already provided or makes insignificant modifications to the already adequate Draft EIR. While these additions to the EIR provide valuable information by which to evaluate the environmental impacts of the Project, and include clarification and insignificant modifications to the EIR, they do not trigger recirculation under the standard articulated in the Guidelines or in *Laurel Heights*. The information added to the EIR does not reveal any potentially new significant impacts which had not been previously analyzed. Similarly, information in the EIR demonstrates that

the new and revised mitigation measures are feasible and will adequately mitigate impacts discussed in the EIR; these measures generally have been made more protective of the environment. Recirculation is not required here.

1.5 LIST OF COMMENTERS

The Table below presents a summary listing of all comment letter received during the official 90-day Draft EIR comment period, including the commenting agency/individual; the assigned numbering for each comment letter; the date of the correspondence; and the page number where the comment letter can be found in Section 2.0 of this Consolidated Final EIR.

As presented in the Table below, J.1, Public Hearing Transcript and Responses includes a transcript of the Hearing Examiner public hearing, which is a text translation of the verbal presentation made by County staff and the verbal comments made by various members of the public.

As presented in Table 1-1 below, G.31, Form Letter 1 – Various Commenters and H.21, Form Letter 2 – Various Commenters include the responses to numerous form letters, included in Appendix A of the Final EIR. The majority of the form letters are exact duplicates of the same letter, with only the name of the sender and their zip code being different. Out of 2,204 form letters received, 99 were modified by the commenter to include additional comments. The additional comments addressed in these modified form letters have been addressed in responses to Comments G.31 and H.21 in Section 2.0 of the Final EIR.

In summary, a total of 2,295 comment letters on the Draft EIR was received by the County during the official 90-day comment period, including 91 letters from agencies, organizations, and individuals, and 2,204 emailed form letters. Of the 2,204 form letters submitted, 79 were duplicate form letter submissions.

TABLE 1-1
LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
A. Federal Agencies			
A.1	U.S. Forest Service, Pacific Southwest Region	July 12, 2017	2-6
A.2	U.S. Forest Service, Angeles National Forest	July 17, 2017	2-14
A.3	U.S. Fish and Wildlife Service	July 19, 2017	2-40
B. State Agencies			
B.1	Department of Toxic Substances Control	June 26, 2017	2-46
B.2	Department of Water Resources	July 10, 2017	2-58
B.3	Department of Transportation, District 7	July 14, 2017	2-72
B.4	Department of Fish and Wildlife	July 17, 2017	2-110
B.5	Office of Planning and Research, State Clearinghouse	July 12, 2017 July 17, 2017 July 18, 2017	2-194

TABLE 1-1
LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
C. County Agencies			
C.1	County Sanitation Districts of Los Angeles	May 30, 2017	2-196
C.2	County of Los Angeles Fire Department	June 6, 2017	2-198
D. Regional Agencies			
D.1	Antelope Valley Air Quality Management District	May 26, 2017	2-210
D.2	Eastern Kern Air Pollution Control District	June 1, 2017	2-212
D.3	Lahontan Regional Water Quality Control Board	July 11, 2017	2-214
D.4	South Coast Air Quality Management District	July 13, 2017	2-236
E. Local Agencies			
E.1	City of Santa Clarita	August 10, 2017	2-252
F. Organizations			
F.1	San Manuel Band of Mission Indians	May 30, 2017	2-260
F.2	Blum Collins LLP on behalf of Golden State Environmental & Social Justice Alliance	June 30, 2017	2-262
F.3	Tri-County Watchdogs	July 13, 2017	2-270
F.3A	Tri-County Watchdogs	August 17, 2017	2-304
F.4	Pacific Crest Trail Association	July 13, 2017	2-400
F.5	Santa Monica Mountains Conservancy	July 17, 2017	2-410
F.6	Santa Monica Mountains Conservancy	July 18, 2017	2-428
F.7	Three Points-Liebre Mountain Town Council	August 16, 2017	2-430
F.8	Center for Biological Diversity, Center for Food Safety, California Native Plant Society (Center for Biological Diversity, et al.)	August 16, 2017	2-474
F.9	Center for Biological Diversity	October 5, 2017	2-1308
G. Individuals			
G.1	Jack Tuszynski	May 19, 2017	2-1322
G.2	Susan Rudnicki	July 7, 2017	2-1324
G.3	Virginia DeMoss	July 7, 2017	2-1328
G.4	Karen Tracy	July 7, 2017	2-1332
G.5	Matt Pakcucko	July 7, 2017	2-1336
G.6	Sandra Namoff	July 7, 2017	2-1340
G.7	Susan Baraz	July 7, 2017	2-1342
G.8	Rose Ann Witt	July 7, 2017	2-1346
G.9	Marianna Breton	July 7, 2017	2-1350
G.10	Brad Berger	July 8, 2017	2-1354
G.11	Joe Bourgeois	July 2, 2017	2-1360
G.12	Pamela De Vries	July 4, 2017	2-1362
G.13	John Adargo	July 12, 2017	2-1368
G.14	Paul G. “Greg” Williams	July 18, 2017	2-1372
G.15	Colleen Boye	July 26, 2017	2-1374
G.16	Larry Brown	August 10, 2017	2-1378
G.17	Candace Huskey	August 10, 2017	2-1380

TABLE 1-1
LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
G.18	Richard Smith	August 16, 2017	2-1382
G.19	Donald M. Days Jr.	August 16, 2017	2-1384
G.20	Robert Buchanan	August 16, 2017	2-1386
G.21	Judy	August 16, 2017	2-1388
G.22	Mike Murphy	August 16, 2017	2-1390
G.23	Bob Smith	August 16, 2017	2-1392
G.24	Beatriz	July 7, 2017	2-1394
G.25	Jack McGhee	July 7, 2017	2-1396
G.26	GF Conroy	July 7, 2017	2-1398
G.27	Ashley Hillard	July 20, 2017	2-1400
G.28	Nick Jensen	July 7, 2017	2-1402
G.29	Gerard Conroy	July 7, 2017	2-1422
G.30	Sierra Alder	July 9, 2017	2-1424
G.31	Form Letter 1 – Various Commenters	Various Dates	2-1426
H. Post-Closure of Review Period Comments			
H.1	Marty Kreisler	August 16, 2017*	2-1434
H.2	Henry Wahl	August 16, 2017*	2-1436
H.3	Anne Burnaugh	August 21, 2017	2-1438
H.4	Richard and Tamira DeSpain	August 28, 2017	2-1440
H.5	Tejon Indian Tribe	February 14, 2018	2-1442
H.6	Ronald and Benita Colitti	February 16, 2018	2-1444
H.7	Tri Pointe Group	February 28, 2018	2-1446
H.8	Wes Williamson	March 2, 2018	2-1448
H.9	Majestic Realty Co.	March 6, 2018	2-1450
H.10	Paul Jerome	March 12, 2018	2-1452
H.11	Jeff Zimmerman	March 17, 2018	2-1454
H.12	Corina Roberts	March 18, 2018	2-1458
H.13	California Wildlife Foundation/California Oaks	March 20, 2018	2-1462
H.14	FEMA Region IX	March 27, 2018	2-1464
H.15	Southern California Edison	March 27, 2018	2-1466
H.16	Association of Rural Town Councils	March 28, 2018	2-1468
H.17	Jack T.	April 3, 2018	2-1470
H.18	Test User	April 6, 2018	2-1472
H.19	Ariel Senseman	April 16, 2018	2-1474
H.20	FEMA Region IX	April 30, 2018	2-1476
H.21	Form Letter 2 – Various Commenters	Various Dates	2-1478
I. Time Extension Comments			
I.1	Helen Henry	July 8, 2017	2-1442
I.2	Alice Wollman	July 8, 2017	2-1494
I.3	Jane Randall	July 8, 2017	2-1496
I.4	Lakes & Valleys Gazette	July 9, 2017	2-1498

TABLE 1-1
LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
I.5	G. Richard DeSpain	July 10, 2017	2-1500
I.6	Center for Biological Diversity	June 30, 2017	2-1502
I.7	Three Points-Liebre Mountain Town Council	July 10, 2017	2-1504
I.8	Merrylou Nelson	July 5, 2017	2-1506
I.9	Rose Bryan	July 7, 2017	2-1508
I.10	Antelope Acres Town Council	July 7, 2017	2-1510
I.11	Dean Canfield	July 8, 2017	2-1512
I.12	Tri-County Watchdogs	July 8, 2017	2-1514
I.13	Mar Preston	July 10, 2017	2-1516
I.14	Rose Bryan	July 13, 2017	2-1518
I.15	Antelope Acres Town Council	July 18, 2017	2-1520
J. Public Hearing Transcript and Responses			
J.1	Public Hearing Transcript and Responses	June 29, 2017	2-1522
Comment No.	**Commenter**	**Date of Correspondence**	**Page Number**
J.1-1	Regional Planning staff member Gina Natoli	June 29, 2017	2-1522
J.1-2	Senior Regional Planning assistant Jodie Sackett	June 29, 2017	2-1522
J.1-3	Regional Planning staff member Gina Natoli; Kristin Starbird, Senior Project Manager at Psomas	June 29, 2017	2-1522
J.1-4	Regional Planning staff member Gina Natoli	June 29, 2017	2-1522
J.1-5	Jerry Gleason	June 29, 2017	2-1522
J.1-6	Jerry Gleason	June 29, 2017	2-1522
J.1-7	Jerry Gleason	June 29, 2017	2-1522
J.1-8	Jerry Gleason	June 29, 2017	2-1522
J.1-9	Rose Bryan	June 29, 2017	2-1522
J.1-10	Rose Bryan	June 29, 2017	2-1522
J.1-11	Rose Bryan	June 29, 2017	2-1522
J.1-12	Rose Bryan	June 29, 2017	2-1522
J.1-13	Matt Misenhimer	June 29, 2017	2-1522
J.1-14	Matt Misenhimer	June 29, 2017	2-1522
* Comment submitted after 5 PM on final day of public review period.			

Correspondence received by the County subsequent to the publication of the Final EIR is listed in Section 3.0 of this Consolidated Final EIR.

2.0 RESPONSES TO COMMENTS

All comment letters received by the County and oral testimony received at the June 29, 2017 Hearing Examiner's meeting have been included and responded to in this Final EIR. Comments that raise environmental issues have been thoroughly addressed in these responses. Comments that do not require a response include those that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise environmental issues; (3) do not address the proposed project; or (4) request the incorporation of additional information not relevant to environmental issues.

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

a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.

b) The lead agency shall provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.

c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:

    1. Revise the text in the body of the EIR; or

    2. Include marginal notes showing that the information is revised in the response to comments.

Revisions to the Draft EIR have been prepared to make clarifications, corrections, or minor revisions to the text, tables, figures, and appendices of the Draft EIR generated either from responses to comments or independently by the County. Therefore, this Response to Comments section, along with the Section 3.0, Draft EIR Clarifications and Revisions, are included in this Final EIR along with the Draft EIR for consideration by the County of Los

Angeles prior consideration of whether to approve, revise, or deny the Project and/or the Final EIR.

Section 15088.5, Recirculation of an EIR Prior to Certification, of the CEQA Guidelines, states:

> (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
>
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
>
> (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
>
> (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.
>
> (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
>
> (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

(f) The lead agency shall evaluate and respond to comments as provided in Section 15088. Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR. In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues.

(1) When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.

(2) When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.

(3) As part of providing notice of recirculation as required by Public Resources Code Section 21092.1, the lead agency shall send a notice of recirculation to every agency, person, or organization that commented on the prior EIR. The notice shall indicate, at a minimum, whether new comments may be submitted only on the recirculated portions of the EIR or on the entire EIR in order to be considered by the agency.

(g) When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR.

The Draft EIR revisions and information presented in the responses to comments do not result in any of the conditions set forth in Section 15088.5 of the State CEQA Guidelines requiring that the EIR be recirculated prior to its certification. Although CEQA requires recirculation of an EIR when "new significant information is added to the EIR" after the EIR is circulated for public review and before it is certified, "new information" added to the EIR "is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." CEQA Guidelines § 15088.5(a); *Laurel Heights Improvement Assn. of San Francisco, Inc. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1129 ("*Laurel Heights*"). When the Legislature drafted the requirements for recirculating an EIR, the Legislature intended to balance the goal of promoting meaningful public participation with the goal of protecting against endless rounds of revisions and recirculation.[3] "Recirculation was intended to be an exception, rather than the general rule."[4]

Recirculation is not required when new information is added that "merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."[5] In response to comments received on the Draft EIR, this EIR includes additional information to clarify information or make minor modifications to the EIR. The EIR includes additional new appendices which contain updated or clarifying information on air quality, water quality, biology, traffic, noise and other topics. The EIR also includes new and revised mitigation measures. While these additions to the EIR provide valuable information by which to evaluate the environmental impacts of the Project, and include clarification and insightful modifications to the EIR, they do not trigger recirculation under the standard articulated in the CEQA Guidelines or in *Laurel Heights*.

This determination is consistent with a line of cases in which courts have considered whether certain new types of information warrant recirculation and determined that they did not. *Silverado Modjeska Recreation & Park Dist. V. County of Orange* (2011) 197 Cal.App.4th 282 (holding that an EIR need not be recirculated because of new information about the proximity of sensitive toad larvae to the project site when the earlier analysis had assumed that the toad was present near the project); *Clover Valley Found. v. City of Rocklin* (2011) 197 Cal.App.4th 200 (finding that specific information added to the final EIR about cultural resource sites added narrative detail about the resources' characteristics but did not add new substantial information affecting the EIR's findings relating to significant impacts); *Marin Mun. Water Dist. v. KG Land Cal. Corp.* (1991) 235 Cal.App.3d 1652 (EIR on district's moratorium on water hookups did not need to be recirculated because of new information that moratorium would be extended by additional five years). Like the examples cited above, the information added to the EIR does not reveal any potentially new significant impacts which had not been previously analyzed. Similarly, information in the EIR demonstrates that the new and revised mitigation measures are feasible and will adequately mitigate impacts discussed in the EIR. Recirculation is not required here.

3 Laurel Heights at 1132
4 *Ibid*.
5 CEQA Guidelines § 15088.5(b)

2.1 RESPONSES TO COMMENT LETTERS RECEIVED

This section includes responses to Draft EIR comments received by the County. With respect to comments letters received, aside from certain courtesy statements, introductions, and closings, individual comments within the body of each letter have been identified and numbered. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. Responses to each bracketed comment are included on the page(s) following each comment letter.

Any general reference or revision to an exhibit, appendix, page, or table described in the responses to comments below are intended to refer to the Draft EIR, unless otherwise specified.

Responses to comments were sent to the agencies, organizations, and individuals that provided comments at least 10 days prior to the County's consideration of the Final EIR. None of the comments or responses constitute "significant new information" or any of the conditions set forth in Section 15088.5 of the State CEQA Guidelines that would require recirculation of the Draft EIR.

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A. Federal Agencies

CENTENNIAL
at TEJON RANCH

USDA United States Department of Agriculture | Forest Service | Pacific Southwest Region

Regional Office, R5
1323 Club Drive
Vallejo, CA 94592
(707) 562-8737 Voice
(707) 562-9240 Text (TDD)

A.1

File Code: 2350
Date: July 12, 2017

Mr. Jodie Sackett
County of Los Angeles Dept. of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012

Subject: Centennial Project, Draft Environmental Impact Report (DEIR)

Dear Mr. Sackett,

The concerns outlined in this letter focus on the Pacific Crest National Scenic Trail (PCT) and the access and recreation opportunities that could be improved through the project area. A.1-1

Overview:
The PCT was designated by Congress as a National Scenic Trail in 1968 and its route location was published in the Federal Register in 1973. This published route generally matches the route currently proposed through Tejon Ranch and under discussion by Tejon Ranch Company (TRC), the Tejon Ranch Conservancy (Conservancy), the U.S. Forest Service (USFS) and Pacific Crest Trail Association (PCTA). The route through the Ranch would be approximately 38 miles in length including the Centennial project along 300th Street West. This route provides a significantly improved trail experience by moving it out of the desert road walk and into spectacular oak savannah landscapes. A.1-2

All parties have worked diligently to determine a viable route and we have requested to TRC and the Conservancy that a conveyance agreement for a trail easement be executed by December 31, 2017 in order for us to move forward with the environmental analysis that would be required to construct the trail.

Specific Comments regarding Exhibit 5.14-2, Figure 3-40, and additional map needed:

- The DEIR has several references to Exhibit 5.14-2 which is supposed to depict the existing (interim location) of the trail - which it does not. The FEIR should include a corrected map. A.1-3

- The Exhibit 5.14-2 map indicates an underpass under Hwy 138 west of the intersection with 300th Street West. Figure 3-40 of the Centennial Specific Plan depicts a conceptual 10 ft. wide x 12 ft. high Trail Underpass, but is not included in the DEIR. The USFS minimum standard for an underpass with equestrian use is 10 ft. wide x 12 ft. high. If feasible, expanding the width and height of the underpass would be preferred. A.1-4

- There are no maps that depict the proposed 38 mile PCT Trail Alignment and/or existing 10,000 acre conservation viewshed easement connecting Tejon Ranch's other conserved lands north and south to the Centennial Project. This would help FEIR reviewers to understand the connection and reasonably foreseeable actions of moving the trail from its existing location on the floor of Antelope Valley to the crest of the Tehachapi Mountains. A.1-5

Mitigation Requirements

1. *Overlap of the 10,000-acre PCT Viewshed easement and the Area 1 off-site mitigation*

   The 10,000 acre conservation viewshed easement TRC dedicated in 2014 appears to overlap onto Area 1 of the proposed Off-Site Mitigation Preserves south of Hwy 138. Where the rest of the 10,000 acre conservation easement to the north of the project appears to be outside of the proposed Preserves (Areas 2-6). The FEIR should clarify/discuss the compatibility of the Trail easement inside Preserve Area #1. We believe the off-site mitigation preserves found in exhibit 4-12 are critical to the quality of key areas of the PCT relocation, with substantial public value. A.1-6

2. *300th Street Easement Dedication for the PCT*
   The DEIR states an area will be reserved for the PCT along the west side of 300th Street West through the Centennial project. The United States through the US Forest Service will need to hold easement rights prior to funds being expended for NEPA compliance and trail construction. This was agreed upon in 2008 in the Tejon Ranch Conservation and Land Use Agreement found at: https://www.sec.gov/Archives/edgar/data/96869/000119312508138009/dex1028.htm A.1-7

   Note: Where the 300th Street West and the potential PCT alignment traverse through the inholding there should be an interim provision for the trail to be within the street right-of-way. The FEIR should discuss what street improvements will be made to 300th Street West through this inholding area connecting back to the Centennial Project to the north. A.1-8

3. *Mitigation Measure MM13-4* which states a block wall shall be installed along the rear of structures abutting the trail and a 34 ft. landscaped setback along 300th Street West.

   Providing a Figure in the FEIR depicting a typical cross section of the PCT along 300th Street West with set-back measurements, screening wall, vegetation plantings and separate bike path would help to analyze visual impacts. For instance Figure 3-39 of Centennial Specific Plan depicts a typical cross section of the PCT, but is not included in the DEIR. A.1-9

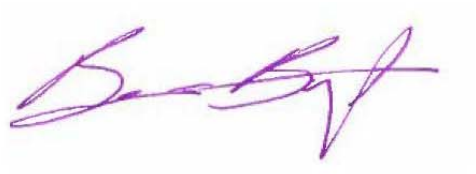
4. *Provisions for Recreation:*
   The FEIR should consider a mitigation/provision for a shade structure with water along the 300th St. West to benefit both PCT travelers and other recreationists. A.1-10

The PCT is open to foot and horse travel and closed to motorized and mechanized (bicycle use). Any connections to other trail systems should be designed to minimize potential conflicts or illegal use on the trail. A.1-11

Proposed structures adjacent to the PCT such as the waste water treatment facility, water transmission and management facilities, school and park, have the potential to negatively impact the trail. Additional mitigation measures should be considered if these proposed locations are selected. A.1-12

If you have additional questions, please contact Beth Boyst, Pacific Crest Trail Program Manager at bboyst@fs.fed.us or 707-562-8881. A.1-13

Sincerely,



BETH BOYST
Pacific Crest National Scenic Trail Manager

Responses to Comment Letter A.1
U.S. Forest Service, Pacific Southwest Region
July 12, 2017

Response to Comment A.1-1:

Thank you for your participation in this public process. The comment is acknowledged and will be included as part of the record. Because the comment does not raise a specific concern regarding the content of the Draft EIR, no further response is required.

Response to Comment A.1-2:

The Draft EIR includes a complete description of the Pacific Crest National Scenic Trail (PCT), its existing alignment, proposed alignment, and its federal designation as a National Scenic Trail.[6] Consistent with this comment, the Draft EIR further explains that the Forest Service, the Pacific Coast Trail Association (PCTA), the Tejon Ranch Conservancy (Conservancy), and the Tejon Ranch Company (TRC) are in ongoing discussions regarding an alternative realignment for the PCT. It is noted the Centennial Project accommodates a request from the PCTA made after Centennial Specific Plan preparation began, and as such it is assumed the PCTA was aware that a large master-planned community was proposed along a section of 300th Street West at the time the request to include space for the realigned PCT was made. The Forest Service, the PCTA, the Conservancy, and the Tejon Ranch Company are discussing the relocation of the existing segment of the PCT that currently crosses Lancaster Road at 270th Street West approximately two miles east-southeast of the Project site so that it is generally aligned along 300th Street West between SR-138 and the northeastern corner of the Project site, as shown on Draft EIR Exhibit 5.14-2.[7] A portion of the western right-of-way of 300th Street West has been reserved for the conceptual PCT realignment where this conceptual realignment is contiguous with a portion the Project site and where it bisects the northeastern corner of the site.[8] An appropriate buffer would be a buffer between the easement and Project development in the easternmost areas of the site.[9]

To facilitate the PCT realignment described in the Draft EIR, TRC has granted to the Conservancy two conservation easements that would preserve in perpetuity the conservation values of those portions of Tejon Ranch land located outside of the Project boundary and through which the proposed PCT alignment would extend. (See, Kern County Official Records Doc. #'s 214047995, 20140445960 ("Conservation Easements")). Both conservation easements expressly acknowledge that the Forest Service, the Conservancy, and TRC are in ongoing discussions regarding an alternative realignment for the PCT, and that TRC intends to convey to the Forest Service a perpetual trail easement for the construction, maintenance, and use of the PCT on the property covered by the conservation easements. (See Conservation Easements, Recital G.) Moreover, the Conservation Easements

6 Los Angeles County Department of Regional Planning (DRP). 2017 (May). *Centennial Project Draft Environmental Impact Report* (pp. 5.14-13, 14). Los Angeles, CA: DRP.
7 *Id.,* p. 5.14-14
8 Ibid.
9 *Id.,* Exhibit 4-10a

both expressly authorize public recreational use of the PCT on the conservation easement property and permit TRC to grant the trail easement to the Forest Service. (See, Conservation Easements Sections 6(b)(2)(O)). Both Conservation Easements further acknowledge that, in October 2009, PCTA and Forest Service, among other parties, entered into a Memorandum of Understanding that delegates to PCTA certain responsibilities for the construction, maintenance and use of that segment of the PCT alignment to be located on the Conservation Easement property. (See, Conservation Easements, Recital G.)

As explained in the Draft EIR, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project, as it is not being proposed by the Project Applicant/Developer.[10] Indeed, the PCT realignment will be subject to a separate permitting and environmental review process prior to its implementation. However, construction of the trail within the 300th Street West right of way is considered a component of the Project development for purposes of this EIR.[11] Thus, the proposed PCT realignment, as depicted on Draft EIR Exhibit 4-10a, is assumed to be the future alignment through the Project site for evaluation purposes in the Draft EIR and is depicted on the Project's Recreation and Trails Plan.[12] Moreover, the Draft EIR analysis includes consideration of the Project's potential impacts on the PCT and its users.[13] The Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043) (AVAP EIR) also considered the environmental effects on the PCT associated with buildout of the Project site in accordance with the Antelope Valley Area Plan.[14]

Response to Comment A.1-3:

Exhibit 5.14-1 shows the existing location of the PCT, and references to Exhibit 5.14-2 were in error. The following revision has been made to the third sentence in the third full paragraph on page 5.14-12:

> Exhibit 5.14-~~2~~1 depicts the existing alignment of the PCT.

Any other references in the Draft EIR to the PCT being illustrated on Exhibit 5.14-2 are similarly revised to refer to Exhibit 5.14-1.

Response to Comment A.1-4:

This comment confirms that the conceptual trail underpass depicted on Figure 3-40 of the Specific Plan included as Appendix 4.0-A in the Draft EIR complies with the USFS minimum standard for an underpass with equestrian use. The request regarding the scale of the underpass is acknowledged and will be taken into consideration in the future design process. The comment will be included as part of the record and made available to the Regional

10 *Id.,* p. 4-19
11 Ibid.
12 *Id.,* Exhibit 4-10a
13 *Id.,* pp. 5.7-138; 5.8-73; 5.13-1, -8, -10, -11, -17, -20 to -23, -30; 5.14-3, -13 to -15, -18 to -22; 5.21-77
14 Los Angeles County Department of Regional Planning (DRP). 2014a (August). *Antelope Valley Area Plan, Draft Environmental Impact Report, State Clearinghouse # 2014061043* (pp. 3-2; 4-15; 5.15-6; 5.15-11 to -16; 5.16-5; Figure 5.15-1). Los Angeles, CA: DRP. http://planning.lacounty.gov/tnc/environmental/.

Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

The PCT trail alignment is also discussed in Section 5.15 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and in Section 3.16 of the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (SCH # 2015031035). Please consult those documents for additional information germane to this topic.

The Centennial Specific Plan is included in its entirely as Appendix 4.0-A of the Draft EIR; therefore, Figure 3-40 of the Specific Plan is included in the Draft EIR.

Response to Comment A.1-5:

As discussed in response to Comment A.1-2, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project, as it is not being proposed by the Project Applicant/Developer.[15] Indeed, the PCT realignment will be subject to a separate permitting and environmental review process prior to its implementation. However, construction of the trail within the 300th Street West right of way is considered a component of the Project development for purposes of this EIR.[16] Thus, the proposed PCT realignment, as depicted on Draft EIR Exhibit 4-10a, is assumed to be the future alignment through the Project site for evaluation purposes in the Draft EIR and is depicted on the Project's Recreation and Trails Plan in order to help the public and County decision makers understand the relationship between the proposed Project and the proposed PCT trail alignment through the Project site.[17] Exhibit 4.10a also depicts the PCT trail alignment as it extends north and south of the Project site to provide additional locational context. Since the PCT trail realignment project is a separate project that will be subject to a separate environmental review and permitting process, and since the trail realignment is not being proposed by the Project Applicant/Developer but accommodates a request from the PCTA regarding the location of a realigned PCT made after Centennial Specific Plan preparation began, the EIR is not required to depict the entire 38-mile trail realignment, the vast majority of which will occur outside of the Project site boundary.

The proposed PCT trail realignment is also discussed in Section 5.15 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.16 of the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035). Please see those documents for further information on this topic.

Response to Comment A.1-6:

The comment correctly states that a portion of the proposed Pacific Crest Trail (PCT) realignment overlaps Area 1 of the Mitigation Preserve. The proposed realignment will shift

15 DRP 2017, p. 4-19
16 Ibid.
17 *Id.,* Exhibit 4-10a

the PCT from its current location along the eastern boundary of Area 1 to a more southerly position running from 300th street southward through the Mitigation Preserve then continuing southward. The Draft EIR shall be modified to include specific language indicating that the goals of the Mitigation Preserve and the Pacific Crest Trail are compatible, and that applicable mitigation measure minimizing impacts of trails shall specifically identify the PCT.

In response to this comment, the following text is hereby added immediately following the last full paragraph on Draft EIR page 5.7-136:

> The resources preserved in the reserve area, when supplemented by individual programs for special-status resources, would mitigate all significant impacts to biological resources on the Project site.
>
> The Mitigation Preserve contains existing uses such as trails and access roads, as well as the proposed realignment of the Pacific Crest Trail. The uses mentioned here are consistent with the goals of the mitigation preserve. MM 7-17 includes a public awareness program which includes signage denoting sensitive areas. These project requirements are expected to minimize disturbances associated with trail usage and human activity within and adjacent to the Mitigation Preserve.

Additionally, the following text is hereby added to MM 7-17 on Draft EIR pages 5.7-192 and 5.7-193:

> This program shall include signs that identify the boundaries of ecologically sensitive areas (including the avoided special status plant populations described in MM 7-1); the use of temporary, wildlife-friendly fencing around sensitive areas that appear to be receiving a high level of disturbance until the disturbance is reversed; and promotion of public education and awareness of such areas. In addition to signage being located along the boundaries of the Mitigation Preserve, signage denoting the boundaries of ecologically sensitive areas and other pertinent information shall be included along the Pacific Crest Trail where it overlaps the Mitigation Preserve.

Response to Comment A.1-7:

As discussed in response to Comment A.1-2, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project, as it is not being proposed by the Project Applicant/Developer.[18] However, construction of the trail within the 300th Street West right of way is considered a component of the Project development for purposes of this EIR.[19] As this comment accurately notes, to facilitate the PCT realignment, TRC has granted to the Conservancy two conservation easements that would preserve in perpetuity the conservation values of those portions of Tejon Ranch land located outside of the Project boundary and through which the proposed PCT alignment would extend. (See,

[18] *Id.,* p. 4-19
[19] Ibid.

Kern County Official Records Doc. #'s 214047995, 20140445960 ("Conservation Easements")). Both conservation easements expressly acknowledge that the Forest Service, the Conservancy, and TRC are in ongoing discussions regarding an alternative realignment for the PCT, and obligate TRC to convey to the Forest Service a perpetual trail easement for the construction, maintenance, and use of the PCT on the property covered by the conservation easements. (See, Conservation Easements, Recital G.) Moreover, in October 2009, PCTA and Forest Service, among other parties, entered into a Memorandum of Understanding that delegates to PCTA certain responsibilities for the construction, maintenance and use of that segment of the PCT alignment to be located on the Conservation Easement property. (See, Conservation Easements, Recital G.)

As discussed in response to Comment A.1-5, the anticipated PCT trail alignment through the Project site is depicted on Draft EIR Exhibit 4-10a. The PCT trail alignment through the Project site is also included in the Centennial Specific Plan's Parks and Recreation Plan and depicted on the Centennial Conceptual Recreation and Trail Plan set forth a Specific Plan Figure 3-32.[20] As explained in the Draft EIR and Specific Plan, the proposed PCT alignment through the Project would enter the Project site from the north at 300th Street West, follow along the street south and connect to the Angeles National Forest southeast of the Project site.[21] A typical cross-section of the PCT along 300th Street West is depicted on Figure 3-39 of the proposed Specific Plan, and a conceptual SR-138 PCT underpass is depicted on Figure 3-40 of the proposed Specific Plan.[22] As shown on Specific Plan Figure 3-39, the PCT alignment along 300th Street West would be separated from the street by a landscaped Project multi-purpose path that would accommodate pedestrians and bicyclists in order to avoid conflicts with hiking and equestrian uses on the PCT alignment.

As discussed in Section 4.0 of the proposed Specific Plan, tentative subdivision maps and tentative map process will be used to establish the precise location of land use designations and street locations, and all map applications must include a detailed site plan depicting the use, location, and size of all improvements included in the mapped area, including streets and trails.[23] It is anticipated that the full 300th Street West right-of-way, inclusive of the PCT and Project multi-purpose path alignments, will be offered for dedication to the County as part of future tentative map applications, subject to a PCT trail easement, license or comparable property interest in favor of the Forest Service and/or PCTA encumbering the PCT alignment depicted on such tentative maps.

Response to Comment A.1-8:

As this comment correctly notes, the 300th Street West alignment through the Project site is bisected by inholding property that is not a part of the Project site and is owned by a third party (Inholding Property), as shown on Draft EIR Exhibit 4-7, Centennial Project – Circulation Plan. As discussed in response to Comment A.1-2, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project,

20 *Id.,* Appendix 4.0-A, pp. 3-74, -88
21 *Id.,* p. 4-39; Appendix 4.0-A, p. 3-88
22 *Id.,* Appendix 4.0-A, pp. 3-90, -91
23 *Id.,* Appendix 4.0-A, pp. 4-7, -12

as it is not being proposed by the Project Applicant/Developer.[24] However, construction of the trail within the site's 300th Street West right of way is considered a component of the Project development for purposes of this EIR and the 300th Street West alignment through the Project site was included in the Project impact area assumed by the EIR.[25]

In February 2007, the owner of the "inholding area" described in this comment granted to the Project Applicant/Developer an easement encumbering a portion of inholding land adjacent to 300th Street West for the purpose of constructing, repairing, maintaining a pedestrian and equestrian trail for the use and enjoyment of the general public, which easement was recorded in the Official Records of Recorder's Office of Los Angeles County as document number 20070330445 (Inholding Trail Easement). The Inholding Trail Easement expressly provides that the Inholding Trail Easement may be conveyed by the Project Applicant/Developer to the Forest Service and shall become part of the PCT. It is anticipated that the Project Applicant will convey the Inholding Trail Easement to the Forest Service in conjunction with its conveyance of the PCT trail easement within Project site in accordance with the ongoing discussions between the Project Applicant/Developer and the Forest Service discussed in response to Comment A.1-7.

As discussed in response to Comment A.1-7, tentative subdivision maps and tentative map process will be used to establish the precise location of land use designations and street locations, and all map applications must include a detailed site plan depicting the use, location, and size of all improvements included in the mapped area, including streets and trails.[26] A typical cross-section of the PCT along 300th Street West showing proposed improvements is depicted on Figure 3-39 of the proposed Specific Plan.[27] As shown on Specific Plan Figure 3-39, the PCT alignment along 300th Street West would be separated from the street by a landscaped Project multi-purpose path that would accommodate pedestrians and bicyclists in order to avoid conflicts with hiking and equestrian uses on the PCT alignment.

Response to Comment A.1-9:

This comment states that providing a figure of a typical cross section of the Pacific Crest Trail along 300th Street West, such as Figure 3-39 in the Specific Plan, would be helpful to analyze visual impacts. As requested, Figure 3-39 of the Specific Plan has been inserted into Section 5.13, Visual Resources, of the Draft EIR as Exhibit 5.13-6. New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. The following text change has also been made to the Draft EIR:

The sixth sentence in the third paragraph on page 5.13-21 of Section 5.13, Visual Resources, has been revised to state:

> MM 13-4 requires that structures proposed along the PCT alignment be screened by a block wall along the rear of the structures and a wide,

[24] *Id.,* p. 4-19
[25] *Id.,* Exhibit 5.7-11b
[26] *Id.,* Appendix 4.0-A, pp. 4-7, -12
[27] *Id.,* Appendix 4.0-A, p. 3-90

landscaped setback that would contain the conceptual PCT realignment (see Exhibit 5.13-6 for a typical cross section of the PCT).

Response to Comment A.1-10:

As shown on Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan, the PCT alignment through the Project site will connect with the Project's network of Community Trails and Regional Trails, which will be accessible by the public. As shown on the Recreation and Trails Plan, the Project's trail system will link to regional, community and neighborhood parks that will be developed by the Project. As shown on Exhibit 4-10a, there are multiple Project parks proposed within close proximity to the PCT and they will be improved with potable water facilities, shade structures and other amenities, as depicted on Draft EIR Appendix 4.0-A, Figures 3-34 through 3-36. Accordingly, it is anticipated that PCT users will have meaningful access to water and shade when traversing the Project site, as recommended by this comment.

Response to Comment A.1-11:

The primary trail connection to the proposed PCT alignment is the County multi-use (hiking, equestrian, and mountain biking) regional trail that spans the majority of the Project and connects at SR-138. As stated in Section 5.14, Parks and Recreation, "All proposed County regional trails shall be planned, designed, and developed in accordance with the County's Trails Manual".[28] Proposed greenways and community trails would also provide connectivity to the realigned PCT, if implemented.

As discussed in response to Comment A.1-7, the PCT alignment along 300th Street West would be separated from the street by a landscaped Project multi-purpose path that would accommodate pedestrians and bicyclists in order to avoid conflicts with hiking and equestrian uses on the PCT alignment. Please see Specific Plan Figure 3-39[29], which depicts a typical cross-section of the PCT trail alignment through Project site, as well as the adjacent multi-purpose path. Moreover, as indicated on page 5.14-19, "County and other trails are generally signed as to the allowed uses" on the relevant trails. The County Trails Manual discusses multi-agency trails, and the associated need for outreach among agencies and consideration of design to ensure appropriate trail use, such as signage and turnarounds.

As discussed in response to Comment A.1-2, it is expected the PCT stakeholders, the County, and Tejon Ranch would coordinate trail design as part of Centennial Project implementation, if approved, so that its ultimate location is beneficial to both the Project site and the wider Project area. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

[28] *Id.,* p. 5.14-14; PDF 14-1, p. 5.14-15
[29] *Id.,* Appendix 4.0-A, p. 3-90

Response to Comment A.1-12:

As discussed in response to Comment A.1-5, the Centennial Project accommodates a request from the PCTA regarding the location of a realigned PCT made after Centennial Specific Plan preparation began. Regardless, it is recognized that the U.S. Forest Service and the PCTA strive to provide the best trail experience possible. In order to ensure the ultimate location of the PCT realignment is beneficial to both the Project site and the wider Project area, it is expected that discussion among the stakeholders for the PCT realignment will continue as part of Centennial Project implementation, if approved, and such design considerations will be acknowledged and contemplated. The Project's potential visual impact on the PCT and its uses were analyzed in in Section 5.13, Visual Resources, which determined that such impacts would be less than significant with implementation of MM 13-4 and due to both the distance and the intervening topography between the trail and the Project site.[30] MM 13-4 requires that Project structures proposed along the PCT to be screened by a block wall along the rear of the structures abutting the trail and a 34-foot-wide landscaped setback shall be provided that would contain the conceptual PCT realignment. Accordingly, additional mitigation to reduce the Project's potential visual impact on the PCT is unwarranted.

Response to Comment A.1-13:

The comment is acknowledged and will be included as part of the record. Because the comment does not raise a specific concern regarding the content of the Draft EIR, no further response is required.

[30] *Id.,* pp. 5.13-22, -23

USDA United States Department of Agriculture | Forest Service | Angeles National Forest
San Gabriel Mountains National Monument
701 North Santa Anita Avenue
Arcadia, CA 91006-2725
626-574-1613

A.2

File Code: 2350
Date: July 17, 2017

Mr. Jodie Sackett
County of Los Angeles, Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012

Dear Mr. Sackett:

This letter responds to the Notice of Completion and Availability of the Draft Environmental Impact Report for the Centennial Project dated May 15, 2017. The DEIR refers to the Tejon Ranch Conservation and Land Use Agreement ("Tejon Agreement") signed June 17, 2008. The Tejon Agreement specified there will be environmental education outreach programs for local communities and underserved populations by Centennial and future projects. Additionally, the Tejon Agreement established a commitment to work with the US Forest Service on the realignment of 38 miles of the Pacific Crest Trail. A.2-1

Comments:

Pacific Crest Trail.
Please see the separate letter dated July 12, 2017 from Beth Boyst, Pacific Crest National Scenic Trail Manager, Pacific Southwest Region, US Forest Service. A.2-2

Environmental, Conservation, and Interpretive Education:
We suggest a review to strengthen this analysis. There may be partnering opportunities with the Angeles National Forest and with the California Department of Water Resources. CDWR operates Vista del Lago Visitor Center a short distance from the Centennial Project area on Interstate 5 with excellent displays about the sources and importance of water resources. The Angeles National Forest has an intense interest in conservation education, interpretive displays, and community outreach, especially to underserved populations and youths. This seems to blend well with the requirements of the Tejon Ranch Conservation and Land Use Agreement as you describe it on pages 4-45 and 4-46 of the DEIR. It is our understanding that a shuttle bus service will also be made available to the Centennial Project area. These bus services might be dual purposed to include Vista del Lago and various nearby educational and interpretative opportunities on the Angeles National Forest such as the historically significant Old Ridge Route with its grand views and unique geology. We encourage joint discussions. A.2-3

Proposed Underpass for Highway 138.
The Centennial Project's open spaces and trails affect the transit of people and horses, but also allow easy distribution of wildlife, noxious and invasive weeds, and invasive fauna (e,g., feral pigs). Listed mitigation measures for noxious weeds are appreciated, but how will that list be modified and updated? And, it is not clear that the monitoring and mitigation plan will detect and stop the spread of noxious weeds. Is there a feral cat or outdoor cat policy? Will dog fecal bags be provided? Are trash containers required to be raccoon proof? How will feral pigs be controlled? A.2-4

Trash Dumping onto the Angeles National Forest and Other Public Lands.
Is there a plan for large item waste disposal service – sofas, televisions, mattresses, carpet, etc.? Without such a plan, dumping could be a problem on public and other open land. A.2-5

Increased Fire and Erosion Risk on Public Lands.
We suggest that the effects of the Centennial Project on fire starts, fire behavior, and fire rates of spread A.2-6

require further analysis and discussion with the Angeles National Forest. Increased public access and activity elevates the probability of fire starts. Urban centers and utility corridors affect ambient temperatures, increasing the probability of starts and rapid spread. The lands and waters within the Angeles National Forest will be subject to greater fire risks. This will lead to erosion and sediment and rocks moving down slope, sometimes impacting private property at the Forest's edge. Although there are fire stations proposed, they may not be enough or in the best locations to minimize the threat of wildland fires. The mitigation measures as proposed do not show how the risk of wildland fire and post-fire effects have been reduced to less than significant effects.

A.2-6 cont.

Mitigation Plan for Oak Woodlands.
The mitigation plan is well explained, but there does not seem to be a timeline. Is it the plan to have these planted and woodlands augmented at the end of the First Phase? The grassland and oak mitigation plan for SEA 17 has not been discussed recently with the Angeles National Forest. We invite discussion.

A.2-7

Maximization of Groundwater Recharge and Groundwater Banking.
Graded slopes, built slopes, and otherwise altered surface water drainages can affect the groundwater movement as well as the groundwater-to-surface water expression from the alluvium in this area. Although the plan notes the surface water effects and that groundwater recharge will occur within the project area, the indirect effects of engineered slopes, effects to springs, effects to groundwater from the proposed well system, and effects to surface/groundwater interactions, all together, are a potential significant effect that may warrant additional analysis. We are concerned with potential water quality impacts to Quail Lake and the California Aqueduct and are concerned that there may be significant effects. More importantly, it is unclear how the project will maximize groundwater recharge and banking.

A.2-8

Assessment Summary for Direct and Cumulative Effects for Cultural Resources, Particularly Tribal and Native American.
The Centennial Project site covers approximately 12,323 acres in an area known for its association with the first Indian Reservation in California (Tejon Ranch.) It is in close association with a significant Native American travel corridor and ethnographically situated with the Federally Recognized Tribe (Tejon Ranch Indian Tribe) comprising primarily the Kitanemuk and Yokut groups. The Centennial Project would involve significant ground disturbance, perhaps resulting in significant and unavoidable impacts to archaeological sites, both surface expressions and buried cultural deposits.

A.2-9

If you have questions, please contact Bob Blount, District Ranger, Angeles National Forest at wmblount@fs.fed.us or at 661-269-2808 ext. 225.

A.2-10

Sincerely,

JEFFREY VAIL
Forest Supervisor

Responses to Comment Letter A.2
U.S. Forest Service, Angeles National Forest
July 17, 2017

Response to Comment A.2-1:

Thank you for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and the Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment A.2-2:

The referenced comment letter is denoted as letter A.1 in this document, and all comments provided by Ms. Boyst of the U.S. Forest Service have been considered and responses are provided herein. Please see responses to Comments A.1-1 through A.1-13.

Response to Comment A.2-3:

As discussed in response to Comment A.1-2, the Forest Service, the Pacific Coast Trail Association (PCTA), the Tejon Ranch Conservancy (Conservancy), and the Tejon Ranch Company (TRC) are in ongoing discussions regarding an alternative realignment for the PCT through the Project site. A portion of the western right-of-way of 300th Street West has been reserved for the conceptual PCT realignment where this conceptual realignment is contiguous with a portion the Project site and where it bisects the northeastern corner of the site. Moreover, TRC has granted to the Conservancy two conservation easements that would preserve in perpetuity the conservation values of those portions of Tejon Ranch land located outside of the Project boundary and through which the proposed PCT alignment would extend. (See, Kern County Official Records Doc. #'s 214047995, 20140445960 ("Conservation Easements")). Both conservation easements expressly acknowledge that the Forest Service, the Conservancy, and TRC are in ongoing discussions regarding an alternative realignment for the PCT, and that TRC intends to convey to the Forest Service a perpetual trail easement for the construction, maintenance, and use of the PCT on the property covered by the conservation easements. (See, Conservation Easements, Recital G.) Moreover, the Conservation Easements both expressly authorize public recreational use of the PCT on the conservation easement property and permit TRC to grant the trail easement to the Forest Service. (See, Conservation Easements Sections 6(b)(2)(O)). Both Conservation Easements further acknowledge that, in October 2009, PCTA and Forest Service, among other parties, entered into a Memorandum of Understanding that delegates to PCTA certain responsibilities for the construction, maintenance and use of that segment of the PCT alignment to be located on the Conservation Easement property. (See, Conservation Easements, Recital G.)

This comment's recommendation that joint discussions be conducted between the Project Applicant, Forest Service, Angeles National Forest and CDWR regarding potential synergies between the Project, Angeles National Forest and the Vista del Largo visitors center are

noted and will be provided to the Project Applicant, Regional Planning Commission, and Board of Supervisors for their consideration. Because this comment does not address or question the content of the Draft EIR or otherwise raise an environmental issue, no further response to required.

Response to Comment A.2-4:

Feral pig control helps control the spread of noxious weeds in the habitat mitigation measures (MMs 7-10 and 7-11) in Section 5.7, Biological Resources. As stated in reference to the preservation of grasslands in MM 7-10, "long-term management will include focused major problematic non-native species eradication (e.g., feral pigs) where feasible".[31] MM 7-11, which provides mitigation for oak woodlands, includes the following in Maintenance Plan and Guidelines, "The Maintenance Plan, to be approved by the County, will include (i) weed control; (ii) herbivory control (e.g., feral pigs)".[32] As discussed in MMs 7-11 and 7-12, the Maintenance Plans will include quantitative monitoring with County approved performance criteria that must be met in order to receive sign-off. Culling of excess feral pig populations is also a routine part of existing operations on Tejon Ranch and will continue on Mitigation Lands. Long-term management of the Mitigation Preserve will be managed by the Tejon Ranch Conservancy (TRC). These conditions are fully expected to detect and stop the spread of noxious weeds. Also, a list of invasive plants species that will be prohibited from being used in landscaping on the site is part of the *Centennial Specific Plan*.[33] Section 3.4.4 of the Specific Plan describes that the prohibited plants shall not be used either in public or private landscaping and it shall be the responsibility of the Homeowners Association to provide current information to homeowners about plant species that are not allowed to be planted in private yards, and to enforce any regulations regarding prohibited plant species, including eradication. The Homeowners Association may utilize sources such as the California Invasive Plant Council to periodically update the list of invasive species thereby providing current information to homeowners.

Continued implementation of the Ranch-wide Management Plan (RWMP) also includes the study of, and conservation activities focused on, reducing feral pig activity. For example, RWMP Conservation Activity NC-3.2(a) includes small-scale pig enclosures are proposed for select riparian areas. Conservation Activity NC-3.2(c) calls for relocation of water troughs where appropriate to replace streams, springs, or ponds as livestock water sources. Each identified spring will be fenced to protect the source from disturbance by livestock and feral pigs. Conservation Activity NC-4.3 includes installation of tree shelters to protect oak seedlings and saplings from herbivores, particularly from feral pigs. Conservation Activity NC-4.4(a) involves the implementation of management trials to assess the influence of feral pig predation on the wildlife species using oak woodland communities. Management trials will likely use physical exclusion of feral pigs from areas with pig-proof fencing but could include depressing pig numbers through increased harvest rates. Conservation Activity FS-1.2(a) provides for the collection of information on feral pig populations to support development of a management strategy. Use of riparian habitats by livestock and feral pigs

31 DRP 2017, p. 5.7-181
32 *Id.,* p. 5.7-108
33 *Id.,* p. 5.7-140, PDF 7-8

will be quantified in riparian study areas using motion-triggered camera traps at each permanent plot. Video data from these cameras will be used to determine the behavior of livestock and feral pigs and the amount of time they spend at each site. Because many wild pigs can have distinctive markings, the Conservancy will evaluate whether population estimates can be made from camera data. Pig disturbance will also be quantified along vegetation transects. Conservation Activity FS-1.3(a) involves the development of a feral pig management strategy. The Conservancy is initiating research on the population abundance and distribution of feral pigs on Tejon Ranch and the ecological damages they cause. The Conservancy will collaborate with TRC to use this information to develop a comprehensive feral pig management strategy to reduce the environmental damages caused by feral pigs to acceptable or lowest practical levels. Conservation Activity FS-1.3(b) includes collaboration with TRC and other organizations to pilot innovative management strategies for feral pigs. The Conservancy wishes to collaborate with TRC and other organizations to pilot innovative management strategies for feral pigs that may inform a management strategy on Tejon Ranch and in other parts of California. Potential management strategies may suggest feral pig control to reduce competition or predation intensity, harvest level modifications, and grazing management or other measures to enhance habitat. Compliance monitoring will focus on ensuring that management actions are implemented as intended (e.g., targeted feral pig abundances are achieved or pigs are effectively excluded from a wetland area). Effectiveness monitoring will evaluate responses to the management action, such as changes in abundance of herpetofauna following reduction of feral pig population. Specific compliance and effectiveness monitoring methods will depend on the wildlife management actions being evaluated and the nature of the expected or desired responses.

In order to be responsive to the Commenter's concern for the control of noxious weeds, MMs 7-15 and 7-17 shall be edited to include methods to help control the spread of noxious weeds such as: 1) cat policy, 2) providing dog bags, and 3) animal-proof trash bins. The following text is hereby added within the first paragraph of MM 7-15 on page 5.7-191 of the Draft EIR:

> Waste and recycling receptacles that discourage foraging by wildlife species adapted to urban environments shall be installed by the Project Applicant/Developer in common areas (i.e., any area where public trash receptacles would be placed, such as parks, sidewalks, community centers, and walking trails) throughout the Project site. Common, residential, and commercial areas will all be served with wildlife resistant trash receptacles.

Additionally, the following text is hereby added to the last paragraph of MM 7-17 on page 5.7-193 of the Draft EIR:

> Domestic cats shall be prohibited from free-roaming (i.e., be allowed outdoors), and shall be required to have a microchip. All dogs shall be required to be leashed while in the designated natural open space areas, and bags for removing pet excrement will be provided at trail entrances and other appropriate locations. In addition, all dogs and cats shall be required to be neutered or spayed; all dogs shall be required to have a microchip; and potential owners shall show evidence prior to entry into the Centennial

Development, as required by Los Angeles County Code (Section 10.20.350). These restrictions/features and their purpose will be described within educational material and distributed to new homeowners and made available to all homeowners as needed.

Response to Comment A.2-5:

The Project has committed to diverting 100 percent of soil during grading activities, and at least 75 percent of non-hazardous construction and demolition waste, away from landfills to recycling or salvage, which exceeds the 65 percent diversion requirement with the Tier I voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code and the 50 percent reduction required by Section 20.87.040 of the County Code. The Project will submit and implement a Recycling and Reuse Plan to Public Works in connection with obtaining a building or grading permit.[34] For operational waste, the Project includes a Solid Waste Management Plan (SWMP) for the recycling or diversion of 75 percent of the solid wastes generated from the Project from landfills.[35] The Specific Plan also allows green waste composting and solid waste and materials recovery facilities and recycling centers in areas designated as Utility (U).

PDF 17-3, MM 17-10, and Section 4.5.14, "Solid Waste Management Plan," on pages 4-85 through 4-88 of the Draft EIR discusses the components of the SWMP, which include a "three bin system," community education, waste collection and recycling, materials recovery facility/transfer station (MRF/TS), composting and green waste facilities, a County Smart Gardening Learning Center, and household hazardous waste collection. Televisions, appliances and other large electronic devices (computers, monitors, etc.) are considered electronic wastes and would be included in the educational or instructional materials provided to residents on the proper disposal of these items. As stated under "Household Hazardous Waste Collection" on page 4-88, "Household hazardous waste and less commonly disposed materials (such as electronics and appliances) would have special pickups or disposal locations and may also be accepted by an MRF/TS year round." The SWMP also includes seasonal (at least two times a year) pickup of household hazardous wastes and less common wastes (such as electronics and appliances).[36]

In addition, waste collection companies operating in the County are required to provide services and rates in accordance with County standards. Section 20.72.080 of the County Code sets the minimum requirements for residential solid waste collection services, which include a requirement for waste collectors to collect bulky items set out for collection that are not reasonably susceptible to being placed in waste containers or bundles, including stoves, refrigerators, furniture, water heaters, and other similar items. Waste collectors are allowed to charge additional fees and/or require advance notice for providing this service.

The availability of seasonal pick-ups and bulky item disposal through the solid waste collector are expected to avoid the need to self-dispose of large items. The future operation

34 DRP 2017, p. 5.17-25, PDF 17-2; pp. 5.17-33 and -34. MM 17-9
35 *Id.,* pp. 5.17-26 through -28, PDF 17-3; pp. 5.17-34 and -35, MM 17-10
36 *Id.,* p. 5.17-27

of an MRF/TS, which includes a household hazardous waste permanent collection and reuse center, at the Project site is also expected to make the disposal of large items at the MRF/TS more convenient (through a shorter driving distance from on-site residential areas to the MRF/TS location than to off-site open lands). This, in turn, would discourage illegal dumping at adjacent public and open lands, such as the Angeles National Forest.

See, also, Section 5.17.4 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.18 of the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment A.2-6:

The Draft EIR evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance.[37] This determination, however, is not reliant solely upon implementation of MM 3-9 or other mitigation measures identified in the Draft EIR. Rather, the Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9.

Phase I Environmental Site Assessments were prepared for the Project site to investigate potentially hazardous current and historic land uses that could adversely affect Project site development.[38] Based on these reports, there are no adjacent land uses that represent fire hazards.[39] However, as disclosed in the Draft EIR, portions of the Project site are designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a VHFHSZ and as a High Fire Hazard Security Zone (HFHSZ), and the potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[40]

CAL FIRE classifies a zone as having a moderate, high, or very high fire hazard based on a combination of how a fire will behave and the probability of flames and embers threatening

37 DRP 2017, p. 5.3-39
38 *Id.,* p. 5.3-38
39 *Ibid*.
40 *Id.,* pp. 5.2-35. -36

buildings. As explained in the Draft EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. These characteristics would be addressed as the Project site is developed, as discussed below.[41]

The Draft EIR explains that Project site's limited access will be significantly improved under Project conditions. The Project would construct an extensive backbone vehicular circulation system that would provide five points of access to the site via SR-138. The design of the Project's internal circulation system would implement the County's Fire Code standards, as applicable, regarding access (e.g., roadway widths, fire hydrant placement, length of single access streets, cul-de-sac dimensions, turning radius, street parking restrictions) (see Section 5.10, Traffic, Access and Circulation, for additional discussion of roadway design; see also the Mobility Plan described in Section 3.2 of the proposed Specific Plan [Draft EIR Appendix 4.0-A]).

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

With respect to fire flows, the Draft EIR explains that the Project would construct a Fire Code compliant water system to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires (refer to Section 5.18, Water Resources, for further discussion of the water system; see also the Water Service Plan described in Section 3.5 of the proposed Specific Plan [Draft EIR Appendix 4.0-A]). The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and LACFD's fire-suppression standards for improved property and development. These standard requirements must be met prior to the approval of building permits; therefore, the Project would implement a water system that would meet all County requirements in support of fire-suppression activities so that less than significant water-related fire hazards would

41 *Id.,* p. 5.2-35

occur. Under Project conditions, fire flows at the Project site will be substantially improved as compared to existing conditions.

Thus, under Project conditions, the Angeles National Forest will have far greater access to fire protection and emergency services in the vicinity of Project site than currently exists. Such access will contribute to LACFD's performance of its obligations under the *Cooperative Fire Protection Agreement Between The County Of Los Angeles Fire Department And The U.S. Forest Service Angeles National Forest* (Mutual Aid Agreement), approved by the Los Angeles County Board of Supervisors on December 20, 2016. The purpose of the Mutual Aid Agreement is to provide for cooperation between LACFD and U.S. Forest Service Angeles National Forest (ANF) in the prevention, detection, and suppression of wildland fires, fuels treatment and prescribed fires with both agencies' respective fire protection areas. The Mutual Aid Agreement also describes the conditions in which "mutual aid" periods are established to provide resources to each on a non-reimbursable basis, as well as the conditions of "Assistance by Hire" on a reimbursable basis. The Project's fire service improvements described above will significantly enhance the LACFD's ability to perform its obligations under the Mutual Aid Agreement to the benefit of the ANF in the vicinity of the Project site.

With regards to vegetative cover and topography, the majority of residential development is proposed for the flatter portions of the Project site. Some residential development, however, is proposed in areas that would be adjacent to large open space areas with moderate vegetative cover. Under existing conditions, the plant communities that make up this cover are highly combustible and would therefore present a high fire hazard and pose a potentially significant impact to development in these areas. As development of the Project site proceeds, however, fire hazards associated with the natural vegetative cover would be eliminated through its replacement with urban landscape vegetation, which is irrigated and less combustible than the existing vegetation.[42] Indeed, the Project's proposed Specific Plan includes a landscaping plant palette comprised of many plant species specifically selected for their fire resistance and requires that the Project's final plant palette be approved by the LACFD.[43]

As explained in the Draft EIR, topography is connected to wildland fire hazards because steep slopes are not only inaccessible to fire fighting vehicles, but steep canyons can create updraft conditions (much like a chimney) and a fire in a steep canyon can spread rapidly into adjacent areas.[44] Steep canyons that are densely covered with combustible vegetation are especially hazardous. Thus, the Draft EIR explains that the potential for wildland fire hazards would still exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[45] Generally, fire-prevention tactics for urban development in wildland fire hazard areas focus on (1) restricting the types of building materials used; (2) appropriate building design; and (3) incorporating setbacks, including fuel-modification

42 *Id.,* p. 5.3-36
43 *Id.,* Appendix 4.0-A, p. 3-42, Table 3-8
44 DRP 2017, p. 5.3-35
45 *Id.,* p. 5.3-36

zones.[46] All developments within a VHFHSZ and HFHSV are required to meet the building construction requirements specified in the County Code for these areas.

The County of Los Angeles' standards that would be applied to the Project to ensure appropriate building design and materials are specified in Chapter 7A of the County Building Code (Title 26) and in the Fire Code (Title 32); these standards include, but are not limited to the following:

- All roof coverings shall be of fire retardant Class A materials. Wood-shingle and wood-shake roofs are prohibited in Very High Fire Hazard Severity Zones (VHFHSZs) regardless of classification (Section 704A.1.2).
- Where the roof profile allows a space between the roof covering and roof decking, the spaces shall be constructed to prevent the intrusion of flames and embers; shall be firestopped with approved materials; or shall have one layer of No. 72 American Society of Testing and Materials (ASTM) cap sheet installed over the combustible decking (Section 704A.1.2).
- Ventilation openings shall be constructed on the underside of eaves and cornices. The Building Official may accept or approve special eave and cornice vents that resist the intrusion of flame and burning embers (Section 706A.3 et. seq.).
- Exterior windows, window walls, glazed doors, and glazed openings in exterior doors shall be multi-pane glazing units with a minimum of one tempered pane, or glass block units, or have a fire-resistance rating of not less than 20 minutes, when tested according to ASTM E 2010, or they shall conform to the performance requirements of the Office of the State Fire Marshall (SFM) 12-7A-2 (Section 704A.3.2.2).
- Spark arresters constructed with heavy wire mesh or other noncombustible material with openings not to exceed ½ inch shall be provided in chimneys of any fireplace, barbecue, incinerator, or any heating appliance in which solid or liquid fuel is used (Section 326.12.2).
- Clearance of brush and vegetative growth shall be maintained (Section 325.2).

The Project's proposed Specific Plan further ensures appropriate building placement and design by requiring LACFD review of all Project tentative tract maps and amendments.[47] Moreover, to further protect against fire, the Specific Plan's General Development Standards expressly prohibits the use of wood-burning fireplaces on the Project site.[48] Finally, public access would be restricted in areas of the Project site that are undeveloped and contain steep slopes in accordance with the Specific Plan's Trail Plan and Open Space Management Plan.[49] Despite limited access to the general population, those areas of the site with the greatest topographic relief would be accessible to fire-fighting equipment via helicopter, other air transport access, and existing unpaved fire roads. As required by the LACFD, upon their Project-level review (e.g., tract map review), clearance for fire access roads and gates would

46 *Id.,* p. 5.3-34
47 *Id.,* Appendix 4.0-A, pp. 4-12, -14
48 *Id.,* p. 2-70
49 *Id.,* pp. 3-88, -94

be incorporated into developed areas. Finally, Project implementation of the Fuel Modification Plan required by MM 3-9 would further reduce fire hazards at the wildland/urban interface.

The County Fire Department's Forestry Division (Forestry Division) provides several fire prevention services, including vegetation management services and fuel modification planning. The purpose of fuel modification is to provide defensible space between structures and wildlands. The LACFD's Fuel Modification Plan Guidelines, last revised in 2011, were created by the Forestry Division to help the public understand the process of fuel modification plan review and approval as well as set forth landscape design criteria for applicable properties located in Fire Hazard Severity Zones.[50]

A Fuel Modification Plan consists of three sequential zones where combustible native or ornamental vegetation has been modified and/or partially or totally replaced with drought-tolerant, low-fuel-volume plant species. The details of fuel modification plans vary in complexity and reflect the fire history; the amount and type of vegetation; the arrangement of the fuels; the topography; the local weather patterns; and the construction, design, and placement of structures.[51] The following is a generalized fuel modification plan and associated zones:

> Zone A is a minimum 20-foot setback zone from the edge of any structures; it is adjacent to structures and should offer protection from intense flames through either properly maintained, irrigated plants with high moisture content, or through walkways, gravel, stone, paved surfaces, or water features to create breaks in the fire's path.
>
> Zone B is the irrigation zone/transition zone that extends from the edge of Zone A up to 100 feet from structures; a large percentage of existing vegetation may be removed and replaced with irrigated, fire- and drought-resistant plants. It may have detached structures and may contain some native vegetation if spaced according to the planting guidelines that create a transition to the native brush and thinning zone (Zone C).
>
> Zone C is the native brush thinning zone and, if applicable, extends from the edge of Zone B up to 200 feet from structures. Vegetation will consist mainly of native plants with appropriate thinning and spacing; adequately spaced ornamental shrubs and trees are allowed (if approved by LACFD) but generally not recommended due to water conservation goals. The objective of this zone is to slow the rate of fire spread, reduce flame lengths, and minimize the intensity of the fires prior to reaching irrigated zones (i.e., Zones A and B) or the structure.

Every fuel modification plan must be reviewed by the LACFD Forestry Division for defensible space, reasonable fire safety, and compliance with Sections 325.2.1, 325.2.2, 325.10, and

50 DRP 2017, p. 5.3-31
51 *Id.,* p. 5.3-32

503.2.1 of the County Code, the Fire Department's Fuel Modification Guidelines, and California Code of Regulations Title 14, Division 1.5, Chapter 7, subchapter 2. After the plan has been approved by the Forestry Division, a signed and notarized copy of the Project Homeowners Association's approved Covenants, Conditions, and Restrictions that include the necessary fuel modification information will be recorded at the County clerk's office and a copy given to the LAFCD Fuel Modification Unit prior to site inspection and release. The fuel modification inspection ensures compliance with applicable requirements of the Fire Code, the Building Code, Section 701A.5 (Vegetation management compliance), and the Residential Code, Section R327.1.5 (Vegetation management compliance). An on-site inspection must be conducted by the LACFD Forestry Division and a final release issued by the forestry division prior to a certificate of occupancy being granted by the County building official.

Planting proposed as part of Project along any public or private roadway that may be used for emergency access will also be reviewed to ensure compliance with applicable Fire Code requirements and safety as part of the Fuel Modification Plan review. Fuel modification distances are site specific, designed for severe fire weather scenarios, and are not intended to be a blanket requirement for all sites. The Zone A and Zone B irrigated zones encompass the minimum 30 to 50 feet of required removal of all highly flammable brush required by the Fire Code. Zone C will typically coincide with the requirement to thin from 30 to 200 feet from any structure.

The State and County regulations that apply to the proposed Project are required regardless of CEQA. With adherence to the required and best-accepted practices for fuel-modification zone management, emergency access, building materials and methods, as well as the changes in land use, and existing mutual aid agreements, the Project's potential to constitute a potentially dangerous fire hazard, or to expose people or structures to a significant risk of loss, injury or death involving fires, would be reduced to a less than significant level.

In response to this comment, the following documents are added to the administrative record:

Los Angeles, County of. 2016. *Adopted Request for Approval of Cooperative Fire Protection Agreement Between The Consolidated Fire Protection District of Los Angeles County and the And The U.S. Forest Service Angeles National Forest.* http://file.lacounty.gov/SDSInter/bos/supdocs/110053.pdf (last accessed September 2017).

Please also see Section 5.8 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.9 of the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment A.2-7:

The plan for the phasing of mitigation is described in MM 7-10 on pages 5.7-180 through 5.7-182 of the Draft EIR. It describes how with each phase of development, there will be a comparable sized portion of the preserve with similar resources dedicated and mitigation

implementation within. Consultation with the Angeles National Forest regarding grasslands and oak mitigation activities in SEA 17 is not specifically required as a mitigation measure in the Draft EIR; however, the following sentence is added to the end of MM 7-11:

> Consultation with representatives from the Angeles National Forest regarding oak and grasslands mitigation activities in SEA 17 shall occur prior to the commencement of oak tree planting in SEA 17.

Response to Comment A.2-8:

Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake watershed, which includes the lake. Consequently, no runoff from Project developed areas will flow to Quail Lake and the Quail Lake drainage and watershed. The Project development will not affect the hydrology, flood or water quality conditions in the lake and the lake's watershed and drainage system. The Project will also avoid impacts to California Aqueduct water quality. As discussed on Draft EIR pages 5.4-73 and 5.4-74 the wastewater reclamation facilities (WRFs) must comply with Title 22 of the *California Code of Regulation,* the California Porter-Cologne Act, and the Lahontan Basin Plan's surface and groundwater quality objectives. Waste Discharge Requirements (WDRs) issued by the Lahontan Regional Water Quality Control Board will require the Project to include design features, such as berms, levees, spill containment features, and other topographical elevation features, to protect the WRFs during large flood events and to protect adjacent properties under any emergency conditions. As shown on Exhibit 4-14 in the Draft EIR, there are no sewer pipelines or force mainlines that would cross over the State Water Project (SWP) Aqueduct; therefore, there is no risk of sewer line rupture over the SWP Aqueduct. In addition, the California Aqueduct contains a levee system that protects its waters from stormwater flooding or other surface flows and the aqueduct channel is constructed with cement and other impervious materials. Consequently, Project runoff, groundwater recharge, discharge from the WRFs or any other activities that could affect surface and groundwater quality will not affect water quality in Quail Lake or in the California Aqueduct.

Project water banking facilities and operations are discussed on pages 5.18-52 to 5.18-54 of Draft EIR Section 5.18, Water Resources. All Project groundwater use and water banking operations will be conducted in accordance with the Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015.[52] The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources and Basin storage capacity over time. An existing 160-acre water banking facility and an on-site 100-acre facility will be used to store and later retrieve imported surface water as required to meet Project water demand. The existing facility is permitted under the Adjudication Judgment and Physical Solution and the on-site facility must meet the requirements of the Adjudication Judgment and Physical

[52] DRP 2017, Appendix 5.18-D

Solution as determined by a watermaster appointed by the Court. The banks will direct imported surface water into a series of constructed basin and weirs for percolation into the local aquifer. The local aquifer has substantially more storage capacity than would be required for Project water banking operations. A series of existing and new on-site and off-site wells will be used to monitor groundwater levels; to extract banked water; to recover return flows; and to extract groundwater for Project use in accordance with the Adjudication Judgment and Physical Solution, including the requirement to leave-behind a portion of the water placed into storage to benefit the aquifer as a whole. The water banking and related facility locations are shown on Draft EIR Exhibit 5.18-7. As discussed on Draft EIR pages 5.18-73 to 5.18-74, additional groundwater recharge will be maximized by not redirecting any existing watershed flows to other watersheds and by capturing and infiltrating onsite storm and dry period flows in a series of infiltration basins located throughout the Project. As discussed on Draft EIR page 5.2-26, the Project has been designed to maintain undeveloped areas with uncompacted soils to provide opportunities for infiltration of runoff in impervious areas and help to preserve pre-development infiltration, evapotranspiration, percolation, subsurface flow, groundwater recharge, and surface runoff conditions. As discussed on Draft EIR page 5.2-27, development on the Project site is generally located on existing poorly infiltrating soils and avoids soils with higher infiltration rates for flow and volume management and groundwater recharge. The Project's distributed and parcel-based low impact development and regional Best Management Practices hydrology, flood control and water quality measures will be implemented to provide infiltration capacity for developed areas that affect locations with higher infiltration rates. As discussed on Draft EIR pages 5.2-28 to 5.2-30, in additional to distributed parcel-based low impact development measures that promote infiltration and recharge, a series of regional basins will be constructed, generally with flat, vegetated bottoms that will, in addition to performing other hydrologic, flood and water quality protective functions, manage excess runoff volumes from the site through infiltration. The locations of the basins are shown on Draft EIR Exhibit 5.2-4. Normalized sizing charts were applied to the proposed development areas that are tributary to each basin to identify the flow retention and duration volumes required to match the pre-development infiltration rates as well as other design characteristics. The design volumes and other characteristics for each of the regional infiltration basins are summarized in Draft EIR Table 5.2-4. Consequently, Project water banking activities, including the leave-behind requirements of the Adjudication Judgment and Physical Solution, retention of open space, avoidance of onsite locations with higher infiltration rates, and the use of regional infiltration basins throughout the site will avoid significant impacts to maximize recharge rates in the Project area.

Please also see Sections 5.9 and 5.17 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Sections 3.10 and 3.18 of the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment A.2-9:

The Project's potential impacts to archaeological resources, including tribal cultural resources, are assessed in Section 5.6, Cultural and Tribal Resources. The Draft EIR has

identified a suite of mitigation measures that are consistent with the requirements of *Public Resources Code* § 21083.2 and together would ensure that the Project's potential impact on cultural resources would be mitigated to a less than significant level.

Consistent with this comment, the Draft EIR confirms the historic occupation of the Tejon region "by the Kitanemuk, Interior Chumash, Tataviam, Southern Valley Yokuts, and Kawaiisu, with the first three of these groups likely to have lived in and/or used the lands comprising the Project site.".[53] The Draft EIR further explains that "Tejon Ranch was the location of the first Native American reservation in the United States…".[54] Given the Project site's association with both Native Americans and the history of the Tejon Ranch subsequent to Spanish occupation, a thorough examination of potential impacts to historic, archaeological, and tribal cultural resources was performed as part of the Draft EIR analysis.

As an initial matter, Assembly Bill (AB) 52 consultation with Native American Tribes was completed for the Project, "…and mitigation measures were agreed upon by all parties involved, including the Tejon Ranch Company".[55] As discussed on Draft EIR page 5.6-48, during consultation, the Tataviam Tribe recommended that the Tejon Tribe serve as the lead tribal consultants, and that the Tataviam would provide its future comments through the Tejon. The Tejon Tribe subsequently informed the Lead Agency that its key consideration for protecting tribal resources included mitigation measures requiring the employment of Native American monitors from the Tejon Tribe during ground disturbing activities, as well as the permanent curation of any prehistoric artifacts and/or Tribal Cultural Resources discovered during construction of the Project. Consistent with the Tejon Tribe recommendations were incorporated into the Draft EIR's mitigation program for cultural resource impacts.

As part of the Draft EIR preparation process, cultural resource studies were conducted on the entire Project site between 2002 and 2015.[56] The surveys resulted in the identification of 57 potentially unique archaeological sites, as shown on Table 5.6-1. Of those 57 sites, 25 potentially unique archaeological sites were identified within the Project's sites development footprint and 30 potentially unique sites were identified in the Project site's open space area.[57]

Additional archaeological testing was performed on the 25 potentially unique sites located within the development footprint and it was determined that (i) two of the identified sites were not cultural resources (i.e., CA-LAN-3235 and CA-LAN-3249), and (ii) three of these sites are unique and eligible for listing on the California Register of Historic Resources (CRHR) and are thus considered significant archaeological resources pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5.[58] The Draft EIR assigns the following trinomial identification numbers to these three eligible sites: CA-LAN-3201, CA-

53 DRP 2017, pp. 5.6-14
54 *Id.,* p. 5.6-16
55 *Id.,* p. 5.6-1
56 *Id.,* p. 5.6-18, Table 5.6-1
57 *Id.,* p. 5.6-1
58 *Id.,* pp. 5.6-46, 5.6-54 to -57

LAN-3240, and CA-LAN-3242. These three sites are described in the Draft EIR pages 5.6-24, 5.6-35, and 5.6-36, respectively.

Impacts to CA-LAN-3201, CA-LAN-3240, and CA-LAN-3242 would be mitigated through avoidance by means of monitoring by a qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe during construction, and either Project redesign or preservation through restricted access, as required by MMs 6-1, 6-3, and 6-4. Moreover, MM 6-2 requires these three sites to be protected by temporary fencing during construction to ensure avoidance of the resource. All monitoring shall be conducted in accordance with an Archaeological Resource Monitoring Plan prepared by an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. If avoidance and preservation of CA-LAN-3201, CA-LAN-3240 and/or CA-LAN-3242 are determined to be infeasible, impacts to any such sites would be mitigated through implementation of a Phase III data recovery program consistent with CEQA Guidelines § 15126.4(b)(3)(C), as required by MMs 6-1 and 6-3. Excavated finds must be offered to the County of Los Angeles and/or its designee (i.e., the Tejon Indian Tribe) on a first refusal basis (MMs 6-1 and 6-3); the Tejon Indian Tribe can then make a determination whether the find is a significant tribal cultural resource and opt to accept the resource for curation in its facility. With implementation of MMs 6-1, 6-2, 6-3, and 6-4, impacts to sites CA-LAN-3201, CA-LAN-3240, and CA-LAN-3242 would be reduced to a less than significant level.

Implementation of the Project would result in a less than significant impact to the 22 sites within the development footprint that have been determined ineligible for CRHR listing or are not cultural resources, and no mitigation is required; however, as testing may not have recovered all significant materials, these sites and a reasonable radius around them will be monitored during grading pursuant to MM 6-1.[59] In the event monitoring discovers potentially significant materials associated with any one of these 22 sites, then a qualified archaeologist must perform a Phase II subsurface test-level investigation and surface collection in accordance with MM 6-1. Should the Phase II testing determine the that potentially significant material qualifies as significant archaeological resources pursuant to CEQA Guidelines § 15064.5, then potential impacts to any such resources shall be mitigated to a less than significant level through avoidance and preservation, in accordance with subsection (a) of MMs 6-1 and 6-4. If avoidance and preservation of any such resource is determined to be infeasible, then potential impacts to such resources shall be mitigated through implementation of a Phase III data recovery program consistent with CEQA Guidelines § 15126.4(b)(3)(C), as required by MM 6-1. Excavated finds must be offered to the County of Los Angeles and/or its designee (i.e., the Tejon Indian Tribe) on a first refusal basis (MMs 6-1 and 6-3); the Tejon Indian Tribe can then make a determination whether the find is a significant tribal cultural resource and opt to accept the resource for curation in its facility.

As identified in Table 5.6-1, there are a total of 30 prehistoric archaeological sites within the Project's proposed open space areas (i.e., areas outside the development footprint), including 27 prehistoric archaeological sites and 3 historic-period sites. The CRHR eligibility

[59] *Id.,* p. 5.6-48

of 18 of the 30 total sites located within Open Space-designated areas has been determined through archaeological testing.[60] Of the 18 sites evaluated, 1 site (CA-LAN-3206) has been determined eligible and 17 sites have been determined ineligible. The CRHR eligibility of the remaining 12 sites has not been evaluated to date, as these sites have never been within an anticipated development (i.e., grading) footprint during the evolution of the Project design.

For the 12 sites whose eligibility for the CRHR is unknown, because these resources have not yet been formally evaluated, the Draft EIR assumes that the sites are historically significant until, and unless, evaluation proves otherwise.[61] Because these 12 sites are outside the development footprint, direct impacts during grading and other construction activities are not expected. However, sites CA-LAN-3217 and CA-LAN-3227 are immediately adjacent the development footprint. Because of their proximity, the sites could suffer damage during grading activities. Because sites CA-LAN-3217 and CA-LAN-3227 are assumed CRHR-eligible, this would be considered a potential significant direct impact. Therefore, MM 6-1 requires monitoring by a qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe (pursuant to AB 52 consultation as described above) when grading is in the vicinity of these sites; MM 6-2 requires the sites to be fenced off during construction to ensure complete avoidance of the resources; and MM 6-4 provides further protective measures if necessary. With implementation of MMs 6-1, 6-2, and 6-4, potential direct impacts to sites CA-LAN-3217 and CA-LAN-3227 during construction would be reduced to a less than significant level.

Long-term operation of the Project would result in potential indirect impacts to the 12 sites with unknown eligibility and the 1 site located in the open space areas that is known to be eligible (CA-LAN-3206) if it is determined that such sites are vulnerable to disturbance due to increased access, by residents and visitors compared to the existing condition. Because archaeological excavation is considered an adverse effect on an archaeological resource, avoidance and preservation of resources without excavation would be the preferred method of managing these sites. Therefore, MM 6-4 requires preparation of an Archaeological Resources Site-Protection Program aimed to protect and preserve any identified archaeological resources that may be vulnerable to disturbance, unless a Phase II archaeological investigation performed by a qualified archaeologist determines that such site is not unique and thus not eligible for listing on the CRHR. The Archaeological Resources Site-Protection Program must be approved by the County and must include several alternatives to restrict access to these sites (e.g., fencing, planting, and capping), thereby protecting and preserving these sites. With implementation of MMs 6-2 and 6-4, potential indirect impacts to the 12 sites within the Project site open space area with unknown eligibility and the 1 site located in the open space areas that is known to be eligible (CA-LAN-3206) would be reduced to a less than significant level.

For the 17 sites located within the Project's open space determined to be ineligible, Project implementation would result in no impacts to these sites and no mitigation is required.

60 *Id.,* p. 5.6-49
61 *Id.,* p. 5.6-50

To further ensure that the Project's potential impacts to cultural resources are reduced to a less than significant level, MMs 6-1 through 6-4 are hereby revised, as follows:

MM 6-1 The Project Applicant/Developer shall retain a qualified Archaeologist who shall oversee archaeological monitoring of topsoil grading and removals (including clearing, grubbing, and trenching) in the immediate vicinity of the following 25 archaeological sites that are within the grading footprint and ~~1~~2 site<u>s</u> in the open space area that ~~is~~ <u>are</u> immediately adjacent to the development impact area: CA-LAN-3201, CA-LAN-3202H, <u>CA-LAN-3217,</u> CA-LAN-3219H, CA-LAN-3227, CA-LAN-3230, CA-LAN-3232, CA-LAN-3233, CA-LAN-3234, CA-LAN-3236, CA-LAN-3237, CA-LAN-3238, CA-LAN-3239, CA-LAN-3240, CA-LAN-3241, CA-LAN-3242, CA-LAN-3243, CA-LAN-3244, CA-LAN-3245, CA-LAN-3246, CA-LAN-3247, CA-LAN-3248, CA-LAN-3250, CA-LAN-3251, CA-LAN-3252, CA-LAN-3253, and CA-LAN-3985H. <u>CA-LAN-3217 and</u> CA-LAN-3227 ~~is~~ <u>are</u> ~~the site~~ immediately adjacent to the grading footprint. Additionally, a Native American monitor representing the Tejon Indian Tribe shall be present during topsoil grading and removals in the vicinity of the 2~~6~~<u>7</u> above-listed archaeological sites.

~~T~~<u>Prior to the issuance of grading permits, the</u> Project Applicant/Developer shall provide written evidence to the County that a qualified Archaeologist has been retained~~;~~ <u>to carry out all mitigation measures related to archeological and historical resources. A qualified Archaeologist is defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. The qualified Archaeologist</u> shall<u>:</u> be present at the pre-grading meeting; ~~shall~~ establish procedures for archaeological resource surveillance, including coordination with representatives of the Tejon Indian Tribe on the location and schedule of Native American monitoring; and ~~shall~~ establish (in cooperation with the Project Applicant/Developer and/or County as well as the Tejon Indian Tribe) procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of any artifacts found, as appropriate.

The qualified Archaeologist shall develop and submit an Archaeological Resource Monitoring Plan to the County for sites in development areas. The qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be retained to attend pre-grade meetings and to monitor earth-moving activities, including clearing, grubbing and trenching, in the vicinity (i.e., the area of a site reasonably expected to contain

archaeological resources plus a buffer of at least 10 meters [33 feet]) of any and/or all cultural resource sites. For implementation of each tract map, if no subsurface Native American or archaeological remains are identified in the vicinity of an archaeological resources site during that initial grading, continuous monitoring will no longer be required but the Project Archaeologist and Native American monitor shall spot-check all additional subsurface excavations in the vicinity of an archaeological resources site at least once a week for the duration of grading and excavation activities or until the monitor deems site clear. The Project Archaeologist shall be responsible for coordinating the location and schedule of Native American monitors.

The Archaeologist and Native American monitor shall carefully inspect these areas to assess the potential for significant prehistoric or historic remains. If potentially significant archaeological resources are uncovered, the qualified Archaeologist and Native American monitor shall halt or redirect ground-disturbing activities away from the vicinity, and a subsurface test and/or evaluation shall be performed to assess the discovery. Further subsurface investigation or data recovery shall be undertaken if the resource is determined by the Project Archaeologist to be unique or historically significant (i.e., important for its prehistoric or historic information) and therefore eligible for the California Register of Historical Resources (CRHR).

The archaeological procedures required by the Archaeological Resource Monitoring Plan shall be incorporated as a note on the Grading Plan cover sheet. If additional or unexpected archaeological features are discovered, the qualified Archaeologist shall report such findings in writing to the County and/or the Tejon Indian Tribe. If archaeological resources are found to be of possible significance, the qualified Archaeologist shall determine appropriate actions, in cooperation with the County and the Tejon Indian Tribe, for further exploration and/or salvage in accordance with this mitigation measure.

The Archaeologist shall submit a Follow-up Report to the County. The Follow-up Report shall include: the period of inspection; an analysis of any artifacts found; and the present repository of the artifacts. Recovered finds shall be offered to the County of Los Angeles and the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance

is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County.

The Project ~~Applicant/Developer shall retain a certified~~ Archaeologist ~~who~~ will perform a Phase II subsurface test-level investigation and surface collection for archaeological resource sites of undetermined CRHR eligibility discovered during monitoring. A Phase II Test-level Report shall be completed that evaluates the sites; includes a discussion of the sites' significance (depth, nature, condition, and extent of the resources); and contains recommendations for final mitigation and cost estimates (if required) to fully mitigate significant impacts. Should the Phase II subsurface test-level investigation and surface collection determine the ~~potential~~ presence of significant ~~subsurface~~ archaeological resources that are eligible for CRHR listing, then potential Project impacts to the eligible archaeological resources site shall be mitigated to a less than significant level through the implementation of one of the mitigation options discussed below~~.~~:

a. Relocation of grading boundaries and fuel modification zones to completely avoid disturbance to the site(s) of eligible archaeological resources. ~~Should boundary relocation be infeasible~~ If it is determined that the relocation of grading boundaries and fuel modification zones in accordance with this subsection (a) is not feasible, then a qualified Archaeologist shall be present in the vicinity of eligible archaeological resources sites during grading and fuel modification brush clearance. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the South Central Coastal Information Center [SCCIC] at California State University, Fullerton. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) Fencing shall be erected outside the eligible archaeological resources sites to visually depict the areas to be avoided during construction. All eligible archaeological resources sites

avoided in accordance with this subsection (a) shall be subject to the preservation requirements of MM 6-4.

b. Per California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3)(A), grading boundary redesign and preservation in accordance with subsection (a) shall be the preferred means to avoid impacts to eligible archaeological resources. However, consistent with CEQA Guidelines Section 15126(b)(3)(C), ~~I~~if it is determined that avoidance and/or preservation of any eligible archaeological resources sites in accordance with subsection (a) are not feasible, then prior to grading in the vicinity of such eligible archaeological resources sites, Phase III data recovery (salvage excavations) shall be conducted for ~~these~~ such eligible archaeological sites or any other eligible sites within the potential impact area of development that cannot be avoided. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) When Phase III data recovery is undertaken, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the eligible archaeological resource, shall be prepared by a qualified Archaeologist prior to any excavation being undertaken. The Phase III work shall provide sufficient scientific information to fully mitigate the impacts of development on these sites to a level considered less than significant and shall be performed in accordance with the standards of the State Historic Preservation Office (SHPO).

Excavated assemblages shall be offered to the County and/or the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. Final mitigation shall be carried out based upon the recommendations in the Phase II

Test-Level Report, and the County of Los Angeles Department of Regional Planning shall make a determination as to the site's disposition based on the recommendations of the qualified Archaeologist. Possible determinations include, but are not limited to, preservation, salvage, partial salvage, or no mitigation necessary.

MM 6-2 Prior to ground disturbing activities, ~~A~~archaeological sites CA-LAN-3201, CA-LAN-3206, CA-LAN-3217, CA-LAN-3227, CA-LAN-3240, and CA-LAN-3242 shall be surrounded with high visibility construction fencing with a buffer of approximately 50 feet around each site to ensure that the archaeological sites are completely avoided during construction-related activities. A qualified Archaeologist shall work with surveying teams and the Construction Supervisor to fence the area to be avoided prior to the commencement of grading.

MM 6-3 Prior to the issuance of grading permits, the ~~The~~ Project Applicant/Developer shall ~~retain~~ provide written evidence to the County that a qualified Archaeologist has been retained to carry out all mitigate~~i~~ion measures related ~~impacts~~ to eligible archaeological sites within the development impact area. A qualified Archaeologist is defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. ~~Additionally, and~~ A qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be present during ground-disturbing activities (i.e, topsoil grading and removals) in the vicinity of the following three ~~below-listed~~ eligible archaeological sites~~.~~: CA-LAN-3201; CA-LAN-3240; CA-LAN-3242. Impacts to these three eligible sites ~~(CA-LAN-3201, CA-LAN-3240, and CA-LAN-3242)~~ shall be mitigated to a less than significant level through the implementation of one of the mitigation options described below~~.~~:

a. Relocation of grading boundaries and fuel modification zones to completely avoid disturbance to the site(s). ~~Should boundary relocation be infeasible~~ If it is determined that the relocation of grading boundaries and fuel modification zones in accordance with this subsection (a) is not feasible with respect to eligible archaeological resources sites CA-LAN-3201, CA-LAN-3240 and/or CA-LAN-3242, then a qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be present in the vicinity of any such eligible archaeological resources

site during grading and fuel modification brush clearance to monitor all activities and ensure that archaeological resources are not impacted. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) Temporary construction ~~F~~fencing shall be erected outside ~~the~~ any such eligible archaeological resources site~~s~~ to visually depict the areas to be avoided during construction, in accordance with MM 6-2. Any temporary fencing materials (i.e., plastic web, chain link, etc.) placed during construction should not become permanent. Any permanent fencing erected in accordance with MM 6-4 to protect the sites should be visually pleasing and consistent with the overall aesthetic experience of the community of Centennial. All eligible archaeological resources sites avoided in accordance within this subsection (a) shall be subject to the preservation requirements of MM 6-4.

b. Per California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3)(A), grading boundary redesign and preservation in place in accordance with subsection (a) shall be the preferred means to avoid impacts to eligible archaeological resources. However, consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is determined that ~~If~~ avoidance and/or preservation of any eligible archaeological resources sites in accordance with subsection (a) is ~~are~~ not feasible, then prior to grading in the vicinity of such archaeological resources sites, Phase III data recovery (salvage excavations) shall be conducted for ~~these~~ such archaeological resources sites or any other eligible sites within the potential impact area of development that cannot be avoided. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) When Phase III data recovery is undertaken, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the eligible archaeological resource, shall be prepared by a qualified Archaeologist prior to any excavation being undertaken. The Phase III work shall provide sufficient

scientific information to fully mitigate the impacts of development on these sites and shall be performed in accordance with the standards of the SHPO.

Excavated finds shall be offered to the County and/or the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. Final mitigation shall be carried out based upon the recommendations in the Phase II Test-Level Report, and the County shall make a determination as to the site's disposition based on the recommendations of the qualified Archaeologist and the Native American monitor representing the Tejon Indian Tribe. Possible determinations include, but are not limited to, preservation, salvage, partial salvage, or no mitigation necessary.

MM 6-4 ~~The Project Applicant/Developer~~ A qualified Archaeologist meeting the requirements of the Secretary of the Interior's Standards for professional archaeology shall develop and implement an Archaeological Resources Site-Protection Program aimed to protect and preserve identified CRHR-eligible archaeological resources avoided in accordance with subsection (a) of MM 6-1 and/or MM 6-3, as well as any identified archaeological resources site located within the Project site's open space areas that is of known eligibility for CRHR listing and which are vulnerable to disturbance during Project construction and/or operation. Identified archaeological resources sites located within the Project site's open space that are of unknown eligibility for CRHR listing and which are vulnerable to disturbance shall also be protected under the Archaeological Resources Site-Protection Program in accordance with this MM 6-4, provided that no such site shall be subject to this MM 6-4 if a Phase II archaeological investigation performed by a qualified Archaeologist in accordance with Secretary of the Interior Standards determines that such site is not unique and is thus ineligible for CRHR listing. Th~~is~~e Archaeological Resources Site-Protection P~~p~~rogram shall be prepared by the qualified monitoring Archaeologist familiar with the resources present

within the Project boundaries, ~~and~~ shall be approved by the County, and shall include implementation of one or more of the following:

a. Fencing and/or other access-restriction methods shall be placed around the archaeologically sensitive areas of the Project site to inhibit human access. This ~~is especially~~ subsection (a) shall be applicable to sites CA-LAN-3217 and CA-LAN-3227, unless the qualified Archaeologist determines that such sites are more appropriately protected in accordance with subsections (b) or (c) of this MM 6-4.; or

b. Non-invasive plant species with thorns (e.g., prickly pear cactus [*Opuntia* spp.]) or other deterrent characteristics shall be planted in areas close to known resources in order to discourage human presence; this is generally applicable to the majority of sites to be preserved in areas of native vegetation.; or

c. Known eligible resources shall be capped with a layer of chemically inactive soil/sediment, in consultation with a qualified Archaeologist. This ~~is especially~~ subsection (c) shall be applicable to sites CA-LAN-3201, ~~CA-LAN-3206,~~ CA-LAN-3240, and CA-LAN-3242, to the extent such sites are avoided in accordance with subsection (a) of MM 6-3, unless the qualified Archaeologist determines that any such site is more appropriately protected in accordance with subsections (a) or (b) of this MM 6-4. This subsection (c) shall be applicable to site CA-LAN-3206, unless, pursuant to the County-approved Archaeological Resources Site-Protection Program required by this MM 6-4, it is determined that such site is not vulnerable to disturbance.

~~The above-mentioned mitigation~~ This MM 6-4 shall be implemented prior to the completion of construction activities and shall be overseen by the County and/or the Tejon Indian Tribe. The qualified Archaeologist shall prepare a written statement documenting appropriate site-protection measures for submittal to the County. Additionally, a Native American monitor representing the Tejon Indian Tribe shall be present during all initial surface grubbing, initial ground surface grading, and any excavation greater than one-half foot in depth. ~~For implementation of each tract map, if no subsurface Native American or archaeological remains are identified during that~~

~~initial grading, continuous monitoring will no longer be required but the Native American monitor shall spot-check all additional subsurface excavations at least once a week for the duration of grading and excavation activities or until monitor deems site clear. The Project Archaeologist shall be responsible for coordinating the location and schedule of Native American monitors.~~

The first sentence of the last full paragraph of Draft EIR page 5.6-46 is hereby revised to correct a typographical error, as follows:

> As identified in Table 5.6-1 above, there are a total of 2~~6~~5 prehistoric and historic archaeological sites within the development footprint.

The last sentence of Draft EIR page 5.6-48 is hereby revised to correct a typographical error, as follows:

> Implementation of the Project would result in a less than significant impact to the 2~~4~~2 sites within the development footprint that have been determined ineligible for CRHR or are not cultural resources, and no mitigation is required; however, as testing may not have recovered all significant materials, these sites and a reasonable radius around them will be monitored during grading.

The last three full sentences of the first partial paragraph on Draft EIR page 5.6-2 are hereby revised as follows to correct typographical errors:

> However, sites CA-LAN-3217 and CA-LAN-3227 ~~is~~ are immediately adjacent the development footprint. Because of ~~its~~ their proximity, the sites could suffer damage during grading activities. Therefore, MM~~s~~ 6.1, MM 6-2, and MM 6-4 would be implemented for th~~is~~ese sites, and potential direct impacts to sites CA-LAN-3217 and CA-LAN-3227 during construction would be reduced to a less than significant level.

The first full sentence, and the balance of the first partial paragraph, and the second full paragraph on Draft EIR page 5.6-50 are hereby revised as follows to correct typographical errors:

> Because these 12 sites are outside the development footprint, direct impacts during grading and other construction activities are not expected. However, sites CA-LAN-3217 and CA-LAN-3227 ~~is~~ are immediately adjacent the development footprint. Because of ~~its~~ their proximity, the sites could suffer damage during grading activities. Because sites CA-LAN-3217 and CA-LAN-3227 ~~is~~ are assumed CRHR-eligible, this would be considered a potential significant direct impact. Therefore, MM 6-1 requires monitoring by a qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe (pursuant to AB 52 consultation as described above) when grading is in the vicinity of these sites (MM 6-1); MM 6-2 requires the sites to

be fenced off during construction to ensure complete avoidance of the resource; and MM 6-4 provides further protective measures if necessary. ~~Excavated finds shall be offered to the County of Los Angeles and/or its designee (i.e., the Tejon Indian Tribe) on a first refusal basis (MM 6-1); the Tejon Indian Tribe can then make a determination whether the find is a significant tribal cultural resource and opt to accept the resource for curation in the Tejon Tribe's facility.~~ With implementation of MM 6-1, MM 6-2, and MM 6-4, potential direct impacts to sites CA-LAN-3217 and CA-LAN-3227 during construction would be reduced to a less than significant level.

Long-term operation of the Project would result in potential indirect impacts to the 12 sites in the Project's open space area with unknown eligibility and the 1 site located in the open space areas that is known to be eligible (CA-LAN-3206) if it is determined that such sites are vulnerable to disturbance due to increased access, by residents and visitors, to these areas of the site compared to the existing condition, wherein the sites are located entirely on private property. Because archaeological excavation is considered an adverse effect on an archaeological resource, avoidance and preservation of resources without excavation would be the preferred method of managing these sites. Therefore, MM 6-4 requires preparation of an Archaeological Resources Site-Protection Program aimed to protect and preserve any identified archaeological resources that may be vulnerable to disturbance, unless a Phase II archaeological investigation performed by a qualified archaeologist determines that such site is not unique and thus not eligible for listing on the CRHR. The Archaeological Resources Site-Protection Program must be approved by the County and must include several alternatives to restrict access to these sites (e.g., fencing, planting, and capping), thereby protecting and preserving these sites. With implementation of MM 6-2 and MM 6-4, potential indirect impacts to the 12 sites within the Project site open space area with unknown eligibility and the 1 site located in the open space areas that is known to be eligible (CA-LAN-3206) ~~site CA-LAN-3227 during grading/construction~~ would be reduced to a less than significant level.

Response to Comment A.2-10:

The comment is noted for the record and will be provided to the Regional Planning Commission and the Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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A.3

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Palm Springs Fish and Wildlife Office
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, California 92262

In Reply Refer To:
FWS-LA-17B0550-17TA1049

July 19, 2017
Sent by email

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, Room 1348
320 West Temple St
Los Angeles, California, 90012

Subject: Notice of Draft EIR for Centennial Housing Project, Antelope Valley, California.

Dear Mr. Sackett:

On May 19, 2017, we (the U.S. Fish and Wildlife Service) received the County of Los Angeles' request for comment on a Draft Environmental Impact Report (DEIR) for the proposed Centennial project in Antelope Valley, 50 miles south of Bakersfield, California. The proposed housing development would include 19,333 dwelling units and associated commercial and civic land uses on approximately 12,323 acres. We provide these comments under the authorities of the Endangered Species Act of 1973, as amended (ESA). A.3-1

The U.S. Fish and Wildlife (Service) responsibilities include administering the Endangered Species Act, including sections 7, 9, and 10. Section 9 of the Endangered Species Act prohibits the "take" of any federally listed endangered or threatened species. "Take" is defined by the ESA as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. "Harm" is further defined as significant habitat modification or degradation that actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering (50 Code of Federal Regulations 17.3). "Harass" is defined as an intentional or negligent act or omission that creates the likelihood of injury to listed species by annoying it to such an extent as to significantly impair normal behavioral patterns which include breeding, feeding, or sheltering (50 Code of Federal Regulations 17.3). The U.S. Fish and Wildlife Service may provide an exemption from the take prohibitions through the issuance of a biological opinion for federal projects pursuant to section 7(a)(2) of the Endangered Species Act, or the issuance of an incidental take permit pursuant to section l0(a)(1)(B) for projects with no federal nexus. A.3-2

The Centennial project overlaps the range of the federally endangered California condor (*Gymnogyps californianus*), and it borders a critical habitat unit that is essential to the recovery of this species. California condors probably fly over the project area, but the DEIR suggests they do not land or forage in the project area on a regular basis, perhaps due to a lack of thermals and A.3-3

associated lift. However, large-scale developments such as this can produce thermals due to an increase in sunlight absorbing materials with a high heat capacity, potentially allowing soaring birds to utilize the area to a greater extent. Over 200,000 additional daily vehicle trips are predicted to occur in this sparsely populated and undeveloped area due to project development. As a result, a presumably substantial increase in roadkill carcasses could also attract California condors to the area, which would also gain a large number of anthropogenic perching sites. While these factors might provide a short-term benefit to individual birds, the hazards associated with foraging and flying in developed areas pose a long-term threat. A.3-3 cont.

We strongly recommend the project implement measures to discourage California condors from perching and foraging in the development area. This species occurs at an extremely low density and is distributed over a large range; which results in a low probability that the Centennial Project will harm one of these birds. With full implementation of the modified conservation measures listed below, this probability will be reduced to a level that does not warrant take coverage. A.3-4

The Service has issued guidance on California condor hazing methods that do not rise to the level of "Take" under the ESA (Service 2014). A number of these methods can only be conducted by a qualified biologist with approval from the Service. We recommend the DEIR include a requirement to contact a qualified biologist to determine when and where such hazing actions might be warranted. We also recommend retaining qualified, on-call condor biologists for the life of the project, who can conduct hazing as needed. A.3-5

We note that Mitigation Measure 7-6 from the DEIR would involve hiring an "authorized biologist" to oversee condor-related conservation measures during construction. Please be aware that the Service typically uses the term "authorized biologist" when referring to biologists that will work on projects requiring take coverage, and it does not appear that this project will need to request take coverage under sections 7 or 10 of the ESA. A.3-6

We appreciate that qualified biologists are not always available to respond in a timely fashion across the species' range, and that hazing is most effective if applied immediately following undesirable behavior. Because of this, we have concluded that a subset of less aggressive hazing methods can be used without a qualified biologist in order to decrease the response time while not increasing the likelihood of injuring California condors. These less aggressive methods include, but are not limited to: yelling, clapping, stomping, leashed barking dogs and the use of low-pressure water spraying devices (directed near, but not directly at, the birds). Commercially available automated systems may also be appropriate for this. We recommend individuals employing these techniques request instruction and guidance from us prior to deploying them, and above all, hazing methods must direct the birds toward a collision hazard-free escape route (without power lines, guy-wires, fences, etc.). Hazing should not be conducted if it, or the birds escape route, is unsafe for California condors. A.3-7

We note that mitigation measure 7-6 from the DEIR will also require the project proponents to minimize micro-trash during construction, install anti-perching devices on all surfaces of new A.3-8

antennae and phone/utility towers, and relocate cattle carcasses from within 1,000 feet of the project boundary to nearby open grasslands. The Service fully supports these measures and recommends the following modifications: 1) Micro-trash restrictions should be written into the covenants, codes, and restrictions (CC&R) that govern property owners within Centennial to extend this measure over the life of the project; 2) Whenever possible, utility towers and antennae should be self-supporting (i.e. not use guy wires), and be as visible as possible (using solid panel siding or dense/wide lattice work); 3) Reflective building materials (e.g. cool roofs), should be installed whenever possible to minimize updrafts that could attract soaring birds; 4) Develop a road-kill removal action plan that will reduce the number of roadside carcasses on nearby roads commonly driven by vehicles entering and leaving the Centennial development. As these carcasses are likely to occur as a result of this project, removing them would not alter the baseline conditions in the area, and would not constitute an effect on California condor foraging behavior.

A.3-8 cont.

Species listed under the California Endangered Species Act, but not under the Federal ESA, may occur in the area, as are species of special concern at the state level (e.g. Burrowing Owl, *Athene cunicularia*). We will defer to the California Department of Fish and Wildlife on how best to avoid impacts to these species, and if take coverage would be warranted based on natural resources with state level protections.

A.3-9

Thank you for the opportunity to comment on this matter. If you have any questions, please contact Jeffrey Ackley at the Palm Springs office (jeffrey_ackley@fws.gov or 760-322-2070 ext. 420).

A.3-10

Sincerely,

BRIAN CROFT Digitally signed by BRIAN CROFT
Date: 2017.07.19 14:06:46 -07'00'

For Ken Corey
Assistant Field Supervisor

Literature Cited

[Service] U.S. Fish and Wildlife. 2014. *Recovery Program Guidance on Hazing California Condors*. Hopper Mountain National Wildlife Refuge Complex. Fillmore, California.

Responses to Comment Letter A.3
U.S. Fish and Wildlife Service
July 19, 2017

Response to Comment A.3-1:

The Commenter's summary of the Project description is correct as written, and no additional response is required.

Response to Comment A.3-2:

The comment states the legal responsibilities of the U.S. Fish and Wildlife Service and does not present a question on the Draft EIR. No further response is required.

Response to Comment A.3-3:

It is recognized that the Project has some potential to increase prey items in the area and add anthropogenic perching opportunities, and the Draft EIR fully addresses impacts associated with anticipated California condor activity in the Project area.[62] As described on page 5.7-148, MM 7-6 is included to further ensure that the proposed Project does not result in future significant impacts on the California condor. MM 7-6 of the Draft EIR states that all surfaces on new antennae and phone/utility towers shall be designed and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching. It also states that during construction, the area shall be kept clean of debris.

Regarding increases in thermals resulting from Project development, the potential that changes of this nature could occur of a magnitude sufficient enough to support a change in condor behavior is highly unlikely. Throughout the daytime, particularly when the skies are free of clouds, urban surfaces are warmed by the absorption of solar radiation. Surfaces in the urban areas tend to warm faster than those of the surrounding rural areas.[63] By virtue of their high heat capacities, urban surfaces act as a giant reservoir of heat energy. For example, concrete can hold roughly 2,000 times as much heat as an equivalent volume of air.[64] A low albedo value, characteristic of black asphalt, absorbs a large percentage of solar heat creating warmer near-surface temperatures. As a result, the large daytime surface temperature within the Urban Heat Island (UHI) is easily seen via thermal remote sensing.[65] As is often the case with daytime heating, this warming also has the effect of generating convective winds within the urban boundary layer. It is theorized that, due to the atmospheric mixing that results, the air temperature perturbation within the UHI is generally minimal or nonexistent during the day, though the surface temperatures can reach extremely high levels.[66]

62 DRP 2017, pp. 5.7-17, -19, -22, -23, -63, -88, -94, -118 to -120, -145, -148, -173, -177, -178, -191
63 Camilloni and Barros 1997
64 H.-Y. Lee 1993
65 Ibid.
66 Camilloni and Barros 1997

At night, the situation reverses. The absence of solar heating causes the atmospheric convection to decrease, and the urban boundary layer begins to stabilize. If enough stabilization occurs, an inversion layer is formed. This traps urban air near the surface and keeps surface air warm from the still-warm urban surfaces, forming the nighttime warmer air temperatures within the UHI. Other than the heat retention properties of urban areas, the nighttime maximum in urban canyons could also be due to the blocking of "sky view" during cooling: surfaces lose heat at night principally by radiation to the comparatively cool sky, and this is blocked by the buildings in an urban area. Radiative cooling is more dominant when wind speed is low and the sky is cloudless, and indeed the UHI is found to be largest at night in these conditions.[67]

Similarly, an article published in *Atmospheric Environment*[68] states that during daytime, when evaporation is very small (<4 percent of net radiation), and therefore sensible heat uses dominate (Bowen ratio >8), the uptake of heat by the buildings and substrate is so large (58 percent) that convective heating of the atmosphere is reduced to a smaller role than expected (38 percent). The nocturnal release of heat from storage is equal to or larger than the net radiation and sufficient to maintain an upward convective heat flux throughout most nights.

The concept is further described in a study published in the *Journal of Applied Meteorology*.[69] The study explains how a method for inferring the distribution of surface heat and evaporative fluxes and the ground moisture availability and thermal inertia (ground conductive capacity) is used to analyze two urbanized areas, Los Angeles and St. Louis. The technique employs infrared satellite temperature measurements in conjunction with a one-dimensional boundary-layer model. Results show that there is a marked reduction of evaporation and moisture availability and a corresponding elevation of sensible heat flux over urbanized areas and over cropped areas with low vegetative cover. Conversely, low heat flux and high evaporation characterize vegetated and, especially, forested areas. Warm urban centers appear directly related to a reduction in vegetation, which normally allows for a greater fraction of available radiant energy to be converted into latent heat flux. The distribution of thermal inertia was surprisingly ill-defined and its variation between urban and rural areas was quite small. Thus, the increased heat storage within the urban fabric, which has been proposed as the underlying cause of the nocturnal heat island, may be caused mainly by enhanced daytime surface heating which occurs because of surface dryness, rather than by large spatial variations in the conductivity of the surface.

As described, condors are extremely infrequent visitors to the Project area, and that limited occurrence occurs almost exclusively as high elevation flyovers. Updrafts created by increased temperatures of the Project development are not expected to be significant, or to change the behavior of condors, because: (1) the development is small compared to large and very densely urbanized metropolitan areas such as Los Angeles shown to have such effects; (2) they are largely a night-time occurrence when condors are not flying; (3) high winds common to the area would further minimize the effects of such thermals; and (4) the

67 Morris, C.J.G. 2006-07-09
68 Oke, T.R., Spronken-Smith, R.A., Jáuregui, Grimmond C.S.B. 1999
69 Carlson, T.n., Dodd, J.k., Benjamin, S.G., Cooper, J.N. 1981

Project is surrounded by large open space areas, and includes significant internal expanses of parkland and other preserved open spaces. Consequently, project implementation would not be expected to result in thermals detectable by the condor nor influence behavior.

In order to be responsive to this and other commenters' requests for additional Project efforts to further reduce any potential adverse effects of the Project on the California condor, MM 7-6 on Draft EIR pages 5.7-177 and 5.7-178 shall be revised as follows:

MM 7-6 Construction Monitoring - The Project Applicant~~/Developer~~ shall retain a ~~qualified~~ CDFW/USFWS-approved "Authorized Biologist~~ with knowledge of California condors~~," to ~~monitor~~ be on-call during all construction activities. If condors are observed foraging or landing in the Project area~~. The resumes of the proposed Biologist(s) will be provided to the CDFW for concurrence. This Biologist(s) will be referred to as the "Authorized Biologist" hereinafter. During clearing and grubbing of construction areas~~, the Authorized Biologist shall ~~be present at all times. During mass grading, construction sites shall be monitored on a daily basis, and the Authorized Biologist will~~ have the authority to stop all construction activities until appropriate corrective measures have been ~~completed~~ implemented. If condors are observed landing in the Project area, the Applicant shall avoid further construction within 500 feet of the sighting until the animals have left the area, or as otherwise authorized by CDFW and USFWS. If the condors are nesting within 0.5-mile of any Project area, no construction activities shall occur within this 0.5-mile buffer until the condors leave, or as otherwise directed by CDFW and USFWS. All condor sightings in the Project area ~~will~~ shall be reported to CDFW and USFWS within 24 hours of the sighting.

~~To further protect California condors potentially foraging in the Project area over the long term from negative interactions with humans and/or artificial structures, the~~ Cattle Carcass Relocation - The Project Applicant~~/Developer~~ shall remove dead cattle that are found ~~or reported~~ within 1,000 feet of the boundary of a residential or commercial development within 24 hours. ~~Dead cattle shall be relocated to a predetermined location.~~ The Approved Biologist will select locations ~~where carcasses shall be placed shall be~~ a minimum of 1,000 feet from ~~a~~ development ~~area boundary. Appropriate locations~~ areas for ~~transfer~~ relocation of carcasses ~~include open grasslands and oak/grassland areas where condors can readily detect carcasses and easily land and take off without encountering physical obstacles such as powerlines and other utility structures~~. The proposed locations would be ~~selected and~~ approved by the CDFW and USFWS. ~~Pursuant to this measure, a~~ A telephone

number for reporting dead cattle shall be provided ~~and actively maintained. Any cattle carcasses transferred to the relocation areas shall be reported to the USFWS Condor Group~~ by the Applicant.

Utility Hazards - All surfaces on new antennae and phone/utility towers shall be designed, installed, and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching. Whenever possible, utility towers and antennae should be self-supporting (i.e. not use guy wires), and be as visible as possible (using sold panel siding or dense/wide lattice work).

Condor Educational Curriculum - The Applicant shall provide a Condor Educational Curriculum that includes the life history of the California condor, how to identify condors, TRC hunting rules and regulations, prohibited behaviors related to condors such as hunting with lead ammunition, and the legal consequences of inadvertently or otherwise illegally shooting or harming California condors. The information will also identify types of microtrash that could be ingested by adult breeding condors and describe measures to eliminate microtrash and provide information on how to report roadkill for removal. In addition, these rules, regulations, and prohibitions shall be listed within CC&Rs.

Microtrash - During construction, the ~~area~~ Applicant shall ~~be~~ ensure that all Project areas are kept clean of debris ~~(e.g., cable, trash, and construction materials). The Project Applicant/Developer shall collect all~~ including microtrash and litter ~~(i.e., anything shiny, such as broken glass), vehicle fluids, and food waste from the Project area on a daily basis~~. Workers ~~shall~~ will be trained on the issue of microtrash: what constitutes microtrash, its potential effects on California condors, and how to avoid the deposition of microtrash.

In addition, the Applicant will ensure that routine community maintenance activities include regular efforts to eliminate microtrash on and near all work sites, recreational events, roads, and adjacent open space areas.

If it is determined that condors are ingesting microtrash in the Project area, the Applicant, CDFW, and USFWS shall evaluate potential remedies to reduce, and, if possible, eliminate microtrash ingestion. Such remedies may include increased education and awareness to residents, guests, staff, and workers regarding the dangers of microtrash, increased monitoring of events and activities that are potential sources of microtrash, and more frequent collection of microtrash.

Condor Deterrent Activities - If the Authorized Biologist deems it necessary, USFWS California condor hazing methods that do not rise to the level of "Take" under the ESA (Service 2014) will be employed. Only the Authorized Biologist, with approval from the USFWS, will conduct hazing and only when such actions are warranted. If the Authorized Biologist is not immediately available, a subset of less aggressive hazing methods, such as yelling, stomping, leashed dog barking or low pressure water spray, may be used when a clear escape route for the condors is identified and upon guidance from USFWS.

Condor Tracking – The Applicant will provide the USFWS with twenty-five (25) GPS satellite tracking transmitters (total cost not to exceed $150,000.00) prior to grading plan approval. This will allow the USFWS to more quickly identify the immediate location of birds that are not moving relative to the ground, which usually indicates that an injury, illness, or death has occurred. The ability to track the movements and locations of individual condors can aid in the monitoring of the overall effectiveness of measures to minimize and mitigate the indirect impact of microtrash by locating possible areas where microtrash was ingested. It can also aide in identifying the location where condors were shot if such an incident were to occur.

Response to Comment A.3-4:

Please see responses to Comments A.3-3 and A.3-5.

Response to Comment A.3-5:

In order to be responsive to the Commenter's request, MM 7-6 shall be modified to include the requirement for the Project to retain a qualified on-call condor biologist for the life of the Project who can employ "hazing" (frightening) methods if/when they deem it is necessary. Please see response to Comment A.3-3 for revisions/edits to the MM 7-6.

Response to Comment A.3-6:

For Draft EIR purposes, "authorized biologist" and "qualified biologist" have the same meaning (MM 7-6).[70] The Commenter is correct that the Project would not cause the 'take' of an ESA species and no Section 7 or Section 10 permit is required.

Response to Comment A.3-7:

Please see responses to Comments A.3-3 and A.3-5.

Response to Comment A.3-8:

In order to be responsive to this and other commenters' requests for additional Project efforts to further reduce any potential adverse effects of the Project on the California condor, MM 7-6 on Draft EIR pages 5.7-177 and 5.7-178 shall be revised. Please see response to Comment A.3-3 for these revisions and further response. In regard to CC&Rs, response to Comment A.3-3 describes additional text added to MM 7-6 including the following paragraph:

> Condor Educational Curriculum - The Applicant shall provide a Condor Educational Curriculum that includes the life history of the California condor, how to identify condors, TRC hunting rules and regulations, prohibited behaviors related to condors such as hunting with lead ammunition, and the legal consequences of inadvertently or otherwise illegally shooting or harming California condors. The information will also identify types of microtrash that could be ingested by adult breeding condors and describe measures to eliminate microtrash and provide information on how to report roadkill for removal. In addition, these rules, regulations, and prohibitions shall be listed within CC&Rs.

Additionally, MM 7-15 on Draft EIR page 5.7-191 states the following: The Homeowners Association shall supply an educational pamphlet to future residents of the Project site regarding: the importance of not feeding wildlife; information stating that trash (containing food) and microtrash that could potentially attract condors should not be accessible to wildlife; the necessity of keeping the ground free of fallen fruit from trees; and instructions about not leaving pet food outside.

The comment also suggests inclusion of a requirement for using reflective building materials (i.e., cool roofs) to minimize updrafts (or thermals) that could attract soaring birds. Please see response to Comment A.3-3 for a detailed discussion on this topic with evidence indicating that potential for such an effect on soaring raptors at the Centennial project site is not expected.

Response to Comment A.3-9:

Thank you for your comment and your participation in this public process. The consideration of State-level special status species that may occur in the Project area has been noted for the

[70] *Id.,* p. 5.7-177

record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment A.3-10:

This comment provides the Commenter's contact information. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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B. State Agencies

CENTENNIAL

at TEJON RANCH

Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

June 26, 2017

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, California 90012
JSackett@planning.lacounty.gov

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR CENTENNIAL PROJECT (COUNTY PROJECT NO. 02-232, GENERAL PLAN AMENDMENT NO. 02-232, ZONE CHANGE NO. 02-232, VESTING TENTATIVE PARCEL MAP NO. 060022, CONDITIONAL USE PERMIT NO. 02-232, DEVELOPMENT AGREEMENT NO. RPPL2016003940) (SCH# 2004031072)

Dear Mr. Sackett:

The Department of Toxic Substances Control (DTSC) has reviewed the subject EIR. The following project description is stated in the EIR: "The Project site consists of approximately 12,323 acres (or approximately 19.3 square miles) and is located in the northwestern portion of the Antelope Valley in unincorporated Los Angeles County and is contiguous to the southern boundary of Kern County." The EIR further states: "The Project involves the development of a new community with residential, commercial, business park, recreational/entertainment, and institutional/civic uses. The Project includes open space, parks, schools, utilities, and infrastructure to support the proposed and uses and future residents."

Based on the review of the submitted document, DTSC has the following comments:

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be necessary to identify any recognized environmental conditions. B.1-1

2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction. B.1-2

3. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB). B.1-3

4. The EIR states: "Residential dwellings are located near the center of the northern property line (currently one residence is present and is occupied)." If planned activities include building modifications/demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials are present in onsite buildings and address as necessary to protect human health and the environment. B.1-4

5. The EIR states: "Currently, the Project site is primarily open space and ranchland. The 12,323 acres of land that comprise the Project site have primarily been used for open cattle grazing over the last 150 years. In addition to cattle grazing, the Tejon Ranch Company owns and cultivates approximately 1,000 acres in the eastern portion of the Project site as pivot fields.1 These 1,000 acres include 5 separate pivot fields that correlate with the approximately 652 acres of Prime Farmland on the site that are currently under cultivation for the production of alfalfa and three-way forage mix (e.g., barley, oats, sudan grass)." If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides. B.1-5

6. The EIR states: "Stained soil was observed in the area of the asphalt, which Tejon Ranch Company reports is planned to be removed in the future." DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from the above stained soil. B.1-6

7. The EIR states: "An inactive portion of a hunter's camp is located in the western portion of the Project site. At the time of the survey, the camp consisted of six trailers, a shooting range, and two outhouses." The shooting range may contain hazardous wastes. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from shooting range. B.1-7

8. The EIR further states: "The groundwater contamination from the Industrial Landfill Area, Diesel Pipeline Area, and Cement Kiln Dust Piles is contained in perched groundwater lying entirely within the Cement Plant site and is at a considerable distance from the Project site (approximately one mile). DTSC is unable to evaluate impact from these potential sources of contamination due to lack of relevant detailed information in the EIR. B.1-8

9. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination. B.1-9

10. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight. B.1-10

If you have any questions regarding this letter, please contact me at (714) 484-5380 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program - Cypress

ed/sh/ja

cc: See next page.

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
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Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2004031072

Responses to Comment Letter B.1
California Department of Toxic Substances Control
June 26, 2017

Response to Comment B.1-1:

Thank you for your participation in this public process. The first paragraph on page 5.3-6 of Section 5.3, Hazards and Fire Safety, of the Draft EIR under the heading "Phase I Environmental Site Assessment Results" states, "To determine the presence of and potential for hazardous materials and/or waste contamination on the Project site from existing and historic on- and off-site uses and/or from recognized environmental conditions (RECs), Phase I ESAs have been prepared, and updated where applicable, to collectively encompass the entire Project site." The applicable studies related to hazards are located in Appendix 5.3 of the Draft EIR, including a Phase I Environmental Site Assessment (ESA) prepared for the proposed Project.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH # 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hazards and fire safety can be found in these documents: Section 5.8 of the AVAP EIR, and Section 3.9 of the RTP/SCS EIR.

Response to Comment B.1-2:

Exhibit 5.3-1, "Locations of Phase I Findings," illustrates the location and name of notable Phase I ESA findings, including RECs, as well as the distribution of Phase I ESA report areas and dates. Also, all notable physical features or uses documented on the Project site at the time of each Phase I ESA are listed pages 5.3-6 to 5.3-8. Phase II ESAs were also conducted (i.e., investigation and sampling), in 1999 and in 2008, based on the results of the Phase I ESAs; the scope, methodology, and results of the two Phase II ESAs are provided under the heading "Soil Sampling" beginning on page 5.3-11. As stated in the fourth paragraph on page 5.3-19, "The Phase I ESAs determine that listed sites and/or current or historic land uses in the Project vicinity would be unlikely to adversely affect site development and the future population on the site." Specific on- and off-site land uses discussed in the Phase I ESAs are further addressed under Threshold 3-4 beginning on page 5.3-19. As discussed, MM 3-4 related to documentation of re-abandonment of the historic oil wells on site, MM 3-5 related to mine closure, and MM 3-6 related to encountering unexpected hazardous materials at the homestead area or elsewhere on the Project site would reduce potential impacts associated with these RECs to a less than significant level. These mitigation measures would be implemented as part of the Project construction. Also, past and current operations of the National Cement Plant (identified as an REC) are analyzed under this

threshold on pages 5.3-20 and 5.3-21, and the Draft EIR concludes, "there is no evidence that either historic or regular operations at the National Cement Plant or on the realigned National Cement Plant Road have or would adversely impact the Project."

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hazards and fire safety can be found in these documents: Section 5.8 of the AVAP EIR, and Section 3.9 of the RTP/SCS EIR.

Response to Comment B.1-3:

As discussed in Draft EIR Section 5.2, Hydrology and Flood, Section 5.4, Water Quality and Sections 7.3.2 and 7.3.4, Cumulative Impacts (Hydrology and Flood and Water Quality), the Project has been designed to meet or exceed the new development requirements of the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit, which was issued as an NPDES permit in 2014, and the County of Los Angeles Low Impact Development Standards Manual (LID Standards Manual) and Low Impact Development (LID) Ordinance (County Code Section 12.84), which implement the MS4 permit. As discussed in Section 5.4 and Section 7.3.4 of Draft EIR, the Project will also comply with the state Construction General Permit, the Lahontan Regional Water Quality Control Board (RWQCB) Limited Threat Discharge Permit, and the Los Angeles RWQCB General Dewatering Permit, each of which has been issued as an NPDES permit, to ensure that no violations of applicable storm water NPDES permits or other significant impacts to surface water or groundwater quality will occur during construction. The Draft EIR also notes that Project activities located within a California Department of Transportation (Caltrans) would be required to comply with the Caltrans Statewide NPDES Permit.[71] In the event a Project wastewater discharge to a storm drains requires NPDES permitting, the Project will obtain such permits from the applicable RWQCB.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project can be found in these documents: Section 5.9 of the AVAP EIR, and Section 3.10 of the RTP/SCS EIR.

[71] DRP 2017, p. 4-108

Response to Comment B.1-4:

As stated in the first paragraph on page 5.3-11, "During site reconnaissance conducted in 1999 by Converse Consultants for a previous Phase I ESA, materials potentially containing asbestos were observed on site. Four samples were taken to be analyzed for asbestos content…" Of these, three samples did not contain asbestos and one sample was asbestos-containing. Accordingly, as stated on page 5.3-20 under the heading "Homestead Area", "As part of the Project, the drums and the limited areas of identified asbestos and/or other debris in the area of the former homestead site would be removed in accordance with all applicable regulatory standards, which are determined based on the quantity, type, and media (i.e., soil, groundwater) of the identified contamination as encountered at the time of site development. If hazardous materials are encountered in the homestead area or anywhere else on the Project site, activities in the immediate area shall be halted until consultation with the appropriate agencies (e.g., DTSC, State Water Resources Control Board, Los Angeles County Fire Department [LACFD]) is performed and the method of removal is determined (MM 3-6)." "Therefore, there would be no impacts to proposed future land uses on the Project site because the limited and common type of contaminated materials that would likely be encountered on the site would be fully resolved during site development activities and prior to occupancy of future land uses. There would be a less than significant impact."

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hazards and fire safety can be found in these documents: Section 5.8 of the AVAP EIR, and Section 3.9 of the RTP/SCS EIR.

Response to Comment B.1-5:

Pesticide use is addressed in Section 5.3.2 of the Draft EIR. As stated on page 5.3-12 under the heading "Pesticide Use", "As detailed in Section 5.5, Land Resources, areas in the northeastern corner of the Project site and surrounding off-site areas have been and are currently used for agricultural purposes." As discussed elsewhere in this section, the 12,323-acre Project has primarily been used for open grazing, rather than cultivation. The pesticides used on the approximately 1,000 acres cultivated in the eastern portion of the site are listed in Table 5.3-1 on page 5.3-13. As discussed on pages 5.3-12 and 5.3-13, "all of these pesticides are listed for general use," and, "A pesticide listed for general use is considered to present little or no danger to either the applicator or the environment if it is used as directed." The 1,000 acres of pivot fields on the site under cultivation by the Tejon Ranch Company have not involved the use of "legacy pesticides" that can result in health hazards, as these areas were not under cultivation when these products were permissible. As such, pesticides are not identified as an REC in the Phase I ESAs prepared for the Project site.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hazards and fire safety can be found in these documents: Section 5.8 of the AVAP EIR, and Section 3.9 of the RTP/SCS EIR.

Response to Comment B.1-6:

This comment's referenced quote refers to an area near the northern portion of the site that was identified during site reconnaissance for the Phase I ESAs, and which the Tejon Ranch Company reported was planned to be removed.[72] As of August 2017, the asphalt debris and surface soil was removed by a professional waste disposal company for off-site transport and disposal at an appropriate location[73,74]; therefore, this observation from the Phase I ESAs would not impact development of the Project site.

In response to this comment, the following documents are added to the administrative record:

Keith, N. 2017a (August 10). Personal communication. Telephone correspondence from N. Keith (Tejon Ranch Company) and J. Neary (Psomas) regarding the disposition of the debris and soil identified in the Phase I ESAs and planned for removal subsequent to Draft EIR publication.

Keith, N. 2017b (October 3). Personal communication. Telephone correspondence from N. Keith (Tejon Ranch Company) and J. Neary (Psomas) regarding the method or removal for the debris and soil identified in the Phase I ESAs.

Response to Comment B.1-7:

The location of the former hunter's camp is in an Open Space-designated area to the northeast of the development footprint. The camp site has never been accessible to the general public or available for commercial use. At present, there are no structures or other improvements at the former camp site. Because this site is located in an Open Space-designated area, it would not be developed as part of the Project, nor would it be accessible to the general public for passive recreational or other uses. Therefore, there is not necessity

72 DRP 2017, p. 5.3-6

73 Keith, N. 2017a (August 10). Personal communication. Telephone correspondence from N. Keith (Tejon Ranch Company) and J. Neary (Psomas) regarding the disposition of the debris and soil identified in the Phase I ESAs and planned for removal subsequent to Draft EIR publication.

74 Keith, N. 2017b (October 3). Personal communication. Telephone correspondence from N. Keith (Tejon Ranch Company) and J. Neary (Psomas) regarding the method or removal for the debris and soil identified in the Phase I ESAs.

to investigate the former shooting range, as there would not be public exposure to this area as a result of the proposed Project. Moreover, the Phase 1 Environmental Site Assessment prepared for this Project site evaluated the environmental condition of the hunter's camp site and determined that the camp revealed no evidence of recognized environmental conditions.

Response to Comment B.1-8:

Relevant information pertaining to the remediation activities of source areas at the National Cement Plant are described on pages 5.3-9 and 5.3-10 of the Draft EIR, as follows (emphasis added):

> "The National Cement Plant—also known as the Los Robles Cement Plant—is located in Kern County approximately one mile north of the Project site; its location is shown on Exhibit 5.3-1. Raw materials quarried at the site are the primary ingredients in Type II Portland Cement. During the 1990s, several locations were discovered where on-site cement manufacturing operations and waste handling practices had, over the years, impacted the quality of soil and groundwater on the Cement Plant site. The waste discharge sources of the Cement Plant site include solid waste disposal to on-site landfills located to the east of the plant structures; liquid waste storage in a belowground waste oil tank located at the southeastern portion of the plant; chemical storage at a drum storage area in the plant's maintenance area at the southeastern portion of the plant; diesel fuel transfer in an underground pipeline in the plant operating area; and cement kiln dust disposal in large piles located to the west of the plant structures. These source areas are commonly referred to as "the Industrial Landfill Area", "the Maintenance Shop Area" (combines the Waste Oil Tank Area and the Drum Storage Area), "the Diesel Pipeline Area", and "the Cement Kiln Dust Piles", respectively. The Cement Plant is not a State or federal Superfund site.
>
> Each source area has undergone specific site-characterization processes to identify the nature and extent of the unauthorized releases. In each source area, the known cause of the unauthorized release has been removed, as required by the regulatory agency with oversight authority. However, in some source areas, approved levels of contaminants remain in the soil. In addition, groundwater quality beneath all source areas was impacted to varying degrees. As a result, the California Regional Water Quality Control Board, Lahontan Region (Lahontan RWQCB) has issued waste discharge requirements (WDRs) and/or cleanup and abatement orders (CAOs) for each of these source areas that required installation of groundwater treatment systems; that prescribe groundwater monitoring in order to ascertain the rate at which pollutant levels are declining; and that allow for corrective action (where necessary) based on the monitoring results to clean up contaminated groundwater.

The groundwater contamination from the Maintenance Shop Area had migrated at shallow depths off the Cement Plant site and under parts of Tejon Ranch adjacent to the southeastern corner of the Cement Plant site. To address groundwater contamination under Cleanup and Abatement Orders 6-90-59A3 and 6-94-90A3, a long-term groundwater pump and treatment system went into operation in July 2003. Quarterly Groundwater Monitoring Reports are prepared for the Lahontan RWQCB (copies of which are available with the County of Los Angeles Department of Regional Planning) to demonstrate containment of the plume and to track the success level in remediating the contaminants of concern (primarily halogenated volatile organic compounds [HVOCs]). Groundwater that is treated to potable water standards is now intermittently discharged into the incised channel in approximately the same area where the groundwater previously discharged naturally. Since the implementation of this groundwater treatment system, HVOCs have not been detected in the surface waters of the incised channel. It is noted that, prior to implementation of the treatment system, the HVOCs were detected at low concentrations and for a short distance before they volatilized. Therefore, this source area poses no threat to the Project site because the limits of surface and groundwater contamination are distant from the Project site and its water supply sources.

The groundwater contamination from the Industrial Landfill Area, Diesel Pipeline Area, and Cement Kiln Dust Piles is contained in perched groundwater lying entirely within the Cement Plant site and is at a considerable distance from the Project site (approximately one mile). There is no connection between the affected groundwater and the groundwater sources available to the Project site.

The Lahontan RWQCB is also the lead oversight agency for ongoing and future environmental activities at the Cement Plant to monitor groundwater quality and required remediation activities. The Lahontan RWQCB works closely with the responsible parties (with the former and current owners of the Cement Plant that have active responsibilities, and the property owner who has backup liability) to ensure that all environmental concerns are adequately identified and addressed in a timely manner. The CAOs charge the responsible parties with long-term remediation and containment actions to clean up and abate the effects of unauthorized waste discharges. The WDRs establish the discharge limitations for the constituents of concern (COC) and outline the monitoring and reporting requirements."

Further, the analysis of Threshold 3-4 under the header "National Cement Plant" on page 5.3-20 states (emphasis added):

"As discussed in detail previously, the National Cement Plant is located in Kern County approximately one mile north of the Project site (Exhibit 5.3-1), and groundwater contamination had resulted from historic activities of this

> facility. Accordingly, there has been agency oversight by DTSC and the Lahanton RWQCB (lead oversight agency) related to continuing remediation efforts. **As described fully above in the Environmental Setting section, the contaminant source areas pose no threat to the Project site and its water supply sources due to distance; lack of connectivity between the shallow groundwater impacted by historic releases and Tejon Ranch water supplies; and the results of ongoing groundwater remediation.** Finally, as part of the Water Quality Technical Report prepared for the Project, the National Cement Plant was reported to have been in compliance with regulatory permitting and related requirements (Geosyntec 2016). Further, in March 2007, the DTSC issued a closure letter for the Systech site, which indicated to the Tejon Ranch Company that the Systech site had been fully remediated (DTSC 2007). Therefore, this land use would result in no impacts to the Project site."

As indicated above and supported by detailed information and sources in the Draft EIR, due primarily both due distance (approximately one mile) and the perched/shallow location of impacted groundwater at this distance, the contamination being actively treated and monitored at the Cement Plant poses no impact to the Project site. Because this comment does not raise a specific concern regarding the facts presented or resultant findings of the Draft EIR with regard to groundwater contamination at the National Cement Plant, no further response is required.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH # 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hazards and fire safety and hydrology and water quality can be found in these documents: Sections 5.8 (Hazards and Hazardous Materials) and 5.9 (Hydrology and Water Quality) of the AVAP EIR, and Sections 3.9 (Hazards and Hazardous Materials) and 3.10 (Hydrology and Water Quality) of the RTP/SCS EIR.

Response to Comment B.1-9:

Disposal of contaminated media is not always the appropriate remedial action, based on site-specific factors. As discussed in response to Comment B.1-4 above, MM 3-6 would be implemented in the event that unanticipated hazardous materials or waste is encountered and directs that coordination with applicable oversight agency(ies) be conducted and that all investigation and/or remediation be conducted pursuant to a Workplan approved by the primary oversight agency(ies). The purpose of this mitigation measure is to encompass all eventualities for unexpected contamination and ensure it is appropriately handled on a case-

by-case basis. As such, MM 3-6 is consistent with the guidance provided in this comment, as shown:

MM 3-6 If unanticipated hazardous materials or waste is encountered during construction, all work in the immediate vicinity of the suspect hazardous material shall be halted and the applicable oversight agency(ies) shall be notified. The applicable agency(ies) are determined based on the type and extent of the material encountered, and may include the California Department of Toxic Substances Control (DTSC), the State Water Quality Control Board, and/or local agencies, such as the County of Los Angeles Fire Department. The Project Applicant/Developer shall coordinate with appropriate agency(ies) on the appropriate means to address the suspect hazardous material/waste. All environmental investigation and/or remediation shall be conducted under a Workplan approved by the primary oversight agency(ies) and construction in the affected area shall not proceed until clearance has been issued by the applicable agency(ies).

As discussed in the first paragraph in Section 4.5.17, "Grading and Construction," "Grading for one phase with an approved tentative tract map may extend into adjacent phases that may or may not be covered by an approved tentative tract map and require the import or export of soils among phases, but earthwork within the Project boundary would achieve an overall earthwork balance." Therefore, Project implementation would not require off-site import of soil to backfill excavated areas. Encountering hazardous materials in on-site materials during excavation activities is addressed by MM 3-6.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hazards and fire safety can be found in these documents: Section 5.8 of the AVAP EIR, and Section 3.9 of the RTP/SCS EIR.

Response to Comment B.1-10:

As discussed in Section 5.3, Hazards and Fire Safety, MM 3-6 requires that if unanticipated hazardous materials or waste is encountered during construction, including in soil or groundwater, all work in the immediate vicinity of the suspect hazardous material must be halted and the applicable oversight agencies must be notified based on the type and extent of the material encountered. The oversight agencies include the California Department of Toxic Substances Control, the State Water Quality Control Board, and/or local agencies, such as the County of Los Angeles Fire Department. MM 3-6 requires that the Project coordinate with the oversight agencies to identify the appropriate means to address any suspect

hazardous material or waste, and that all environmental investigation and/or remediation must be conducted under a work plan that is approved by the primary oversight agency. MM 3-6 provides that all construction in an area affected by the encounter of unanticipated hazardous materials or waste will not continue until clearance has been issued by the applicable agencies. Consequently, MM 3-6 addresses the requirements and process for unanticipated hazardous materials or waste encounters, including contaminated soil or groundwater, during construction or demolition as discussed in the comment. Because the type and scope of any unanticipated soil and/or groundwater contamination cannot be known in advance, and the appropriate agency(ies), investigation, and remediation is based on site-specific factors, MM 3-6 is intended to encompass all eventualities for unexpected contamination and ensure it is appropriately handled on a case-by-case basis. Please refer to response to Comment B.1-9 with regard to soil contamination. With regard to groundwater contamination, there are no known sources of groundwater contamination on or near the site that would affect water resources for the proposed Project. Please refer to response to Comment B.1-8 for discussion of shallow (perched) groundwater contamination on the National Cement Plant property.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hazards and fire safety can be found in these documents: Section 5.8 of the AVAP EIR, and Section 3.9 of the RTP/SCS EIR.

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STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY
EDMUND G. BROWN JR., Governor

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

July 10, 2017

County of Los Angeles
Department of Regional Planning
Attn: Samuel Dea
320 West Temple Street
Los Angeles, California 90012

Draft Environmental Impact Report for the Proposed Centennial Project, Community of Gorman, Los Angeles County, Southern Field Division, West Branch of California Aqueduct Milepost 4.0, SCH2004031072

Dear Mr. Dea:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Proposed Centennial Project within the County of Los Angeles. The document describes a proposal by the Tejon Ranch Company to develop 19,333 residential units, in addition to business parks, commercial use spaces and institutional/civic structures and spaces within approximately 12,323 acres east of Interstate Route 5. The project is located approximately 25 miles north of the Community of Castaic. The Department of Water Resources' (DWR) West Branch California Aqueduct (Aqueduct), a part of the State Water Project (SWP), is located within the project boundaries on the north side of Hwy 138. B.2-1

DWR responded with comments to the 2015 Notice of Preparation (NOP) for this project in an October 30, 2015 letter to your office. Our letter does not appear within the State Agency comments appendix of the DEIR. We have enclosed a copy of our original comment letter and we reiterate the concerns addressed in the letter. Tejon Ranch Company will be required to comply with any and all provisions of Water Code Section 12899-12899.11 or California Code of Regulations, Title 23, Section 630-635 regarding encroachments within, or affecting, the SWP right-of-way. B.2-2

In addition to our earlier comments on the NOP, which need to be addressed in the DEIR, DWR has amended wildlife comments after reviewing the DEIR. This includes, but is not limited to, analysis and implementation of a buffer of natural habitat between the development and DWR right-of-way wide enough to prevent impacts to DWR maintenance and repair work during nesting bird season; and the addition of wildlife overpasses that begin and end outside DWR right-of-way. B.2-3

Buffers should take into consideration standard requirements by California Department of Fish and Wildlife for nesting raptors. Overpasses dedicated to wildlife movement will reduce the risk to DWR personnel from vehicle collision with large mammals, reduce the risk of accidents trying to avoid hitting wildlife, reduce the risk of animals hit by vehicles on bridges from falling into the Aqueduct, and prevent an increase in wildlife being trapped in the Aqueduct while trying to access open space. B.2-4

As indicated in our previous letter, portions of this project may require the issuance of an encroachment permit from DWR. B.2-5

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available for public review. Any future correspondence relating to this proposed project shall be directed to:

Leroy Ellinghouse, Chief
SWP Right-of-Way Management Section
Division of Operations and Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-1
Sacramento, CA 95814

B.2-6

If you have any questions, please contact Scott Williams at (916) 653-5746, or Leroy Ellinghouse of my staff at (916) 653-7168.

Sincerely,

for David M. Samson, Chief
State Water Project Operations Support Office
Division of Operations and Maintenance

Enclosure

cc: Tejon Ranch Company
4436 Lebec Road
Tejon Ranch, California 93243

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY
EDMUND G. BROWN JR., Governor

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

October 30, 2015

Samuel Dea
Special Projects Section
Department of Regional Planning
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Revised Notice of Preparation, Centennial Project, East of the Community of Gorman, North of Quail Lake, Los Angeles County, Southern Field Division, SCH2004031072

Dear Mr. Dea:

Thank you for the opportunity to review and comment on the Revised Notice of Preparation (NOP) of the Centennial Project (Project) located in an unincorporated area north of Quail Lake and south of Tehachapi Afterbay in Los Angeles County. The Project includes development of 12,323-acre master planned community with residential, business park, commercial, civic and institutional, and recreation and entertainment uses within the privately-owned Tejon Ranch. Community infrastructure facilities that will serve the Project include construction of wastewater reclamation facilities, water treatment facility, water bank, and materials recovery facility. A new bridge crossing over the West Branch of the California Aqueduct (Aqueduct) is also proposed in the Project. B.2-7

The Notice of Preparation of the Project was originally submitted in 2004 and is revised to include reduction in development area and no development in the northwest area of the Project site.

California Department of Water Resources (DWR) has concerns about the Project at the following areas:

Biological Resources

DWR personnel conduct routine maintenance and repairs adjacent to the Project. DWR requests impacts to wildlife that cause migration into DWR right-of-way be analyzed as nesting birds and special-status species relocating into DWR right-of-way will impact our ability to maintain and improve State Water Project (SWP) facilities. Nesting birds, including ground nesting raptors, and special status species moving into DWR right-of-way due to loss of habitat would likely require DWR having to consult with wildlife control agencies in order to perform the routine maintenance and repair. Movement of B.2-8

wildlife into DWR right of way has the potential to stop work until take permits are secured, whereas prior to development no take permits were required. B.2-8 cont.

Antelope, deer, and badgers are often seen in the area of the Project. Movement of wildlife species into the DWR right-of-way could result in increased accidents with large mammals and road kill. The environmental impact report (EIR) shall address wildlife movement caused by the Project. Page 6 of the NOP states that the Aqueduct is a barrier to wildlife movement; however, many species have been observed finding ways to cross the Aqueduct and an increased number of bridges along the Aqueduct could promote crossings by wildlife. B.2-9

Hydrology and Water Quality

Two golf courses are planned for each side of the Aqueduct. Golf courses traditionally use fertilizers and pesticides for maintenance. Fertilizers and pesticides could have a major impact on water quality to the California Aqueduct. Impacts to water quality caused by maintenance of the golf courses and project drainage need to be addressed in the EIR. In addition, the Project will increase use of fertilizers and pesticides used by residents. Fertilizers and pesticides could have a major impact on water quality to the California Aqueduct. Impacts to water quality caused by residential use need to be addressed as well. B.2-10

The Project also has the potential to increase the risk of household chemicals and hydrocarbons entering the Aqueduct. Improper disposal of motor oil and household chemicals is a recognized problem in many California communities and may have a significant impact to the Aqueduct as a result of the Project. Impacts to water quality of the Aqueduct shall be addressed. B.2-11

New bridge development and improvements to existing bridges over the Aqueduct have the potential to impact water quality during construction. Impacts to water quality due to construction shall be addressed. B.2-12

Drainages need to be designed to avoid the California Aqueduct, and must be specifically discussed in the EIR. B.2-13

The Project would be located adjacent to the California Aqueduct and Quail Lake. In addition, the western portion of the Project site is located within the watershed of Gorman Creek, which drains to Pyramid Lake. The EIR should evaluate whether the Project would cause erosion and introduce sediment into the Aqueduct or Quail Lake, and whether the Project would cause other pollutants to flow into these waters or B.2-14

Gorman Creek. Introduction of sediment into the SWP system could reduce the capacity of the SWP water storage and conveyance facilities, damage SWP mechanisms, and/or require DWR to perform additional, unnecessary, and potentially costly maintenance on the SWP facilities. Also, introduction of sediment and other pollutants into the SWP system could impair the quality of the water transported by the SWP. B.2-14 cont.

Geology and Soils

Ground subsidence due to overdraft of ground water is a problem that impacts canals throughout California. Ground subsidence near the Project could cause impacts to the Aqueduct that may result in the need to increase maintenance or call for major repairs. Groundwater use and overdraft prevention shall be addressed in the EIR document. B.2-15

Some portions of the Project would be built in close proximity to SWP facilities. The EIR should evaluate whether the Project would affect the geology and/or soils in the vicinity of the SWP facilities in a manner that would impair the geological stability of the SWP or the quality of the water flowing through the SWP. B.2-16

Hazards

The Project would be located near several SWP facilities, most of which are closed to the public for safety and infrastructure security reasons. The Project would substantially increase the number of people living, working, shopping, recreating, and otherwise visiting the Project area. The EIR should evaluate whether the Project would substantially increase the potential for public safety hazards (e.g., drowning), vandalism, or infrastructure security concerns attributable to the proposed population increase near the SWP. The Project should be designed to discourage and prevent unauthorized access to SWP facilities. B.2-17

The EIR should also evaluate the potential for the Project to introduce hazardous materials (e.g., construction fuels and chemicals) onto SWP land and into the water carried by the system. B.2-18

Land Use

The Project would be located adjacent to the California Aqueduct and Quail Lake. The Project should be designed to avoid unauthorized encroachment onto SWP facilities and to not interfere with DWR's ability to access and maintain the SWP. If the Project encroaches onto land owned or managed by DWR (e.g., the proposed access road, bridges, and water pipeline), the Project sponsor should coordinate with DWR during B.2-19

the early stages of the planning process about securing authorization for the encroachment(s).

Any construction activity in the vicinity of the California Aqueduct may require an encroachment permit issued by DWR. Information regarding regulations and forms for submitting an application for an encroachment permit to DWR can be found at:

http://www.water.ca.gov/engineering/Services/Real_Estate/Encroach_Rel/

B.2-19 cont.

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available for public review. Any future correspondence relating to this proposed project shall be sent to:

Leroy Ellinghouse, Chief
SWP Encroachments Section
Division of Operations and Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-2
Sacramento, California 95814

If you have any questions, please contact Leroy Ellinghouse, Chief of the SWP Encroachments Section, at (916) 653-7168 or Jonathan Canuela at (916) 653-5095.

B.2-20

Sincerely,

David M. Samson

David M. Samson, Chief
State Water Project Operations Support Office
Division of Operations and Maintenance

cc: State Clearinghouse
Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, California 95814

Responses to Comment Letter B.2
Department of Water Resources
July 10, 2017

Response to Comment B.2-1:

Thank you for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment B.2-2:

The DWR comment letter was received by the County. It was erroneously left out of the document during the printing process. Please find a response to your agency's Notice of Preparation (NOP) letter in responses to Comments B.2-8 through B.2-20.

Response to Comment B.2-3:

Although the project includes a buffer between development and the DWR right-of-way, where feasible, not all areas are buffered. However, there is no reasonable expectation that development of adjacent areas will increase the nesting bird restrictions on DWR right-of-way maintenance activities. Birds likely to nest within developed areas are typically extremely common species with high tolerance for disturbance. As such, nesting buffer restriction for these species would likely be minimal and DWR maintenance activities are not likely to be affected. Wildlife overpasses are not currently part of the proposed project; however, the applicant has committed to exploring opportunities and working with DWR for a crossing, if feasible.

Response to Comment B.2-4:

The standard CDFW nesting raptor buffer distance is 500 feet. As described in the response to Comment B.2-3, Project development is not expected to increase nesting bird, including raptors, restrictions on DWR right-of way activities due to the limited buffers expected for species typically nesting in developed areas.

Response to Comment B.2-5:

The Project has been designed to avoid unauthorized encroachment onto State Water Project (SWP) facilities. The Project shall not encroach onto land owned or managed by DWR (e.g. proposed access roads, bridges, and water pipeline) without first acquiring the appropriate encroachment permit.

Response to Comment B.2-6:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment B.2-7:

The Notice of Preparation (NOP) comment letter from DWR has been included in Appendix 2.0-A of the Draft EIR. Responses to the NOP comment letter are provided below. This comment summarizes the Project description described in the NOP. Please see Section 4.0, Project Description, of the Draft EIR for a description of the Project analyzed in the Draft EIR.

Response to Comment B.2-8:

The Project includes a buffer between development and the DWR right-of-way where feasible. As explained in the Draft EIR, under existing pre-Project conditions, the California Aqueduct substantially reduces the permeability of the linkage for many wildlife species, though it remains functional for many species to some degree.[75] Oso Canyon and its many tributaries west of the Aqueduct and the east-west-oriented drainages that are located east of the Aqueduct undoubtedly are used by some animals as local travel paths as they move across their home range areas on the Project site; however, the Aqueduct serves to block east-west movement on the Project site for most ground-dwelling wildlife. Limited opportunities for wildlife to cross the Aqueduct have been identified at four locations, but wildlife movement across that formidable barrier is probably a rare event.[76]

Under Project conditions, there is no reasonable expectation that development of adjacent areas will increase the nesting bird and special status species restrictions on DWR right-of-way maintenance activities. Fencing along the DWR right-of-way and the lack of suitable habitat in the right-of-way would preclude wildlife from relocating into the right-of-way. Project development along the Aqueduct would reduce the potential for birds and special status species to be present on the site near the Aqueduct. Thus, it is unlikely for migratory birds, raptors and special status species to be present on the site so as to restrict DWR activities on their right-of-way. Birds that are likely to nest within developed areas of the site are typically extremely common species with a high tolerance for disturbance. As such, nesting buffer restrictions for these species would likely be minimal. In addition, open space areas with more suitable habitat would be provided near the DWR right-of-way at the northwestern section of the site, which may serve as habitat for wildlife species that would be displaced by the Project. Thus, the presence of common species on the developed portions of the site would not affect DWR maintenance and repair activities at the Aqueduct.

Response to Comment B.2-9:

Wildlife movement is addressed on pages 5.7-50 through 5.7-64 in Section 5.7, Biological Resources, of the Draft EIR. Under existing pre-Project conditions, the California Aqueduct substantially reduces the permeability of the linkage for many wildlife species, though it remains functional for many species to some degree.[77] Oso Canyon and its many tributaries west of the Aqueduct and the east-west-oriented drainages that are located east of the

75 DRP 2017, p. 5.7-62
76 *Id.*, p. 5.7-63
77 *Id.*, p. 5.7-62

Aqueduct undoubtedly are used by some animals as local travel paths as they move across their home range areas on the Project site; however, the Aqueduct serves to block east-west movement on the Project site for most ground-dwelling wildlife. Limited opportunities for wildlife to cross the Aqueduct have been identified at four locations, but wildlife movement across that formidable barrier is probably a rare event.[78] Moreover, the majority of the site is open grassland and does not support the forest and shrub cover that many larger, wide-ranging species tend to use during movement episodes.[79] Thus, the risk of accidents with large mammals and road kill on the Project site is unlikely.

The Draft EIR's biological resources analysis indicates that significant impacts to wildlife movement and general wildlife habitat would result from implementing the Project but these impacts would be reduced to less than significant levels with implementation of MM 7-14 through MM 7-18 on pages 5.7-190 through 5.7-193. A bridge over the West Branch of the California Aqueduct is proposed by the Project[80] and PDF 7-7[81] states that the Project Applicant will explore locating a wildlife-friendly crossing across the Aqueduct. However, this crossing will have to be approved by the County and DWR (as the agency with jurisdiction over of the Aqueduct). As discussed in response to Comment B.2-8, however, fencing along the DWR right-of-way and the lack of suitable habitat in the right-of-way would preclude wildlife from relocating into the right-of-way.

Response to Comment B.2-10:

Impacts related to fertilizer and pesticide is addressed in Section 5.4, Water Quality, and Section 5.7, Biological Resources, of the Draft EIR. The impact of fertilizer and pesticide use associated with golf courses on protected wetlands is addressed on page 5.7-164. The Draft EIR determined that this impact would be less than significant with implementation of Project Design Features and mitigation measures, including PDF 7-6[82] and MM 7-22,[83] which requires the Project Applicant/Developer to prepare a Golf Course Management Plan that requires any golf course developed on the site to be built and managed in accordance with the Audubon Cooperative Sanctuary Program for Golf Courses (or equivalent).[84] This program is a cooperative effort between the United States Golf Association and Audubon International that is designed to promote ecologically sound land management and to conserve natural resources.

Impacts on water quality due to fertilizer and pesticide use by development on the site are also addressed in Section 5.4, including pages 5.4-33, 5.4-77 through 5.4-79. The Draft EIR determined that this impact would be less than significant with implementation of MMs 4-1 and 4-2.

78 *Id.*, p. 5.7-63
79 *Id.*, p. 5.7-165
80 *Id.*, pp. 4-41, -42
81 *Id.*, p. 5.7-139
82 *Ibid*.
83 *Id.*, p. 5.7-194
84 *Id.*, p. 5.7-164

As required by MM 4-2, the Project will implement an Integrated Pest Management (IPM) program consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and the Natural Resources Statewide Integrated Pest Management Program. The IPM program will prevent or suppress pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and judicious use of pesticides. Pesticide best management practices (BMPs) will be implemented to promote safety (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); compliance with regulatory requirements; spill mitigation; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation (CDPR). Pesticides are subject to degradation and vary in their ability to eradicate pests. Some pesticides break down almost immediately into nontoxic byproducts, while others can be active for longer periods of time. Pesticides that degrade rapidly are less likely to adversely affect non-targeted organisms. In some instances, longer-lasting pesticides are preferable if fewer applications or smaller amounts of pesticide use are required to control pests. The proper amount and frequency of pesticide use will be addressed in the IPM program.

Pesticide loads and concentrations in Project runoff will be reduced by the regional and distributed low impact development BMPs required by MM 4-1. An IPM program that will reduce pesticide requirements by controlling pests with nontoxic measures will be implemented in accordance with MM 4-2 and will ensure that unavoidable pesticide use will be managed to minimize impacts to surface and groundwater. Compliance with MM 4-1 and MM 4-2 will be reconfirmed in drainage and landscape plans to be submitted to the County with each Project tract map application. All Project pesticide use will comply with applicable laws and regulations, including USEPA and CDPR pesticide use limitations. As a result, the Project would result in less than significant impacts related to pesticides.

Potential hydrology and flood impacts to Quail Lake, including runoff from golf course areas, are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake watershed, which includes the lake. Consequently, no runoff from Project developed areas will flow to or occur within Quail Lake and the Quail Lake drainage and watershed will not affect the hydrology, flood or water quality conditions in the lake and the lake's watershed and drainage system.

The Project will also avoid impacts to California Aqueduct water quality. As discussed on Draft EIR pages 5.4-73 through 5.4-74 the wastewater reclamation facilities (WRFs) must comply with Title 22 of the *California Code of Regulation,* the California Porter-Cologne Act, and the Lahontan Basin Plan's surface and groundwater quality objectives. Waste Discharge Requirements (WDRs) issued by the Lahontan Regional Water Quality Control Board will require the Project to include design features, such as berms, levees, spill containment

features, and other topographical elevation features, to protect the WRFs during large flood events and to protect adjacent properties under any emergency conditions. As shown on Exhibit 4-14 in the Draft EIR, there are no sewer pipelines or force mainlines that would cross over the State Water Project (SWP) Aqueduct; therefore, there is no risk of sewer line rupture over the SWP Aqueduct. In addition, the California Aqueduct contains a levee system that protects its waters from stormwater flooding or other surface flows and the aqueduct channel is constructed with cement and other impervious materials. Consequently, Project runoff, groundwater recharge, discharge from the WRFs or any other activities that could affect surface and groundwater quality will not affect water quality in Quail Lake or in the California Aqueduct.

Response to Comment B.2-11:

Drainage issues are discussed in Section 5.2, Hydrology and Flood, and Section 5.4, Water Quality, of the Draft EIR. As stated on page 5.2-17, approximately 88 percent of the proposed development would occur east of the West Branch of the Aqueduct, where flows are toward the north and northeast. Stormwater flows from areas west of the West Branch of the Aqueduct are conveyed under the Aqueduct via existing culverts. The existing flow patterns associated with larger tributary systems would be largely maintained by the Project and no direct stormwater discharges to the Aqueduct will occur. In addition, the Project includes 28 regional retention and detention basins to maintain runoff flow rates and volumes at pre-development conditions to avoid downstream hydromodification impacts, in accordance with the County's Low Impact Development Standards Manual. These basins would also provide stormwater treatment and pollutant removal from runoff flows. Section 5.4, Water Quality, of the Draft EIR addresses potential storm water pollutants, including chemicals and petroleum hydrocarbons, and PDF 4-1[85] and MM 4-1[86] would retain storm water flows within the development sites to meet water quality and hydrology and hydromodification standards. These measures would prevent changes in existing rates, volumes and stormwater quality of off-site flows and ensure that related Project impacts are less than significant.

Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations, shows the locations of the proposed development areas and the 28 regional detention and retention basins that comprise the primary hydromodification and hydrology best management practices (BMPs) that will be implemented for the Project. As discussed in Draft EIR Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, the Project will avoid most of the watercourses and watershed areas in the Gorman Creek, Quail Lake, and Oso Creek Drainage Areas. Approximately 18 percent of the proposed development would occur west of the West Branch of the Aqueduct, and drainage impacts in this area would primarily affect Oso Creek tributaries flowing north from the south side (i.e., the northerly face) of Oso Canyon. Drainage impacts in the Gorman Creek Drainage Area would largely be avoided and no drainage impacts will occur in the Quail Lake Drainage Area. Approximately 88 percent of the proposed development would occur east of the West Branch of the Aqueduct. As

85 DRP 2017, pp. 5.4-29, 30
86 *Id.,* p. 5.4-90

discussed in Draft EIR Section 5.7 (specifically, Threshold 7-3), and as shown in Exhibit 5.2-4, Proposed Infiltration Basin Locations, 18 of the proposed regional detention and retention basins will be located to the east of the Aqueduct. Smaller drainages in this location would generally be integrated with the Project's storm drain system. Flow patterns associated with several existing larger tributary systems, including the East Tributary systems and the Cow Spring Canyon, Horse Camp Canyon, the 300th Street Tributary systems, will largely be maintained by avoiding or constructing flow controls in existing channels or by recreating existing channels after site grading. Flow, low impact development (LID), and hydromodification management facilities (e.g., detention and retention basins) will be constructed adjacent to channels, primarily in downstream reach locations. None of the basins or runoff channels will discharge to the Aqueduct. The California Aqueduct contains a levee system that protects its waters from stormwater flooding or other surface flows and the aqueduct channel is constructed with cement and other impervious materials. Consequently, Project development area runoff will not directly flow into or indirectly affect (e.g., by groundwater infiltration) water quality in the California Aqueduct.

Pages 5.4-73 through 5.4-74 discuss the potential impacts of the two proposed water reclamation facilities (WRFs) to surface water bodies and the regulations and mitigation measures that would be implemented to prevent significant adverse impacts. The WRFs would include design features required by the Lahontan Regional Water Quality Control Board, such as berms, levees, spill containment features, and other topographical elevation features, to protect the WRFs during large flood events and to protect adjacent properties under any emergency conditions. As shown on Exhibit 4-14 in the Draft EIR, there are no sewer pipelines or force mainlines that would cross over the Aqueduct; therefore, there is no risk of sewer line rupture over the Aqueduct that may affect water in the Aqueduct. In addition, the Aqueduct contains a levee system that protects its waters from stormwater flooding or other surface flows. Thus, proposed development and the WRFs are not expected to have any adjacency impacts to the Aqueduct.

Section 5.3.2, Hazards and Hazardous Materials, discusses the disposal of hazardous materials in accordance with existing regulations during construction and long-term operation. Implementation of the Project would result in the on-site handling of hazardous materials that are common in urban environments. This includes the development of residential land uses, at varying densities, along with commercial/retail, business park, education, utility, and institutional/civic land uses. The materials that would be expected to be used on the Project site include commercial cleansers, solvents, and other janitorial or industrial-use materials; paints; landscape maintenance materials; pressurized gases; chlorine for pools; petroleum products at gas stations; and others. The handling, storage, and usage of these materials would be subject to applicable local, State, and/or federal regulations. In addition, any hazardous materials used during construction would also be transported, used, stored, and disposed of according to any applicable local, State, and/or federal regulations. In addition, as stated in MM 17-10 on page 5.17-34, the Project shall incorporate the Solid Waste Management Plan that would divert hazardous waste, electronic waste, and universal waste from the waste bin and provide seasonal pickup (at least two times a year) for household hazardous wastes and less commonly disposed materials (such

as electronics and appliances). This would prevent improper disposal of wastes at the Aqueduct and ensure that related Project impacts are less than significant.

Consequently, Project development, including runoff and the operations of the two WRFs, will not affect California Aqueduct water quality.

Response to Comment B.2-12:

Proposed Aqueduct crossings will not include any wastewater lines to avoid potential water quality impacts from the failure of any such facilities. The Project would require four crossings of the California Aqueduct, including the wellhead pipeline crossing of the East Branch of the Aqueduct. As discussed in Draft EIR Section 4.8.2, Responsible and Trustee Agencies, the Project would require an Encroachment Permit from the California Department of Water Resources (DWR) for the new and expanded bridge crossings of the Aqueduct and for the crossing of potable and recycled water pipes. The pipelines may extend over or under the Aqueduct, depending on DWR's requirements and the specific engineering conditions at each crossing location.

As requested by the Lahontan Regional Water Quality Control Board (Comment D.3), MM 2-4 has been added to the Draft EIR to clarify that all Project construction will comply with the California General Construction Permit issued by the State Water Resources Control Board (CAR000002, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-0006-DWQ) (Construction General Permit). Project compliance with the General Construction Permit is also discussed in the second paragraph of page 5.2-2, the second full paragraph on page 5.2-25, and first full paragraph on page 5.2-26 in Section 5.2, Hydrology and Flood.[87] In addition, in response to requests from the Lahontan Regional Water Quality Control Board, MMs 2-4, 2-5, 3-10, 4-3, 4-4, 19-2, 19-6, and 19-7 have been added to the Draft EIR to further protect construction period and post-construction water quality.

Construction impacts on water quality are analyzed on pages 5.4-53 through 5.4-57 and pages 5.4-67 through 5.4-68 in Section 5.4, Water Quality, of the Draft EIR. The Construction General Permit requires the implementation of best management practices (BMPs) to reduce pollutants in the stormwater during the construction activities, as discussed on pages 5.4-7 through 5.4-9. Project compliance with the Construction General Permit (new MM 2-4) would ensure that construction period Project impacts, including to Aqueduct water quality from bridge construction, would be reduced to a less than significant level. Please also see response to Comment D.3-8.

Response to Comment B.2-13:

The Drainage Plan for the Project is discussed on pages 4-62 through 4-63. Draft EIR Exhibit 4-16, Centennial Project – Conceptual Drainage and Flood Control System, shows that no new drainages are proposed over or under the Aqueduct. As stated on page 5.2-17, the existing flow patterns on the site associated with larger tributary systems would be largely maintained by the Project and flows under the Aqueduct would be through existing

[87] DRP 2017, pp. 5.4-7 to -9; 5.4-50 to -56; 5.4-67 to -68; 5.4-71; and 5.4-74 to -76

culverts. As stated on page 5.2-33, runoff from new impervious surfaces related to intersection improvements along State Route 138 (SR-138), utility connections, and Aqueduct crossings would be controlled and distributed to parcel-specific low impact (LID) facilities or to the proposed regional detention and retention basin system. The on-site basins would control runoff flow rates and volumes, as well as treat stormwater to meet County LID standards.[88]

Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations, shows the locations of the proposed development areas and the 28 regional detention and retention basins that comprise the primary hydromodification and hydrology best management practices (BMPs) that will be implemented for the Project. As discussed in Draft EIR Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, the Project will avoid most of the watercourses and watershed areas in the Gorman Creek, Quail Lake, and Oso Creek Drainage Areas. Approximately 18 percent of the proposed development would occur west of the West Branch of the Aqueduct, and drainage impacts in this area would primarily affect Oso Creek tributaries flowing north from the south side (i.e., the northerly face) of Oso Canyon. Drainage impacts in the Gorman Creek Drainage Area would largely be avoided and no drainage impacts will occur in the Quail Lake Drainage Area. Approximately 88 percent of the proposed development would occur east of the West Branch of the Aqueduct. As discussed in Draft EIR Section 5.7 (specifically, Threshold 7-3), and as shown in Exhibit 5.2-4, Proposed Infiltration Basin Locations, 18 of the proposed regional detention and retention basins will be located to the east of the Aqueduct. Smaller drainages in this location would generally be integrated with the Project's storm drain system. Flow patterns associated with several existing larger tributary systems, including the East Tributary systems and the Cow Spring Canyon, Horse Camp Canyon, the 300th Street Tributary systems, will largely be maintained by avoiding or constructing flow controls in existing channels or by recreating existing channels after site grading. Flow, LID, and hydromodification management facilities (e.g., detention and retention basins) will be constructed adjacent to channels, primarily in downstream reach locations. None of the basins or runoff channels will discharge to the Aqueduct. The California Aqueduct contains a levee system that protects its waters from stormwater flooding or other surface flows and the aqueduct channel is constructed with cement and other impervious materials. Consequently, Project drainages have been designed to avoid and not directly flow into or to indirectly affect (e.g., by groundwater infiltration) the California Aqueduct.

Response to Comment B.2-14:

Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations, shows the locations of the proposed development areas and the 28 regional detention and retention basins that comprise the primary hydromodification and hydrology best management practices (BMPs) that will be implemented for the Project. As discussed in Draft EIR Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, the Project will avoid most of the watercourses and

[88] *Id.,* pp. 5.4-45 to -48

watershed areas in the Gorman Creek, Quail Lake, and Oso Creek Drainage Areas. As discussed in Draft EIR Section 5.7 (specifically, Threshold 7-3), and as shown in Exhibit 5.2-4, Proposed Infiltration Basin Locations, 18 of the proposed regional detention and retention basins will be located to the east of the Aqueduct. Smaller drainages in this location would generally be integrated with the Project's storm drain system. Flow patterns associated with several existing larger tributary systems, including the East Tributary systems and the Cow Spring Canyon, Horse Camp Canyon, the 300th Street Tributary systems, will largely be maintained by avoiding or constructing flow controls in existing channels or by recreating existing channels after site grading. Flow, LID, and hydromodification management facilities (e.g., detention and retention basins) will be constructed adjacent to channels, primarily in downstream reach locations. None of the basins or runoff channels will discharge to the Aqueduct. The California Aqueduct contains a levee system that protects its waters from stormwater flooding or other surface flows and the aqueduct channel is constructed with cement and other impervious materials. Consequently, Project drainages have been designed to avoid and not directly flow into the California Aqueduct.

As stated on page 5.2-17, the existing flow patterns on the site associated with larger tributary systems would be largely maintained by the Project and flows under the Aqueduct would be through existing culverts. The analysis under Threshold 2-1 specifically addresses the potential for erosion and siltation on- and off-site. As stated on page 5.2-25, Project development area runoff discharges would affect the East, Oso Creek, and Gorman Drainage Areas but no receiving channels will be affected in the Quail Lake Drainage Area. As requested by the Lahontan Regional Water Quality Control Board (Comment D.3), MM 2-4 has been added to the Draft EIR to clarify that all Project construction will comply with the California General Construction Permit issued by the State Water Resources Control Board (CAR000002, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-0006-DWQ) (Construction General Permit), including the implementation erosion and sediment control BMPs during short-term construction activities. In addition, in response to requests from the Lahontan Regional Water Quality Control Board, MMs 2-4, 2-5, 3-10, 4-3, 4-4, 19-2, 19-6, and 19-7 have been added to the Draft EIR to further protect construction period and post-construction water quality. Under MM 2-1, the Project will meet the requirements in Section 8 – Hydromodification Impacts of the County Low Impact Development (LID) Standards Manual by implementing nonstructural and structural site design measures that reduce long-term erosion and sedimentation; on-site distributed and parcel-based LID measures that capture and avoid runoff and sediment mobilized by runoff; and a regional runoff retention and detention system that includes 28 basins distributed throughout the site. As concluded in Section 5.2, impacts related to erosion or siltation on- or off the site, including to the Quail Lake and Gorman Creek watersheds, will be less than significant.

Response to Comment B.2-15:

The Project's impacts associated with subsidence are addressed on page 5.1-24 in Section 5.1, Geotechnical, of the Draft EIR, and were determined to be less than significant. As discussed in the Draft EIR, there has been no subsidence or a negligible amount of subsidence in the adjacent Neenach and other western Antelope Valley groundwater

subbasins in the Project site vicinity. The hydrogeologic investigation determined that increased groundwater pumping and recharge as part of site development would not result in adverse impacts to the underlying groundwater basins and the Project would not result in impacts related to current or future subsidence. Further discussion of the hydrogeologic conditions in the Antelope Valley Basin can be found in the Bookman-Edmonston Groundwater Data in Appendix F of Appendix 5.1-A of the Draft EIR.

Impacts on groundwater, including overdraft protection and groundwater use are discussed in Section 5.18, Water Resources, of the Draft EIR and were determined to be less than significant. The Project's use of 1,634 acre-feet per year of groundwater, production of imported water return flows from urban water use in the Antelope Valley Basin, and water banking operations in the Antelope Valley will comply with the Antelope Valley Adjudication Judgment and Physical Solution, which was approved by the Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time.[89] A watermaster will be appointed under the supervision of the Court to implement the Adjudication Judgment and Physical Solution. The Adjudication Judgment and Physical Solution prohibits water use that causes material injury, which is defined in Section 3.5.18 of the Judgment to mean impacts to the Basin caused by pumping or storage of groundwater that cause material physical harm to the Basin, any Basin subarea, or any producer, party or production right under the Adjudication Judgment and Physical Solution. The Adjudication Judgment and Physical Solution incorporates and implements a judicial determination of the total sustainable yield of the Antelope Valley aquifer and limits the use of native supplies and imported water return flows to levels that will allow for the sustainable use of groundwater, including the avoidance of overdraft conditions. All groundwater use, water banking activities, and return flow production for the Project will comply with the requirements of the Adjudication Judgment and Physical Solution and will be consist with the prevention of groundwater overdraft and avoid other significant impacts to groundwater.

Response to Comment B.2-16:

While the Conceptual Land Use Plan in Exhibit 4-1, Centennial Project – Conceptual Land Use Plan, of the Draft EIR shows that future development would be located beside the California Aqueduct, minimum yard setbacks would be required on individual lots in addition to the DWR buffer along both sides of the Aqueduct. Also, as stated on page 5.1-22, geotechnical investigations would be performed for each tract map as the Project is implemented. Page 5.1-24 states that development would comply with County subdivision specifications, County building code requirements, the Project's Grading Plan, the Specific Plan's Hillside Design Guidelines, and existing and future tract map-level, geotechnical recommendations for the Project. This would prevent impacts to the geological stability of the adjacent structures, including the Aqueduct. The quality of water flowing through the SWP would not be affected by the Project. As discussed in the response to Comments B.2-10 through B.2-14 above, no discharges of stormwater, wastewater, or wastes would be made to the Aqueduct.

[89] DRP 2017, Appendix 5.18-D

Response to Comment B.2-17:

As explained by the California Supreme Court in *California Building Association v. Bay Area Air Quality Management District*, lead agencies are generally not required to analyze the impact of existing environmental conditions, such as existing aqueducts, on a Project's future users or residents.[90] Nevertheless, the Draft EIR discloses that project operation would include activities generally associated with urban development, and that urban areas include a variety of emergencies and minor criminal activity that would require response times within the Project site. There are existing fences along the DWR right-of-way that prevent trespassing, vandalism and other security concerns at the Aqueduct. As stated on page 5.16-21 of the Draft EIR, security fencing and private security would be provided by the Applicant in construction areas within the Project site. This is expected to reduce crime incidence on the site, including the DWR right-of-way.

In the long term, the Project would increase the number of people on the site and the potential for crime and medical emergencies. However, the Project includes the construction of a permanent County Sheriff station on the Project site, with a store-front substation that would be operational before the first certificate of occupancy for the Project is issued (MM 16-4).[91] The presence of sheriff deputies on the site is expected to reduce crime incidence, including trespassing, vandalism and other security concerns at the Aqueduct. In addition, the Project includes conceptual site locations for up to four new fire stations on the Project site. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department's (LACFD's) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Project Applicant/Developer would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project. The Project Applicant/Developer would provide funding for the construction of fire protection facilities in accordance with the approved Project, in lieu of paying established developer fees at the time building permits are issued (MM 16-2). Implementation of MM 16-2 would provide for fire station sites and funding for fire protection services to serve the Project. Therefore, impacts on fire services would be reduced to a less than significant level.

Response to Comment B.2-18:

Draft EIR Section 5.3.2, Hazards and Hazardous Materials, addresses hazardous materials and their disposal in accordance with existing regulations during construction and long-term operation. As requested by the Lahontan Regional Water Quality Control Board (Comment D.3), MM 2-4 has been added to the Draft EIR to clarify that all Project construction will comply with the California General Construction Permit issued by the State Water Resources Control Board (CAR000002, Order 2009-0009-DWQ as amended by Order

[90] California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 269 (CBIA v. BAAQMD)

[91] DRP 2017, p. 5.16-25

2010-0014-DWQ and Order 2012-0006-DWQ) (Construction General Permit), including best management practices (BMPs) that address hazardous materials during construction. In addition, in response to requests from the Lahontan Regional Water Quality Control Board, MMs 2-4, 2-5, 3-10, 4-3, 4-4, 19-2, 19-6, and 19-7 have been added to the Draft EIR to further protect construction period and post-construction water quality.

Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations, shows the locations of the proposed development areas and the 28 regional detention and retention basins that comprise the primary hydromodification and hydrology (BMPs) that will be implemented for the Project. The Project will avoid most of the watercourses and watershed areas in the Gorman Creek, Quail Lake, and Oso Creek Drainage Areas. As discussed in Draft EIR Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-4, Proposed Infiltration Basin Locations, 18 of the proposed regional detention and retention basins will be located to the east of the Aqueduct. Smaller drainages in this location would generally be integrated with the Project's storm drain system. Flow patterns associated with several existing larger tributary systems, including the East Tributary systems and the Cow Spring Canyon, Horse Camp Canyon, the 300th Street Tributary systems, will largely be maintained by avoiding or constructing flow controls in existing channels or by recreating existing channels after site grading. Flow, LID, and hydromodification management facilities (e.g., detention and retention basins) will be constructed adjacent to channels, primarily in downstream reach locations. None of the basins or runoff channels will discharge to the Aqueduct. Draft EIR pages 5.4-73 through 5.4-74 discuss the potential impacts of the two proposed water reclamation facilities (WRFs) to surface water bodies and the regulations and mitigation measures that would be implemented to prevent significant adverse impacts. The WRFs would include design features required by the Lahontan Regional Water Quality Control Board, such as berms, levees, spill containment features, and other topographical elevation features, to protect the WRFs during large flood events and to protect adjacent properties under any emergency conditions. As shown on Exhibit 4-14 in the Draft EIR, there are no sewer pipelines or force mainlines that would cross over the Aqueduct; therefore, there is no risk of sewer line rupture over the Aqueduct that may affect water in the Aqueduct. In addition, the Aqueduct contains a levee system that protects its waters from storm water flooding or other surface flows. Project drainages have been designed to avoid and not directly flow into the California Aqueduct. Consequently, the Project will avoid potential impacts to the Aqueduct and water carried by the Aqueduct from the use of construction-period fuels and chemicals by compliance with the Construction General Permit, discussed above. "In addition, any hazardous materials used during construction would also be transported, used, stored, and disposed of according to any applicable local, State, and/or federal regulations".[92]

Potential hazardous materials impacts to the Aqueduct and Aqueduct waters under post-construction conditions, including from hazardous materials transport, storm water, wastewater, or wastes, will be reduced compared to the existing condition wherein the National Cement Plant Road utilizes a bridge crossing. This existing bridge crossing would be incorporated into the Centennial Project's circulation plan, and the realigned National

[92] *Id.,* p. 5.3-16

Cement Plant Road would no longer cross over the West Branch of the Aqueduct. Any on-site transport of hazardous materials, which would be those typical of an urban environment,[93] and would "include commercial cleansers, solvents, and other janitorial or industrial-use materials; paints; landscape maintenance materials; pressurized gases; chlorine for pools; petroleum products at gas stations; and others. The handling, storage, and usage of these materials would be subject to applicable local, State, and/or federal regulations. While many such common materials are technically labeled "hazardous", the presence of such materials is common in a mixed-use urban environment, and their use on the Project site would not pose an unusual or uncommon threat to the health or safety of the future population of the Project site".[94] These materials would also not pose a threat to the waters of the Aqueduct or other SWP facilities, with implementation of the Project's Integrated Water Resources Management Plan.

Bridge crossings over the Aqueduct would be designed to convey stormwater away from the aqueduct so that pollutants contained in stormwater runoff are captured and managed within the project drainage system that is designed to comply with Los Angeles County Low Impact Development ordinance which includes stormwater quality management. Any accidental spill of "hazardous materials" on the bridge would be contained on the surface of the bridge structure and would be conveyed to the project drainage system where it would be managed through spill response programs and procedures already developed for urban areas that are followed by the County fire department and Hazmat Response teams.

As discussed in Section 5.3, Hazards and Fire Safety, "[t]he Business Park land use designation may include a hospital or other medical-related facilities and light industrial facilities; the Utility, Business Park (conditional), and Institutional/Civic (conditional) land use designations would have the option to construct a Materials Recycling Facility (MRF). These types of facilities are, again, typical of urban development and a myriad of specialized regulations are applicable to medical and industrial land uses, as appropriate. The proposed Business Park land use areas are situated entirely along the south side of SR-138, and the proposed public facilities land use areas where the MRF could be located are situated along the northeast boundary. These are "edge" areas of the Project site, rather than being intermixed with residential and other land uses.[95] The edge areas are also situated away from the West Branch of the Aqueduct and other SWP facilities.

Response to Comment B.2-19:

The Project site does not include land within the DWR right-of-way. An access road, bridge, and water pipelines are proposed over and/or under the Aqueduct and page 4-108 acknowledges that the Project would require an Encroachment Permit from DWR for two bridge crossings of the California Aqueduct ("A" Street and "B" Street), as well as for the crossing of potable and recycled water pipes. At the time that an encroachment permit is

93 *Ibid*.
94 *Ibid*.
95 *Ibid*.

required from DWR, the Project Applicant/Developer shall comply with the regulations and complete the forms needed for the permit application.

Response to Comment B.2-20:

Thank you for your comment and your participation in this public process. The DWR will continue to be included in the mailing list for the environmental review process for the Project and will be given copies of subsequent environmental documentation at the address provided.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

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July 14, 2017

Mr. Jodie Sackett
County of Los Angeles
Dept. of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

RE: Centennial Project
Draft Environmental Impact Report
SCH# 2004031072
IGR# 07-LA-2016-00925-FL
Vic. LA/ 5/ PM 82.625
LA/ 138/ PM 0.415 – 4.106

Dear Mr. Sackett:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

The proposed project (Project) involves the development of a new community of 9 villages with each contain a mix of land uses, such as residential, commercial, business park, recreational/entertainment, and institutional/civic uses. It is in the northwestern portion of the Antelope Valley in unincorporated Los Angeles County.

The Project allows up to 19,333 dwelling units on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light manufacturing uses) on approximately 597 gross acres and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes conceptual site locations for up to 4 new fire stations and a new sheriff's station, and 2 wastewater reclamation facilities. The Project would also require the implementation of off-site features consisting of roadway improvements and connections and upgrades to existing off-site utility systems, and preserve 5,624 acres of on-site open space within the Open Space designation. B.3-1

Caltrans noted that the Project buildout would be implemented in phases based on future market conditions over an approximate 20-year period through a series of future tract and parcel maps. B.3-2

If residential development occurs prior to the commercial, business, and employment center, the typical morning and evening commutes could occur, thus establishing a sprawl type of development. To avoid an unsustainable scenario, the County as the lead agency should plan the phasing of the development accordingly. Both residential and employment centers should be developed concurrently. B.3-2 cont.

Furthermore, the Project included an Affordable Housing Program that provides Very Low-, Low, and Moderate-Income affordable housing opportunities in several housing categories, including for-sale units and/or rental units. Caltrans would like to remind that the provision of affordable housing for the various income levels is critical to minimize long-distance peak hour commutes. Special attention should be given to the phasing-in of development and housing affordability. B.3-3

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "*provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability.*"

The entire development should be pedestrian and bicycle friendly with bicycle and pedestrian connections to the outside community. Internal circulation of public transit and adequate bike parking should be provided throughout. To provide good connectivity within each community and between communities the grid pattern is preferred over the cul-de-sac design. Park-and-ride areas should be included and designed to accommodate regional transit. The different communities should be designed to accommodate Neighborhood Electric Vehicles (NEV's). B.3-4

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians and that meet ADA standards and requirements are critical at every on and off ramp and freeway terminus intersections. Caltrans will work with the County to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists.

As a follow-up to a tele-conference meeting on July 13, 2017 between County of Los Angeles and Caltrans in regarding to Project's traffic analysis report and the proposed mitigation measures. Please see below for Caltrans' comments regarding the Project's DEIR and the Traffic Study. B.3-5

- In reviewing the Project' DEIR and the Traffic Study, there were references to the Northwest SR-138 Corridor Improvement project (NW SR-138 project); Caltrans recommend that a brief summary of the NW SR-138 project be included in the DEIR and the Traffic Study. Such as the purpose, proposals, alternatives, and how it relates to the Project.

  Caltrans selected Alternative 2 of the NW SR-138 project as the Preferred Alternative. The Project's proposed improvements should be consistent with what was already approved in the NW SR-138 project. B.3-6

- The traffic data, results, and conclusions indicated in the Project's DEIR and Traffic Study should be consistent with the NW SR-138 project' Traffic Study. This will avoid conflicting data. B.3-7

- Intersection Control Evaluation (ICE) Report pertaining to State Routes, should be consistent with NW SR-138 project, since the ICE Policy has been established.

  However, if the Project chooses to include its own intersection analysis on State Routes, it should be amended to what was previously concurred with in the NW SR-138 project, and submitted to Caltrans for review prior to the Final Environmental Impact Report (FEIR). B.3-8

- To further address the Project's potential significant impacts to State Routes, as agreed to during the teleconference held on July 13, 2017 with Caltrans, the County of Los Angeles and its traffic consultants, a follow-up meeting is necessary to further discuss and refine the details regarding proposed mitigation measures and fair share contributions, including a Mitigation Agreement with Caltrans. Such that the Project is to be developed over time according to market demands and so would the transportation improvements. Therefore, Caltrans requests that the Transportation facilities necessary to accommodate build-out of the entire Project should be identified at this stage, along with a plan that indicates which improvements will be would be implemented by each phase and the amount of the fair share contributions that will be due at that time. B.3-9

In the spirit of mutual cooperation, Caltrans would like to request a meeting with the Lead Agency and consultants to evaluate traffic impacts, identify potential improvement, and established a funding mechanism that helps mitigate cumulative transportation impacts in the project vicinity. B.3-10

If you have any questions, please feel free to contact the project coordinator, Ms. Frances Lee, at (213) 897-0673 or electronically at frances.lee@dot.ca.gov. B.3-11

Sincerely,

DIANNA WATSON
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

Responses to Comment Letter B.3
California Department of Transportation
July 14, 2017

Response to Comment B.3-1:

Thank you for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment B.3-2:

Thank you for the comment concerning balanced Project development over time. The Draft EIR includes a Conceptual Phasing Plan implemented over a 20-year period.[96] As summarized in Draft EIR Table 4-1, Centennial Project Overview, and on Draft EIR page 4-6, at full buildout the Project would include approximately 12,323 acres and would allow up to 19,333 dwelling units (du) on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light manufacturing uses) on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. Proposed sites for major utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass approximately 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on approximately 145 acres. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use.

Development within the Project site will require the preparation and implementation of tentative tract maps (TTMs) for each phase and component of the Project. As discussed on Draft EIR page 4-92, the TTMs serve as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[97] Chapter 4 of the Specific Plan describes the processes and procedures for implementing the Specific Plan, including the processes and procedures for subsequent Project approvals such as future TTMs. Chapter 4 of the Specific Plan also establishes mechanisms that allow for flexibility in the development of the Project to respond to market conditions over the anticipated buildout of the Project while ensuring consistency with the purpose and intent of the Specific Plan. Specific Plan Section, 4.5.2 Discretionary Conformance Review, provides that significant

96 DRP 2017, Exhibit 4-20; *Id.,* pp. 4-91 and -92
97 Final EIR Appendix 4.0-A.Rev

modifications of the Specific Plan, including land use adjustments under Specific Plan Section 4.6, (Adjustment, Transfer, and Conversion Regulations) are subject to discretionary review and approval, including additional CEQA analysis as applicable.[98]

Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to the Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[99] sets forth the conditions for approval of subdivision maps and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and the physical improvements to be installed. The primary objectives of the Act include the coordination of subdivision design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[100]

The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted cumulative conditions, are implemented without resulting in undue burdens to County and other taxpayers.

The mitigation measures for the Centennial Project are listed in the Mitigation Monitoring and Reporting Program (MMRP).[101] The MMRP requires that Project traffic conditions, impacts and improvements, including required Project funding for state highway improvements, be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. MMs 10-25 and 10-26 (see the Final EIR MMRP), presented as MMs 10-29 and 10-30 in the Draft EIR, require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation, and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and

98 DRP 2017, Appendix 4.0-A, p. 4-8
99 Government Code § 66410, et seq.
100 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.
101 Final EIR Appendix 2.0-C.Rev

approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, as the comment suggests, the Project's residential development was to occur prior to the proposed onsite employment or commercial land uses, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the EIR. If these differences are found to generate new or more severe significant impacts, a subsequent environmental impact report, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

The Specific Plan and the MMRP also require that project infrastructure be in place prior to residential, employment-generating and commercial development. As discussed on pages 4-92 to 4-96 of the Draft EIR, the first phase of development will include permanent and temporary uses, major infrastructure, public services, and roadway/circulation improvements to ensure that all services and infrastructure components are of sufficient size and capacity to serve early residents and occupants (e.g., schools, roadways, public park maintenance, and utilities). The MMRP requires that sufficient services and infrastructure, such as water, wastewater, utilities, roadways, be confirmed during the review and approval process for each TTM (see references to a "Tentative Tract Map" in the column titled, "When Monitoring to Occur" in Final EIR Appendix 2.0-C.Rev). The Draft EIR states that if future development phases are delayed or do not occur, these facilities will continue to provide permanent services and infrastructure. As a result, the Project will have incentives to develop residential, commercial and employment-generating uses in accordance with the balanced pattern discussed in the Draft EIR and required by the Specific Plan to ensure that early-phase infrastructure investments are efficiently utilized over time.

In summary, as discussed in the Draft EIR, the Project development approval process has been designed to ensure that all proposed land uses, including residential, commercial and employment-generating land uses, occur in a balanced manner. Future development will be implemented in accordance with the Specific Plan and the review and approval of TTMs for

the site. The extent to which the balanced development required by the Specific Plan and discussed in the Draft EIR is being achieved over time, including environmental and traffic impacts, will be evaluated during the TTM review and approval process. If Project development does not occur as projected, a subsequent environmental impact report, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved. As a result, the Project cannot generate long-term development that substantially deviates from the balanced development and associated interim and long-term traffic patterns described in the Draft EIR.

Response to Comment B.3-3:

The Project includes MM 21-14, which states the following:

> Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan (see Appendix 3-H of the *Centennial Specific Plan*).
>
> (DRP 2017, p. 5.21-91)

The Project's Affordable Housing Implementation Plan[102] provides the additional detail requested by the Commenter on the income levels of the required affordable units, which prescribe the required percentage of units for include moderate, low and very low-income households. It is also noted that housing affordability is also addressed by the range of market rate units in the Project, as well as the Project's overall addition to the supply of housing within the region. The non-partisan Legislative Analyst's Office has concluded that California has a housing shortage that is most acute in coastal areas, that this housing shortage has resulted in a dramatic increase in housing costs, that housing costs have in turn caused California to have the highest poverty rate in the nation, and that only a very significant increase in overall housing supply help alleviate the supply shortfall and help normalize housing prices. See, e.g., Legislative Analyst's Office, California's High Housing Costs: Causes and Consequences;[103] Census Bureau Poverty summary;[104] Recent Trends in Housing Affordability.[105] The Project addresses housing affordability both by deed restricting 10 percent of its units for affordable housing, and by developing a broad range of market based housing at different price points for working families who do not qualify for subsidized affordable housing.

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102 Final EIR Appendix 3-C of Appendix 4.0-A

103 California Legislative Analyst's Office (LAO). 2015 (March 17). California's High Housing costs: Causes and Consequences. http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf.

104 LAO. 2017 (September 12). Census Bureau Poverty Statistics summary. http://www.lao.ca.gov/LAOEconTax/Article/Detail/251.

105 LAO. 2017 (June 22). Recent Trends in Housing Affordability. http://www.lao.ca.gov/LAOEconTax/Article/Detail/245.

Response to Comment B.3-4:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Project has been designed to incorporate the pedestrian, biking, connectivity, neighborhood electric vehicle (NEV) and other standards and objectives discussed in this comment. As discussed in Draft EIR pages 4-30 to 4-40, the Project's Mobility Plan is an integral part of the Centennial Land Use Plan and provides for an integrated network of roadways, walking, and biking trails to reduce automotive use and facilitate safe and efficient travel. Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. An extensive network of sidewalks, greenway trails (approximately 13 miles), and community trails (approximately 60 miles) would link residential, schools, shopping, and employment areas. Non-motorized transportation planning elements are integrated into the Centennial Circulation Plan to encourage non-automotive transit modes, including: small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations; facilities that make walking, cycling, and transit use safe, comfortable, attractive, and efficient transportation options; parking behind buildings to encourage walking in retail areas along street frontage; and streetscapes designed as public spaces to promote social interaction and physical activity. Consistent with these objectives, MM 14-1 requires that the Project: provide a functional system of community trails, greenway trails, and natural corridors to serve as recreational opportunities and as alternative means of transportation to reduce vehicular traffic; provide complete streets throughout the community to provide alternative modes of transport (walking, biking, low-speed vehicles [LSVs] such as neighborhood electric scooters, bikes and other low-speed electric vehicles [NEVs]; incorporate sidewalks (separated by a parkway from streets) and trees to be the main street elements to create a walking environment, promoting pedestrian activity; provide Class I – IV bike lanes throughout the Project to ensure a variety of alternative transportation options; provide permanently anchored bicycle racks within 200 feet of visitors' entrance of nonresidential buildings, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of two-bike capacity rack; for new nonresidential buildings with over 10 tenant-occupants or for additions or alterations that add 10 or more tenant vehicular parking spaces, provide secure bicycle parking spaces at a rate of 5 percent of tenant parking being added, with a minimum of one space; for residential buildings, provide permanently anchored bicycle racks within 100 feet of the visitor's entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity with a minimum of one two-bike capacity rack; for nonresidential buildings within the Business Park and Commercial areas with 75,000 or more square feet of gross floor area, provide locker rooms and shower facilities; and for multifamily buildings, provide on-site bicycle parking for at least one bicycle per every two dwelling units. The Mobility Plan also requires the formation and funding of a Transportation Management Agency prior to the issuance of the first occupancy permit for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial and ensuring that the use of single occupancy vehicles for travel is reduced in accordance with the Project's mobility performance standard. As a result, the Project incorporates the transportation and mobility objectives discussed in this comment.

Response to Comment B.3-5:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment B.3-6:

The Draft EIR discusses the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"), including State Route (SR) 138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-35 and 5.10-36, and Section 7.0, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Project Draft EIR was filed by the County on May 15, 2017 and the 60-day comment period began on May 17, 2017.

As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements.

In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, the Centennial Specific Plan Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. As discussed on Draft EIR pages 5.10-2 to 5.10-5, both the Draft EIR and the NW SR-138 FEIR use the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County. The Draft EIR utilizes a more recent version of the model that was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. The STS also uses the traffic forecasts from the updated North County Sub-Area Model provided by the County to analyze potential Project and cumulative impacts to reflect the most current information available regarding traffic conditions in the North County region.

The Draft EIR considered potential Project impacts with improvements required to accommodate the full buildout of the Project under existing traffic plus Project buildout conditions, and cumulative traffic plus Project buildout conditions. The Draft EIR identified mitigation measures that would maintain acceptable level of service (LOS) standards at all applicable highway segments, intersections, and ramps. To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under

cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Draft EIR.[106] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[107]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[108]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[109]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[110]

The STS compares the Project's potential impacts identified in the Draft EIR for Interstate-5 (I-5), SR-14 and SR-99 facilities using the volume to capacity methodology specified by the Congestion Management Plan for Los Angeles County and the Project's potential impacts using the Caltrans' recommended HCM methodology. HCM calculations were prepared for 62 locations within the Draft EIR study area consisting of freeway segments in advance of and after major system interchanges as well as representative locations between major system interchanges. The analyzed locations provide a comprehensive coverage of the Draft EIR study area because they include the freeway facilities with the greatest potential to be affected by congestion. Under existing plus Project conditions, the Draft EIR and the STS show that all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[111] Under cumulative plus Project conditions with mitigation, the Draft EIR and the STS show that almost all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[112] The STS indicates that certain study locations,

106 DRP 2017, Final EIR Appendix 5.10-C, Sections 2.5 and 3
107 Final EIR Appendix 5.10-C, Tables 3-3 and 3-4
108 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
109 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
110 *Id.,* Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9
111 *Id.,* Appendix 5.10-C, Table 4-1
112 *Id.,* Appendix 5.10-C, Table 4-2

such as the Grapevine grade segment of I-5, would not meet HCM-based LOS standards because topographic conditions, lane and speed controls, and other localized conditions would result in higher traffic densities. As shown in STS Table A-5, however, LOS conditions would be worse under cumulative without Project conditions, and LOS conditions improve under cumulative with Project conditions with the implementation of the Project MMs.[113] Consequently, the Project does not result in a significant impact at any location that does not meet HCM-based LOS standards under cumulative with Project conditions with mitigation.

As discussed above, the Draft EIR considered improvements to SR-138 that would be required to accommodate the full buildout of the Project under cumulative traffic conditions. The implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative conditions, and additional improvements consistent with the SR-138 facilities considered in the Draft EIR would be required to accommodate all of the Project's full buildout traffic under long-range cumulative conditions. The NW SR-138 FEIR also clarified certain aspects of the SR-138 design details that would be implemented with Alt 2, including the number and locations of intersections along SR-138 from I-5 to SR-14. The NW SR-138 FEIR addressed several types of intersection configurations for each location but defers selection of the final configurations to the SR-138 design phase. Subject to minor adjustments for consistency with these Alt 2 design details, the SR-138 facilities that would result from the additional improvements to Alt 2 required for full Project buildout under long-range cumulative conditions as described in the STS are substantially similar to the full buildout SR-138 facilities discussed in the Draft EIR. The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[114]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[115]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[116]

As discussed in the STS[117], and as shown below, the Project's MMs have been clarified to reflect the implementation of these improvements with Alt 2. As required by MMs 10-3 and 10-4, the Project will contribute fair share funding or provide funding for SR-138 improvements in accordance with a mitigation agreement with Caltrans for the

113 *Id.,* Appendix 5.10-C, Section 5
114 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
115 *Id.,* Appendix 5.10-C, Section 2.1
116 *Id.,* Appendix 5.10-C, Section 2.4
117 *Id.,* Appendix 5.10-C, Section 5

implementation of Alt 2, improvements required to connect the Project circulation system with the Alt 2 facilities, and, if confirmed in traffic studies submitted in conjunction with the review and approval process for future Project tract maps, additional SR-138 improvements that may be required to accommodate full Project buildout under cumulative traffic conditions.

As requested by Caltrans, the following revisions to the Draft EIR are provided to reflect the preferred Alternative 2 SR-138 improvements identified in the NW SR-138 FEIR.

The third full paragraph on Draft EIR page 4-41 is hereby revised as follows:

> The draft NW SR-138 EIR/EIS, TAR and ICE Report ~~do~~ did not identify a preferred alternative and Caltrans deferred the selection of a preferred alternative to the Final EIR/EIS. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 includes a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. Caltrans has also reserved the right to determine the specific preferred intersection control based on the traffic and safety data at the time the improvements occur. Thus, depending on the timing of the implementation of the realigned SR-138; and the timing of the implementation of the Project; the ultimate connection requirements for Project roads to SR-138 may need additional future design analysis in conjunction with future phases of development. All construction activities within Caltrans right-of-way would be closely coordinated with Caltrans, subject to their review and design standards, and subject to their approval. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The second full paragraph on Draft EIR page 5.10-36 is hereby revised as follows:

> There is no implementation schedule for the NW SR-138 Project; however, the draft EIR/EIS for the proposed improvements was made available for public review in July 2016. The draft NW SR-138 EIR/EIS, TAR and ICE Report ~~do~~ did not identify a preferred alternative and Caltrans deferred the selection of a preferred alternative to the Final EIR/EIS. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 would include a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. Caltrans has also reserved the right to determine the specific preferred intersection control based on the traffic and safety data at the time the improvements occur. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The carryover paragraph on Draft EIR page 7-9 is hereby revised as follows:

> existing alignment of SR-138. The portion of SR-138 between 300th Street West and Gorman Post Road, which is applicable to the Project site, is envisioned by Caltrans to be a six-lane expressway. This alternative would involve at-grade signalized intersections at Cement Plant Road and 300th Street West; a grade-separated overcrossing at the Gorman Post Road intersection (same as Build Alternative 1); and a new grade separate structure (standard box culvert) east of Quail Lake near the airport (same as Build Alterative 1). Same as Build Alternative 1, this alternative would include an extension of the existing RCB culvert at the Quail Lake Outlet into the west branch of the California Aqueduct. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 would include a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-

lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The two full paragraphs on Draft EIR page 5.10-130 are hereby revised as follows:

The on-site roadway network has been designed to accommodate projected traffic from proposed land uses. Impacts on the internal roadway system would be less than significant after mitigation. If improvements at Project access points on SR-138 are not constructed, impacts would be significant and unavoidable. Project buildout would result in significant traffic impacts on off-site roadways and freeways, including SR-138, I-5 mainline segments and interchange ramps, and arterial roadway intersections (see Table 5.10-~~30~~32 below). Mitigation measures have been identified to reduce all significant Project impacts, as listed in Table 5.10-~~31~~33, Mitigation Summary. In addition, MM 10-~~23~~20 would protect the right-of-way needed to widen and realign SR-138.

Although mitigation measures identified for Caltrans facilities would reduce Project impacts, it is outside the control of the County of Los Angeles to implement these measures. The ~~CTIP~~ Traffic Mitigation Agreement or the Project Applicant's fair share contribution requirements in MM 10-3 and MMs 10-6 through 10-~~28~~24 and MMs 10-~~31~~27 through 10-4~~5~~41 will provide funding for the planning, design, and construction of certain improvements. MM 10-4 requires the Project Applicant to work to establish a funding program to collect fair share contributions from other projects for the required improvements. Compliance with these mitigation measures would reduce traffic impacts to a less than significant level. Potential Project impacts would be significant and unavoidable, however, if the improvements are not constructed by Caltrans because the County (as the Lead Agency) lacks

jurisdiction and control over State highway facilities and cannot mandate the construction of improvements to these facilities.

Table 5.10-33 on Draft EIR pages 5.10-132 to 5.10-134 is hereby revised as follows:

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
SR-138
Existing Plus Project Mitigation • Improve SR-138 to a four lane expressway from I-5 to 240th Street West and to a limited access conventional four-lane highway from 240th Street West to 190th Street West, with right-of-way reserved for a six-lane expressway between I-5 and 300th Street West or comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-6/Traffic Study MM-1) • Intersection improvements from the westerly access of the Centennial Specific Plan area to SR-14 ~~30th Street West or~~ comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o Specific Plan Westerly Access and SR-138 o Specific Plan Central Access and SR-138 o 300th Street West and SR-138 ~~o 290th Street West and SR-138~~ o Margalo Drive and SR-138 o Three Points and SR-138 o ~~245th~~ 250th Street West and SR-138 o ~~230th~~ 210th Street West and SR-138 ~~o 190th Street West and SR-138~~ o 170th Street West and SR-138 ~~o 110th Street West and SR-138~~ o 90th Street West and SR-138 o 60th Street West and SR-138 ~~o 30th Street West and SR-138~~ **Cumulative Conditions Mitigation** • Dedicate right-of-way within the Project site at each site access location to accommodate the ultimate intersection or interchange configuration as determined by the Northwest 138 Corridor Improvement project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~ (MM 10-20~~23~~/Supplemental Traffic Study MM-18) • To accommodate up to 75 percent of the Project and anticipated cumulative development, ~~C~~contribute fair share of adding one lane in both directions (six lanes total) on SR-138 from I-5 to 300th Street West and one lane in both directions (four lanes total) on SR-138 from 300th Street West to the SR-14 interchange (in addition to above), or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-22~~24~~/Supplemental Traffic Study MM-19) • To accommodate 100 percent of the Project and anticipated cumulative development, ~~C~~contribute fair share of adding a second additional ~~one auxiliary~~ lane in both directions (six lanes total) on SR-138 from 300th Street West to approximately ½ mile east of 250th~~245th~~ Street West (in addition to above), or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-23~~25~~/Supplemental Traffic Study MM-20) • Fair share participation and/or contribution to the Kern COG RTP/SCS improvement projects on SR-58 between I-5 in Kern County and I-15 in San Bernardino County, which could include development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors. (MM 10-24~~26~~/Traffic Study MM-21) • ~~Fair share participation and/or contribution to the SR-138 improvements to a limited access facility with grade-separated interchanges, consistent with the County's analysis of the AVAP, or fair share participation and/or contribution to the SR-138 improvements (freeway/ expressway or expressway/limited access conventional highway) being advanced by Caltrans in the Northwest 138 Corridor Improvement project (specific improvements pending Caltrans selection of a preferred alternative). (MM 10-27/Traffic Study MM-22)~~ • ~~Fair share participation and/or contribution to strengthening and widening the inside and outside shoulders of I-5 between the Fort Tejon and Grapevine Road interchanges and between the SR-138 and Lake Hughes Road interchanges. (MM 10-28/Traffic Study MM-23)~~
I-5
Cumulative Conditions Mitigation • On-Site Transportation Management Association (TMA) that would coordinate and manage the following programs: (MM 10-25~~29~~/Traffic Study MM-24) 1. Ride Share Program 2. Transit Program 3. Commuter Bus Program • Contribute fair share to planned freeway mainline improvements for the following segments: (MM 10-27~~31~~/Traffic Study MM-25) 1. Between Parker Road and SR-14 – add one HOV or HOT lane in each direction. 2. Between Lake Hughes and Parker – add one auxiliary lane in each direction. • Fair share participation and/or contribution to the development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors between I-5 in Kern County and I-15 in San Bernardino County. (MM 10-24~~26~~/Traffic Study MM-26)
I-5/SR-138 Interchange
Existing Plus Project Mitigation • To mitigate the westbound SR-138 to SB I-5 connector ramp, construct one auxiliary lane to the I-5 mainline, or contribute fair share to the SR-138/I-5 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-18~~21~~/Traffic Study MM-16) **Cumulative Conditions Mitigation** • To mitigate the westbound SR-138 to SB I-5 connector ramp, contribute fair-share to the construction of two auxiliary lanes to the I-5 mainline, or contribute fair share to the SR-138/I-5 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-28~~32~~/Traffic Study MM-27) • To mitigate the northbound I-5 to eastbound SR-138 connector ramp, contribute fair share to the construction of two auxiliary lanes to the I-5 mainline before the northbound I-5 to eastbound SR-138 connector ramp, or contribute fair share to the SR-138/I-5 connector ramps improvements being

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-29~~33~~/Traffic Study MM-28)
SR-14/SR-138 Interchange
Cumulative Conditions Mitigation • Contribute fair share to the construction of one mainline auxiliary lane and a second off-ramp lane for the SR-14 northbound off ramp to SR-138, or contribute fair share to the SR-138/SR-14 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-30~~34~~/Traffic Study MM-29) • Contribute fair share to the construction of a second lane on the SR-14 southbound on-ramp from SR-138, or contribute fair share to the SR-138/SR-14 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-31~~35~~/Traffic Study MM-30)
Off-Site Intersections
Existing Plus Project Mitigation • Contribute fair-share to recommended mitigation measures at the following intersections, or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o Intersection improvements from the westerly access of the Centennial Specific Plan area to the SR-14 interchange ~~30th Street West~~ (MMs 10-7 through 10-17~~20~~/Supplemental Traffic Study MM-2 through MM-15) o I-5 SB Ramps and Sedona/The Old Road (Intersection 26) (MM 10-19~~22~~/Traffic Study MM-17) **Cumulative Conditions Mitigation** • Contribute fair-share to recommended mitigation measures at the following intersections, or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o SR-14 SB Ramps and SR-138 (Caltrans Intersection) (MM 10-32~~36~~/Supplemental Traffic Study MM-31) o SR-14 NB Ramps and SR-138 (Caltrans Intersection) (MM 10-33~~37~~/Supplemental Traffic Study MM-32) o I-5 NB Ramps and Lake Hughes (LA County/Caltrans Intersection) (MM 10-34~~38~~/Supplemental Traffic Study MM-33) o I-5 SB Ramps and Sedona/The Old Road (LA County/Caltrans Intersection) (MM 10-19~~22~~/Traffic Study MM-34) o I-5 SB Ramps and Magic Mountain (LA County/Caltrans Intersection) (MM 10-35~~39~~/Traffic Study MM-35) o I-5 NB Ramps and Magic Mountain (City of Santa Clarita/Caltrans Intersection) (MM 10-36~~40~~/Traffic Study MM-36) o I-5 SB Ramps and Valencia (LA County/Caltrans Intersection) (MM 10-37~~41~~/Traffic Study MM-37) o I-5 NB Ramps and Valencia (City of Santa Clarita/Caltrans Intersection) (MM 10-38~~42~~/Traffic Study MM-38) o I-5 SB Ramps and McBean (LA County/Caltrans Intersection) (MM 10-39~~43~~/Traffic Study MM-39)

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
o I-5 SB Ramps and Calgrove (City of Santa Clarita/Caltrans Intersection) (MM 10-~~40~~44/Traffic Study MM-40) o I-5 NB Ramps and Calgrove (City of Santa Clarita/Caltrans Intersection) (MM 10-~~41~~45/Traffic Study MM-41)
393SR: State Route; I: Interstate; Kern COG: Kern Council of Governments; RTP/SCS: Regional Transportation Plan/Sustainable Communities Strategy; HOT: high-occupancy toll; Caltrans: California Department of Transportation.
Sources: ~~Stantec 2017 (Table 4-11).~~ Draft EIR Appendix 5.10-A (Traffic Study) and Final EIR Appendix 5.10-C (Supplemental Traffic Study)

The following mitigation measures and accompanying text beginning with the last partial paragraph on Draft EIR page 5.10-145 to the end of the first full paragraph on Draft EIR page 5.10-157 are hereby revised as follows:

MM 10-3 The Project Applicant/Developer shall seek to enter into a ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement for Land Development Impacts to California State Transportation Facilities with Caltrans and shall comply with the terms the ~~CTIP agreement~~ Traffic Mitigation Agreement if approved and implemented. Compliance with the ~~CTIP~~ Traffic Mitigation Agreement shall constitute compliance with the mitigation measures for the Project's traffic impacts on the State highway system. Any required improvements that result from direct Project impacts (i.e., not from cumulative impacts), and are required on Caltrans-owned facilities, shall be implemented through a ~~CTIP~~ Traffic Mitigation Agreement. Any required improvements that result from cumulative traffic impacts may be implemented through payment of fair share fees.

MM 10-6 *(Supplemental Traffic Study MM-1)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement to improve SR-138 to a four lane expressway from I-5 to 240th Street West and to a limited access four lane conventional highway from 240th Street West to 190th Street West, with right-of-way reserved for a six-lane expressway between ~~I-5~~ Gorman Post Road and 300th Street West, or comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-7 *(Supplemental Traffic Study MM-2)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall

comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the following intersection improvements at Specific Plan Westerly Access and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions.
- Construct intersection to include: two NB left-turn lanes, three NB through lanes and one NB right-turn lane.
- In the SB direction, construct two left turn lanes, three through lanes and ~~one free-flow~~ two right-turn lanes.
- In the EB direction, construct three left-turn lanes and one right-turn lane.
- In the WB direction, construct two left-turn lanes and ~~a~~ ~~free-flow~~ two right-turn lanes.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-8 *(Supplemental Traffic Study MM-3)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Specific Plan Central Access and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions.
- In the NB and SB directions, construct two left-turn lanes, three through lanes and one right-turn lane.
- In the EB direction, construct two left-turn lanes and one right-turn lane.
- In the WB direction, construct two left-turn lanes and ~~a~~ ~~free-flow~~ two right-turn lanes.

- Install traffic signal and include SB and NB right-turn overlap phasing.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-9 *(Supplemental Traffic Study MM-4)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 300th Street West and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions.
- Construct two left-turn lanes and one right-turn lane in the EB direction and two left-turn lanes and dual right-turn lanes in the WB direction.
- In the NB direction, construct two left-turn lanes, three through lanes, and one right-turn lane.
- In the SB direction, construct two left turn lanes, three through lanes and one ~~free-flow~~ right-turn lane.
- Install traffic signal and include WB right-turn overlap phasing.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-10** *(Traffic Study MM-5)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 290th Street West and SR-138:~~

- ~~Widen SR-138 to a four-lane highway from westerly project entrance to 290th Street West, with auxiliary lanes between intersections, resulting in three through lanes in the WB and EB directions.~~

~~• Additional intersection improvements include: two EB left turn lanes, one WB right turn lane, two SB left turn and two SB right-turn lanes.~~

~~• Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-1011 *(Supplemental Traffic Study MM-6)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Margalo Drive and SR-138:

- Widen SR-138 to a four-lane ~~highway~~ expressway from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions.~~
- Additional intersection improvements include: ~~one~~ two EB left turn lanes, ~~and~~ one WB right-turn lane, one SB left-turn lane, and two SB right-turn lanes.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-1112 *(Supplemental Traffic Study MM-7)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Three Points and SR-138:

- Widen SR-138 to a four-lane ~~highway~~ expressway from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs~~ resulting in ~~three~~ two through lanes in the WB and EB directions.
- Additional improvements include adding one NB left-turn lane, ~~and~~ one SB left turn lane and one SB right turn lane.

Or contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-12~~13~~ *(Supplemental Traffic Study MM-8)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 250~~245~~th Street West and SR-138:

- Widen SR-138 to a four-lane expressway ~~highway~~ from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs~~ resulting in ~~three~~ two through lanes in the WB and EB directions.
- Additional improvements include adding one ~~NB left-turn lane and one~~ SB left turn lane, one EB left-turn lane, one WB U-turn lane and one dedicated ~~EB~~ WB right-turn lane.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-13~~14~~ *(Supplemental Traffic Study MM-9)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 210th ~~230~~th Street West and SR-138:

- Widen SR-138 to a four-lane limited access conventional highway from 240th ~~290~~th Street West to 190th Street West.
- Additional improvements include one SB left-turn lane, one ~~SB~~ NB ~~right~~ left-turn lane, ~~and~~ one EB left-turn lane, one EB right-turn lane, and one WB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-15** *(Traffic Study MM-10)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 190th Street West and SR-138:~~

- ~~Widen SR-138 to a four-lane highway from 290th Street West to 190th Street West with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions.~~
- ~~Additional improvements include adding one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left turn lane and one dedicated EB right-turn lane.~~
- ~~Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-~~14~~16 *(Supplemental Traffic Study MM-11)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 170th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.
- Additional improvements include one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-17** *(Traffic Study MM-12)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 110th Street West and SR-138:~~

- ~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.~~
- ~~Additional improvements include: one EB left-turn lane, one WB left-turn lane, two NB left-turn lanes, one SB left-turn lane and two SB right-turn lanes.~~
- ~~Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-15~~18~~ *(Supplemental Traffic Study MM-13)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 90th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.
- Additional improvements include: ~~one~~ two EB left-turn lanes, one EB right-turn lane, one WB left-turn lane, one WB right-turn lane, one NB left-turn lane and one SB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-16~~19~~ *(Supplemental Traffic Study MM-14)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 60th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.

- Additional improvements include: one EB left-turn lane, one EB right-turn lane, one WB left-turn lane, one WB right-turn lane, one NB left-turn lane and one SB left-turn lane.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-17~~20~~ *(Supplemental Traffic Study MM-15)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at ~~30th Street West~~ the SR-14 and SR-138 interchange:

- ~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.~~
- ~~Additional improvements include adding one EB left-turn lane and one WB left-turn lane.~~
- Install traffic signals at the NB off-ramp and the SB off-ramp.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-18~~21~~ *(Traffic Study MM-16)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of one auxiliary lane at the connector ramp from westbound SR-138 to southbound I-5 for existing plus Project conditions

MM 10-19~~22~~ *(Traffic Study MM-17 and MM-34)* To provide adequate capacity at The Old Road at I-5 SB Ramps/Sedona intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute

fair share funding toward the addition of a second southbound left-turn lane from The Old Road to the I-5 Southbound On-Ramp.

MM 10-2023 *(Supplemental Traffic Study MM-18)* To mitigate the increase of side-street delay for the existing adjacent off-site areas and for planned on-site side streets along SR-138, the Project Applicant/Developer shall either (1) comply with the terms of the ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement or (2) dedicate right-of-way within the project site at each site access location to accommodate the ultimate intersection or interchange configuration to be determined by the Northwest Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~ at the following SR-138 intersections:

- Westerly Access
- Central Access
- 300th Street West
- ~~290th Street West~~

MM 10-21 *(Supplemental Traffic Study MM-22)* To provide adequate on- and off-site capacity to accommodate up to 10 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall comply with the terms of the Traffic Mitigation Agreement for the following SR-138 intersection improvements for site access:

- Westerly Access: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one shared NB through/right lane, one SB left-turn lane, and one shared SB through/right lane. Install traffic signal.
- Central Access: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one NB through lane, one NB right-turn lane, one SB left-turn lane, one SB through lane, and one SB right-turn lane. Install traffic signal.
- 300th Street West: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one

NB left-turn lane, one shared NB through/right lane, one SB left-turn lane, and one shared SB through/right lane. Install traffic signal.

- 190th Street West: Provide one EB left-turn lane, one EB through lane, one WB through lane, one WB right-turn lane, one SB left-turn lane, and one SB right lane.

MM 10-2224 *(Supplemental Traffic Study MM-19)* To provide adequate on- and off-site capacity to accommodate up to 75 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the widening of SR-138, including:

- Addition of ~~an auxiliary~~ one additional lane in each direction (six lane~~s total~~ freeway) from I-5 to Gorman Post Road
- Addition of two additional lanes in each direction (six lane expressway) from Gorman Post Road to 300th Street West
- Addition of one additional lane in each direction (four lane expressway) from 300th Street West to 240th Street West
- Addition of one additional lane in each direction (four lane limited access conventional highway) from 240th Street West to the SR-14 interchange

MM 10-2325 *(Supplemental Traffic Study MM-20)* To provide adequate on- and off-site capacity to accommodate 100 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the widening of SR-138, including:

- Addition of ~~an auxiliary~~ a second additional lane in each direction (six lanes total) from 300th Street West to approximately ½ mile east of 250th ~~245th~~ Street West
- Construct additional intersection turn lanes at the following SR-138 intersections:
    - Westerly Project Access
    - 300th Street West
    - Margalo Drive

- Three Points Road
- 60th Street West

MM 10-2426 *(Traffic Study MM-21 and MM-26)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards RTP/SCS improvement projects on SR-58 between I-5 in Kern County and I-15 in San Bernardino County, as verified by the County in consultation with the Kern COG and Caltrans. Improvements could include development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors.

~~**MM 10-27** *(Traffic Study MM-22)* To provide adequate capacity on SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for the SR-138 improvements to a limited access facility with grade-separated interchanges, consistent with the County's analysis of the AVAP, or fair share participation and/or contribution to the SR-138 improvements (freeway/expressway or expressway/limited access conventional highway) being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

~~**MM 10-28** *(Traffic Study MM-23)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the CTIP or (2) contribute fair share funding towards the following planned improvements to I-5:~~

- ~~I-5 between Fort Tejon and Grapevine Road and between SR-138 and Lake Hughes Road interchanges: Strengthening and widening the inside and outside shoulders of I-5.~~

MM 10-2529 *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs.

The Project Applicant/Developer, through the required implementation of the Mobility Plan, shall:

- Reinforce and serve the Land Use Plan;
- Provide future residents, visitors and employees with multiple modes of transit/non-single occupancy vehicle (non-SOV) accessibility for internal and external trips ~~by future residents and visitors~~;
- Provide options to reduce vehicle trips and emissions by linking effective travel demand management with transportation systems and parking policies;
- Provide residents and employees on the Project site with multiple modes of transportation options (i.e., walk, bike, public transit, private auto, car share, bike share, etc.);
- Provides for 80 percent on average, but no less than 50 percent of each Village's residential units to be located within one-half mile of a Village center that includes retail and service uses;
- Provide parks within a 5-minute walk (0.25 mile) of 80 percent of all residential units;
- Provide a transit route easement no less than 25 feet wide in the Centennial Commerce District connecting the Town Center, Business Park, and Industrial/Civic areas and also northerly connecting to the Village Five Core;
- Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than ~~single-occupancy automobile~~ SOV use ~~by 30 percent in relation to standard ITE-generation rates for the overall Project~~; ~~and~~
- Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs ~~single-occupancy automobiles by 20 percent~~.;
- Require TMA implementation of a program to coordinate with automotive dealers on the Project site to promote CNG, electric, and hybrid electric vehicles~~.~~;

- Require TMA oversight of requirement for service fleet vehicles for agencies or businesses located on-site to be alternative fuel vehicles to the maximum extent feasible, as determine by the Project Applicant/Developer.; and
- Require TMA implementation of a combination of measures to provide adequate temporary bike parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure.

The Circulation Plan sets forth requirements for roadway classifications; intersection controls; and traffic calming measures. Where approved by the California Department of Transportation (Caltrans) and the County and where maintenance and durability costs are comparable to traditional materials, use "cool" pavement materials, which reduce heat island effect.

MM 10-2630 *(Traffic Study MM-24)* Each component of the Mobility Plan incorporates Transportation Demand Management (TDM) features to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and thereby reduce pollutant emissions. Related to this is the creation and ongoing operation of a Transportation Management Association (TMA) to fund and manage the operation of ongoing transportation programs, including but not limited to transit and on-demand services.

The key TDM elements that are inherent in the overall Mobility Plan are:

- Sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas;
- Small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations;
- Pedestrian environments incorporated with public streets;

- Transit route easement connecting the residential and commerce areas;
- Parking behind buildings to encourage walking in retail areas along street frontage; and
- Parks within 0.25 mile of 80 percent of all residential units.

MM 10-27~~31~~ *(Traffic Study MM-25)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards the following planned improvements to I-5:

- I-5 between Lake Hughes and Parker: Addition of one auxiliary lane in each direction.
- I-5 between Parker Road and SR-14: Addition of one HOV or HOT lane in each direction.

MM 10-28~~32~~ *(Traffic Study MM-27)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of two auxiliary lanes at the connector ramp from westbound SR-138 to southbound I-5 for ~~Year 2035~~ cumulative buildout conditions.

MM 10-29~~33~~ *(Traffic Study MM-28)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of two auxiliary lanes at the connector ramp mainline before the northbound I-5 to eastbound SR-138 connector ramp.

MM 10-30~~34~~ *(Traffic Study MM-29)* To provide adequate capacity at the SR-14/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at SR-14/SR-138:

- Construction of one auxiliary lane and a second off-ramp lane for the SR-14 northbound off ramp to SR-138.

MM 10-31~~35~~ *(Traffic Study MM-30)* To provide adequate capacity at the SR-14/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at SR-14/SR-138:

- Construction of a second lane on the SR-14 southbound on-ramp from SR-138.

MM 10-32~~36~~ *(Supplemental Traffic Study MM-31)* To provide adequate capacity at the SR-14 SB Ramps and SR-138 interchange, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the reconfiguration of the interchange to include two eastbound through lanes and ~~three~~ two westbound through lanes~~. In the southbound direction, add a second right-turn lane;~~ and install a traffic signal ~~and include right-turn overlap phasing~~ or (2) contribute fair share funding for intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-33~~37~~ *(Supplemental Traffic Study MM-32)* To provide adequate capacity at SR-14 NB Ramps and SR-138 interchange, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the reconfiguration of the interchange to include two eastbound through lanes and two westbound through lanes ~~and, in the northbound direction, add two left-turn lanes~~ and a traffic signal or (2) contribute fair share funding for intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-34~~38~~ *(Traffic Study MM-33)* To provide adequate capacity at Lake Hughes Road at I-NB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the addition of one lane to the northbound off-ramp and restripe the configuration to include one left-turn, one shared left/right-turn lane, and one dedicated right-turn lane.

MM 10-35~~39~~ *(Traffic Study MM-35)* To provide adequate capacity at the Magic Mountain Parkway at I-5 SB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the restriping of the southbound off-ramp to provide two left-turn lanes, one shared left-turn/through lane, and one right-turn lane.

MM 10-36~~40~~ *(Traffic Study MM-36)* To provide adequate capacity at the Magic Mountain Parkway at I-5 NB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the conversion of the shared through/right-turn lane to a shared left/through/right-turn lane.

MM 10-37~~41~~ *(Traffic Study MM-37)* To provide adequate capacity at the Valencia Road at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the striping of a third westbound through lane.

MM 10-38~~42~~ *(Traffic Study MM-38)* To provide adequate capacity at the Valencia Road at I-5 NB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the traffic signal modification to add a northbound right-turn overlap phase.

MM 10-39~~43~~ *(Traffic Study MM-39)* To provide adequate capacity at the McBean Parkway at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the restriping of the dedicated westbound right-turn lane to a shared through/right-turn lane.

MM 10-40~~44~~ *(Traffic Study MM-40)* To provide adequate capacity at the Calgrove Road at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward adding a second eastbound through lane and a de-facto right-turn lane and a second through lane in the westbound direction.

MM 10-41~~45~~ *(Traffic Study MM-41)* To provide adequate capacity at the Calgrove Road at I-5 NB Ramps intersection, the Project

Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward restriping to add a westbound de facto right-turn lane.

Since Caltrans has ~~deferred the selection of a preferred build alternative for the Northwest 138 Corridor Improvement Project and has also~~ reserved the right to determine the specific types of intersection controls at the time the improvements occur ~~and MMs 10-6 through 10-27 and MMs 10-31 through 10-35 would mitigate the Project's impacts and cumulative impacts on the SR-138~~, ~~these~~ mitigation measures related to intersection controls on SR-138 are subject to change pending Caltrans determination of the specific types of intersection controls that will be implemented ~~preferred 138 Corridor alternative~~. T~~herefore, t~~he Centennial Project will contribute its fair share and/or contribute towards the cost of the Northwest 138 Corridor Improvement Project preferred Alternative 2. ~~for the alternative ultimately selected by Caltrans and Metro.~~ Refer to the Traffic Study (Draft EIR Appendix 5.10-A) and the Supplemental Traffic Study (Final EIR Appendix 5.10-C) for additional detail on the traffic mitigation.

Under MM 10-25~~29~~, the Project is required to reduce use of automobiles by implementing PDFs and TDM measures to be administered and monitored by a Transportation Management Association. These mandatory mitigation measures require ~~the reduction of single-occupancy automobile use for~~ that a minimum of 20 percent of total peak morning and afternoon off-site commute~~s~~ trips and a minimum of 30 percent of total on-site internal trips be completed by using transit modes other than ~~20 percent, and require the reduction of~~ single occupancy automobile use ~~within the Project site by 30 percent~~. The traffic analysis above conservatively assumes full trip (i.e., single occupancy automobile) volumes on- and off-site, and thus, is conservative and actual traffic volumes from the Project are anticipated to be lower.

5.10.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation measures have been established to reduce the Project's significant impacts on traffic access and circulation. However, these mitigation measures call for improvements to Caltrans facilities, which are outside the control of the County of Los Angeles and the Project Applicant. Implementation of the ~~CTIP~~ Traffic Mitigation Agreement or fair share contributions by the Project Applicant in accordance with MM 10-3, MMs 10-6 through 10-24~~28~~, and MMs 10-27~~31~~ through 10-41~~45~~ will ensure that the Project provides fair share funding required to mitigate potential Project impacts. Implementation of a traffic mitigation fee program (MM 10-4) would provide a mechanism for providing fair share contributions from other projects and future activity affecting State facilities.

Response to Comment B.3-7:

This comment addresses traffic study information for SR-138.[118] This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the NW SR-138 Project Draft EIR was filed by the County on May 15, 2017 and the 60-day comment period began on May 17, 2017.

As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements.

In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. As discussed on Draft EIR pages 5.10-2 to 5.10-5, both the Draft EIR and the NW SR-138 FEIR use the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County. The Draft EIR utilizes a more recent version of the model that was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. The STS also uses the traffic forecasts from the updated North County Sub-Area Model provided by the County to analyze potential Project and cumulative impacts to reflect the most current information available regarding traffic conditions in the North County region.

The Draft EIR considered potential Project impacts with improvements required to accommodate the full buildout of the Project under existing traffic plus Project buildout conditions, and cumulative traffic plus Project buildout conditions. The Draft EIR identified mitigation measures that would maintain acceptable level of service (LOS) standards at all applicable highway segments, intersections and ramps. To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW 138

[118] DRP 2017, pp. 4-39 to -41; 5.10-34 to -36; 7-8 and -9

FEIR and the Draft EIR.[119] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[120]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[121]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[122]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[123]

The STS compares the Project's potential impacts identified in the Draft EIR for Interstate-5 (I-5), SR-14 and SR-99 facilities using the volume to capacity methodology specified by the Congestion Management Plan for Los Angeles County and the Project's potential impacts using the Caltrans' recommended HCM methodology. HCM calculations were prepared for 62 locations within the Draft EIR study area consisting of freeway segments in advance of and after major system interchanges as well as representative locations between major system interchanges. The analyzed locations provide a comprehensive coverage of the Draft EIR study area because they include the freeway facilities with the greatest potential to be affected by congestion. Under existing plus Project conditions, the Draft EIR and the STS show that all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[124] Under cumulative plus Project conditions with mitigation, the Draft EIR and the STS show that almost all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[125] The STS indicates that certain study locations, such as the Grapevine grade segment of I-5, would not meet HCM-based LOS standards because topographic conditions, lane and speed controls, and other localized conditions would result in higher traffic densities. As shown in STS Table A-5, however, LOS conditions would be worse under cumulative without Project conditions, and LOS conditions improve under cumulative with Project conditions with the implementation of the Project mitigation measures.[126] Consequently, the Project does not result in a significant impact at any location

119 Final EIR Appendix 5.10-C, Sections 2.5 and 3
120 *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
121 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
122 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
123 *Id.,* Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9
124 *Id.,* Appendix 5.10-C, Table 4-1
125 *Id.,* Appendix 5.10-C, Table 4-2
126 *Id.,* Appendix 5.10-C, Section 5

that does not meet HCM-based LOS standards under cumulative with Project conditions with mitigation.

As discussed above, the Draft EIR considered improvements to SR-138 that would be required to accommodate the full buildout of the Project under cumulative traffic conditions. The implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative conditions, and additional improvements consistent with the SR-138 facilities considered in the Draft EIR would be required to accommodate all of the Project's full buildout traffic under long-range cumulative conditions. The NW SR-138 FEIR also clarified certain aspects of the SR-138 design details that would be implemented with Alt 2, including the number and locations of intersections along SR-138 from I-5 to SR-14. The NW SR-138 FEIR addressed several types of intersection configurations for each location but defers selection of the final configurations to the SR-138 design phase. Subject to minor adjustments for consistency with these Alt 2 design details, the SR-138 facilities that would result from the additional improvements to Alt 2 required for full Project buildout under long-range cumulative conditions as described in the STS are substantially similar to the full buildout SR-138 facilities discussed in the Draft EIR. The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[127]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[128]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[129]

As discussed in the STS,[130] the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2. As required by MMs 10-3 and 10-4, the Project will contribute fair share funding or provide funding for SR-138 improvements in accordance with a mitigation agreement with Caltrans for the implementation of Alt 2, improvements required to connect the Project circulation system with the Alt 2 facilities, and, if confirmed in traffic studies submitted in conjunction with the review and approval process for future Project tract maps, additional SR-138 improvements that may be required to accommodate full Project buildout under cumulative traffic conditions. As a result, the STS

127 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
128 *Id.,* Appendix 5.10-C, Section 2.1
129 *Id.,* Appendix 5.10-C, Section 2.4
130 *Id.,* Appendix 5.10-C, Section 5

prepared in response to Caltrans comments incorporates the SR-138 improvements and identified in the NW SR-138 FEIR with the Draft EIR traffic analysis.

Response to Comment B.3-8:

This comment addresses intersection evaluations for the Project along SR-138. As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. Alt 2 includes a six-lane divided freeway between I-5 and Gorman Post Road, constructing a six-lane divided expressway between Gorman Post Road and 300th Street West, constructing a four-lane divided expressway between 300th Street West and 240th Street West, and constructing a four-lane conventional highway between 240th Street West and SR-14. The NW SR-138 FEIR also clarified certain aspects of the SR-138 design details that would be implemented with Alt 2, including the number and locations of intersections along SR-138 from I-5 to SR-14. The NW SR-138 FEIR addressed several types of intersection configurations for each location but defers selection of the final configurations to the SR-138 design phase.

In July 2017 Caltrans submitted a comment letter on the Draft EIR requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. The STS determined that:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[131]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[132]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[133]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[134]

131 *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
132 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2, and 3-9
133 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
134 *Id.,* Appendix 5.10-C, Tables 3-7 through 3-9

The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including intersection improvements required to connect the Project circulation system with SR-138, and other intersection improvements that may be required if projected long-range cumulative conditions are verified in subsequent traffic studies conducted in future Project tract map applications.[135]

The intersection improvements required to connect the Project circulation system with SR-138 include the following: (a) at the Cement Plant (Private) Road (West Project Access) intersection, add a third eastbound left-turn lane, add a second westbound left-turn lane, add a second northbound left-turn lane, add a second northbound through lane, add one northbound right-turn lane, add a second southbound left-turn lane, add a second southbound through lane, and add two southbound right-turn lanes; (b) at the Project Central Access Road (Centennial Town Center) intersection, provide a new intersection to include two eastbound left-turn lanes, three eastbound through lanes, one eastbound right-turn lane, two westbound left-turn lanes, three westbound through lanes, two westbound right-turn lanes, two northbound left-turn lanes, three northbound through lanes, one northbound right-turn lane, two southbound left-turn lanes, three southbound through lanes, and one southbound right-turn lane, and maintain right of way for the addition of a fourth eastbound and a fourth westbound through lane (½ mile total) if needed for cumulative traffic; and (c) at the 300th Street West Intersection, add a second westbound left-turn lane, add a second northbound left-turn lane, add a second northbound through lane, add one northbound right-turn lane, add two southbound left-turn lanes, and add a second southbound through lane.[136]

To accommodate full Project buildout and long-range cumulative traffic on SR-138, additional enhancements may be required at the West Project Access, Central Access Road, 300th Street West, Margalo Drive, Three Points Road, 250th Street West and 60th Street West intersections.[137] The need for any of these improvements will be evaluated in the traffic studies required for each Project tract map application in accordance with the MMRP for the Project.[138]

As discussed in the STS[139] all of the Project connection intersection improvements and potential intersection enhancements under long-range cumulative conditions would occur within the right-of-way footprint of Alternative 2 evaluated in the NW SR-138 FEIR and within the Project development footprint evaluated in the Draft EIR and will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Draft EIR.[140] All Project-related intersection improvements to SR-138 will be coordinated with Caltrans, including evaluating under applicable intersection control evaluation policies. As discussed in the STS[141] the Project's mitigation measures have been clarified to reflect the implementation of these

135 *Id.,* Appendix 2.0-C.Rev, MMRP
136 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
137 *Id.,* Appendix 5.10-C, Section 2-4
138 *Id.,* Appendix 2.0-C.Rev
139 *Id.,* Appendix 5.10-C, Section 2.5
140 *Id.,* Appendix 5.10-C, Sections 2.5 and 3
141 *Id.,* Appendix 5.10-C, Section 5

improvements with Alt 2. As required by MMs 10-3 and 10-4, the Project will contribute fair share funding or provide funding for SR-138 improvements in accordance with a mitigation agreement with Caltrans for the implementation of Alt 2, improvements required to connect the Project circulation system with the Alt 2 facilities, and, if confirmed in traffic studies submitted in conjunction with the review and approval process for future Project tract maps, additional SR-138 improvements that may be required to accommodate full Project buildout under cumulative traffic conditions.

Response to Comment B.3-9:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As discussed in Draft EIR Section 5.10, Traffic, Access, and Circulation, the Project Applicant intends to implement and fund State transportation facility mitigation measures through the proposed Traffic Mitigation Agreement, which would provide funding contributions, phasing, guarantees of payments, and collection of third-party contributions for required SR-138 mitigation. Alternatively, the Project will pay a fair share contribution towards the construction of transportation facilities that will mitigate for potential Project impacts. More specifically, as discussed on Draft EIR page 5.10-91, and in the Supplemental Traffic Study (STS) prepared to incorporate the identification of preferred Alternative 2 in the Northwest State Route 138 Corridor Improvement project Final EIR/EIS with the Project traffic analysis, MMs 10-3 and 10-4 require the Project Applicant to seek to enter into a Traffic Mitigation Agreement and transportation mitigation fee program that would fully mitigate for all impacts to SR-138 highway segments under cumulative plus Project conditions or to contribute fair share funding for the required improvements.

The STS is attached as Appendix 5.10-C of the Final EIR. The STS determined that:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[142]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[143]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[144]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[145]

142 *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
143 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
144 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
145 *Id.,* Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9

The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[146]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[147]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[148]

The Project mitigation measures have been updated to reflect the incorporation of SR-138 Alternative 2 with the Project traffic analysis and the improvements described in the STS.[149] MMs 10-6 through 10-18, MM 10-20, and MMs 10-28 through 10-33 require fair share funding mitigation for impacts to SR-138 segments, intersections and ramps. MM 10-20 requires that the Project dedicate right-of-way along the segment of the SR-138 that runs adjacent to the Project site to ensure that sufficient land is reserved for future rights-of-way that would be used to widen and realign SR-138 at these locations. Compliance with these mitigation measures or the fair share contributions towards the improvements described above would reduce the potential cumulative plus Project impacts to SR-138 highway segments identified to less than significant levels.

Response to Comment B.3-10:

The comment is noted for the record and will be provided to the Regional Planning Commission and the Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment B.3-11:

This comment provides the Commenter's contact information. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

146 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
147 *Id.,* Appendix 5.10-C, Section 2.1
148 *Id.,* Appendix 5.10-C, Section 2.4
149 *Id.,* Appendix 5.10-C, Section 5

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July 17, 2017

Jodie Sackett
County of Los Angeles
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Subject: Draft Environmental Impact Report (DEIR) and Centennial Specific Plan (CSP) for the Centennial Project (State Clearinghouse number 2004031072).

Dear Mr. Sackett:

The California Department of Fish and Wildlife (CDFW) has reviewed the DEIR and CSP submitted by Los Angeles County (Lead Agency) for the proposed Centennial Project (Project). The Project is located approximately 35 miles north of the City of Santa Clarita in Los Angeles County; approximately 50 miles south of the City of Bakersfield in Kern County; and approximately 36 and 43 miles west of the Cities of Lancaster and Palmdale, respectively, in Los Angeles County. State Route 138 (SR 138) bisects the southern portion of the Project site in an east-west orientation, just south of the Kern County/Los Angeles County boundary in the immediate vicinity of Quail Lake. The California Aqueduct splits into a west and east branch just to the north of the Project site. The west branch of the California Aqueduct continues south bisecting the western portion of the Project site. The east branch of the California Aqueduct continues in an easterly direction and borders the Project site to the north. B.4-1

The proposed Project includes the development of a new community with residential, commercial, business, recreational/entertainment, and institutional/civic uses. The Project site is comprised of approximately 12,323 acres and would allow up to 19,333 dwelling units on approximately 4,987 acres. Other land uses include approximately 7,363,818 square feet (sf) of business park uses (office, research and development, warehouse and light manufacturing) on approximately 597 acres and approximately 1,034,550 sf of commercial uses on approximately 102 acres. Proposed institutional/civic uses (schools, medical facilities, libraries, etc.) encompass approximately 1,568,160 sf on approximately 110 acres. In addition, the Project will provide parks, public and private recreational amenities, schools, public services, helipads, transit centers, and water and waste water treatment facilities. Proposed land uses will allow for the development of new oil and gas wells and extraction facilities, including surface mining; the development of new renewable energy resources, including solar, wind and other renewable energy generation facilities; shooting ranges; and hunting, camping and hiking activities. B.4-2

There are several drainages on the Project site, including drainages within Oso Canyon and Tentrock Canyon, and an unnamed drainage that parallels SR 138 on its north side. Portions of the Project site will be left as open space, primarily within Significant Ecological Area (SEA) 17, which is located along the northwestern and southeastern edges of the Project site, and within the creeks and drainages that will not be filled, as well as drainage features that will be

recreated after Project development. Primary access to the Project site will be from SR 138, with additional access available from 300th Street West and 290th Street West and the relocated National Cement Plant Road. Upgrades to SR 138 and Interstate 5 (I5) are planned through a separate California Department of Transportation (Caltrans) development project to accommodate increasing traffic usage of the aforementioned roadways. Offsite facilities are also proposed as a part of the Project to accommodate the new infrastructure to serve the Project site. Current land use on the Project site predominantly consists of annual grassland grazing with agriculture production occurring along the eastern edge of the Project site. B.4-2 cont.

The Project area and the surrounding Tejon Ranch lands are one of the largest, most-intact, privately-held, natural habitat areas remaining in California, and support a diverse assemblage of vegetation communities and special status species. Vegetation communities known to occur on the Project site include, but are not limited to, Wright's buckwheat scrub, mixed oak woodland, alluvial scrub, cottonwood woodland, riparian herb, rush riparian grassland, southern arroyo willow riparian, southern cottonwood-willow woodland, southern willow scrub, valley oak riparian woodland, unvegetated wash, willow riparian forest, willow riparian woodland, alkali meadow, Baltic rush, coastal and valley freshwater marsh, seeps and ephemeral ponds, and native perennial grasslands, wildflower fields, and native and nonnative annual grasslands.

Special status species known to occur on or within the vicinity of the Project site include but are not limited to, the State and federally endangered and State fully protected California condor (*Gymnogyps californianus*); State and federally endangered least Bell's vireo (*Vireo bellii pusillus*) and southwestern willow flycatcher (*Empidonax traillii extimus*); State endangered tricolored blackbird (*Agelaius tricolor*) and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*); State threatened Swainson's hawk (*Buteo swainsoni,* SWHA) and Tehachapi slender salamander (*Batrachoseps stebbinsi*); State fully protected golden eagle (*Aquila chrysaetos*), and white-tailed kite (*Elanus leucurus*); California Rare Plant Rank (CRPR) 1B.1 Piute Mountains navarretia (*Navarretia setiloba*); CRPR 1B.2 round-leaved filaree (*California macrophyllum*) and State Species of Special Concern burrowing owl (*Athene cunicularia,* BUOW), silvery legless lizard (*Anniella pulchra pulchra*), coast horned lizard (*Phrynosoma blainvillii*), two-striped garter snake (*Thamnophis hammondii*), northern harrier (*Circus cyaneus*), American badger (*Taxidea taxus*) and Tehachapi pocket mouse (*Perognathus alticolus inexpectatus*). The Project site is also one of the largest remaining perennial and annual grassland habitat areas in Los Angeles County. The Project as proposed would result in a cumulatively significant impact to native perennial grasslands and regional wildlife movement. B.4-3

Our specific comments follow and are organized in the same sequence as the sections in the DEIR. B.4-4

Department Jurisdiction

Trustee Agency Authority: CDFW is a Trustee Agency with the responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact plant, fish and wildlife resources. Pursuant to Fish and Game Code Section 1802, CDFW has jurisdiction over the conservation, protection and management of fish, wildlife, native plants and habitat necessary for biologically sustainable populations of those species. As a Trustee Agency for plant, fish and wildlife resources, CDFW is responsible for providing, as available, B.4-5

biological expertise to review and comment on environmental documents and impacts arising from project activities, as those terms are used under CEQA.

Responsible Agency Authority: CDFW has regulatory authority over projects that could result in "take" of any species listed or is a candidate for listing by the State (State-listed) as threatened or endangered, pursuant to the California Endangered Species Act (CESA). For this or any other project which impacts listed species, an incidental take permit (ITP) is the mechanism for providing take authorization under CESA. CEQA requires a Mandatory Finding of Significance if a project is likely to substantially impact threatened or endangered species (sections 21001{c}, 21083, Guidelines sections 15380, 15064, 15065). Impacts must be avoided or mitigated to less than significant levels unless the CEQA Lead Agency makes and supports a Statement of Overriding Consideration (SOC). A CEQA Lead Agency's SOC would not preclude the Project proponent's obligation to comply with CESA.

Lake and Streambed Alteration Notification: CDFW has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource, pursuant to Fish and Game Code sections 1600 *et seq*. Section 1602(a) of the Fish and Game Code requires an entity to notify CDFW before engaging in activities that would substantially change the bed, channel, or bank of a stream or substantially divert or obstruct the natural flow of a stream. Project activities are proposed that will involve work within the bed, bank, or channel (which may include associated riparian resources) of several CDFW jurisdictional resources; therefore, CDFW recommends the Project applicant submit a Lake and Streambed Alteration Notification to CDFW for the Project.

Other Rare Species: Species of plants and animals need not be listed as Endangered, Rare or Threatened (E, R or T) pursuant to CESA and/or the Federal Endangered Species Act (ESA) to be considered E, R or T under CEQA. If a species can be shown to meet the criteria for a listing as E, R or T under CESA and/or ESA as specified in the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15380), it should be fully considered in the environmental analysis for the Project.

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Take of any fully protected species is prohibited, and CDFW cannot authorize their take except under the provisions of a Natural Communities Conservation Plan (NCCP), 2081.7 or a Memorandum of Understanding for scientific purposes. Neither the Lead Agency nor Project proponent are plan participants of an NCCP; 2081.7 does not apply to the proposed Project, and a development project is not considered a scientific purpose.

Several fully protected species are known to occur on the Project site. This status, and the absence of an NCCP for the Project, precludes CDFW from authorizing any amount of incidental take for fully protected species. When projects show the potential to cause take of fully protected species, we advise on appropriate measures to avoid take. Given the legal status of fully protected animals, take avoidance measures must meet very high standards of effectiveness, substantially greater than the measures to minimize take required under ITPs.

Bird Protection: CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Sections of the Fish and

B.4-5 cont.

Game Code that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). B.4-5 cont.

Potential Impacts and Recommendations

Draft Environmental Impact Report:

Project Description (Section 4.0): Exhibit 4-7 in the DEIR shows that the current Cement Plant Road will be upgraded from the current 2-lane road to a 6-lane major highway. The northern portion of Cement Plant Road is located in the northern portion of the SEA. The DEIR states that the SEA will not be impacted. No dimensions are provided as to the current and proposed upgraded footprint (including width) of Cement Plant Road so it is unclear to CDFW if the current footprint of Cement Plant Road is wide enough to support an upgrade to a 6-lane major highway without impacting the SEA. B.4-6

The DEIR states that the cable and internet provider has not been identified at this point in time, but would be provided by one of the two available providers within the Project area. Depending on the provider chosen, the new cable and internet line may be extended either 4 or 8 miles from its existing location to reach the Project site. The Biological Resources section of the DEIR did not address the potential routes of the telecom line extension, nor conduct biological surveys to identify potential impacts to species that may result from the installation of the telecom line extension. CDFW recommends the DEIR be revised to include survey results and a biological analysis of potential impacts from the installation of the telecom line. B.4-7

CDFW also recommends that all new and existing dry utilities be installed underground to minimize impacts to migratory birds, including California condor. B.4-8

Hydrology and Flood (Section 5.2): The Hydrology and Flood Section of the DEIR discloses that existing onsite drainages will be integrated into the Project's storm drain system. Integration activities include removal, reengineering, and reduction of drainage areas due to diversion and re-route of Project runoff. Channels within the Project site will be avoided, integrated into the storm drain system or be reengineered after site grading. Most Project runoff will be subject to control and treatment in a regional system that consists of 28 detention and retention basins located throughout the Project site, with 11 of these basins occurring within or adjacent to a channel (Exhibit 5.2-4 and 5.2-5). In addition to capturing Project site runoff, onsite basins and reengineered natural streams will also be designed to capture potential mudflows and may be revegetated or enhanced with drought tolerant and native species, some of which do not currently exist on the Project site. B.4-9

The aforementioned modifications to the drainages and channels on the Project site are a substantial change in the biological function and composition of these features and may result in adverse impacts to CDFW jurisdictional areas (e.g., streams), wildlife and special status species and their associated habitats, as well as additional offsite resources, and would require acquisition of a lake and streambed alteration agreement from CDFW pursuant to Fish and Game Code Section 1600 et seq. CDFW recommends the DEIR be revised to include a detailed analysis of the biological impacts of these modifications, including increased pollutant,

chemical, and fertilizer loads in jurisdictional areas from site runoff, changes in species composition and habitat use from revegetation and reengineering of jurisdictional features, in-channel hydromodification measures (plunge pools, bank stabilization, flow diversion, culverts, etc.) and increased sediment deposit. B.4-9 cont.

The Hydrology and Flood Section of the DEIR also states that the Project will conform to the County's flood and hydrology control standards (during a 50-year design storm event) by either reducing offsite flows and volumes or by maintaining existing site conditions. According to Table 5.2-7 in the DEIR, existing offsite flow conditions will only remain unchanged in the Gorman Watershed. All other watersheds will have a reduction in existing offsite flow/volume conditions. CDFW recommends the DEIR be revised to include an analysis of the biological impacts of a reduction in offsite flow/volume and include a discussion as to whether offsite flows will exit the Project site in the same location as pre-Project conditions in order to maintain offsite connectivity and existing offsite biological resources. In addition, CDFW is unclear if these basins will also be used for recreational or multi-use purposes. The DEIR discusses a potential fishing lake in Section 4.5.6 (Parks/Recreation); however, additional details such as, but not limited to, the location, size, fish species stocked, vegetation, fencing, and any additional recreational uses are not described in the Biological Resources section of the DEIR. Since fishing lakes may serve as a point source for introduced and/or invasive species, CDFW recommends the DEIR be revised to further describe and analyze the potential siting of lakes, ponds, and other perennial waterbodies and their locations. The impacts of these features need to be fully described, disclosed, and analyzed in the Biological Resources Section of the DEIR. These impacts include, but are not limited to the introduction of sport fish, the potential for introduction of invasive species from the general public (such as non-native fish, amphibians, and reptiles), the impacts of these introductions on native species within and adjacent to the Project site, and specific measures to reduce these impacts to less than significant. B.4-10

Hazards and Fire Safety (Section 5.3): An abandoned mine shaft, approximately four feet high by five feet wide (at the entrance), and partially blocked by soil, extends approximately eight feet into the side of a hill near Quail Lake. In order to eliminate potential risks and prevent future access into the abandoned mine, the DEIR proposes to permanently close the mine. However, the DEIR does not provide any information on any potential wildlife species that may be using the mine, nor does it provide information on any surveys that have been done to monitor wildlife species' potential use of the mine. Abandoned mines are known to provide habitat for a variety of wildlife species, including, but not limited to, maternity and/or roosting habitat for bat species. CDFW recommends the Project Applicant conduct focused bat and wildlife surveys, over the course of one year (to account for seasonal use), to determine potential species' use of the mine. CDFW further recommends this section, as well as the Biological Resources section, of the DEIR be revised to include the results of these surveys, an analysis of the impacts to special status species from the potential closure of the mine, and specific measures to avoid, minimize, and mitigate these impacts. B.4-11

Mitigation Measure 3-2 of the Hazards and Fire Safety section of the DEIR requires the access way into the Project site be paved or treated with environmentally safe dust-control agents (i.e., dust palliatives). The DEIR also allows for the use of these dust-control agents in other areas of the Project site. The location, extent of use, and environmental safety of these dust-control agents has not been described in the DEIR, nor have they been analyzed in regards to potential special status species and habitat impacts in the Biological Resources B.4-12

section of the DEIR. The use of dust control agents and paved access roads may impact special status species and their associated habitats (e.g., changes in soil moisture infiltration rates, obstruction of movement pathways, increased salt concentrations from dust control agents, etc.) and this is not discussed in the DEIR. Therefore, CDFW recommends the Biological Resources section of the DEIR be revised to include and further describe these activities and their locations; fully analyze the potential impacts of dust control agents on biological resources, and the specific measures to avoid, minimize and fully mitigate these impacts. . B.4-12 cont.

Mitigation Measure 3-9 of the Hazards and Fire Safety section of the DEIR requires the future development of a Fuel Modification Plan. This Plan will described the extent and location of the fuel modification zone, clearance area, plant pallet and planting locations. The deferred development of this Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of this Plan is not required. CDFW recommends the DEIR be revised to include the Fuel Modification Plan for CDFW review. B.4-13

Water Quality (Section 5.4): The Water Quality section of the DEIR states that the Lahontan Regional Water Quality Control Board (RWQCB) and the Los Angeles RWQCB have issued permits for the Project governing construction-related dewatering and discharge operations. The Lahontan RWQCB permit regulates construction dewatering, diverted stream flows, dredge spoils dewatering and subterranean seepage dewatering among other activities. The Los Angeles RWQCB permit regulates construction-related dewatering discharges, and addresses discharges from temporary dewatering operations associated with construction and permanent dewatering operations associated with development. The location, extent of dewatering and discharges, and environmental impacts from these activities have not been described in the DEIR, nor have they been analyzed in regards to potential special status species and habitat impacts. Since these actions may impact special status species and their associated habitats and requires the submission of a Lake and Streambed Alteration Notification to CDFW for these activities, CDFW recommends the Biological Resources section of the DEIR be revised to further describe and analyze these potential activities and related biological impacts. B.4-14

Project Design Feature (PDF) 4-2 in the Water Quality section of the DEIR describes the development of an Integrated Pest Management (IPM) and landscaping best management practices (BMP) that will be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The Plan and BMPs will be consistent with Section 3.3 of the CSP. However, the CSP only provides a guideline to the development of the Plan and BMPs and is subject to change, and therefore, may not be incorporated into the Plan and BMPs. In addition, the DEIR does not include these guidelines as Mitigation Measures and therefore they are not enforceable. The deferred development of the BMPs and Landscaping Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan and BMPs are not required. In addition, the guidelines in the CSP are not included as Mitigation Measures in the DEIR, are not enforceable, and are subject to change during each tract map application. CDFW recommends the DEIR be revised to include the IPM BMPs, the landscaping BMPs, and the Landscaping Plan for CDFW review and comment. B.4-15

CDFW also recommends the IPM prohibit the use of all rodenticides containing anticoagulants or other toxins that may result in secondary poisoning in non-target wildlife. This prohibition needs to be implemented via notification to homebuyers through their home purchase contracts and CC&Rs and as part of the larger natural area maintenance plan for the Project. If use of rodenticides that may result in secondary poisoning in non-target wildlife cannot feasibly be prohibited from use on the Project site, CDFW recommends regular monitoring of blood samples drawn from predator species on the Project site and within adjacent Tejon Ranch lands to document any indication of secondary toxicity health concerns. An adaptive management plan that includes: measures to remedy secondary toxicity problems, further enforcement, public awareness efforts, capture and treatment of infected wildlife with vitamin K supplements as directed by a veterinarian, and an established baseline for representative predator species in the Project area before Project related rodenticide pest control measures are likely to occur. All of these activities need to be incorporated into a Project resource management plan, included in the DEIR as a Mitigation Measure, and funded by the Project Applicant for the life of the Project. CDFW further recommends the DEIR be revised to include a Mitigation Measure for the above recommendations related to the IPM and BMP. B.4-16

Land Resources (Section 5.5): PDF 5-1 in the Land Resources section states that grazing operations on portions of the Open Space preserve areas will be continued as a management tool for grassland conservation, subject to the specifications of the Native Perennial Grassland and Wildflower Field Mitigation Plan to be prepared as part of Project implementation. Several PDFs in the DEIR are not included as Mitigation Measures in the DEIR and are therefore not enforceable. PDF 5-1 is one of these measures. The lack of enforceability and the delayed development of this plan, which may have a significant role in potentially protecting and reducing impacts to several important biological resources on the site, does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of this plan is not required. CDFW recommends the DEIR be revised to include the Native Perennial Grassland and Wildflower Field Mitigation Plan for CDFW review and comment and the DEIR be further revised to incorporate all PDFs as enforceable Mitigation Measures. B.4-17

Biological Resources (Section 5.7):

Tricolored Blackbird: Tricolored blackbird (TCBB) is a State endangered species. Breeding colonies of tricolored blackbird occur at Quail Lake and at a pond on the north central portion of the Project site. Oso Creek also provides additional onsite habitat for this species. In addition to breeding habitat, the Project site also provides foraging habitat for this species. The DEIR proposes a no-disturbance buffer of 400 feet for permanent impacts and the allowance of temporary impacts within 400 feet during non-breeding season for the Oso Creek TCBB colonies. A no-disturbance buffer is not identified in the DEIR for the TCBB colony at the pond location. The ecological rationale for instituting this size buffer is not discussed or supported by the reproductive, foraging, and habitat needs for all life stages of the species. Foraging habitat adjacent to and available in close proximity to nesting sites must be sufficient in size to support a robust population of insects and seed to sustain the colony year after year and preclude edge effects from the development to cause degradation of both nesting and foraging habitat. The invasion of rats, feral dogs and cats, pesticide use impacts on insect prey species and poisoning from development encroachment in close proximity to the breeding colonies needs to be fully B.4-18

analyzed and subsequently utilized to inform and quantify all no-disturbance buffers in the DEIR. B.4-18 cont.

CDFW does not concur that the no-disturbance buffers currently proposed in the DEIR are sufficient to fully avoid and preclude take (as defined under Section 86 of Fish and Game Code) of TCBB. Therefore, CDFW is recommending consultation and acquisition of an ITP pursuant to Fish and Game Code Section 2081 in advance of Project implementation. B.4-19

California Condor: "Based upon the pre-historic range of the California condor and that of pronghorn antelope and other ungulates, the proximity of the Antelope Valley to the Tehachapi and San Gabriel Mountains probably meant that the west end of the Antelope Valley floor (including Centennial) was used for foraging by condors at least on an infrequent basis (Bloom 2009: DEIR Appendix)." Increasingly, condors are expanding their current flight paths to include more frequent flights over the west end of the Antelope Valley floor, including the Project site. United States Fish and Wildlife Service (USFWS) telemetry data has also documented an occurrence of a condor landing (possibly to feed on a carcass) on the Project site. In addition, condors released from captive breeding programs appear to be more curious and adaptive to human presence than those that were in the wild prior to 1987 (when the last condor was captured for captive breeding) (Bloom 2009: DEIR Appendix). "The presence of human structures, pets, and livestock can actually serve as an attractant to condors, particularly along the development/Open Space interface" (Bloom 2009: DEIR Appendix). B.4-20

CDFW disagrees with the DEIR's conclusion that Project implementation is not expected to result in impacts to California condor due to "condor not occupying the low valley floor areas that are likely to incur the greatest level of disturbance from future development". Specifically, the *Environmental Assessment of the Centennial Specific Plan Project Site on the California Condor (Gymnogyps californianus),* included as an appendix to the DEIR, determines that the Project site will result in direct impacts to condors in the loss of potential foraging habitat and indirect impacts to condors through increased human and domestic animal use of the Project site and within the Project vicinity (Bloom 2009: DEIR Appendix). CDFW recommends that the Measures to Avoid, Minimize, Mitigate Potential Impacts and the Measures to Contribute to the Conservation and Recovery of the Condor, within the *Environmental Assessment of the Centennial Specific Plan Project Site on the California Condor (Gymnogyps californianus)* be incorporated as Mitigation Measures into a revised DEIR; including the aforementioned measures related to microtrash, illegal shooting, and global positioning system (GPS) tracking. B.4-21

CDFW also disagrees with the DEIR's conclusion that the Tehachapi Uplands Multiple Species Habitat Conservation Plan (TUMSHCP) will provide for the long-term preservation of essential condor areas that would offset potential impacts from the Project. Projects impacts were not contemplated under the TUMSHCP and therefore, mitigation lands that have been preserved under the TUMSHCP to offset impacts to condor cannot be considered in the DEIR as additional available habitat that would aid in offsetting Project impacts. Similarly, the Ranchwide Agreement requires permanent protection of 178,000 acres within 30 years of receiving the first development entitlement, which was conferred to Tejon Mountain Village in 2009. The conservation of a portion of these mitigation lands is dependent on development milestones of Tejon Mountain Village and should not be considered as additional available adjacent habitat that may aid in offsetting Project impacts when to date, no lands have been conserved other than the 62,000 acres purchased by the State in 2010, and it is unknown when additional future B.4-22

conservation will occur. Therefore, CDFW does not agree that impacts to habitat and some species, including the California condor, by the Project will be mitigated to less than significant because of their ability to use habitat lands included in the Ranchwide Agreement and the TUMSHCP. Moreover, the Ranchwide Agreement will allow some activities (e.g., hunting, filming, recreational use, etc.) that may be incompatible with species protection and recovery. In addition, the ability for the Project to develop energy production measures (e.g., solar and wind facilities, etc.) within the Open Space mitigation lands further reduces the quality of the proposed onsite mitigation lands and may have detrimental impacts on several special status species, including but not limited to, California condor. B.4-22 cont.

As described above, California condor is a State and federal endangered and State fully protected species. The avoidance buffers listed in Mitigation Measure 7-6 for California condor are not sufficient to ensure full avoidance of this species. CDFW recommends the Project Applicant consult with CDFW and USFWS to determined appropriate avoidance buffers for California condors and these measures be included in a revised DEIR. B.4-23

Burrowing Owl: BUOWs are known to occur on and adjacent to the Project site. CDFW recommends the Lead Agency require the *Staff Report on Burrowing Owl Mitigation* (dated March 7, 2012), be followed in its entirety and without modification, including the listed no-disturbance buffers, mitigation and relocation recommendations and that these measures be added to the DEIR as enforceable conditions. The staff report can be found on our website at www.dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf. CDFW recommends that a qualified biologist conduct a survey no more than 30 days before the onset of any Project activities in each construction area. If Project activities are delayed or suspended for more than 30 days, the area should be resurveyed. B.4-24

As outlined in the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012), burrow exclusion in and of itself will not always avoid or minimize and mitigate BUOW impacts to less than significant levels, and eviction of BUOWs is a potentially significant impact under CEQA. When temporary or permanent burrow exclusion and/or burrow closure is implemented, BUOWs should not be excluded from burrows unless or until: B.4-25

1. A BUOW Exclusion Plan is developed and approved by the Lead Agency and CDFW;
2. Permanent loss of occupied burrow(s) and habitat and temporary exclusion is mitigated;
3. Site monitoring is conducted prior to, during and after exclusion of BUOWs from their burrows sufficient to ensure take is avoided; and
4. Excluded BUOWs are documented using artificial or natural burrows on an adjoining mitigation site.

Swainson's Hawk: SWHAs are known to occur on the Project site in a non-nesting capacity (DEIR 2017) and may nest on the Project site in the future. Because of the known site fidelity (repeated use of the same nest site annually) demonstrated by SWHA, CDFW considers any documented SWHA nest to be active unless it is demonstrated by protocol-level surveys B.4-26

conducted during the nesting season (January 1 through September 15) to be unoccupied. Annual grasslands, alfalfa, fallow fields, dry-land and irrigated pasture, non-flooded rice land, cereal grain crops (including corn after harvest), as well as beet, tomato and other low-growing row or field crops are all considered SWHA foraging habitat (CDFG 1994). CDFW recommends the Lead Agency require surveys for nesting SWHA and that the surveys be conducted within a 0.5-mile buffer around each construction area, before starting any Project-related activities, following the survey methodology developed by the SWHA Technical Advisory Committee (SWHA TAC 2000). In the event that SWHA is detected within a 0.5 mile, consultation with CDFW is recommended to discuss how to implement the Project and avoid take (e.g., minimize impacts). CDFW also recommends the Lead Agency require the Project developer follow the measures outlined in the *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (Bueto swainsoni) in the Central Valley of California* (CDFG 1994). If take cannot be avoided, acquisition of an ITP would be warranted in advance of Project implementation for Project-related incidental take of SWHA. Please note, that encroachment within the 0.5-mile no-disturbance buffer is not recommended without prior acquisition of an ITP (since such encroachment has been demonstrated to cause nest failure). B.4-26 cont.

Raptors and Migratory Birds: For the protection of raptors and migratory song birds and to assist in avoiding take of avian species as required by Fish and Game Code sections 3503, 3503.5 and 3513, if Project-related activities will occur during the breeding season (January through mid-September), CDFW recommends the Lead Agency require surveys be conducted by a qualified biologist no more than 14 days prior to the beginning of any Project-related activity likely to impact raptors and migratory song birds, for each construction area. If Project activities are delayed or suspended for more than 14 days during the breeding season, repeat the surveys. If nesting raptors and migratory song birds are identified, CDFW recommends the Lead Agency require the active nest be monitored by a qualified biologist for the first 24 hours prior to any construction related activities to establish a behavioral baseline. Once work commences, all nests should be continuously monitored to detect any behavioral changes as a result of the Project. If behavioral changes are observed, the work causing that change should cease and CDFW be consulted for additional avoidance and minimization measures. If monitoring of identified nests by a qualified biologist is not feasible, the following minimum no-disturbance buffers are advised to be implemented: B.4-27

1. 250 feet around active passerine (perching birds and songbirds) nests,
2. 500 feet around active non-listed raptor nests and
3. 0.5 mile around active listed bird nests.

These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

Other Avian Species: Since Project build-out will occur over many years, and avoidance of certain listed species is being assumed, we recommend repeating focused surveys (protocol-level where applicable) in all areas with potentially suitable habitat for species such as Least Bell's vireo and southwestern willow flycatcher, in the season prior to construction of any given construction area of the development. B.4-28

American Badger: To minimize potential Project-related impacts to American badger, CDFW recommends mitigation measures be revised to require wintering surveys be conducted no more than 14 days prior to the initiation of construction related impacts in each construction area and within a 100-foot buffer. If Project activities are delayed or suspended for more than 14 days, repeat the surveys. Occupied dens should be clearly marked with fencing or flagging and a 100-foot no-disturbance buffer zone placed around the den in a manner that does not isolate the badger from intact adjacent habitat or prevent the badger from accessing the den. If den avoidance is infeasible, CDFW shall be contacted. Please note that trapping, flushing and/or collapsing of occupied badger dens would result in take as defined in Fish and Game Code Section 86. Similarly, CDFW recommends mitigation measures be included to require natal den surveys be conducted no more than 14 days prior to the initiation of construction-related impacts in each construction area and within a 200-foot buffer. Occupied natal dens should be clearly marked with fencing or flagging and a 200-foot no-disturbance buffer zone placed around the den in a manner that does not isolate the badger from intact adjacent habitat or prevent the badger from accessing the den. The 200-foot no-disturbance buffer shall remain in place until a qualified biologist has determined, and CDFW has agreed in writing, that young have left the den and are no longer reliant upon the den or parental care for survival. B.4-29

Bats: The DEIR does not adequately describe the potential for impacts to bats, nor does the DEIR provide any alternative discussion or avoidance strategies to mitigate the loss of occupied bat habitat. The DEIR concludes the Project site contains suitable foraging habitat for several bat species. However, the DEIR incorrectly concludes no suitable maternity or hibernation roost locations are known to be present on or in the immediate vicinity of the site. As previously discussed above, the Project intends to permanently close an old mine shaft which could be currently utilized by bats. Tree cavities can also be used by bats for roosting and maternity habitat. Mitigation Measure 7-9 of the DEIR indicates a field survey for bats would occur no earlier than 20 days prior to any grading activity that would occur during the breeding season (April-August) to determine if active roosts of special status bats are present. B.4-30

Bats are considered non-game mammals and are protected by state law from take and/or harassment (Fish and Game Code § 4150, CCR § 251.1). Several bat species are also considered Species of Special Concern, which meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines §15065). CDFW considers adverse impacts to a Species of Special Concern, for the purposes of CEQA, to be significant without mitigation. Mitigation is more than avoiding maternity roosts, wintering sites, night roosts, mating roosts and foraging sites; mitigation is also providing similarly functioning habitat to replace what is impacted. B.4-31

To minimize potential Project-related impacts to bat species, CDFW recommends the Lead Agency revise Mitigation Measure 7-9 to require the developer to conduct preconstruction surveys to establish areas of occupancy the year prior to the start of construction in each construction area and that surveys be conducted by a minimum of two CDFW-approved biologists and consist of: B.4-32

- Two spring surveys (April through June) and two winter surveys (November through January)

- Each survey consists of one dusk emergence survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat on the Project site
- Conduct each survey within one 24-hour period
- Focus visual inspections on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering)
- Use bat detectors, bat call analysis and visual observations during all dusk emergence and pre-dawn re-entry surveys

Data Collection for Each Survey:

- Whether bats are, or have been, present on the Project site
- Assemblage of species using the site
- Frequency of site use (including seasonal changes)
- Type of roost (i.e., maternity roost, day roost, night roost, feeding perch, mating roost, satellite roost, transitional roost or winter hibernaculum)
- Location, ambient temperature, internal dimensions and the aspect and orientation of the roost
- Spatial and temporal distribution of bat activity
- Flight paths, exit and entrance points
- Intensity of bat usage (i.e., number of bats, time and duration of use)
- Identification of any survey constraints

B.4-32 cont.

If bats are found to occupy the Project site, CDFW recommends the Lead Agency require the Project developer implement the general bat avoidance, minimization and mitigation measures outlined below. CDFW is available to discuss and refine these measures with the Lead Agency and the Project developer:

- Avoid direct and indirect impacts to roosting sites by establishing a no-disturbance buffer of 300 feet around roost sites.
- Prohibit clearing and grubbing adjacent to the roost site and lighting use near the roost site where it would shine on the roost or interfere with bats entering or leaving the roost. Prohibit the operation of internal combustion equipment, such as generators, pumps and vehicles within 300 feet of the roost site. Prohibit the use of bird netting.
- If avoidance of roost sites is infeasible, maintain portions of the features that provide naturalized habitat to the greatest extent possible and improve existing roost sites and/or provide new roost sites on buildings or on the Project site. Implement these measures only after consultation with CDFW.

B.4-33

- New roost sites must be in place prior to the initiation of Project-related activities to allow enough time for bats to relocate.
- Design and locate new and enhanced roost sites to be compatible with the bats' search image and habitat requirements (i.e., thermal regulation, interior size, ventilation, etc.). Design new and enhanced roost sites in consultation with CDFW.
- Exclude bats from directly affected work areas selectively and only to the extent necessary to prevent morbidity or mortality to the colony. Use one-way bat exclusion devices, installed in a bat-safe way, to exclude bats and then use expandable foam, steel wool or other method to block the entrance, after the bats have gone. Exclude bats only after consultation with CDFW, at a time that is compatible with the species' normal behavior patterns (i.e., breeding, feeding, hibernating, etc.). In general, exclusions shall not occur during the maternity/pup-rearing season nor during the hibernation season, as determined by conditions at the Project site.

B.4-33 cont.

Pronghorn (Antilocapra americana): Pronghorn numbers and habitat use of the Project site, as described in the DEIR, appear to be antidotal and potential Project impacts appear to minimize the status of pronghorn on the Project site and within the region. The DEIR states, "Although not classified as a special status species, the relatively small population of reintroduced pronghorn antelope on the Project site is considered of interest due to limited numbers and historical presence in the region. Project implementation would reduce the amount of available foraging habitat for this population. However, impacts on a reintroduced population of a non-special status species that may result from Project implementation would be considered adverse but less than significant under applicable CEQA significance thresholds. As part of the Ranchwide Management Plan, which is an implementation tool of the Ranchwide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures that are also supported by CDFW. Potential measures could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation; completing further evaluation of modeling tools at a site-specific level (such as those used on the Carrizo Plain), and incorporating volunteer involvement with supportive activities such as fencing retrofits."

B.4-34

The presence of pronghorn on the Project site and within the region rises to a higher level of CEQA impact consideration than cited in the DEIR. This determination is based on the local and regional ecosystem value of pronghorn reintroduction into portions of Kern and Los Angeles Counties' Antelope Valley Region. This species once existed in the region, but was extirpated prior to reintroduction efforts in the 1980s on Tejon Ranch. CDFW recommends that unmitigated Project impacts to pronghorn be considered significant by the Lead Agency under CEQA. CEQA directs that a special emphasis be placed on environmental resources that are rare or unique to the region and would be affected by a proposed project (CEQA §15125 (c)). Lead Agencies have a duty under CEQA to avoid or minimize environmental damage where feasible (CEQA Section 15021).

B.4-35

CDFW recommends a revised DEIR be completed and a map included documenting pronghorn sighting data points and sighting dates on and adjacent to the Project site. The Department of Water Resources has documented pronghorn occurrences in grassland habitat that the DEIR currently describes as pronghorn having limited access to because of restrictions. CDFW also recommends the revised DEIR describe the most likely California Aqueduct crossing locations

B.4-36

used by pronghorn to gain habitat access and incorporate Mitigation Measures into the DEIR to enhance these crossing locations on the Project site and within Tejon Ranch lands to further facilitate access to existing grassland habitat for pronghorn. B.4-36 cont.

The Pronghorn population has persisted in the region for decades and its small size places it in great peril of local extinction. CDFW concurs with the DEIR that any activity employed to improve habitat quality and fawn survival for pronghorn in the Project area would benefit this species. However, the Project will result in greater stressors to the pronghorn population because of loss of habitat, continued loss of already restricted movement opportunities for pronghorn to access habitat south of SR 138 and west of I5, increased threat from vehicle collision, and harassment and predation by domestic pets and humans. In July 2017, a pronghorn was observed on the Peterson Ranch Habitat Mitigation Bank approximately 25 miles southeast of the Project site in Los Angeles County which further demonstrates CDFW's concern for the persistence of this species in the region and providing for unrestricted movement across SR 138. Therefore, CDFW recommends further evaluation on the direct, indirect and cumulative effects of the Project, during and after full buildout, including use of habitat by pronghorn on the Project site and movement through the site and offsite habitats. This evaluation should be based on precise Pronghorn composition counts that can be replicated and serve as reliable estimates of population size and habitat use. The use of telemetry tracking of pronghorn individuals would further the understanding of habitat use, mortality factors, and movement trends on the Project site and within the region. Movement monitoring of pronghorn would have been invaluable in determining the movement route taken by the pronghorn individual observed on the Peterson Ranch Mitigation Bank in July 2017 to inform habitat movement pathway preservation and Project mitigation measures for this species. B.4-37

Ring-tailed Cat: The Biological Resources section of the DEIR concludes that the Project site does not support habitat for the State fully protected ring-tailed cat (*Bassariscus astutus*). However, ring-tailed cat is a secretive, nocturnal species that can be easily missed in survey and impact assessment efforts. Therefore, CDFW recommends additional survey efforts for ring-tailed cat and avoidance of occupied habitat for this species since ring-tailed cat is a State fully protected species. Take of ring-tailed cat or any State fully protected species is prohibited and cannot be authorized by CDFW (Fish and Game Code Sections 3511, 4700, 5050, and 5515). B.4-38

Western Pond Turtle: Western pond turtle (*Emys marmorata pallida*) has the potential to occur adjacent to Quail Lake and within several areas of the Project site. CDFW recommends a Mitigation Measure be incorporated into the DEIR to require protection for western pond turtle during their breeding season and require a no-disturbance buffer of 475 feet from the outside edge of Quail Lake into the Project site to protect nesting areas. CDFW is recommending a 475-foot buffer since female pond turtles can move overland for up to 325 feet to find suitable sites for egg-laying. In addition to avoiding a minimum of 325 feet from the edge of a water feature, CDFW recommends an additional 150 feet beyond the 325-foot overland travel range to protect nests and nesting sites from direct and indirect Project disturbance. CDFW also recommends focused surveys for western pond turtles be conducted in all areas of the Project site that provide potential habitat for western pond turtle and survey results be incorporate into a revised DEIR to allow CDFW to make specific recommendations and comments on additional mitigation measures proposed to minimize impacts to this species. B.4-39

Western Spadefoot: Western spadefoot (*Spea hammondii*) aestivate underground in upland habitat and emerge during heavy rainfall events in order to migrate to nearby water bodies (including those that are ephemeral in nature) to breed. Western spadefoot may occur on the Project site. If breeding sites for western spadefoot are identified in the Project site during pre-construction surveys, CDFW recommends the Lead Agency require the Project developer consult with CDFW prior to the implementation of the Project to develop a plan to avoid impacts to western spadefoot, and obtain CDFW's written concurrence with the plan prior to plan implementation. B.4-40

Argentine Ants: CDFW recommends revising Mitigation Measure 7-16 to establish argentine ant control "dry zones" of a minimum of 650 feet and encourage landscape plans to incorporate these same "dry zones" landscaping and require all nursery plant material within 700 feet of Open Space areas, preserved populations, and mitigation lands be inspected and certificated as being free of argentine ants. Irrigation of Open Space areas, preserved fauna populations, and mitigation lands are also strongly discouraged and plantings within these areas should be hand watered only if absolutely necessary. Restoration should be timed to take advantage of the natural rainy season. B.4-41

Special Status Plants: Mitigation Measure 7-1 in the Biological Resources section of the DEIR relies on the future completion of focused plant surveys to confirm the proposed mitigation lands support populations of California androsace (*Androsace elongate* ssp. *acuta*), crownscale (*Atriplex coronate var. coronata*), round-leaved filaree, Mojave spineflower (*Chorizanthe spinosa*), sylvan scorzonella (*Microseris sylvatica*) and adobe yampah (*Perideridia pringlei*) to confirm compliance with the DEIR's proposed 2:1 mitigation ratio for impacts to these species. B.4-42

The 2:1 replacement to impact ratio is not substantiated within the DEIR and does not describe nor demonstrate that successful rare plant mitigation is attainable. Scientific literature does not support the assertion that transplanting plants into areas of microhabitat where they do not occur is viable in assuring long-term persistence of the species. Therefore, CDFW does not support transplantation of rare plants as a mitigation strategy. CDFW recommends avoidance of rare plant populations by delineation and observation of a no-disturbance buffer from the outer edge of the plant population(s) or specific habitat type(s) required by special status plant species, including a sufficient buffer area that ensures habitat is available for pollinators, maintains the current topography and drainage conditions of existing plant populations, and minimizes anthropogenic impacts. Because the collection of seed and establishment of new sensitive status plant populations has not been substantiated in the literature, transplantation is experimental in nature, and CDFW is not aware of any long-term studies that document the viability and persistence of either transplanted or seeded populations of these particular special status plant species. If full avoidance of existing populations or clusters of individual plants cannot be achieved, CDFW recommends avoidance in combination with conservation, funding, and management of existing, healthy populations in perpetuity as the preferred mitigation method. Furthermore, mitigation for impacts to special status plant species need to be completed prior to the initiation of Project-related activities. B.4-43

Mitigation Measure 7-1 also relies on the future development of a Special Status Plant Species Restoration Plan. The deferred development of the Special Status Plant Species Restoration Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan is not required. CDFW recommends B.4-44

the DEIR be revised to include the Special Status Plant Species Restoration Plan for CDFW review and comment. B.4-44 cont.

Eight populations of crownscale, totaling more than 16,000 plants, were identified during surveys on the Project site. The identifying characteristics exhibited on these plants were mixed between the more common crownscale and the federal endangered San Jacinto Valley crownscale (*Atriplex coronata var. notatior*) which is only known to occur 100 miles to the east of the Project. Based on distribution and on a single taxonomic verification, the DEIR determines the onsite occurrences are the more common crownscale species. However, CDFW recommends consulting multiple experts and conducting genetic work to determine if this is an unrecognized species, or an isolated occurrence of San Jacinto Valley crownscale in Los Angeles County before removing this population. Additionally, if this is an isolated population, outside of its known range, CDFW recommends conducting an additional analysis to determine how removal of this species potentially shrinks the species' range. B.4-45

Piute Mountains navarretia is a CRPR 1B.1 species. Before surveys for the Project site were conducted this species was only reported to occur in Kern and Tulare Counties. To date, surveys on the Project site have identified three (3) populations of Piute Mountains navarretia with approximately 20,100 individuals. Known occurrences of Piute Mountains navarretia on the site are currently outside of the proposed impact area. CDFW recommends additional protocol surveys for this species be completed prior to Project implementation, for the entire site in potentially suitable habitat, following a good rain year, in an effort to detect additional populations. CDFW also recommends this species be fully avoided and managed to preserve these populations in perpetuity. B.4-46

Federally Listed Species: CDFW also recommends consulting with the USFWS on potential impacts to federally listed species. Take under ESA is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with ESA is advised well in advance of Project implementation. B.4-47

Significant Ecological Area: CDFW recommends that development south of SR 138 be removed from the Project. Introducing development to the area south of SR 138 will have negative impacts to the SEA, specifically creation of a large edge effect on the adjacent SEA, including light, noise, temperature increase, increased albedo, increased Argentine ant risk, increased fire risk, point source for invasive species introduction, and human disturbances (e.g., trash, dogs, loitering, etc.), thereby lowering its conservation value. In addition, by removing development south of SR 138, the Project will also avoid several special status plant occurrences. B.4-48

Vegetation Mapping: The vegetation mapping units used in the DEIR were set at a scale of approximately 1 acre; and patches of vegetation smaller than 1 acre were generally not mapped except for observed seeps and ephemeral ponds. CDFW is concerned the smaller scale variation of vegetation assemblages are not accurately reflected in the DEIR vegetation mapping. CDFW recommends all unique stands or polygons be recorded, no matter the size. Providing detailed mapping enables CDFW to assess the value and the appropriateness of proposed mitigation accurately. CDFW recommends conducting vegetation mapping following the standards of mapping all unique, homogenous stands, no matter the size, and including this B.4-49

revised information in the DEIR. CDFW is unable to accurately assess impacts or values of the vegetation assemblage within the Project area, nor the proposed mitigation lands until revised mapping is completed. B.4-49 cont.

Oak Woodlands: The DEIR determines that significant impacts to oak tree resources would be reduced to less than significant levels with implementation of Mitigation Measures 7-11 and 7-19 through 7-20, in accordance with the County of Los Angeles Oak Tree Ordinance and in compliance with the Los Angeles County Oak Woodlands Conservation Management Plan. The DEIR analyzes impacts to oak trees over eight inches in diameter at breast height (DBH), proposes to use existing oak woodlands, counts planting within these areas as creation, only includes a five (5) year monitoring period, does not require grazing in all of these areas, and does not account for the acreage of oak woodland as a community with an existing density of trees. B.4-50

CDFW recommends the DEIR be revised to reflect a 4-inch DBH when considering which oak trees, and trees in general, require mitigation. More importantly, the oak woodland community needs to be considered in its entirety when considering mitigation to replicate the habitat function. Oak trees are a dense, slow growing hardwood requiring decades to mature. CDFW recommends revising the mitigation measures to require monitoring oak trees/oak woodlands for a minimum of 15 years and up to 20 years to determine success. To reestablish the oak woodlands, CDFW recommends three planting seasons. The first planting season, year 0, being the acorn and sun tolerate ground covers; the second planting season occurring at approximately year 5, introducing sun/shade tolerate species; and the third planting season at year 10 with the introduction of more shade tolerate understory species. To determine the appropriate species and density of the oak woodlands, three representative oak woodland sites need to be analyzed for species composition, density, and richness. The created sites, once established, need to reflect the representative sites. Furthermore, CDFW recommends the creation site be deemed successful only after 10 contiguous years without irrigation. However, CDFW recommends irrigation be prohibited in establishing oak woodlands as the trees grow at an abnormal rate and establish a root system that will not optimally sustain the tree once irrigation has been removed. CDFW recommends a revision to Mitigation Measure 7-11 to reflect the temporal loss in creating oak woodlands. CDFW also recommends the creation of 18.6 acres to compensate for the loss of non-heritage oaks/oak woodlands and an additional 10:1 ratio for heritage oak trees. These areas should be protected against anthropogenic impacts for the life of the project. B.4-51

Riparian, Wetland and Stream Features: The DEIR states that significant impacts to jurisdictional drainages, wetlands, and riparian vegetation from the Project would be reduced to less than significant levels with implementation of Mitigation Measure 7-12, which states that (1) all lost functional values shall be replaced; (2) appropriate regulatory agency permits and/or agreements shall be obtained; and (3) the mitigation measures stipulated in those permits/agreements shall be implemented. Mitigation Measure 7-12 also states that Functional Capacity Units (FCU) will be used to determine the mitigation level necessary to restore riparian functions. CDFW does not agree with the use of FCUs as the basis for determining mitigation requirements. FCUs do not guarantee that wetland/riparian habitat is mitigated to the level necessary to be called "in-kind". Plant species assemblages for each unique wetland/riparian patch need to be maintained to be considered in-kind mitigation. CDFW recommends full avoidance of both wetland features, as well as any lake, river, or stream under Section 1600 of B.4-52

the Fish and Game Code. This would eliminate the need to create the proposed 78.4 acres of wetland/riparian habitat, the creation of which would in turn impact another vegetation community that would require mitigation. CDFW also recommends developing success criteria (Mitigation Measure 7-12) tied to on the ground species richness, abundance, percent cover, and diversity, by vegetation layer. Additionally, the monitoring period for replacement planting success should not start until all irrigation and weed control has been completed and removed. Irrigation and weed control are considered part of the establishment period and monitoring during these periods would provide data that is heavily skewed. Success criteria need to be based on trends; no positive trend in weed cover (weed control should be completed prior to planting and during the establishment period, nor during monitoring) and no negative trends of native vegetation over the monitoring period. This trend analysis provides a more thorough indication of the trajectory of the success of the restored habitat. B.4-52 cont.

Refuse: To reduce urban wildlife conflicts that often result in mortality to bears and other wildlife species, CDFW recommends Mitigation Measure 7-15 in the DEIR be revised to require the use of bear-proof trash cans throughout the entire Project site, including during Project construction, after full Project build-out and for the life of the Project. CDFW also recommends Mitigation Measure 7-15 be revise to require the use of bear-proof trash cans at all individual homes and not limit use to common areas as specified in Mitigation Measure 7-15. B.4-53

Fencing: CDFW recommends the DEIR be revised to include capping of all vertical open pipes used for fence posts, property line stakes, signs, roof ventilation, chimneys, vault toilets, and similar structures and metal fence stakes used on the Project. Capping can be accomplished using bolts or other materials to avoid raptor talons becoming entrapped within the bolt holes of metal fence stakes. Further information on this subject may be found at: http://kern.audubon.org/death_pipes.htm. B.4-54

Grubbing and Grading: CDFW recommends the DEIR be revised to require that any grading/grubbing be done in phases in order to facilitate pushing wildlife of higher mobility towards intact adjacent habitat. Islands of habitat should not be created during site disturbance where wildlife will enter and then be subject to mortality when these areas are grubbed and/or graded. Attempts to salvage species of low mobility should be made prior to the initiation of ground disturbance activities. Salvaged species should be salvaged out of harm's way onto adjacent suitable habitat not disturbed by the project in areas with enough intact suitable habitat to support these species home range sizes. B.4-55

Wildlife Movement Corridors: Mitigation Measure 7-14 of the DEIR describes a designated SR 138 underpass where the highway crosses the Project's western border. The proposed underpass will be 100 feet wide and will flare out on both sides of the highway to a 150 foot width in Project Open Space adjacent to the highway. The DEIR states that these design specifications are expected to allow some local wildlife to safely pass between Open Space areas on opposite sides of SR 138.

CDFW is unclear what the width of the underpass will be throughout the entire length of the underpass structure since the DEIR only specifies that the underpass will flare out where it meets SR 138. If the underpass does maintain the 150 foot width throughout the entire length of the structure, this would only allow for 25 feet of extra clearance on each side of the multi-use pathway that will go through the center of the structure to allow for wildlife movement. It is also B.4-56

unclear if the additional 25 feet on each side will be dedicated to wildlife movement and if design features will be incorporated to limit human and domestic animal encroachment into these corridors and encourage species use. In addition, CDFW would like to note that such a limited corridor width would not be sufficient to serve as a wildlife movement corridor for the Project site. CDFW also recommends the other planned underpass and overpass bridge crossings that will be constructed across SR 138 to facilitate both pedestrian and bike access to employment centers be designed to also facilitate wildlife movement across the site. In addition, CDFW recommends the unnamed drainage that parallels SR 138 to the north be avoided by Project development so that it may continue to "serve as a valuable foraging resource" and wildlife movement area across the site. B.4-56 cont.

A camera station study of wildlife movement observations along the I5 was conducted; however, a wildlife movement study throughout the remainder of the Project site has not been completed and wildlife movement information throughout the remainder of the Project site. Based on the information provided in the DEIR, this information appears to be anecdotal in nature. CDFW recommends the Lead Agency require a complete systematic, long-term wildlife movement study that encompasses the entire Project site and extends to offsite areas of existing wildlife habitat. CDFW recommends the study be conducted over a period of at least two years and consider all directions through and around the Project site. Camera stations and tracking medium should be used at each of the California Aqueduct, I5, and SR 138 crossings. CDFW also recommends the study consider species life histories, behavior, and an assessment of how the Project may modify species behavior and movement. Based on this study, a mitigation strategy should be developed that incorporates the study's findings, site specific information, and includes Open Space planning to enable wildlife to move safely through and around the entirety of the Project site. B.4-57

Focused Protocol Surveys: CDFW recommends the DEIR incorporate an enforceable measure to require focused protocol surveys to be conducted in all areas of potentially suitable habitat for the entirety of the Project impact area, and a 500-foot buffer, prior to the initiation of construction-related activities for all special status species that have a potential to occur on the Project site. The surveys should be conducted in the year prior to disturbance for each construction area. This CDFW recommendation is necessary because previous surveys varied in their areas of coverage and levels of intensity and were not designed for maximum species detectability. For more information on species specific protocols see https://www.wildlife.ca.gov/Conservation/Survey-Protocols. . B.4-58

Additional Mitigation Measure Comments: CDFW recommends Mitigation Measure 7-3 be revised to remove the following statement: "If a wildlife species is in harm's way and has not moved on its own, the Biologist will attempt to scare them away from the area. If wildlife does not move, and where feasible, the wildlife species will be relocated to suitable habitat." Implementation of this portion of the mitigation measure would result in take through harassment and direct mortality of wildlife species (if relocation is deemed not feasible) and is prohibited under Fish and Game Code. B.4-59

Grazing: Grazing operations will be directed under the Grassland Mitigation Plan, which is a component of the Mitigation Preserve Management Plan and/or the Ranchwide Management Plan. The deferred development of this Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of this B.4-60

plan is not required. CDFW recommends the DEIR be revised to include the Grassland Mitigation Plan for CDFW review and comment. B.4-60 cont.

Jurisdictional Features: The Jurisdictional Delineation Report discloses that jurisdictional features were mapped to the extent of the Ordinary High Water Mark (OHWM) and edge of riparian vegetation, where applicable. The DEIR acknowledges that CDFW jurisdiction can extend beyond the OHWM to the edge of riparian habitat where this habitat type is present. However, at a minimum, CDFW jurisdiction extends to the back edge of the bank, includes associated riparian habitat, and may also include terracing and the adjacent floodplain, depending upon site indicators. The OHWM is a definition used by the United States Army Corps of Engineers to determine the extent of its jurisdiction under the federal Clean Water Act. CDFW jurisdiction is separate from, and unrelated to, that of the Clean Water Act, and in most cases extends beyond the OHWM. Therefore, the extent of impacts to CDFW jurisdictional features is likely greater than what is disclosed in the Jurisdictional Delineation Report and included in the DEIR. In addition, implementation of the restoration and enhancement activities proposed in the DEIR would also require notification pursuant to Fish and Game Code Section 1600 et seq. and may also require acquisition of an ITP because the proposed activities have the potential to impact State-listed species. Potential impacts to all special status species and habitats within the area of the proposed offsite activities also need to be evaluated in the DEIR for CEQA review. B.4-61

CDFW also recommends Exhibit 5.7-9 in the Biological Resources section of the DEIR be revised. The jurisdictional features on this exhibit have been kept to scale and therefore the majority of CDFW jurisdictional features are not visible. CDFW cannot determine if these features are not visible because of the mapping scale or because they have been omitted. B.4-62

Offsite Mitigation: The DEIR proposes a total of 23,547 acres of offsite mitigation lands, comprised of six separate Areas, as depicted on Exhibit 5.7-10 in the Biological Resources section. Area 1 contains 6,417 acres; Area 2 contains 2,556 acres; Area 3 contains 4,183 acres; Area 4 contains 7,319 acres; Area 5 contains 643 acres; and Area 6 contains 2,429 acres of proposed offsite mitigation lands. As noted in the DEIR, these lands are a part of the Ranchwide Agreement.

The lands in Areas 3, 4, and 5 (totaling 12,145 acres) have already been conserved through an agreement and purchase of a conservation easement using funds entirely provided by the State of California. The easement was conveyed to the State and is currently held by the Wildlife Conservation Board (WCB). The conservation easement precludes the use of the lands in Areas 3, 4, and 5 in baseline habitat condition from serving as mitigation for any proposed development projects, including Centennial. The lands in Areas 3, 4, and 5 may serve as mitigation only in the event that enhancement actions are implemented and performed in perpetuity that will add functional habitat value to the lands above baseline. Further, all enhancement actions are required to be reviewed and approved by WCB. As currently discussed and contemplated in the DEIR, Areas 3, 4, and 5 are not intended to undergo enhancement activities and are considered as mitigation in baseline condition. However, in accordance with the terms and conditions of the conservation easement conveyed over these areas, these lands cannot be used to offset impacts from the implementation of the Project. Therefore, with the removal of the offsite 12,145 acres that constitute Areas 3, 4, and 5 from consideration as compensatory mitigation for the Project, the remaining Areas (1, 2 and 6) B.4-63

contain a total of only 11,402 acres. This effectively reduces the available compensatory habitat mitigation for the Project to a 2:1 mitigation ratio and cannot effectively reduce the loss of the varied and rare habitat types from Project impacts to a less than significant level. B.4-63 cont.

Land Use, Entitlements and Planning (Section 5.8): This section of the DEIR includes the Antelope Valley Area Plan (AVAP) Consistency Analysis (Table 5.8-1). This analysis evaluates the Project's consistency with the requirements of the AVAP. CDFW disagrees with several statements of consistency in the aforementioned table. For example, Goal Land Use (LU) 2 of the AVAP is: "a land use pattern that protects environmental resources". The DEIR determines that the Project is consistent with this goal through the preservation of the SEA, biological mitigation lands, Tejon Ranch land preserved under the Tejon Ranch Land Use and Conservation Agreement and the Project's land use plan. The SEA is designated as Open Space in the DEIR and the CSP. As described in the DEIR and further detailed in the CSP, the Open Space land use designation allows for a variety of uses, including, but not limited to: golf courses; information centers; apiaries; fish hatcheries; nurseries (growth and sales); commercial greenhouses; stables; trails (bike, equestrian, pedestrian); helispots; helipads; monuments and interpretive sites; wineries; cemeteries; amusement rides; bike, motor scooter and boat rentals; campgrounds; lakes; swimming pools; photovoltaic panels; outdoor festivals and fairs; filming; crop production and agricultural uses; storage and maintenance yards; special events; model home complexes; and other accessory uses and structures. The continuation of hunting activities are also allowed in SEA 17 (as described in Noise section 5.12 of the DEIR) but not included in the land use designation table in the CSP. B.4-64

Allowing these and similar uses within the Open Space lands does not preserve the value of these lands and in many cases would prohibit the use of these Open Space areas (including those Open Space areas within the center of the Project site) for use by special status species (plant and animals) that currently use the lands on the Project site. It would also impede the use of any potential wildlife movement corridors, across and in some cases, adjacent to the Project site. Furthermore, provisions in the CSP allow for the current land use designations to be changed. This would allow for the possibility that current Open Space areas may be changed to other designated uses, including but not limited to: residential, industrial, and commercial. This level of built-in flexibility, combined with the lack of detailed design plans and descriptions in the DEIR does not provide CDFW with enough information to determine what the Project impacts will be. As stated above, the allowed land uses in lands adjacent to Open Space areas may also impact the ability of wildlife to use and move through the Open Space areas. As one example, there is a recreation/entertainment and residential area located on the west side of the Project site, north of SR 138, directly adjacent to a potential wildlife movement corridor. The land uses in these development areas allow for amphitheaters; solar and renewable energy generation (including photovoltaic panels, microturbines, and associated facilities); and outdoor festivals and fairs among other uses, which may severely impact the ability of wildlife to continue to use this area of the Project site as a movement corridor. B.4-65

The goal of Policy LU 2.1 in Table 5.8-1 is "to limit the amount of potential development in....wildlife corridors." The DEIR states that the Project preserves important regional wildlife corridors and biological connectivity of regional open space. However, the DEIR also states that cumulative impacts to regional wildlife movement will be significant with mitigation. Due to significant impacts in regional wildlife movement, and for the reasons outlined in the sections above, CDFW disagrees with the DEIR's determination that the Project is consistent with Policy B.4-66

LU 2.1. Regional and local wildlife movement corridors occur on the Project site and are not sufficiently avoided and protected or replaced by the Project. B.4-66 cont.

Policy LU 2.5 in Table 5.8-1 refers to limited development in riparian areas. The DEIR states that the Project is consistent with this policy by avoiding or minimally impacting riparian areas on the site by designating major drainage channels on the site as Open Space. While the Project has designated major drainage channels as Open Space, they have also allowed these channels to be reengineered, revegetated and altered to collect site runoff, mudflows, serve as recharge and retention basins and incorporated adjacent multi-use trails. Also, as mentioned above, Open Spaces have a variety of allowable land uses that are not all consistent with minimizing impacts to riparian areas. Therefore, CDFW does not agree with the DEIR's determination that the Project is consistent with Policy LU 2.5 with respect to riparian conservation. B.4-67

The goal of Policy M 10.5 in Table 5.8-1 is to locate and design trail routes to minimize impacts to sensitive environmental resources and ecosystems. The DEIR states that trails will be located along roads and in greenways and have been designed to minimize impacts to sensitive environmental resources and ecosystems. The DEIR also states that signs will be posted along trails cautioning against disturbance and trails will be designed to discourage people and pets from entering sensitive drainages. As discussed above, trail design (e.g., lighting requirements, fencing, location, signage, etc.) is discussed in the DEIR and the CSP; however, all of these items are not included as Mitigation Measures in the DEIR and are only discussed as guidelines in the CSP, which are subject to change and/or omission during final site design. Therefore, CDFW does not agree with the DEIR's determination that the Project is consistent with Policy M 10.5. CDFW recommends wildlife friendly fencing be designed and included in a revised DEIR to minimize potential impacts to the SEA and other Open Space areas from human and pet-related disturbances and protect the sensitive resources and habitats that occur within these areas. B.4-68

Goal COS 4 in Table 5.8-1 is a goal to protect sensitive habitat and species to promote biodiversity. The DEIR states that the Project will protect sensitive habitat and species through the protection of Open Space, authorized Open Space uses and measures. Policy COS 4.2 refers to limiting the amount of potential development in the SEA, wildlife corridors, and other sensitive habitat areas. The DEIR states that the Project is consistent with this policy by avoiding SEA development and protecting Open Space that protects wildlife corridors and other sensitive habitat areas, including SEAs. Policy COS 4.7 in Table 5.8-1 refers to development standards that maximize opportunities for wildlife movement. The DEIR states that no fencing that would restrict wildlife movement is proposed in Open Space areas, which serve as wildlife corridors. CDFW does not agree with the DEIR's determination that the Project is consistent with the aforementioned policies and goals. Please refer to the discussions above for further detail on land use within the SEA. B.4-69

The goal of Policy COS 4.8 is to ensure ongoing habitat preservation by coordinating with CDFW to obtain the latest information regarding threatened and endangered species. The DEIR states that the Project is consistent with this policy by providing for ongoing habitat preservation within designated Open Space and states that the latest information regarding sensitive plant and wildlife species is incorporated in the Biological Resources section. CDFW would like to note that while discussions for the Project have occurred in the past, recent B.4-70

discussions (within the last 3 years) have not occurred between CDFW and the Project Applicant, with the exception of two preliminary reviews of a draft jurisdictional report and one site visit to discuss jurisdictional features. In addition, CDFW also notes that the status of tricolored black bird (*Agelaius tricolor*), described in the Biological Resources section, has changed from State Candidate to State Endangered. B.4-70 cont.

Noise (Section 5.12): The Noise section includes a statement that limits construction to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday, in compliance with County code requirements. However, CDFW recommends that all Project-related activities be restricted to daylight hours and nightwork be prohibited throughout the entire Project site to reduce the potential to adversely affect special status species, their movement and their associated habitat use on and adjacent to the Project site. CDFW also recommends vehicle and equipment access within the Project site be restricted to existing roads and overland travel be minimized and confined to areas where development will occur. CDFW also recommends the DEIR be revised to incorporate these recommendations as Mitigation Measures in the DEIR. B.4-71

Mitigation Measure 12-7 in the Noise section requires the preparation of a Blasting Plan. The Blasting Plan will include information such as a pre-blast survey, the location and hours of blasting and other additional items. Blasting has the potential to adversely affect special status species and their associated habitat on and adjacent to the Project site. The deferred development of the Blasting Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan is not required. CDFW recommends the DEIR be revised to include the Blasting Plan for CDFW review and comment. B.4-72

Visual Resources (Section 5.13): Mitigation Measure 13-6 in the Visual Resources section of the DEIR requires the development of an Exterior Lighting Plan (also referred to as the Dark Sky Plan). This Plan applies to all proposed structures and development areas that border natural Open Space resources. Exterior lighting on the Project site has the potential to adversely affect special status species, their movement and their associated habitat on and adjacent to the Project site. The deferred development of the Exterior Lighting Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan is not required. CDFW recommends the DEIR be revised to include the Exterior Lighting Plan for CDFW review and comment. B.4-73

Parks and Recreation (Section 5.14): The Parks and Recreation section of the DEIR requires the development of a Public Access Plan "to ensure significant, but well managed, public access into the Conservation Easement Areas." CDFW is unclear if this Plan will incorporate public access into both the SEA and the offsite mitigation lands since the Conservation Easement Areas are not clearly and consistently defined in the DEIR. The DEIR states that "there would be no disturbance or development within the designated SEA" (see page1-6 of the DEIR); however, allowing public access within the SEA would be considered a Project impact and would need to be analyzed in the Biological Resources section of the DEIR. In addition, impacts from public use of the mitigation lands should also be analyzed in the Biological Resources section of the DEIR. Furthermore, the deferred development of the Public Access Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan is not required. CDFW recommends B.4-74

the DEIR be revised to include the Public Access Plan for CDFW review and comment and that public access, development and disturbance within the SEA be prohibited. B.4-74 cont.

Cumulative Impacts (Section 7.0): The Cumulative Impacts section of the DEIR makes the determination that the Project will result in a cumulatively significant impact to native grasslands and regional wildlife movement. CDFW agrees with this determination. Based on the current design of the Project, CDFW has also determined that development of the Project will result in significant impacts to local wildlife movement and special status plant species. CDFW recommends the Project be redesigned to allow for local and regional wildlife movement through the site (including grassland and drainage areas east of the California Aqueduct) and avoid and preserve a significantly larger proportion of special status plant species occurring in the grassland areas of the Project site east of the California Aqueduct. B.4-75

Centennial Specific Plan (CSP): Figure 3-2 in the CSP appears to indicate the presence of roads within the SEA. It is unclear from this map if these are existing or newly proposed roads since they are not labeled in the map legend. These roads have not been described in any other area of the DEIR or the CSP. The DEIR and CSP states that Project-related impacts will not occur within the SEA. Please clarify the presence and intended use of the roads within the SEA. B.4-76

The CSP and DEIR include the Open Space lands to the east of the California Aqueduct as part of the Project's onsite mitigation. As previously discussed, these areas as currently designed, do not support species movement and/or use in these Open Space areas of the Project site, and therefore should be removed from the onsite mitigation acreages until the Project is redesigned to address these species issues. B.4-77

The CSP leaves several items of enforcement and control under the responsibility of the Home Owners Association (HOA). These items include, but are not limited to, the maintenance of internal and transitional slopes, the maintenance of fuel modification zones, the control of Argentine ants, the enforcement of drought-tolerant planting and education, the enforcement of prohibited plant species and the eradication efforts of these species. It is unclear to CDFW where the funding, training and dedicated staffing will come from to enforce these policies. CDFW would also like to note that previous projects that have proposed and implemented similar measures have had mixed success with implementation of these measures. The failure to implement these measures may significantly impact sensitive biological resources on the Project site and needs to be evaluated in the DEIR. B.4-78

The planting guidelines in the CSP allow for the use of ground covers and turf grasses. Because of their potential to quickly spread into adjacent native vegetation and Open Space areas, CDFW recommends prohibiting the use of ground covers and Bermuda grass in Open Space areas and areas adjacent to Open Space and native vegetation. B.4-79

The CSP Hillside Design Guidelines (HDG) include a guideline to retain and incorporate 50 percent or more of the existing onsite trees and woodlands into the overall Landscaping Plan. It is unclear to CDFW if this percentage will include the lands within the SEA or if this requirement focuses on the remainder of the Project site. If this guideline includes the SEA area, CDFW would like to know what percentage of the SEA will be counted toward achieving the 50 percent success metric. The HDG also includes a guideline to use bridge design techniques that "allow easy wildlife migration" beneath the bridge with a minimum 6-foot vertical B.4-80

and horizontal clearance. However, the details of the bridge design techniques are not provided in the CSP nor discussed in the DEIR. CDFW recommends the DEIR and Biological Resources section be revised to include information on the bridge design techniques and an analysis for potential wildlife movement. This is necessary to demonstrate the bridge design techniques will be functionally permeable and facilitate use by wildlife. As previously mentioned, the CSP is a guidance document and is subject to change; therefore, CDFW also recommends the bridge design techniques be included as a Mitigation Measure in the DEIR. B.4-80 cont.

The Single Family Detached (SFD) Average Fee Lot figure in the Housing Glossary section of the CSP includes an Open Space designation, which is defined as the front yard, fenced side yard, rear yard and street parkway. CDFW requests clarification as to whether the acreages associated with the SFD Open Space designation are included in the Open Space acreage calculations for onsite mitigation lands. B.4-81

Thank you for the opportunity to comment on the DEIR and CSP. If you have any questions regarding these comments, please contact Lori Bono, Senior Environmental Scientist (Specialist), at (559) 243-4014, extension 350, or lori.bono@wildlife.ca.gov. B.4-82

Sincerely,

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Responses to Comment Letter B.4
California Department of Fish and Wildlife
July 17, 2017

Response to Comment B.4-1:

Thank you for your comment and your participation in this public process. This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Following receipt of this comment, the Applicant met with representatives of the CDFW on two occasions and had three additional conference calls to review each of the comments raised in CDFW's letter in detail. The Final EIR includes additional details, clarifications, and text modifications, as discussed with CDFW following receipt of this Draft EIR comment letter.

Response to Comment B.4-2:

This introductory comment summarizes the Project description and does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment B.4-3:

This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment B.4-4:

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment B.4-5:

The descriptions of the statutory and CEQA jurisdiction of the California Department of Fish and Wildlife are noted for the record. The Draft EIR also includes a regulatory setting description of relevant laws and regulations in Section 5.7.2, Relevant Plans, Policies and Regulations.

Response to Comment B.4-6:

Exhibit 4-7, Centennial Project – Circulation Plan, depicts the Project's roadway circulation plan and labels the roads according to roadway type (e.g. major highway, secondary highway, collector, SR-138). The existing alignment of the Cement Plant Road within the SEA would remain unchanged and would not be widened or otherwise altered with Project implementation. The proposed re-alignment of Cement Plant Road begins within the Project's development area footprint and would be designed as a two-lane collector road, and not a six-lane major highway as stated in the comment. As such, the realignment of Cement Plant Road would have no impacts on the SEA.

Response to Comment B.4-7:

The extension of existing cable and internet from their current location to the Project site would occur via existing utility poles or within existing underground vaults. As a result, activities associated with the extension of these services are expected to entail only maintenance and minor modification of existing facilities, and would not disturb vegetation or wildlife.

Response to Comment B.4-8:

This comment states that CDFW recommends that all new and existing dry utilities be installed underground to minimize impacts to migratory birds. As stated in the Project Description, "All on-site dry utilities will be constructed within public right-of-way…", and "Existing overhead lines along SR-138 and Gorman Post Road, as well as the lines running from the Bailey Substation to the northwest within the site, may be relocated; they may remain overhead; or they may be placed underground".[150] Maintaining existing overhead utility lines would not result in an impact associated with the Project, as this is the existing condition. Whether or not existing overhead lines are placed underground is a decision that would occur as part of Project implementation (if approved). The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment B.4-9:

Although the Project has been designed to avoid impacts to many drainages identified on the Project site, some drainages will be impacted. Impacts range from minor temporary disturbance of some drainage areas to the permanent loss of other drainage areas. The temporary and permanent loss of vegetation, habitat and functions and the effect on plant and wildlife species is analyzed in the Draft EIR; these analyses are located throughout Section 5.7.6 beginning on page 5.7-141 through page 5.7-173. Jurisdictional drainage impacts are specifically discussed on pages 5.7-162 and 5.7-163 and shown in Figure 5.7-13. The Draft EIR also considers graded/reengineered drainages as a permanent loss in terms of biological resource impacts, even though some functions may be restored in the post-Project drainage condition. Additionally, a new Exhibit B.4-9, On-Site Open Space Areas, has

[150] DRP 2017, p. 4-95

been prepared as part of this response to comment, and illustrates where most of the existing drainage corridors are retained as the general location of re-engineered drainages. New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR.

The effects of Project implementation on downstream (i.e. off-site) biological resources is expected to be negligible because the changes in existing drainage hydraulics and water quality as it exits the development areas are negligible. As discussed in Sections 5.2, Hydrology and Flood, and 5.4, Water Quality, regional and distributed water quality treatment measures (e.g. regional detention and retention basins and parcel-specific measures) will meet County LID standards for new development and will provide sufficient treatment capacity to reduce potential surface and ground water quality. As discussed in Section 5.2, Hydrology and Flood, the hydromodification BMPs for the Project would be consistent with County requirements for new development set forth in the County LID Standards Manual, as incorporated in MM 2-1.[151] Performance standards for post-development peak flow rates and volumes during major (50-year) storm events are also consistent with County requirements and are incorporated in MM 2-2.[152] As required in MM 2-2, all BMPs must be implemented to ensure that, for the capital event, there is no increase in peak discharge rates and no increase in runoff volume offsite compared with peak discharge rates and runoff volumes under existing, pre-development conditions. Compliance with the hydrology and flood performance standard shall be demonstrated by using a methodology approved Los Angeles County Department of Public Works for comparing Project site pre- and post-development peak discharge rates and runoff volumes.[153] Furthermore, Section 5.2 provides that all soft-bottom drainage facilities – including regional and distributed basins and stream channels – would be designed to fully drain or infiltrate captured water in less than four days.[154] As a result, invasive aquatic wildlife species would be precluded from becoming established. The seasonality of flows is expected to match pre-project conditions other than a small quantity of urban run-off flow expected to be near perennial. To manage these flows, forebays at the entrance of each LID basin are designed to capture these flows where vegetation increases can be managed routinely. As a result, impacts on biological resources are expected to be less than significant. In addition, to provide assurance that the Project's flood control and other water retention features do not allow establishment of invasive aquatic wildlife, MM 7-16 has been modified to incorporate monitoring and eradication if necessary. The following text modification is made to the last paragraph of MM 7-16 on page 5.7-192 of the Draft EIR (which also addresses management of potential future recreational pond features addressed in response to Comment B.4-10):

> To prevent the establishment of invasive aquatic wildlife such as the American bullfrog (*Lithobates catesbeianus*) and the African clawed frog (*Xenopus laevis*), all Project flood control and other water retention features shall be monitored seasonally and following rain fall events to confirm pooling does not persist for more than 15 days. If such pooling beyond 15 days is detected,

151 *Id.,* p. 5.2-49
152 *Id.,* pp. 5.2-49 and -50
153 *Id.,* pp. 5.2-49 and -50
154 *Id.,* p. 5.2-48

> including, for example, in artificially created fishing/casting ponds which can only be constructed following issuance of a conditional use permit and further environmental review, the constructed pond location shall be checked routinely for presence of aquatic invasive wildlife by a qualified biologist until the unexpected pooling no longer persists. If detected, eradication measures to remove all invasive aquatic wildlife shall be implemented by the qualified biologist and may include one or more techniques, including trapping, pithing, and pellet shooting.

As noted by the Commenter, Project implementation will result in reduced flows in several watersheds.[155] Reductions in the Oso Creek watershed area are relatively minor relative to the total watershed flow. Oso Creek has significant inflow from other tributaries immediately downstream of the Project, which provides the majority of downstream flows; therefore, no significant offsite impacts from reduced flows will result in the Oso Creek watershed. The eastern flowing watersheds do not support downstream aquatic or riparian resources. When flowing northeastward off the site, these drainages merge and sheet flow across the bridge over the east branch of the California Aqueduct and are no longer discernable.[156] Historical imagery shows that flows are very infrequent this far downstream and dissipate quickly across active agricultural fields. The result of the reduced downstream surface flows is an increase in infiltration upstream on the Project site, whereby the underground aquifers do not experience a reduction. As a result, downstream resources are not expected to be impacted to any measurable degree. To clarify the lack of downstream changes occurring off-site, additional language has been added to the Draft EIR on page 5.7-163 as a stand-alone paragraph after the paragraph starting with "Additionally" and before the paragraph starting with "Impacts" near the bottom of the page.

> The Project's drainage masterplan is designed to ensure, as required by State mandate, that the quantity and quality of water leaving the Project is not greater than the pre-Project condition at the point of discharge. Additionally, although the Project results in reduced flows in some downstream areas, they are either very minor, such as in Oso Creek, or there are no aquatic/riparian resources supported downstream, such as the eastern drainages. Lastly, the timing of flows, both seasonally as well as pooling and flowing durations, are not expected to defer substantially from pre-project conditions, as further addressed in Section 5.2, Hydrology and Flood, of the Draft EIR. As a result, off-site downstream drainages as well as the associated habitats and plant and wildlife species are not expected to be impacted to any measurable degree. Furthermore, those drainages that are proposed for a continuous series of in-channel hydraulic measures are considered impacted in their entirety.

In addition to meeting the RWQCB and County's hydrology and water quality standards, MM 7-12 on page 5.7-187 of the Draft EIR also specifies that the Project Applicant/Developer

155 *Id.,* Table 5.2-7
156 *Id.,* p. 5.2-18

is required to obtain the necessary permits or agreements, including compliance with the Streambed Alteration Agreement requirements of the California Fish and Game Code.

Response to Comment B.4-10:

Please see response to Comment B.4-9 above. As discussed in this response, regarding the location of the exiting flows from the Project site, the effects of Project implementation on downstream (i.e. off-site) biological resources is expected to be negligible because the changes in drainage hydraulics and water quality as it exits the development areas are negligible. Historical imagery shows that flows are very infrequent this far downstream and dissipate quickly across active agricultural fields. The result of the reduced downstream surface flows is an increase in infiltration upstream on the Project site, whereby the underground aquifers do not experience a reduction. As a result, downstream resources are not expected to be impacted to any measurable degree. To clarify the lack of downstream changes occurring off-site, additional language has been added to the Draft EIR, as described in response to Comment B.4-9. The discharge locations (nodes 1 through 8) in the existing condition were relabeled to conduct the post-development analysis, and are located at the same points along the Project boundary.[157] Therefore, off-site discharges would maintain the same connectivity to drainage courses and associated biological resources. Regarding the use of the proposed retention and detention basins, these facilities would not be used for recreational purposes. These would solely act as flood control facilities and not as components of proposed parklands.

In addition, although some of the existing drainages will be graded/reengineered/re-contoured or modified with drop structures, many biological functions will be realized in the post-Project drainage condition. A new Exhibit B.4-9, On-Site Open Space Areas, has been prepared and illustrates where most of the existing drainage corridors are retained as the general location of re-engineered drainages. New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. This consistency in the approximate location of these drainage pathways allows for the retention of connectivity between on and off-site drainages.

As presented in Section 4.8, Intended Use, of the Draft EIR, in addition to the Project's discretionary actions (i.e. approval of the Specific Plan, General Plan Amendment, Zone Change, Vesting Tentative Parcel Map, Development Agreement, and Conditional Use Permit), additional ministerial and discretionary actions related to the future approvals are anticipated for Project implementation. Project buildout would be implemented in phases, based on future market conditions, over an approximate 20-year period, through a series of future tract and parcel maps.

A fishing/casting pond for non-commercial use is among the recreational amenities that could be included in the Project's recreational open space. There is no current plan, location or other information known about the potential amenity; the final amenity suite for each park area (e.g. playgrounds, tennis courts, picnic areas, etc.) will be designed as part of the tentative tract mapping process for sub-areas of the Project site. To address the

[157] *Id.*, p. 5.2-39

Commenter's concern about the potential impacts associated with such a non-commercial fishing/casting pond, the Specific Plan Table 2-16, Land Use Matrix, has been revised to require a subsequent County discretionary approval ("C" for conditional use permit) instead of a ministerial approval ("P" for permitted without further discretionary review). As a constructed, non-commercial recreational amenity, such as an artificial pond will be required to comply with all applicable water quality and safety laws and regulations, and is not anticipated to have any new or worse significant environmental impacts. The detailed designated and operational features of any such future pond will be subject to review and approval as part of the future discretionary tentative tract map approval process. Some future actions will be ministerial in nature as they will not require any special discretion or judgment on the part of the County official in processing the application; such actions will not require future CEQA review. Other actions will require the exercise of discretion by the County or may propose a scope of development that has not been reviewed as part of the Draft EIR. Future CEQA review of these discretionary actions shall be processed in accordance with CEQA and the State CEQA Guidelines. Examples of such future discretionary actions include: land uses requiring substantial conformance review, conditional use permits (CUP), parcel maps, and tentative maps, as presented in further detail on pages 4-106 to 4-107of the Draft EIR.

In addition, to provide assurance that the Project's flood control and other water retention features do not allow establishment of invasive aquatic wildlife, MM 7-16 will be modified to incorporate monitoring and eradication, if necessary. The following text is hereby added to the last paragraph of MM 7-16 on page 5.7-192 of the Draft EIR:

> To prevent the establishment of invasive aquatic wildlife such as the American bullfrog (*Lithobates catesbeianus*) and the African clawed frog (*Xenopus laevis*), all Project flood control and other water retention features shall be monitored seasonally and following rain fall events to confirm pooling does not persist for more than 15 days. If such pooling beyond 15 days is detected, including, for example, in artificially created fishing/casting ponds which can only be constructed following issuance of a conditional use permit and further environmental review, the constructed pond location shall be checked routinely for presence of aquatic invasive wildlife by a qualified biologist until the unexpected pooling no longer persists. If detected, eradication measures to remove all invasive aquatic wildlife shall be implemented by the qualified biologist and may include one or more techniques, including trapping, pithing, and pellet shooting.

Response to Comment B.4-11:

The remnant mineshaft, as stated in the comment, is described in Section 5.3, Hazards and Fire Safety, for the purpose of providing a general description of the mineshaft dimensions for context to potential site hazards. That site reconnaissance documentation was conducted in 1999.[158] Subsequent to this, several biological surveys of the Project site have been conducted, with the most recent site reconnaissance that would have observed the mineshaft

[158] DRP 2017, Exhibit 5.3-1

occurring for the 2015 special status plant surveys. Site surveys determined that the mineshaft did not constitute suitable habitat for bat roosts and no evidence of bat occupation was detected.

Discussions of suitable bat habitat found on site are provided in Draft EIR Section 5.7, Biological Resources, Table 5.7-8, on pages 5.7-97 and 5.7-98, with further discussion on pages 5.7-124 and 5.7-125. In addition, the following text is hereby inserted at the end of the second paragraph in the "Mammals" section on page 5.7-50 of the Draft EIR:

> The habitat value, and potential for sensitive bat species occurrence, was evaluated for the remnant mineshaft entrance in the northwest of Quail Lake. The entrance is shallow and exposed (approximately 6 feet deep by 4 feet tall by 5 ½ feet wide), and accordingly, does not provide the type of habitat used by bats. No bats were observed, and there is no evidence of prior bat occupancy.

In addition, based on the lack of characteristics typically associated with a mine shaft, other wildlife species known to prefer such features are not expected to occur. However, the location in general has been surveyed in the past and may be surveyed in the future if it falls within potentially suitable habitat of a species for which surveys are being conducted in accordance with MMs 7-2, 7-3, and 7-5 described on pages 5.7-175 through 5.7-177 of the Draft EIR.

Response to Comment B.4-12:

In order to reduce the potential for fugitive dust during short-term construction activities, MM 3-2 in Section 5.3, Hazards and Fire Safety, requires the use of environmentally safe dust control agents or paving on unpaved access roads during rough grading and construction activities.[159] Such access roads would connect paved/developed roadways in completed phases of the Project to areas of disturbance from grading. The exact location(s) of these access roads is unknown and would be determined as the phased implementation of the Project moves forward. However, these temporary construction access roads would occur within the overall Project grading footprint. For these disturbed areas, the Draft EIR considers them to be impacted and wildlife habitat values are considered lost. It is possible that wildlife will traverse graded construction areas that are treated with soil binders. As such, the text below is hereby added to the end of page 5.7-166 of Section 5.7, Biological Resources, of the Draft EIR under the heading "Indirect Impacts" in order to provide an assessment of the impacts on wildlife that may continue to utilize these areas during the construction phases when dust control agents are in use:

> During grading and construction, implementation of environmentally safe dust control agents may be used on unpaved access roads that connect paved/developed roadways in completed phases of the Project to areas of disturbance from grading. Although the application of dust control agents would occur on disturbed access roads that would be devoid of vegetation,

[159] *Id.,* p. 5.3-26

> some wildlife may enter the construction area. Due to the lack of cover and forage, the frequency and number of animals is expected to be minimal and limited to more mobile species such as birds, large mammals, and some insects. Because MM 3-2 requires that the use of dust control agents be environmentally safe, and because the use of graded/disturbed construction areas by wildlife is anticipated to be minimal, impacts to wildlife would be less than significant.

Response to Comment B.4-13:

This comment states that future development of the Fuel Modification Plan for the Project does not provide CDFW with an opportunity to assess potential species and habitat impacts, and recommends revising the Draft EIR to include the Fuel Modification Plan.

Fuel modification planning is based many details that are not available prior to tract-map level site design, such as lot-by-lot land use types, proximity of land uses to fire hazard zones, and adjacent scopes. Therefore, a Fuel Modification Plan cannot be developed based on a conceptual land use plan, such as provided in a Specific Plan for a master-planned community. Regardless, the future implementation of the required Fuel Modification Plan was considered in the analysis of biological resources by including an average 50-foot-wide buffer to the grading/impact footprint to ensure that all anticipated potential impacts from implementation of Project were captured in the Draft EIR. Also, MM 7-1 restricts disturbance, including by fuel modification, of the crownscale and Mojave spineflower populations that are located in the described areas and MM 7-21 prohibits fuel modification zones from encroaching on the adjacent Significant Ecological Area (SEA).

Response to Comment B.4-14:

The Commenter's description of the jurisdictional activities of the two Regional Water Quality Control Boards (RWQCBs) is noted for the record. The regulatory setting descriptions provided in Section 5.2.2, Relevant Plans, Policies, and Regulations, of Section 5.2, Hydrology and Flood, includes additional information about RWQCB jurisdiction. The Draft EIR includes a project-level analysis of all planned land disturbances in Section 5.7, Biological Resources;[160] and a further analysis of changes in on-site hydrology, during construction and operation, in Section 5.2.[161] Loss of habitat values in jurisdictional waters and riparian areas is included in Section 5.7 of the Draft EIR.[162]

Although the location of specific building foundations is not known at this time, dewatering associated with the testing of water lines, sprinkler systems, and other facilities, like foundations, is anticipated, as discussed on page 5.4-55 of Section 5.4, Water Quality. The Project will comply with the State's Construction General Permit, the Lahontan RWQCB Limited Threat Discharge Permit, and the Los Angeles RWQCB General Dewatering Permit during construction. Best Management Practices (BMPs) that would be implemented under

160 *Id.,* pp. 5.7-141 to -162
161 *Id.,* pp. 5.2-23 to -43
162 *Id.,* pp. 5.7-162 to -164

the General Dewatering Permit for construction dewatering include infiltration of clean groundwater; on-site treatment using suitable treatment technologies; on-site or transport off site for sanitary sewer discharge with local sewer district approval; or use of a sedimentation bag for small volumes of localized dewatering.[163] In summary, the Project's construction period runoff that is subject to treatment BMPs that comply with the State's Construction General Permit, and with the Limited Threat Discharge and Dewatering Permits adopted by the Lahontan and Los Angeles RWQCBs during construction, would have less than significant impacts to water quality, and therefore, would not significantly impact biological resources. In addition, to provide assurance that the Project's flood control and other water retention features do not allow establishment of invasive aquatic wildlife, MM 7-16 will be modified to incorporate monitoring and eradication if necessary. The following text is hereby added to the last paragraph of MM 7-16 on page 5.7-192 of the Draft EIR:

> To prevent the establishment of invasive aquatic wildlife such as the American bullfrog (*Lithobates catesbeianus*) and the African clawed frog (*Xenopus laevis*), all Project flood control and other water retainment features shall be monitored seasonally and following rain fall events to confirm pooling does not persist for more than 15 days. If such pooling beyond 15 days is detected, including, for example, in artificially created fishing/casting ponds which can only be constructed following issuance of a conditional use permit and further environmental review, the constructed pond location shall be checked routinely for presence of aquatic invasive wildlife by a qualified biologist until the unexpected pooling no longer persists. If detected, eradication measures to remove all invasive aquatic wildlife shall be implemented by the qualified biologist and may include one or more techniques, including trapping, pithing, and pellet shooting.

The biological resources analysis in Section 5.7 of the Draft EIR is comprehensive, and assesses the impacts associated with the complete loss of biological resources within the impact footprint as well as implementation of the suite of mitigation measures and PDFs set forth in both Sections 5.2 and 5.7. This bigger picture, conservative approach is adequate to determine Project impacts of these dewatering and discharge activities at this time, as part of the CEQA process.

With respect to the Jurisdictional Delineation (JD) of water resources on the site, during the preparation of the Draft EIR, Psomas received input from the Lahontan Regional Water Quality Control Board (LRWQCB) and California Department of Fish and Game (CDFW) on the JD based on conference calls to discuss the findings of JD report and site visits conducted in February 2016 and May 2017. LRWQCB staff did not have any suggested revisions to the findings of the JD report.

The JD report identified as "waters" on the Project site intermittent or ephemeral lengths of "episodic" streams that flow for only a short time during and immediately after rain events. During the May 2017 site visit, CDFW staff did not identify any streams, wetlands, or riparian

[163] *Id.,* pp. 5.4-29 and -30, -53 to -57

areas that were omitted from the JD report. CDFW staff did, however, recommend expanding the acreage of some of the intermittent and ephemeral streams on the Project site based on an interpretive report published by the California Energy Commission (CEC) called "Methods to Describe and Delineate Episodic Stream Processes on Arid Landscapes for Permitting Utility-Scale Solar Power Plants, with the MESA Field Guide".[164] For several decades prior to issuance of the MESA Memo, CDFW had interpreted and applied its "streambed alteration agreement" permit program under *California Fish and Game Code* Section 1600 to regulate stream widths based on the onsite physical "bed and bank" features of ephemeral and intermittent streams, which typically flow only during and for a short time after rain events, that are common in arid climates such as the Project site. Under the MESA Memo, however, CEC staff—working with CDFW staff—decided that for utility-scale solar power plants in arid climates, agency permit authority should be expanded to include areas near a stream that did not have a "bed and bank" but showed any evidence of water flow or erosion.

Applying the MESA Memo outside the context of CEC's utility-scale permit authority has been controversial, particularly since it dramatically expands longstanding CDFW Section 1600 program interpretations without any change to this existing program's statutes and regulations.[165] CDFW's website does not identify the MESA Memo as an applicable CDFW Section 1600 guidance document; it is instead identified as an "additional resource" developed "from other agencies"—in this case the California Energy Commission.[166]

Although CDFW staff have continued to implement the MESA Memo expanded interpretation under the agency's interpretation of the Section 1600 permit program, the California Legislature passed Senate Bill 506 in the 2017 session which directed CDFW to update its website with guidance documents that CDFW was and intended to continue to apply to its Section 1600 permit program. Governor Brown vetoed SB 506, however, and in in his veto message instead noted that CDFW "is beginning a rulemaking process on the Lake and Streambed Alteration Program" and thus that posting any interpretative or regulatory guidance on its website was "premature." The Governor's veto message concluded, "I am directing the Department to update its website to reflect the new guidance, once the regulations are complete." Since CDFW has not yet proposed any new regulations or otherwise begun the rulemaking process, CDFW staff's recommended addition of "Mesa Memo" acreage to the JD report is similarly premature. As part of its responsible agency authority, CDFW has permit jurisdiction over Section 1600 streambed alterations under existing and future changes to its regulatory program. For lead agency CEQA compliance purposes, the physical features of the site are accurately described under existing adopted statutes and regulations. CDFW's MESA Memo, and staff interpretations of the application of the MESA memo on the Project site, are noted for the record as is CDFW's responsible agency jurisdiction to interpret and apply the Section 1600 program at the Project site. If the MESA Memo is in fact adopted as a future regulation, with no changes made during the rulemaking process or by the Legislature, there would be no change to the impacts analyzed, but more of the Project site would be subject to the Section 1600 CDFW permit program requirements. For informational purposes, based on CDFW staff's interpretation and application of the

164 Please see http://www.energy.ca.gov/2014publications/CEC-500-2014-013/index (MESA Memo).
165 See Coalition Letter to CDFW, Nov 13, 2017.
166 Please see https://www.wildlife.ca.gov/Conservation/LSA/Resources.

MESA Memo at the Project site during their May 2017 site visit, the following revised jurisdictional calculations would exist for the Project site.

TABLE 5.7-10
WITH MESA MEMO MODIFICATIONS (MAY 2017)
ONSITE JURISDICTIONAL WETLANDS AND WATERS SUMMARY

Agency with Jurisdiction		On Site	Off Site	Total Project Area (acres)
USACE *	acres	1.7	~~0.1~~0.0	~~**1.8**~~**1.7**
	linear feet	~~21,896~~ 21,843	~~23~~0	~~**21,919**~~ **21,843**
CDFW	acres	~~165.3~~ 169.0	0.3	~~**165.6**~~ **169.3**
	linear feet	~~551,061~~ 562.276	~~2,273~~ 1.635	~~**553,334**~~ **563,911**
RWQCB	acres	~~148.9~~ 150.2	0.3	~~**149.2**~~ **150.5**
	linear feet	~~551,061~~ 562.276	~~2,273~~ 1.635	~~**553,334**~~ **563,911**

USACE: U.S. Army Corps of Engineers; CDFW: California Department of Fish and Wildlife; RWQCB: Regional Water Quality Control Board
* All of the USACE acreage consists of non-wetland waters
Source: BonTerra Psomas 2015a

Response to Comment B.4-15:

The Draft EIR includes PDF 4-2 and MM 4-2 in Section 5.4, Water Quality, which require that the Project implement an Integrated Pest Management (IPM) program consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and the Natural Resources Statewide Integrated Pest Management Program. The IPM program must prevent or suppress pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants, biological controls, cultural practices, habitat modification, and judicious use of pesticides. Pesticide management BMPs will be implemented to promote safety (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); compliance with regulatory requirements; spill mitigation; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation).[167] MM 4-2 provides more than guidelines for development of the IPM; it sets forth a performance standard that requires prevention or suppression of pest problems as well as a combination of techniques described above to achieve the performance standard[168], and therefore is legally sufficient (see response to Comment F.8-173). To ensure that the performance standards above are met, County approval will be required, and MM 4-2 in the Draft EIR will be modified, as follows:

> The Project shall implement integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the

[167] DRP 2017, pp. 5.4-30 and -90
[168] *Id.,* pp. 5.4-30, -31; 5.4-79, -90, -91

> integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program. The integrated pest management program will be provided to the County in association with the Landscape Plan submitted to the County with each tentative tract map.

In addition, the following sentence in the Impact Summary on pages 5.4-66, 5.4-71, and 5.4-89 in the Draft EIR will be modified, as follows:

> Compliance with the LID performance standards and integrated pest management and landscaping BMP requirements will be reconfirmed ~~in drainage and landscape plans to be submitted to the County~~ in conjunction with each Project tract map review and approval process.

Response to Comment B.4-16:

MM 4-2 in the Draft EIR will be modified to prohibit the use of rodenticides containing anticoagulants on the Project site or Mitigation Preserve lands.[169] The following text will be added as the seventh bullet (last bullet) to MM 4-2 in Section 5.4, Water Quality:

- All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.

It is noted that CC&Rs are a binding enforcement mechanism, and that violations of the CC&Rs are subject to private enforcement by the master developer and HOA. As a volunteered mitigation measure the County also has CEQA enforcement authority per the MMRP. With this addition, the subsequent recommendations in the comment regarding how to manage/minimize the impacts, if not feasible to prohibit the use of rodenticides containing anticoagulants, are no longer applicable.

Response to Comment B.4-17:

In an effort to make the plan for implementing grassland preservation and management available immediately, the Ranch-wide Management Plan (RWMP) shall be adopted as the managing plan, included in the Final EIR, and no new plan will be prepared. Management of the Mitigation Preserve shall be in accordance with the RWMP, which incorporates BMPs for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions (see RWMP Vol. II Sections 5.1 and 5.2). The RWMP includes standards for management of the grasslands areas that will preserve the grasslands in perpetuity. The RWMP has been submitted for review and approval to CDFW and USFWS, as applicable. The RWMP provides a comprehensive framework, with the context of the TRCRWA, for the effective preservation and management of the preserved

[169] *Id.,* p. 5.4-90

open space lands located on Tejon Ranch, including the mitigation lands for the Project site. The RWMP shall be included as Final EIR Appendix 5.7-D and the Tejon Ranch Conservancy Ranch-Wide Agreement (TRCRWA) shall be included as Final EIR Appendix 5.7-E, and the following edit is hereby made to page 5.7-62.

> Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-~~W~~wide Management Plan (RWMP) (Final EIR Appendix 5.7-D) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

All references to the Native Perennial Grassland and Wildflower Fields Management Plan within the Draft EIR are replaced with the RWMP. Additional edits to MM 7-10 are described in response to Comment B.4-63, including edits to the last paragraph of MM 7-10 on page 5.7-182 of the Draft EIR:

> The ~~open space~~ Mitigation Preserve ~~preserve~~, including the grasslands within it, shall be preserved in perpetuity to offset Project impacts on native grasslands and wildflower fields prior to issuance of a grading permit for the Project site. The phasing of mitigation has been previously described. The preservation and management of these grasslands through the RWMP ~~Native Perennial Grassland and Wildflower Field Mitigation Plan~~ will sufficiently offset and fully mitigate the impacts on native grasslands and wildflower fields associated with the Project.

The preservation phasing [of grassland areas] through conservation easements shall be based on the percentage total area of impact per phase of development, regardless of the specific resource impacts. The specific location of the acreage to be dedicated within a particular phase will be chosen to maximize the replacement of resource values lost during that phase of construction while maintaining as much contiguous acreage as possible. In order to preserve an adequate quantity of grassland, lands outside the County of Los Angeles, within the County of Kern, would be used for mitigation. As each phase is proposed, a percentage of the mitigation preserve (which is equivalent to the percentage of that phase's impacts out of the total project impacts) shall be dedicated concurrent with the entitlement approval of that phase. The open space preserve, including the grasslands within it, shall be preserved in perpetuity to offset Project impacts on native grasslands and wildflower fields prior to issuance of a grading permit for each phase. The phasing of mitigation has been previously described. The preservation of 14,908 acres of grasslands coupled with the long-term management through implementation of the Ranch-wide Management Plan will sufficiently offset and fully mitigate the impacts on native grasslands and wildflower fields associated with the Project.

With regard to the enforceability of this mitigation, which would include continued grazing as appropriate, the MMRP constitutes a binding requirement upon the Applicant to implement all mitigation measures associated with the project. With specific regard to

MM 7-10, the timing hook for implementation of the mitigation measure is preservation of the phase's share of mitigation land prior to issuance of the grading permit for that phase. The Mitigation Monitoring and Reporting Program (MMRP) has been included in the Final EIR as Appendix 2.0-C.Rev.

With regard to the Commenter's suggestion that PDF 5-1 and all other PDFs be made mitigation measures, it is noted that all PDFs are already inherent elements of the Project. They are described throughout the Draft EIR in order to highlight the ways in which the Project has already been designed to minimize potential environmental impacts. Mitigation measures, on the other hand, are designed to reduce significant adverse impacts of a project. As such, to the extent any PDFs describe actions that are feasible mitigation measures that would reduce adverse Project impacts, all such elements of the PDFs have already been identified and incorporated into mitigation measures applicable to the Project.[170]

Response to Comment B.4-18:

As of Draft EIR preparation, the tricolored blackbird was not a State Endangered Species, but rather a Candidate under review for this status. On April 19, 2018, the California Fish and Game Commission authorized the listing of tricolored blackbird as a "threatened" species.[171,172] However, it is noted that Candidate species are afforded the same legal protections as state listed species. Therefore, consultation with CDFW will be required. The relevant analysis therefore remains the same under CEQA, and no mitigation measure updates are required.

No tricolored blackbird have been seen at the northern portion of the Project site in recent years; however, the permanent setback described for this species in MM 7-7 in Section 5.7, Biological Resources, on pages 5.7-178 and 5.7-179 will apply to both the Quail Lake use area as well as the pond use area in the northern portion of the Project site. Thus, all permanent direct impacts to potential breeding ponds will be avoided as discussed in the Draft EIR However, the MM 7-7 will be revised to require that all temporary impacts will be avoided within ¼ mile during the nesting season to avoid indirect effects during construction. See responses to Comments B.4-18, B.4-19, F.3-14, F.3-15, F.3-16 F.3-17, F.3-18, F.3-19, F.3-20, F.3-21, F.8-156, and F.8-158 and other applicable responses for further information.

With respect to foraging habitat, the Draft EIR indicated that loss of foraging habitat could interrupt breeding if both Quail Lake and the north pond were used for breeding at the same time. As noted above, it has been nine years since any tricolored blackbird were found at the north pond, the habitat has become severely degraded, and the area is not likely to become suitable in the future. The species routinely shifts breeding locations, and there are also existing suitable breeding locations within the Mitigation Preserve as described in Appendix 5.7-C of the Draft EIR, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile

170 DRP 2017, p. 2-6, 4-16

171 California Fish and Game Commission (FGC). 2018 (April). Revised Meeting Agenda, April 18-19, 2018, 9:00 AM. Sacramento, CA: FGC. http://cal-span.org/unipage/?site=cal-span&owner=CFG&date=2018-04-19.

172 Nossaman, LLP. 2018 (April 19). California Lists Tricolored Blackbird. Irvine, CA: Nossaman. https://www.endangeredspecieslawandpolicy.com/2018/04/articles/listing/california-lists-tricolored-blackbird/.

setback during breeding season, which will protect the existing foraging habitat for that season during construction, and the land use adjacent to Quail Lake up to approximately ½ mile is almost entirely open space recreation and, therefore, will be permeable and available for foraging. Please also see discussion of coordination with CDFW in response to Comment B.4-1.

In addition, potential indirect impacts to tricolored blackbird are assessed in the Draft EIR, these potential indirect impacts include (1) increased lighting and glare effects on wildlife species in the remaining and adjacent open space areas; (2) potential increase in use of pesticides, herbicides, and in release of pollutants into adjacent drainages, creeks, and wetlands as a result of landscaping maintenance, irrigation, and storm water runoff; (3) increase in non-native plant species that are adapted to more urban environments and can out-compete native species for available resources, thus reducing the distribution and population of native species; (4) increases in human activity and domestic animal presence that can disturb natural habitat areas by trampling and extirpating native vegetation and displacing wildlife populations. Implementation of MMs 13-2 and 13-6 from Section 5.13, Visual Resources, which require the Project Applicant to develop a Lighting Plan to reduce potential impacts to biological resources caused by light and glare. MM 4-2 in Section 5.4, Water Quality, and is hereby edited to add the following text on page 5.4-91.

- Pesticide management, which includes safety requirements (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); regulatory requirements; spill mitigation measures; groundwater and surface water protection measures associated with pesticide use; and pesticide applicators must be certified by the California Department of Pesticide Regulation.
- <u>All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.</u>

MM 7-13 requires a Landscaping Plan (subject to County review) and will identify both a plant palette composed of non-invasive species and a list of invasive plant species prohibited from being planted on the Project site. MM 7-157 requires a public awareness program to restrict public access to the riparian and open space areas. MM 7-15 would require installation of waste and recycling receptacles that discourage foraging by wildlife species; inspection of all landscaping materials to ensure that they are free of Argentine ants prior to planting; and distribution of educational pamphlets to future Project residents regarding the importance of not feeding wildlife. MM 7-17 requires the implementation of a public awareness program in an effort to restrict public access to the riparian and open space areas to designated trails and to prevent unleashed domestic animals from entering these areas. This program will also include signs that identify the boundaries of ecologically sensitive areas; the use of temporary fencing around sensitive areas; and the promotion of public education and awareness of such areas. In addition, only passive recreational activities shall be permitted in designated natural open space areas, and all dogs shall be required to be leashed while in the designated natural open space areas.

Furthermore, as described in response to Comment B.4-63, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 14,908 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance wetland areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide for the long-term preservation of breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide-range foraging species to continue to persist in the region.

Therefore, the third full paragraph on page 5.7-149 of the Draft EIR is clarified as follows:

> Due to the shifting of tricolored blackbird nesting locations from year to year, a subset of two or three of the available nesting locations may represent the entire regional breeding population. A substantial reduction of foraging lands surrounding this subset of nesting locations could result in considerable reduction of nesting success. A review of the Quail Lake and the on-site colony subset identified a potential post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In a given year, if these two areas were used for nesting, the reduced availability of suitable foraging land could result in substantial reduction in nesting success. However, the north pond has become unsuitable habitat, so the likelihood of its future use by tricolored blackbird is very low. Additionally, the species shifts breeding locations between sites, and there are also existing potentially suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the breeding colony for that season during construction. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance wetland areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide forage ranging species to continue to persist in the region. Based on the revised MMs 7-7, 7-10, and 7-12, the impacts to foraging habitat are less than significant.

To further clarify this concern and those mentioned in other comments, the following edits are hereby made to MM 7-7 on pages 5.7-178 and 5.7-179:

> The Project shall incorporate avoidance and additional open space buffer features for each of the two ~~this~~ known tricolored blackbird nesting areas on and adjacent to the Project site ~~area~~. Permanent impacts will be restricted to

a distance of 400 feet from the nesting area excluding small impact areas associated with infrastructure and utilities along SR-138 immediately south of Quail Lake. The nesting area will be delineated by a qualified Ornithologist based on all available data (three years of site-specific data shall be used). Temporary impacts (i.e., construction noise) within a ¼ mile ~~400 feet~~ of active nesting areas shall be restricted to the non-breeding season. The breeding season for this species shall be considered April 1 through July 1. The applicant shall consult with CDFW and may obtain an Incidental Take permit if determined appropriate.

~~The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat. Potentially suitable areas for enhancement and preservation include lower Oso Canyon proximate to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source.~~

As described on page 5.7-150, in addition to MM 7-7, the Project design incorporates a buffer. To provide further clarification of the distances of those buffers, the first full paragraph on page 5.7-150 is hereby revised as follows:

To avoid all direct impacts and minimize indirect impacts to the nesting colonies on the Project site, MM 7-7 is included. This measure states that the Project shall incorporate avoidance and additional open space buffer features for the identified nesting areas such as at the northern edge of the Project site and at Quail Lake. Permanent impacts will be restricted to a minimum distance of 400 feet from the nesting area. The nesting area will be delineated by a qualified Ornithologist based on all available data (a minimum of three years of site-specific data shall be used). Temporary impacts (i.e., construction noise) within ¼ mile ~~400 feet~~ of active nesting areas shall be restricted to the non-breeding season. The breeding season for this species shall be considered April 1 through July 1. In addition to MM 7-7, the Project design incorporates a buffer of between 1,000 and 2,000 feet along the northern shore of Quail Lake to minimize impacts to adjacent foraging grounds. At the east end of the Lake, east of the mouth of the aqueduct, where a small section of shoreline is close to the project impact footprint, land uses include a regional park within a low density development zone so that lands immediately beyond the required 400 foot buffer (if nesting is identified) remain permeable and retain some potential for foraging for this species.

See above and other applicable responses including responses to Comments B.4-18, B.4-19, F.3-14, F.3-15, F.3-16 F.3-17, F.3-18, F.3-19, F.3-20, F.3-21, F.8-156, and F.8-158.

Response to Comment B.4-19:

The Project Applicant is required to comply with all applicable federal, State, and local laws independent of the mitigation measures set forth in the Draft EIR. Mitigation to avoid and reduce impacts to this species has been included in the Draft EIR, as further described in response to Comment B.4-18 above. The Commenter's conclusion that an Incidental Take Permit is required under State law is noted. Please refer to response to Comment B.4-18 regarding species listing, responses to Comments B.4-29 and B.4-61 regarding applicable mitigation measures requiring pre-construction surveys, and to Applicant's independent legal obligation to secure all required permits (including where applicable ITP permits). Please also refer to response to Comment B.4-18 regarding the modified buffer distance, and further clarification regarding elevation change and Specific Plan development restrictions. Please also see discussion of coordination with CDFW in response to Comment B.4-1.

Response to Comment B.4-20:

As noted, the Bloom report (2009) was included as an appendix to the Draft EIR. The Commenter's statements regarding the Bloom report are noted for the record.

Response to Comment B.4-21:

The Draft EIR fully addresses impacts associated with anticipated California condor activity in the Project area.[173] As discussed on page 5.7-148 of the Draft EIR, the Project is not likely to lead to events that significantly impact the California condor. Furthermore, as described on page 5.7-148, MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. However, to respond to the comment, MM 7-6 is revised to better incorporate the recommendations from the Bloom report (2009). MM 7-6 on Draft EIR pages 5.7-177 and 5.7-178 shall hereby be revised as follows:

MM 7-6 Construction Monitoring - The Project Applicant~~/Developer~~ shall retain a ~~qualified~~ CDFW/USFWS-approved "Authorized Biologist~~ with knowledge of California condors~~," to ~~monitor~~ be on-call during all construction activities. If condors are observed foraging or landing in the Project area~~. The resumes of the proposed Biologist(s) will be provided to the CDFW for concurrence. This Biologist(s) will be referred to as the "Authorized Biologist" hereinafter. During clearing and grubbing of construction areas~~, the Authorized Biologist shall ~~be present at all times. During mass grading, construction sites shall be monitored on a daily basis, and the Authorized Biologist will~~ have the authority to stop all construction activities until appropriate corrective measures have been ~~completed~~ implemented. If condors are observed landing in the Project area, the Applicant shall avoid further construction within 500 feet of the sighting until the animals have left the area, or as

[173] DRP 2017

otherwise authorized by CDFW and USFWS. If the condors are nesting within 0.5-mile of any Project area, no construction activities shall occur within this 0.5-mile buffer until the condors leave, or as otherwise directed by CDFW and USFWS. All condor sightings in the Project area ~~will~~ shall be reported to CDFW and USFWS within 24 hours of the sighting.

~~To further protect California condors potentially foraging in the Project area over the long term from negative interactions with humans and/or artificial structures, the~~ Cattle Carcass Relocation - The Project Applicant~~/Developer~~ shall remove dead cattle that are found ~~or reported~~ within 1,000 feet of the boundary of a residential or commercial development within 24 hours. ~~Dead cattle shall be relocated to a predetermined location.~~ The Approved Biologist will select locations ~~where carcasses shall be placed shall be~~ a minimum of 1,000 feet from ~~a~~ development ~~area boundary. Appropriate locations~~ areas for ~~transfer~~ relocation of carcasses ~~include open grasslands and oak/grassland areas where condors can readily detect carcasses and easily land and take off without encountering physical obstacles such as powerlines and other utility structures~~. The proposed locations would be ~~selected and~~ approved by the CDFW and USFWS. ~~Pursuant to this measure, a~~ A telephone number for reporting dead cattle shall be provided ~~and actively maintained. Any cattle carcasses transferred to the relocation areas shall be reported to the USFWS Condor Group~~ by the Applicant.

Utility Hazards - All surfaces on new antennae and phone/utility towers shall be designed, installed, and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching. Whenever possible, utility towers and antennae should be self-supporting (i.e. not use guy wires), and be as visible as possible (using sold panel siding or dense/wide lattice work).

Condor Educational Curriculum - The Applicant shall provide a Condor Educational Curriculum that includes the life history of the California condor, how to identify condors, TRC hunting rules and regulations, prohibited behaviors related to condors such as hunting with lead ammunition, and the legal consequences of inadvertently or otherwise illegally shooting or harming California condors. The information will also identify types of microtrash that could be ingested by adult breeding condors and describe measures to eliminate microtrash and

provide information on how to report roadkill for removal. In addition, these rules, regulations, and prohibitions shall be listed within CC&Rs.

Microtrash - During construction, the ~~area~~ Applicant shall ~~be~~ ensure that all Project areas are kept clean of debris ~~(e.g., cable, trash, and construction materials). The Project Applicant/Developer shall collect all~~ including microtrash and litter ~~(i.e., anything shiny, such as broken glass), vehicle fluids, and food waste from the Project area on a daily basis~~. Workers ~~shall~~ will be trained on the issue of microtrash: what constitutes microtrash, its potential effects on California condors, and how to avoid the deposition of microtrash.

In addition, the Applicant will ensure that routine community maintenance activities include regular efforts to eliminate microtrash on and near all work sites, recreational events, roads, and adjacent open space areas.

If it is determined that condors are ingesting microtrash in the Project area, the Applicant, CDFW, and USFWS shall evaluate potential remedies to reduce, and, if possible, eliminate microtrash ingestion. Such remedies may include increased education and awareness to residents, guests, staff, and workers regarding the dangers of microtrash, increased monitoring of events and activities that are potential sources of microtrash, and more frequent collection of microtrash.

Condor Deterrent Activities - If the Authorized Biologist deems it necessary, USFWS California condor hazing methods that do not rise to the level of "Take" under the ESA (Service 2014) will be employed. Only the Authorized Biologist, with approval from the USFWS, will conduct hazing and only when such actions are warranted. If the Authorized Biologist is not immediately available, a subset of less aggressive hazing methods, such as yelling, stomping, leashed dog barking or low pressure water spray, may be used when a clear escape route for the condors is identified and upon guidance from USFWS.

Condor Tracking – The Applicant will provide the USFWS with twenty-five (25) GPS satellite tracking transmitters (total cost not to exceed $150,000.00) prior to grading plan approval. This will allow the USFWS to more quickly identify the immediate location of birds that are not moving relative to the ground, which usually indicates that an injury, illness, or death has occurred. The ability to track the movements and locations of

individual condors can aid in the monitoring of the overall effectiveness of measures to minimize and mitigate the indirect impact of microtrash by locating possible areas where microtrash was ingested. It can also aide in identifying the location where condors were shot if such an incident were to occur.

Response to Comment B.4-22:

The Draft EIR does not indicate that that TUMSHCP provides mitigation for Project impacts on the condor. Rather, the Draft EIR, as found on page 5.7-63 and on page 5.7-173, indicates that, in addition to the Centennial Mitigation Preserve, many species may benefit from the TUMSHCP and other open space conservation efforts, like the Ranch-Wide Agreement (TRCRWA)[174] and Antelope Valley Area Plan (AVAP).

With respect to condor, no significant impact is expected to result from loss of foraging habitat. Based on the USFWS analysis, even with the cumulative build out of all development areas on the Ranch, the TUMSHCP would benefit the recovery of the condor. As discussed in the Supplemental Draft EIS for the TUMSHCP, the USFWS has reviewed all of the proposed development on the Ranch, including the Centennial Project, and through approval of the TUMSHCP, concluded "Consequently, even with the Commercial and Residential Development Activities proposed under the alternatives [TMV, Grapevine and Centennial], given the estimated amount of foraging habitat that would remain on Tejon Ranch (Ranch), and the estimated food for condors that would be produced from cattle, pig, and native ungulate carcasses on that foraging habitat, it is likely that the Ranch would continue to function as an essential and viable foraging area for the expanding condor population."[175] It is clear from this statement that the USFWS made a determination that with the TUMSHCP implementation, the Centennial Project is not expected to change the Ranch's ability to function as an essential and viable foraging area for the expanding condor population. See also Biological Opinion on the Proposed Issuance of an Incidental Take Permit for the TUMSHCP (April 26, 2013).

While the TRCRWA itself is not considered mitigation for the Centennial Project, the agreement allows its conservation lands to be used as mitigation lands for development, and the Centennial Mitigation Preserve is within its boundaries. Overall, as discussed on page 5.7-16 of the Draft EIR, the TRCRWA allows TRC and its development partners to pursue approvals from permitting agencies to develop of portions of the Ranch, including the Project site, while providing for the designation and permanent protection of approximately 145,000 acres of contiguous open space areas immediately north of the Project site to protect the biological resources and wildlife connectivity of the 270,000-acre Ranch. The TRCRWA also established options for the dedication or sale of approximately 62,000 acres in 5 additional areas of the Ranch for further open space preservation. In addition, 33,000 acres of designated open space within the development areas have been preserved. Collectively, these open space dedication and acquisition areas comprise approximately 240,000 acres,

174 Final EIR Appendix 5.7-E
175 *Ibid*.

or approximately 90 percent, of the 270,000-acre Ranch. The open space preservation and development constraints in the TRCRWA have been recorded on title, and comprise the reasonable foreseeable land uses on the Ranch. Under the TRCRWA, the Conservancy will adopt, update, monitor and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch. Maintenance of the open space or conserved lands will be the responsibility of the Conservancy, funded in large part by a fee based on a portion of the purchase price for each residential parcel on the Ranch. Since Centennial constitutes over 75 percent of the currently planned residential units on the Ranch, it will bear the substantial costs of funding the Conservancy and maintaining wildlife movement corridor areas through the Ranch.

The Project design is also consistent with the AVAP inclusive of open space designations, SEA protection, and preservation of habitat linkages.[176] The AVAP is a community-based plan that is a subset of the County of Los Angeles General Plan, which includes the Project area. The AVAP EIR provides an analysis of all potential, reasonably foreseeable environmental impacts related to the implementation of the AVAP "to indicate possible ways to reduce or avoid environmental damage and to identify alternatives" to the AVAP.[177] Additionally, the AVAP EIR discloses "significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present and reasonably foreseeable future projects."[178] The development areas of the Project, as required, fall within the AVAP designated development areas.

While neither the TUMSHCP nor the TRCRWA nor the AVAP mitigate for Centennial Project impacts, they contribute to the regional conservation of the Condor and other species that occur within their shared boundaries.

With respect to allowed uses within the Project's proposed Mitigation Preserve lands, the Specific Plan has been updated to reflect additional restricted uses in open space. Neither wind energy conversion systems nor solar and renewable energy generation facilities are permitted within the Open Space land use designation. Public access is prohibited on both the onsite and offsite preserve lands; though existing private recreational use may continue. Existing allowed uses such as hunting is restricted to designated hunting areas on the offsite Mitigation Preserve area only, and such use is considered compatible because no new disturbances are expected. Furthermore, hunting on the Ranch as a whole is subject to the restrictions in the TUMSHCP to protect the condor.

176 Los Angeles County Department of Regional Planning (DRP). 2015 (June). *Antelope Valley Area Plan: Town & Country* (Table 5.8-1, pp. 5.8-23 through 70). Los Angeles, CA: DRP. http://planning.lacounty.gov/tnc.

177 Los Angeles County Department of Regional Planning (DRP). 2014b (October). *Final Environmental Impact Report, Antelope Valley Area Plan, County of Los Angeles* (p. 2-1). Los Angeles, CA: DRP. http://planning.lacounty.gov/assets/upl/project/tnc_feir.pdf.

178 Ibid.

Response to Comment B.4-23:

The condor mitigation measures have been expanded as noted in response to Comment B.4-21. Please see response to Comment B.4-21.

Response to Comment B.4-24:

The following text is hereby inserted after the second paragraph of MM 7-2 on page 5.7-175:

> Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate burrowing owl pre-construction surveys and avoidance and mitigation measures as identified below.
>
> *Burrowing Owl Pre-Construction Surveys*
>
> The project biologist shall conduct pre-construction take-avoidance surveys no more than 30 days prior to ground-disturbing activities within each construction area. Focused burrowing owl surveys shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (March 2012). Breeding season surveys shall include at least four survey passes completed between February 15 and July 15, with at least one visit between February 15 and April 15, and a minimum of three survey visits (at least 3 weeks apart) between April 15 and July 15, including at least one visit after June 15. Non-breeding season surveys shall include at least four visits spread evenly throughout the non-breeding season. The surveys shall be conducted in suitable burrowing owl habitat within 150 meters (492 feet) of the project footprint. Surveys shall be conducted by walking 20-meter transects. Because burrowing owls can recolonize a site after a few days, time lapses between project activities trigger subsequent take avoidance surveys, including, but not limited to an additional survey within 24 hours of ground-disturbing activities. Once surveys are completed, the project biologist shall prepare a survey report on the survey methods and results.
>
> *Burrowing Owl Avoidance and Mitigation Measures*
>
> Submit for DRP and CDFW approval and subsequently implement a Burrowing Owl Exclusion Plan, which includes four avoidance and relocation strategy tiers and associated mitigation requirements set forth in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012): Tier 1 – Avoidance Buffers; Tier 2 – Passive Relocation; Tier 3 – Prevention of Recolonization of Development Areas; and Tier 4 – Active Relocation (Optional). Site monitoring shall be required prior to, during, and after exclusions of burrowing owls from their burrows. Excluded burrowing owls shall be monitored and documented using artificial or natural borrows on adjoining Mitigation Preserve lands or other open space.

> Avoidance buffers shall be established in accordance with the buffer distances described in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012), which range from 50 to 500 meters, depending on the season and level of disturbance. The buffers may be reduced, but only after consultation with and approval from CDFW.

In addition, the following paragraph in MM 7-2 on page 5.7-175 is hereby deleted:

> ~~Pre-construction burrowing owl and Swainson's hawk surveys shall be conducted in all potentially suitable habitat areas prior to initial site preparation. Methods employed shall be consistent with standard and appropriate protocols for both species within the appropriate season of the year prior to construction. Burrowing owl pre-construction surveys shall be conducted prior to the start of construction/ground-breaking activities. Surveys will be conducted following the California Department of Fish and Wildlife's (CDFW's) 2012 burrowing owl survey protocol. These surveys shall be conducted weekly beginning 30 days prior to the start of construction with the final survey occurring 1 day prior to construction.~~

Response to Comment B.4-25:

The mitigation measure for the burrowing owl is revised as described in response to Comment B.4-24. The revisions include points 1, 3, and 4 in the comment. Regarding point 2 of the comment, the Draft EIR discusses impacts to the burrowing owl on page 5.7-150, while impacts to individuals is considered potential significant and imitation is provided, the loss of habitat is determined to be adverse but less than significant. The availability of potentially suitable habitat for this species in the region is extensive and includes the majority of the landscape within it. As such, the loss of habitat resulting from Project implementation is relatively minor and would not be expected to have a discernable effect on regional populations of the species. Furthermore, the Mitigation Preserve described in PDF 7-1 on page 5.7-135 sets aside over 27,000 acres of land composed of lands which are largely suitable for burrowing owl and burrowing owl have been detected within the Mitigation Preserve.[179] Consequently, no mitigation is required for the permanent loss of burrowing owl habitat.

Response to Comment B.4-26:

Mitigation to avoid impacts to Swainson's hawk is included in MM 7-2 on page 5.7-175 of the Draft EIR. However, in an effort to incorporate the specifics requested by the Commenter, the measure is revised. MM 7-2 is hereby revised as follows (see also response to Comment F.8-144 for changes to MM 7-2 related to golden eagle):

> ~~Pre-construction burrowing owl and Swainson's hawk surveys shall be conducted in all potentially suitable habitat areas prior to initial site preparation. Methods employed shall be consistent with standard and~~

[179] DRP 2017, Appendix 5.7-C, Mitigation Preserve Review

~~appropriate protocols for both species within the appropriate season of the year prior to construction. Burrowing owl pre-construction surveys shall be conducted prior to the start of construction/ground-breaking activities. Surveys will be conducted following the California Department of Fish and Wildlife's (CDFW's) 2012 burrowing owl survey protocol. These surveys shall be conducted weekly beginning 30 days prior to the start of construction with the final survey occurring 1 day prior to construction.~~

~~If pre-construction surveys locate an active Swainson's hawk nest on the Project site, then no construction activities will occur within ½ mile of the nest between March 1 and September 15. Furthermore, a Swainson's hawk Monitoring and Mitigation Plan shall be prepared within 90 days after locating an active Swainson's hawk nest in consultation with the County and the CDFW.~~

Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate Swainson's hawk pre-construction surveys and avoidance and mitigation measures as identified below.

Swainson's hawk pre-construction surveys

Pre-construction surveys for Swainson's hawk shall be conducted during the two survey periods prior to construction by the Project Lead Biologist following the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000). These methods include surveying for active nests within a 0.5-mile radius of all Project activities prior to construction activities.

Swainson's hawk avoidance measures

If active Swainson's hawk nests (defined as nests used during one or more of the last 5 years) are found during these surveys, the Project Proponent shall utilize the CDFW *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks* (Buteo swainsoni) *in the Central Valley of California* for addressing the species as modified below. During initial ground disturbance construction, no intensive disturbances (e.g., heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities) or other Project-related activities that may cause nest abandonment or forced fledging shall occur within 0.5-mile of an active nest between January 1 and September 15, unless take authorization is obtained and provides otherwise.

The buffer zone may be decreased to 0.25-mile around nests for subsequent construction (i.e., in areas where disturbance—such as heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities—is not a normal occurrence during the nesting season). Active nest trees (where the nest is intact and has been used in the last 5 years) shall not be removed unless there is no practicable

way of avoiding them. Encroachment of construction within the 0.5-mile buffer and removal of active nesting trees shall only be undertaken subject to consultation with CDFW and issuance of a California Fish and Game Code Section 2081 Incidental Take Permit, and associated conditions, if any are required. The tree removal period shall be limited to between October 1 and December 31.

Swainson's hawk monitoring during construction

If construction or other Project-related activities that may cause nest abandonment or forced fledging are necessary within the buffer zone, prior acquisition of an Incidental Take Permit shall be required. Monitoring of the nest site by the Project Lead Biologist is required to determine whether the nest is abandoned. If the nest is abandoned and if the nestlings are still alive, the master developer shall fund the recovery and hacking (i.e., the controlled release of captive-reared young) of the nestling(s). Existing activities such as agricultural activities, commuter traffic, and routine facility maintenance activities within 0.25-mile of an active nest shall not be prohibited.

Response to Comment B.4-27:

Mitigation to avoid impacts to nesting birds is included in the Draft EIR in MM 7-8 on page 5.7-179. However, to incorporate the specifics requested by the Commenter, the measure is revised. MM 7-8 on pages 5.7-179 and 5.7-180 of the Draft EIR is hereby replaced in its entirety with the following:

The Project Biologist shall conduct pre-construction nesting bird surveys no earlier than seven days prior to any Project-related construction/ground disturbance activities within each construction area and a 500-foot buffer that occurs during the nesting/breeding season of special-status bird species potentially nesting on the site, with the exception of the special-status bird species addressed under separate subheadings below (including burrowing owl, golden eagle, and Swainson's hawk). The pre-construction surveys shall be conducted between January 1 and September 15, or as determined by the Project Biologist. If construction activities are delayed for more than 14 consecutive days, the surveys shall be repeated.

The purpose of the pre-construction nesting bird surveys will be to determine whether occupied nests are present in the disturbance zone or within 500 feet of the disturbance zone boundary.

If occupied nests are found, then limits of construction to avoid occupied nests shall be established by the Project Biologist in the field with flagging, fencing, fencing, or other appropriate barriers. The following minimum no-disturbance buffers will be required: 250 feet around active non-listed passerine nests and 500 feet around active non-listed raptor nests.

Construction personnel shall be instructed on the sensitivity of nest areas. Project-related activities will not occur within the no-disturbance buffers. The Project Biologist shall serve as a construction monitor during those periods when construction activities are to occur near active nest areas to avoid inadvertent impacts to these nests. The Project Biologist may adjust the 250-foot or 500-foot setback at his or her discretion depending on the species, the behavioral baseline conditions determined through passive monitoring, and the location of the nest (e.g., if the nest is well-protected in an area buffered by dense vegetation). Once a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, construction may proceed in the setback areas. Monitoring reports shall include information regarding active nests and status of nests.

Response to Comment B.4-28:

In order to refine the methods for least Bell's vireo and southwestern willow flycatcher pre-construction surveys and avoidance, the following text is hereby inserted after the first paragraph of MM 7-5 on page 5.7-177 of the Draft EIR:

Preconstruction surveys and avoidance measures for the least Bell's vireo and southwestern willow flycatcher, specifically shall be as follows:

Least Bell's vireo and southwestern willow flycatcher pre-construction surveys

In the season prior to construction, within all potentially suitable habitat within 0.5 mile of proposed construction areas, the Project Biologist shall conduct focused surveys for least Bell's vireo and southwestern willow flycatcher. Least Bell's vireo surveys will follow the currently accepted Least Bell's Vireo Survey Guidelines (USFWS 2001). Surveys for southwestern willow flycatcher will be conducted using the methods outlined in A Natural History Summary and Survey Protocol for the Southwestern Willow Flycatcher, issued by the U.S. Geological Survey (USGS) and U.S. Department of the Interior and approved by the U.S. Fish and Wildlife Service (USFWS) (Sogge et al. 2010). Surveys for least Bell's vireo and southwestern willow flycatcher will be conducted concurrently.

Least Bell's vireo and southwestern willow flycatcher avoidance measures

If active nests are found, clearing and construction within 0.5 mile of the nest shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the Project Biologist, and there is no evidence of a second attempt at nesting. If no active nests are observed, construction may proceed. If active nests are found, work may proceed provided that construction activity is located at least 0.5 mile from active nests (or as authorized through take permits). This buffer may be adjusted provided noise levels do not exceed 60 dBA hourly L_{eq} at the edge of the nest site as

> determined by a qualified biologist in coordination with a qualified acoustician.
>
> If the noise meets or exceeds the 60 dBA L_{eq} threshold, or if the biologist determines that the construction activities are disturbing nesting activities, the biologist shall have the authority to halt the construction and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between the nest site and the construction activities, and working in other areas until the young have fledged. If noise levels still exceed 60 dBA L_{eq} hourly at the edge of nesting territories and/or a no-construction buffer cannot be maintained, construction shall be deferred in that area until the nestlings have fledged. All active nests shall be monitored on a weekly basis until the nestlings fledge. The qualified biologist shall be responsible for documenting the results of the surveys and the ongoing monitoring and for reporting these results to CDFW and USFWS.

Response to Comment B.4-29:

The Draft EIR provides mitigation for impacts to the American badger, among other species, through implementation of MM 7-2 on pages 5.7-175 through 5.7-176 of the Draft EIR, which require pre-construction surveys, biological monitoring during construction, and relocation of some species to areas outside Project's impact footprint. The Commenter recommends a series of modifications for the badger specifically to address various lifecycle stages of this species. In review of the Commenter's request and the approved Grapevine Project EIR's American badger mitigation measure, MMs 7-2 and 7-3 of the Draft EIR have been modified. The first sentence of MM 7-2 on page 5.7-175 is hereby revised as follows:

> A pre-construction/grading survey of all areas proposed for construction/ grading activities that contain potentially suitable habitat for silvery legless lizard, coast horned lizard, and two-striped garter snake~~, and American badger~~ shall be conducted by a qualified Biologist.

The following text is hereby added to the end of MM 7-2 on page 5.7-176:

> For the American badger specifically, the following pre-construction survey and avoidance measure protocols shall be implemented.
>
> *American Badger Pre-Construction Surveys and Avoidance Conditions*
>
> Pre-construction winter/non-natal surveys for American badger shall be required for any construction activities commencing between November 1 and February 15. Surveys shall be conducted within potentially suitable habitat, within 100 feet of disturbance zones, no more than 14 days prior to construction activities to determine whether American badger winter dens are present within disturbance zone or within 100 feet of the

disturbance zone boundary. If Project activities are delayed or suspended for more than 14 days, the project-construction surveys shall be repeated.

If an American badger winter or non-natal den is occupied within the disturbance zone or within 100 feet of the disturbance zone, then the den location shall be clearly marked with fencing or flagging, in a manner that does not isolate the badger from intact adjacent habitat or prevent the badger from accessing the den, to avoid inadvertent impacts on the den. The den shall be monitored by a qualified biologist to confirm normal activities during construction. If it is not practicable to avoid the wintering or non-natal den during construction activities, CDFW will be contacted. Construction activities shall be allowed to proceed when the den is vacated.

Pre-construction natal den surveys for American badger shall be required for any construction activities commencing between March 15 and July 31. Pre-construction surveys shall be conducted within potentially suitable habitat, within 200 feet of the disturbance zone, by the project biologist, no earlier than 14 days prior to ground-disturbing construction activities to determine whether American badger natal dens are present within the project disturbance zone or within 200 feet of the disturbance zone.

If active natal dens are located within these areas during pre-construction surveys, construction activities shall be postponed. If natal dens are detected during construction, construction activities shall be halted within 200 feet of the natal den. This buffer may be reduced based on the location of the den or type of construction activity, based on the direction of the project biologist and CDFW has agreed in writing. Construction activities shall not preclude the ability of the documented badgers to disperse to on-site open space or off-site habitat when the natal den is vacated (i.e., habitat suitable for dispersal must be maintained until dispersal occurs). Construction will be postponed or halted in these areas until it is determined by the project biologist that the young are no longer dependent on the natal den. To avoid inadvertent impacts during construction and to ensure that construction activities are at least 200 feet from active natal dens, any active natal dens within the survey area shall be clearly marked with fencing or flagging in a manner that does not isolate the badger from sufficient intact adjacent habitat, prevent the badger from accessing the den, or inhibiting normal behavioral activities (e.g., foraging and dispersing from the site) by the mother and pups. Construction activities shall be allowed to proceed when the den is vacated.

The second sentence of MM 7-3 on page 5.7-176 is hereby revised as follows:

The Biologist shall relocate silvery legless lizard, coast horned lizard, two-striped garter snake~~, American badger,~~ and any other special status wildlife

species that can be moved which would otherwise be destroyed or adversely affected by construction and/or site-preparation activities.

Response to Comment B.4-30:

Discussions of suitable bat habitat found on-site are provided in the Draft EIR Section 5.7, Biological Resources, in Table 5.7-8 on page 5.7-97 and 5.7-98, with further discussion on pages 5.7-124 and 5.7-125. Mitigation for potential impacts to bats is provided in MM 7-9 on page 5.7-180 of the Draft EIR. MM 7-9 is revised/replaced in response to Comment B.4-32 below. This revised MM 7-9 includes avoidance requirements if bats are detected, and states that construction within 100 feet of non-maternity roosts, and within 300 feet of maternity roosts, shall be postponed or halted until the roost is vacated and juveniles are self-sufficient, as determined by the Biologist.

Regarding the Commenter's assertion that suitable maternity or hibernation roost locations may be present on the Project site, biological surveys of the Project site have been conducted and no suitable roost locations were identified.[180] A site visit conducted on November 27, 2017 confirmed that the "mineshaft"[181] did not constitute suitable habitat for bat roosts, and no evidence of bat occupation was detected.

In response to the comment, the following text is hereby inserted at the end of the second paragraph in the "Mammals" section on page 5.7-50 of the Draft EIR:

> The habitat value, and potential for sensitive bat species occurrence, was evaluated for the remnant "mineshaft" entrance northwest of Quail Lake. The site is shallow and exposed (approximately 6 feet deep by 4 feet tall by 5 ½ feet wide) and, accordingly, does not provide the type of habitat used by bats. No bats were observed, and there is no evidence of prior or current bat occupancy.

In addition, the Draft EIR text is modified to indicate that there is a low potential for maternity roosts to occur in woodland areas within tree cavities, although they are typically too small. The following edit is hereby made within the first paragraph on page 5.7-152 of the Draft EIR:

> The oak woodlands in western portions of the Project site may provide temporary roost sites for individual Townsend's big-eared bats. Maternity roosts are less likely due to the typically small size of tree cavities, but may occur. Potential foraging habitat is expected to be limited to edge habitats along streams and areas adjacent to and within the oak woodlands in western portions of the Project site outside the Project's impact footprint; therefore,

180 DRP 2017, pp. 5.7-97, -98

181 Although the site is formally described as a "mineshaft" in the Parks and Recreation Department Land Use Designation, site visits have confirmed the site can more accurately be described as an exploratory "drift", or horizontal, opening. No associated remnant support structures were observed. The site is approximately 6 feet deep by 4 feet tall by 5 ½ feet wide.

> Project implementation is not expected to impact the Townsend's big-eared bat and no mitigation is required.

The revised MM 7-9, as shown in response to Comment B.4-32 below, provides adequate protections for the avoidance of impacts to bat species.

Response to Comment B.4-31:

Due to loss in foraging habitat for bat species, the Draft EIR impact assessment will be modified. The following text will be modified on page 5.7-152 in Section 5.7.6, Environmental Impacts, of the Draft EIR:

> This loss is small relative to the amount of foraging habitat available to these two species elsewhere in the region; therefore, the loss of potential foraging habitat for the pallid bat and western mastiff bat is considered to be adverse but less than significant and no mitigation is required. Similarly, regional bat populations in general would be impacted by the Project due to loss of foraging grounds and some suitable roosting sites. These losses represent a relatively small percentage of the total regional foraging and roosting opportunities, and regional bat populations would not be reduced to below self-sustaining levels. Furthermore, the Project's approximate 27,000-acre Mitigation Preserve provides long term sustainable resources for regional populations. Therefore, Project impacts on bat species in general is considered less than significant. The loss of individual pallid bats, however, may be considered significant under Section 15380 of the State CEQA Guidelines. Implementation of ~~MM 7-3 for biological monitoring during construction, MM 7-4 for clear demarcation of disturbance limits, and~~ MM 7-9 for pre-construction bat surveys and minimization and avoidance measures ~~are~~ is recommended to avoid taking of roosting individuals that may be present within the Project's impact footprint.

Response to Comment B.4-32:

Although the Draft EIR proposes implementation of MM 7-9 for pre-construction bat surveys, MM 7-3 for biological monitoring during construction, and MM 7-4 for clear demarcation of disturbance limits to avoid taking of solitary roosting individuals, the suggested measure is hereby added to replace MM 7-9 in its entirety, as follows:

> **MM 7-9** Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate pre-construction bat surveys for bat roosts for pallid bat, western mastiff bat, western red bat, Townsend's big-eared bat as identified below.
>
> a) Pre-Construction Surveys: No earlier than one year prior to the commencement of construction activities for each construction area, a pre-construction survey shall be conducted by qualified project biologists to establish areas of roosts occupancy of special-status bats

(including maternity roosts, non-maternity roosts, and winter hibernacula) are present in the Project disturbance zone and within 300 feet of the Project disturbance zone boundary. The number of required project biologists and number of survey nights will be based on the size of the construction area to assure that the whole of the construction area can be adequately surveyed. The surveys shall consist of:

i. Two spring surveys (April through June) and two winter surveys (November through January);

ii. Each survey consists of one dusk emergence survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat in the construction area;

iii. For each survey areas, conduct all three survey types within one 24-hour period;

iv. Construction areas too large to be adequately assessed in one survey, as determined by the Project biologist, shall be divided into multiple smaller survey areas.

iv. Focus visual inspections on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering); and

v. Use bat detectors, bat call analysis and visual observations during all dusk emergence and pre-dawn re-entry surveys.

Data collection for each survey shall include the following information:

i. Whether bats are, or have been, present at roosts on the Project site;

ii. Assemblage of species using the site for roosting;

iii. Type of roost (i.e., maternity roost, day roost, night roost, feeding perch, mating roost, satellite roost, transitional roost or winter hibernaculum);

iv. Location, ambient temperature, internal dimensions and the aspect and orientation of the roost;

v. Spatial and temporal distribution of bat roosting activity;

vi. Flight paths, exit and entrance points;

vii. Number of bats, time and duration of use observed during roost surveys;

viii. Photographs; and

ix. Identification of any survey constraints.

x. If roosts are detected during pre-construction surveys, the following avoidance measures will be implemented unless relocation and/or take is authorized under California Endangered Species Act (CESA), as required by applicable law.

b) Avoidance Measures Fencing Installation

i. For Maternity Roosts: If an active maternity roost is identified in these areas, the maternity roost will not be directly or indirectly disturbed by prohibiting clearing and grubbing adjacent to the roost site, prohibiting lighting use near the roost site where it would shine on the roost or interfere with bats entering or leaving the roost, prohibiting the bird netting and prohibiting the operation of internal combustion equipment, such as generators, pumps and vehicles within 300 feet of the roost site until the maternity roost is vacated and juveniles have fledged, as determined by the project biologist. The rearing season for native bat species in California is approximately April 1 through August 31.

ii. For Hibernacula or Non-Maternity Roosts: If non-breeding bat roosts (hibernacula or non-maternity roosts) are found within the disturbance zone, the following shall be implemented:

a. Avoid direct and indirect impacts to roosting sites by prohibiting all project-related activities within 100 feet of the roost.

b. Additionally, within 300 feet of the roost, prohibit clearing and grubbing adjacent to the roost site and lighting use near the roost site where it would shine on the roost or interfere with bats entering or leaving the roost.

Prohibit the operation of internal combustion equipment, such as generators, pumps and vehicles, and the use of bird netting.

c. If avoidance of roost sites is infeasible, maintain portions of the features that provide naturalized habitat to the greatest extent possible and improve existing roost sites and/or provide new roost sites on buildings or on the Project site. Implement these measures only after consultation with CDFW.

d. New roost sites must be in place prior to the initiation of Project-related activities to allow enough time for bats to relocate.

e. Design and locate new and enhanced roost sites to be compatible with the bats' search image and habitat requirements (i.e., thermal regulation, interior size, ventilation, etc.). Design new and enhanced roost sites in consultation with CDFW.

f. Exclude bats from directly affected work areas selectively and only to the extent necessary to prevent morbidity or mortality to the colony. Use one-way bat exclusion devices, installed in a bat-safe way, to exclude bats and then use steel wool or other method to block the entrance, after the bats have gone. Exclude bats only after consultation with CDFW, at a time that is compatible with the species' normal behavior patterns (i.e., breeding, feeding, hibernating, etc.). In general, exclusions shall not occur during the maternity/pup-rearing season or during the hibernation season, as determined by conditions at the Project site.

Response to Comment B.4-33:

The recommended avoidance and minimization measures have been added to the Draft EIR, as described in response to Comment B.4-32 above.

Response to Comment B.4-34:

The information supporting the occurrence of pronghorn in the Project area is based on best available scientific information.[182] In addition to published data cited in Section 5.7, Biological Resources, biologists surveying the Project site on multiple occasions over the course of multiple years have recorded observations of pronghorn and other species, and the suitability of habitat and likelihood of use by pronghorn based on these and other factors observed in the field. Additional supporting data were derived from Tejon Ranch hunting management staff. There is no intent to minimize the status of the pronghorn in the region. The status as non-special status is based on the CDFW Special Animals list, and the regional distribution information provided is at a greater level of detail than nearly all other common species evaluated. Additionally, supplemental data have recently been supplied by the Tejon Ranch Conservancy depicting areas of observed use from 2013 through 2017 (see new Exhibit B.4-34). New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. The pattern of use derived from the Conservancy data and shown on the data map is consistent with the Draft EIR and shows minimal on-site use and far greater use of areas immediately northeast of the site within the off-site Mitigation Preserve lands. Furthermore, the areas where pronghorn are detected on-site are predominantly within the on-site Mitigation Preserve in the northwest portion of the site.

Response to Comment B.4-35:

Although not included on the CDFW list of Special Animals, it is acknowledged that CDFW has an interest in maintaining the pronghorn herd in the Antelope Valley. Therefore, the EIR takes a conservative approach and assesses impacts on the pronghorn stating on page 5.7-153 of the Draft EIR "although not classified as a special status species (CDFW 2017b), the relatively small population of reintroduced pronghorn antelope on the Project site is considered of interest due to limited numbers and historical presence..." The pronghorn CEQA impact analysis provided in Draft EIR is appropriate and consistent with standard practice for sensitive species as well as best available scientific information, including on-site observations. Additional population distribution information has been obtained from the Tejon Ranch Conservancy since release of the Draft EIR for review. Data show a distribution concentrated northeast of the Project site, and within the Mitigation Preserve, with much more infrequent occurrence on the Project site (see new Exhibit B.4-34). New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. Furthermore, the on-site observations are largely within the on-site preserve area. These data are consistent with the Draft EIR analysis. It is also acknowledged that pronghorn have been observed, and are therefore expected to occasionally forage, within proposed Project impact areas. Draft EIR page 5.7-153 states "Project implementation would reduce the amount of available foraging habitat for this population." Regarding movement of local population of animals, page 5.7-166 of the Draft EIR states "This reduction would result from increased barriers to access as well substantial increases in truck traffic at the SR-138 crossing due to the realignment of Cement Plant Road to intersect with SR-138 immediately adjacent to the potential local wildlife crossing point at the SR-138 (Location 4 on

[182] DRP 2017, pp. 5.7-127, 128

Exhibit 5.7-6)". The Draft EIR adequately assesses pronghorn impacts and the determination of less than significant impacts remains appropriate inclusive of all available species data. In addition, as stated on page 5.7-153 of the Draft EIR, as part of the Ranch-wide Management Plan,[183] which is an implementation tool of the Ranch-Wide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures that are also supported by CDFW. Potential measures could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation; completing further evaluation of modeling tools at a site-specific level (such as those used on the Carrizo Plain), and incorporating volunteer involvement with supportive activities such as fencing retrofits. Additionally, the RWMP includes specific elements targeting pronghorn conservation including:

> *Conservation Activity NC-1.4(a). Develop and implement pronghorn habitat enhancements…*
>
> *The Conservancy will implement enhanced monitoring of the Tejon Ranch pronghorn population to better understand their status and distribution on the Ranch and to identify conditions that may be limiting their population. Using this information and botanical data for the grassland monitoring plots (Conservation Activity NC-1.1), the Conservancy will develop and evaluate standards for residual dry matter (RDM) and vegetation height applicable to grazing management in Antelope Valley grassland. These standards will be used to achieve multiple goals, including enhancing native plant species and enhancing pronghorn habitat. Based on the results of this work, the Conservancy will work with TRC to implement grazing management trials to evaluate management prescriptions that may enhance pronghorn habitat, native plant species, and other target species. For example, the Conservancy hypothesizes that rotating livestock into pastures with low suitability for pronghorn fawning during the spring fawning season may reduce potential disturbance to fawning females and improve fawn survival. Implementing this grazing management practice will likely require improving the availability and distribution of water for livestock, particularly in the southeast portion of Tejon Ranch (Figure 3-2).*
>
> *Conservation Activity NC-1.4(b). Modify fences to enhance pronghorn movements. Pronghorn generally attempt to move under barbed-wire fencing rather than move between the strands or jump over the fence. The Conservancy will enhance the ability of pronghorn to move through suitable habitat by replacing the lower strands on barbed-wire fences with smooth wire in key fence segments in the Antelope Valley (Figure 3-3).*

[183] Tejon Ranch Conservancy (TRC). 2013 (June). *Tejon Ranch Conservancy Ranch-wide Management Plan.* Frazier Park, CA: TRC. http://www.tejonconservancy.org/rwmp.htm.

In an effort to provide additional clarity in the Draft EIR regarding impacts on pronghorn movement, the following edit is hereby made to the third sentence of the third full paragraph on page 5.7-153:

> Project implementation would reduce the amount of available foraging habitat and some opportunities for crossing SR-138 for this population.

Response to Comment B.4-36:

As mentioned in response to Comment B.4-35, additional population distribution data have been obtained from the Tejon Ranch Conservancy. The data include sighting data points and sighting dates on and adjacent to the Project site (see new Exhibit B.4-34). New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. Regarding the Department of Water Resources (DWR) observations, it is entirely feasible and not unexpected for periodic observations of pronghorn to occur within an area determined to have limited access. Crossing points over the California Aqueduct are discussed and described in the wildlife movement discussion starting on page 5.7-50 of the Draft EIR and are applicable to pronghorn in addition to other wildlife. The most likely crossings for pronghorn to gain access to habitat could be assessed; however, with the limited use of such areas as described in response to Comment B.4-34, determining the most frequent of the infrequently used crossing points would not aid the impact assessment for the species in the Draft EIR. As currently designed, the project incorporates a crossing opportunity under SR-138 connecting areas of appropriate habitat that would be retained subsequent to project buildout. Incorporating additional crossings over the California Aqueduct into the interior of developed portions of the Project site would not be consistent with the interest to retain a healthy regional population of pronghorn. The regional population would be unlikely to benefit from such a mitigation measure and may in fact be harmed. However, in addition the RWMP pronghorn conservation elements described in response to Comment B.4-36, MM 7-14 may also benefit pronghorn crossing of the SR-138. The measures states that a designated SR-138 underpass shall be located where the highway crosses the Project's western border near the current intersection with Cement Plant Road. The width of the underpass shall be 100 feet and shall flare out on both sides of the highway to a 150-foot width in the Project open space adjacent to the highway. These specifications are expected to allow some local wildlife to safely pass between open space areas on opposite sides of the highway. For additional information about the pronghorn please refer to responses to Comments B.4-34, B.4-35, B.4-36, B.4-37, F.8-165, F.8-165A, F.8-166, and F.8-167. Additionally, a new Exhibit B.4-34, Pronghorn Observations on Tejon Ranch, has been prepared as part of this response to comment. New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR.

Response to Comment B.4-37:

Please see responses to Comments B.4-35 and B.4-36, above.

Regarding the observation of pronghorn at Petersen Ranch, the occurrence would be considered an outlier at this time. Individuals of regional populations of wildlife species are sometimes found outside the known occurrence area. Unless the occurrence is repeated, it

is typically considered a single event and not evidence of a population trend or expanded distribution. The individual animal observed was a solo male, and because he was observed at multiple locations over time this may have caused concern about more widespread occupancy of other individual animals, but the data show that the pronghorn herd predominantly occupies the foothill areas east of the Project site and elsewhere in the area. Please refer to new Exhibit B.4-34, included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR, and responses to Comments B.4-34, B.4-35, B.4-36, B.4-37, F.8-165, F.8-165A, F.8-166, and F.8-167. However, it is feasible that the occurrence is representative of a yet to be verified expansion into the Petersen Ranch area or a rare event that could eventually lead to increase in use of that area. If this is the case, and the area does not have low survivorship conditions, the linkage to the area should be considered noteworthy. Based on review of aerial maps of the region, the linkage used to reach Petersen Ranch may be any one of dozens of low quality connections with no indication of which is more likely to be functional. However, movement from the core use area for the herd on Tejon Ranch seems highly unlikely given the difficulties of traversing 25 miles of mostly non-suitable habitat and mostly non-preferred terrain. Further evaluation of impacts to this species is unwarranted based on responses to Comments B.4-35 and B.4-36, and the existing evaluation in the Draft EIR.

Response to Comment B.4-38:

The Draft EIR's assessment of ring-tailed cat (or ringtail) use of the Project site and the impact assessment are based on best available scientific information coupled with habitat assessments conducted by biologists traversing the site on multiple occasions searching for potentially suitable habitat elements and evidence of occupation. No ringtail has been reported, or been known to occur, within 40 miles of the Project site. The determination for ring-tail is based predominantly on known range and distribution and habitat suitability. Based on these elements, Project site surveys would generally not be necessary based on the distance to known occurrences. Additionally, because the project will be built out over a 20-year period, surveys completed prior to project approval would not prove future absence and thus pre-construction surveys are the more appropriate mitigation approach under CEQA. To further ensure that ringtails are not directly impacted, a pre-construction survey and direction on how to proceed depending on the results of the survey will be added to MM 7-2, beginning on page 5.7-175. Specifically, pre-construction surveys for ringtail, as well as mandatory consultation with CDFW if any ringtail occurrence is discovered, have been added for this fully protected species, consistent with CDFW-approved mitigation for the Grapevine Tejon and Newhall Ranch projects. MM 7-2 is modified by inserting the following text to the end of the measure in a new paragraph:

> Pre-construction surveys for the ring-tailed cat shall be conducted throughout the Project disturbance area in the appropriate season within the year prior to disturbance. If results are negative, Project activities will proceed without further restrictions in regard to this species. If detected, the applicant shall consult with CDFW and modify Project activities at that time to ensure complete avoidance and no take of ring-tailed cat will occur.

Response to Comment B.4-39:

The Project has been designed to avoid impacts to the western pond turtle.[184] Based on the potential for this species to move upland from Quail Lake and the CDFW's statement that this species can move overland up to 325 feet, the following text in the second paragraph of MM 7-2 on page 5.7-175 of the Draft EIR has been revised as follows:

> Areas adjacent to Quail Lake and on the Project site potentially supporting western pond turtle breeding habitat shall not be disturbed during the breeding season for the turtles (April through August). No Project activities shall occur within ~~300~~ 400 feet from the edge of Quail Lake, due to potential for nesting in those areas.

With this revision to the Draft EIR, a 400-foot no-disturbance buffer during the nesting season has been incorporated (MM 7-2).[185] This 400-foot buffer provides an additional 75 feet of buffer beyond the 325-foot overland range for this species, as cited by the Commenter. Given that 325 is feet is at the considered upper limit of travel away from Quail Lake, the frequency of occurrence at such a distance would be considered very low and uncommon. Most previous studies indicate that the majority of females nest well within 50 meters of water (Rathbun, Siepel, & Holland, 1992; Reese & Welsh, 1997). In addition, conditions within the area where construction would occur within 475 feet of Quail Lake are largely marginal to unsuitable. Soils are mapped as sandy/gravel fan deposits in this area. Research indicates pond turtle prefer soils with some clay component because nest conditions require very specific humidity. The slope is mapped at less than 25 percent in this area, with most being 40 percent, and pond turtles prefer slopes of 15 percent or less. These conditions likely limit turtle movement outside the shore line in this area. In addition, the north side of Quail Lake includes a paved road between lake shore and upland habitat which may discourage upland movement. Therefore, the majority of potential nesting locations are buffered by distances greater than 75 feet. Note also that the Caltrans SR-138 widening project EIR concludes that the project would have no significant impact to pond turtle even though construction is immediately adjacent to Quail Lake. Construction impacts from the Caltrans project include only installation of snow fencing and require that a monitor is present during construction. The 75-foot buffer is therefore an effective and efficient method to protect the western pond turtle and expanding the buffer to 475 feet would provide minimal additional protection for the species and is not warranted.

Regarding the recommendation for focused surveys, MM 7-5, described on page 5.7-177 of the Draft EIR, requires that focused surveys for the western pond turtle, as well as other species listed, be conducted within the year prior to construction and within the appropriate season. Surveys shall be conducted in accordance with the approved CDFW or U.S. Fish and Wildlife Service (USFWS) protocol. In order to clarify the location of the required survey, the following edits are hereby made to MM 7-5 on page 5.7-177 of the Draft EIR, as follows:

184 DRP 2017, p. 5.7-147
185 *Id.,* p. 5.7-175

Surveys shall be conducted within all areas of potentially suitable habitat and in accordance with the approved CDFW or U.S. Fish and Wildlife Species (USFWS) protocol for that species.

Response to Comment B.4-40:

Mitigation to avoid impacts to western spadefoot is included in MM 7-5 on page 5.7-177 of the Draft EIR. However, in an effort to incorporate the specifics requested by the Commenter, the measure is revised. MM 7-5 is hereby revised with an insert at the end of the measure as follows:

Western spadefoot pre-constructions surveys and avoidance measures shall be implemented as follows:

Western spadefoot pre-construction surveys

Prior to approval of a Grading Permit, the applicant shall provide to the County evidence verified by the Project Biologist that the area proposed to be graded, including a 300-foot buffer area, has been surveyed for suitable western spadefoot breeding habitat. If suitable breeding habitat is identified, the verification shall include a map of the delineated areas, including the 300-foot buffer, which are to be avoided. Surveys shall be conducted within 60 days prior to construction during a time of year when the species can be detected above ground at suitable breeding sites. Suitable breeding habitat is defined as areas of temporarily ponded water, including within creeks and within the valley floor uplands. Suitable breeding sites should support ponded water for at least three weeks. To ensure that diseases are not conveyed between work sites by the Project Biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force will be followed at all times.

Western spadefoot avoidance measures

If western spadefoot is detected within the Project footprint, measure "(i)" shall be implemented with appropriate review and concurrence from CDFW. If western spadefoot is detected outside the Project footprint, but within 300 feet of the Project footprint boundary, measure "(ii)" shall be implemented. Prior to implementation of avoidance measures, the Project Biologist shall confer with CDFW.

If western spadefoot is detected (including egg masses and larvae) in water within the Project footprint and cannot be permanently avoided (e.g., by placing a resource avoidance area over the site), suitable breeding habitat shall be created within suitable natural sites in open space outside of the Project footprint under the direction of the Project Biologist. The amount of occupied breeding habitat to be impacted by the Project shall be

replaced at a 2:1 ratio. The habitat creation location shall be in suitable habitat within on-site open space and as far away as feasible from residential and commercial development and roads. The created breeding habitat shall be designed such that it supports standing water for no longer than three months following winter rains so that aquatic predators (e.g., fish, bullfrogs, and crayfish) cannot become established. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the impacted breeding site as feasible. No site preparation or construction activities shall be permitted within 300 feet of the vicinity of the impacted breeding site until the design and construction of the pool habitat in preserved areas of the site have been completed and all detected western spadefoot tadpoles, egg masses, and adults are moved to the created breeding habitat.

The Project Biologist shall monitor the relocation site for a cumulative total of five years in which environmental conditions are conducive for western spadefoots to successfully complete the breeding cycle (i.e., adequate rain for pools to hold water for a sufficient period). Monitoring shall be conducted during and immediately following peak breeding season such that surveys can be conducted for adults as well as for egg masses, larval, and metamorphic western spadefoot. Success criteria for the monitoring program shall include verifiable evidence of western spadefoot reproduction at the relocation site during five years with suitable breeding conditions.

If western spadefoot is detected (including egg masses and larvae) in water within 300 feet of the Project footprint boundary, but not within the Project footprint itself, an exclusion fence shall be constructed along the Project boundary between the construction footprint and the occupied breeding site to prevent western spadefoots from moving into and aestivating within the construction footprint. The exclusion fencing shall consist of 16-inch metal flashing, or an equivalent material, which shall be buried at least 6 inches below the ground surface, extending at least 8 inches above the ground. The fencing shall cover a sufficient length of the boundary to inhibit western spadefoots from entering the Project footprint without entrapping aestivating western spadefoot. The necessary length and appropriate location of the exclusion fence relative to the occupied breeding site shall be determined by the Project Biologist.

No construction activities involving heavy equipment generating noise, ground vibration, and/or dust shall be allowed within 300 feet of occupied breeding sites until western spadefoots have metamorphized and are no longer present in the breeding pool, as determined by the Project Biologist. Acceptable Project activities (e.g., quiet and/or low impact activities) within 300 feet of the occupied breeding site shall be allowed at the discretion of the Project Biologist.

Response to Comment B.4-41:

MMs 7-16 and 7-18 on pages 5.7-191 and 5.7-193 of the Draft EIR describe Project requirements to reduce impacts of non-native ants and other pests. The Commenter's recommendations to modify MM 7-16 to incorporate "dry zones" to protect against Argentine ants will be made. MM 7-16 beginning on page 5.7-191 of the Draft EIR shall be modified by adding the following language to the end of the measure as a new paragraph:

> Similarly, to preclude the invasion of Argentine ants into Mitigation Preserve lands, "dry zones" of a minimum of 350 feet shall be established between development and the Mitigation Preserve. Soil moistures shall be maintained at levels below about 10 percent soil saturation within dry zones to deter the establishment of nesting colonies of ants. All landscaping materials to be used in these zones shall be inspected and certified as "free" of Argentine ants prior to planting. Additionally, these materials shall be inspected by a qualified restoration specialist for the presence of Argentine ants. Plants or other materials with Argentine ants shall be rejected.

The effectiveness of deterring Argentine ants is approximately 99 percent at 100 meters (approximately 328 feet) according to Suarez et al. (1998) and Menke and Holway (2006). Although the study does indicate that 200 meters (approximately 650 feet) provided 100 percent effectiveness, the doubling of the buffer to gain the additional 1 percent is not warranted, particularly since research supporting the larger buffer was not done in the type of dry climate zone present in Antelope Valley. In addition, because there is no irrigation within the Mitigation Preserve, and the larger buffer distance suggested by the Commenter was derived from a study that did not include the generally dry conditions that exist on the Project site for most of the year, even if 1 percent of ants were to reach its edge, the ants' ability to expand into the Mitigation Preserve would be limited to 150 feet at most – and the Mitigation Preserve and associated Tejon Ranch open space lands preserved pursuant to the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement [TRCRWA]) comprises hundreds of thousands of acres – this 1 percent risk at the Mitigation Preserve edge is not biologically significant and would not compromise the functions and values within the Mitigation Preserve. Other elements of the recommendation, including the requirement for certification of Argentine ant-free landscaping materials and for restoration activities to take advantage of the rainy season, are already incorporated within MMs 7-16 and 7-18.

In response to the comment, one additional change is made to MM 7-16 in the last paragraph of the MM on page 5.7-192. Although the comment requests all landscape materials to be used within 700 feet of protected open space areas to be certified ant-free, the distance has been dropped altogether and replaced with "all" plants. The text of the fifth control is hereby changed as follows:

> (5) Ensuring that all landscape container plants ~~installed within 200 feet of preserved populations~~ are ant free prior to installation to reduce the chance of colonies establishing in areas close to the preserved populations;

Response to Comment B.4-42:

As shown in response to Comment B.4-43 below, MM 7-1 has been clarified to reflect the hierarchy of mitigation for rare plants: First, areas in the Mitigation Preserve meeting the 2:1 ratio will be preserved, and if there is insufficient preservation (based on final impacts), then the measure includes enhancement and creation. Therefore, there is no reliance on the future surveys to confirm compliance with preservation, but rather to ensure compliance by verifying the acreage of impact is two times greater than the acreage of mitigation.

Response to Comment B.4-43:

In accordance with the recommendation in Comment B.4-43, the Project's priority shall be preservation of the six special status plant species impacted by the Project prior to issuance of grading permits at a 2:1 ratio of individual plants preserved:impacted. If the preservation ratio is less than 2:1 for one or more of the six impacted species, enhancement and restoration methods to expand preserved population(s) of the species to a quantity representing a minimum 2:1 ratio within the Mitigation Preserve. Creation is also a mitigation option to achieve the plant mitigation ratio, but is less preferable to preservation and enhancement, and would occur only in suitable locations (e.g., appropriate soils, topography, slope, etc.). Both enhancement and creation would require further monitoring and verification to assure that the 2:1 ratio is maintained in the long term, and this long-term requirement would be added to the RWMP if or to the extent required in the future.

To modify the Draft EIR in accordance with this preservation component per the discussion above, the last two sentences of the second paragraph on page 5.7-142 are hereby edited as follows:

> Implementation of MM 7-1, proposed to mitigate for impacts to special status plants, would reduce the level of impact by promoting the distribution of this species in the Project region through the preservation and/or ~~propagation~~ enhancement of ~~new~~ existing populations and creation of new populations, if necessary, in the Mitigation Preserve. The expansion of the local population of this species is expected to increase its potential to be sustained in perpetuity.

To modify the Draft EIR in accordance with this preservation component per the discussion above, the last two sentences of the first partial paragraph on page 5.7-143 are hereby edited as follows:

> Implementation of MM 7-1, to mitigate for impacts to special status plants, would reduce the level of impact by promoting the distribution of this species in the Project region through the preservation and/or ~~propagation~~ enhancement of ~~new~~ existing populations in the Mitigation Preserve. The expansion of the local population of this species is expected to increase its potential to be sustained in perpetuity.

Additionally, the final sentence in the fourth paragraph of MM 7-1 on page 5.7-174 is hereby edited as follows:

> These existing areas shall be (in order of priority) preserved, enhanced, expanded, ~~or~~ restored, or created ~~or new areas shall be created in suitable habitat~~ in order to compensate at a 2:1 ratio for the thousands of individual special status plants that will be lost due to the Project.

Beyond preservation (the priority for plant mitigation goals), the preferred methods for achieving the 2:1 replacement ratio of special status plant species are those that have the most potential for success—enhancement or expanding of existing populations. These methods have the highest potential for success due to a likelihood of existing suitable microhabitat, soils types, presence of pollinators, and genetic diversity. Other recent large projects in the region, such as the SR-138 widening and the Tehachapi Renewable Transmission Project have 2:1 mitigation for rare plants. Newhall Ranch uses a ratio of 3:1 for Endangered plant species. Creation of populations is the method of last resort that shall be employed if the 2:1 ratio cannot be met through preservation and enhancement. Although literature is not available for the species impacted on the Project site, successful rare plant restoration projects have been conducted. For example, The New England Wild Flower Society developed a successful method to germinate Robbins' cinquefoil seeds and to accelerate their development into seed-producing adults for transplanting. Between 1973 and 2006 the population rebounded 2.5 times. The species was removed from the federal Endangered list in 2002. Follow up monitoring post-recovery goals, indicated the cinquefoil numbers and condition remained stable.[186] Further, successful reintroduction has also been accomplished with the special status species western yampah (*Perideridia erythrorhiza*), endemic to southern Oregon.[187] Although long-term monitoring data is not available, during the three years the transplantation was monitored, 90 percent of transplanted plants reproduced successfully.

Evidence for a greater degree of potential success is based on observations of many of the special status plants requiring mitigation located in the Mitigation Preserve during a reconnaissance survey and during focused plant surveys. Such observations indicate highly compatible conditions for the proposed preservation, creation, and/or enhancement/restoration of special status plant populations. Apart from direct observations of special status plants requiring mitigation, the level of compatibility is supported by similarities in soil type, slope, aspect, and distance from known populations. Additionally, special status plant species impacted by the Project (*California androsace*, *adobe yampah*, and *sylvan microseris*), and many other special status plant species not impacted by the Project, have been documented in the Mitigation Preserve by the Tejon Mountain Village Project.[188] The documentation of multiple populations of these species on the Mitigation Preserve further adds to the regional value of these mitigation lands and the increases the likelihood of persistence of the species in the region.

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186 United States Department of Agriculture, Forest Service (USDAFS). 2017 (November, access date). Recovery of Robbins' Cinquefoil - *A Partnership Success*. Washington, DC: USDAFS. https://www.fs.fed.us/wildflowers/Rare_Plants/conservation/success/potentilla_robbinsiana_recovery.shtml.

187 Roberts, Kimberly A. 2003. Conservation Biology of *Perideridia erythrorhiza* (Apiaceae): Experimental Reintroduction and Life History. Oregon: Oregon State University.

188 Kern County Planning Department (Kern County). 2009 (May). *Draft Environmental Impact Report, SCH# 2005101018, Tejon Mountain Village by TMV, LLC*. Kern County, CA: Kern County.

The Draft EIR includes a Review of the Mitigation Preserve as Appendix 5.7-C. In summary, the evaluation of potential mitigation lands generally considers lands within closer proximity to the impacted lands as highest potential value. This generality stems from that fact that conditions are generally more similar in close proximity than further apart. Conditions include weather, geographic position, soil type, slope, and many others. The mitigation lands selected utilize this approach and include lands on site and immediately adjacent and then with the most similar conditions when moving further away from the Project site to capture additional acreage.

All of the lands selected for the Mitigation Preserve in Los Angeles County fall within the County's Significant Ecological Area designation. Although the designation does not preclude development, it is an indication of high biological value in the County. With inclusion in the Centennial Mitigation Preserve, these County SEA lands will now be preserved in perpetuity allowing for the maximum protection of the biological values the SEA designation was intended to protect, such as unique assemblages of oak tree species, wildflower fields, and regional wildlife movement corridors. Furthermore, the lack of future development or other landscape disturbances to these lands will also influence adjacent undeveloped SEA lands by reducing the potential for the spread of non-native plants and wildlife.

The majority of the acreage in the Mitigation Preserve was selected for its grassland resources. Extensive research was conducted in the grasslands on the Project site to understand and document composition of these distinctive communities of herbaceous plants and wildflowers. Grassland communities in the Mitigation Preserve were subsequently studied to ensure their composition was similar and the quality was the same or better. Studies included native bunchgrass modeling, model testing/truthing, indices of nativeness, indices of similarity, plot sampling, and many other methods. In addition, through these studies and a subsequent series of field visits, many populations of special status plant species—including California androsace, round leaved filaree, adobe yampah, Mojave spineflower, and Sylvan scorzonella—have been identified in the Mitigation Preserve and on many additional acres of potentially suitable habitat for these and other species.

For example, vast wildflower fields were observed in Off-Site Preserve Area 3 spanning hundreds of acres. Wildflower fields occur mainly in the grassland vegetation. Dominant species comprising wildflower fields include California poppy, common monolopia, and Great Valley phacelia, with various other native herbaceous species interspersed throughout. Occupied and potentially suitable habitat for round leaved filaree was abundant in Off-Site Preserve Area 3 and contained the most acreage of all On-Site and Off-Site Mitigation Areas visited (approximately 300 acres). Potential round leaved filaree habitat occurs scattered throughout the grassland vegetation in Off-Site Preserve Area 3 in varying patch sizes. The largest patches occur in the flatlands in the southeastern areas and occur on both sides of the California Aqueduct, which projects into Off-Site Preserve Area 3 in the southeast. CNDDB records indicate that thousands (5,000—8,000) of filaree individuals have been documented within Off-Site Preserve Area 3.[189] Additionally, sylvan scorzonella

[189] California Department of Fish and Wildlife (CDFW). 2016. California Natural Diversity Database. Records of Occurrence for round-leaved filaree in Kern and Los Angeles Counties. Sacramento, CA: CDFW, Natural Heritage Division.

individuals were detected in the eastern portion of Off-Site Preserve Area 3, and many acres of potentially suitable habitat were observed. Many acres of potentially suitable California androsace habitat were also detected in Off-Site Preserve Area 3. Potentially suitable adobe yampah habitat was not directly detected during field reconnaissance due to the nuanced nature of the habitat. As mentioned previously, potentially suitable habitat is assumed present on north-facing slopes and slope cuts associated with drainages in Off-Site Preserve Area 3 as suitable soils are present in these areas.

These findings support the effectiveness of the Mitigation Preserve to off-set the impacts to grasslands as well as the associated rare plant species impacted by the Project. Another important element considered in the selection of mitigation lands was the potential to support existing populations/and or potentially suitable habitat for wildlife species impacted by the Project. In finding areas with similar vegetation types and in close proximity to the Project site, the Mitigation Preserve captures habitat that is very similar to the site, which would be expected to be occupied by a very similar suite of wildlife species. In addition, field visits in the Mitigation Preserve have identified several unique wetland habitat areas with potential to support tricolored blackbird breeding and hundreds of acres of potential foraging land. Some of these areas are, in fact, occupied by breeding colonies of tricolored blackbirds, which have been recorded foraging throughout the areas. Occupied burrowing owl habitat and hundreds of acres of potentially suitable habitat for this species has also been recently detected from within the Mitigation Preserve. These results are not unexpected given the process used in selecting these lands. Furthermore, regional wildlife movement corridors identified in the higher elevations of the surrounding landscape will benefit from the preservation of the selected lands due to the effect of buffering from undeveloped lands. The evidence gathered supports the determination that lands in the Mitigation Preserve are appropriate and well suited to meet the applicable mitigation requirement and adequately off-set Project impacts.

Furthermore, the Project's 39,000-acre Mitigation Preserve is coupled with two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement (TRCRWA) and the Tehachapi Upland Multiple Species Habitat Conservation Plan (TUMSHCP), which further contribute to sustaining regional plant populations. Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for Tejon Ranch (Ranch) or projects within the Ranch. Maintenance of the open space or conserved lands will be the responsibility of the Conservancy, funded in large part by a fee based on a portion of the purchase price for each residential parcel on the Ranch. Since Centennial constitutes over 75 percent of the currently planned residential units on the Ranch, it will bear the substantial costs of funding the Conservancy.[190]

In addition, the TUMSHCP ensures the persistence of covered species, including sustaining viable populations of those species. Lands to be conserved as part of the TUMSHCP are

[190] DRP 2017, pp. 5.7-62, -63

adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and mitigation measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident plant and wildlife populations. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species occur in the foothills and lowland areas as well, including the Centennial site. These species will benefit from the TUMSHCP in addition to the Centennial Mitigation Preserve program.[191] In addition, the U.S. Fish and Wildlife Service considered development within the region, specifically inclusive of several major projects including Centennial, Newhall, Tejon Mountain Village, and Grapevine, in the TUMHSCP, and concluded that the TUMSHCP includes measures to minimize and mitigate remaining impacts on Covered Species and measures that contribute to conservation and recovery.[192]

No lands required as mitigation for any other permit or development project of Tejon Ranch are included in the Mitigation Preserve. Under the TRCRWA, areas that cannot be developed based on this private party agreement between Tejon Ranch and the environmental group signatories (Sierra Club, Natural Resources Defense Council, Audubon Society, Planning & Conservation League, and Endangered Habitats League), are expressly allowed to be used as mitigation for planned development activities including Centennial. Certain lands for which Conservation Easements were acquired by the State Wildlife Conservation Board cannot be used for mitigation preservation credits in their baseline condition, but can expressly be used for mitigation enhancement, restoration, and/or creation credits. The voluntary conservation undertaken by Tejon Ranch in the TRCRWA was expressly endorsed by the State's resource and environmental agencies, and use of these voluntary conservation areas as mitigation for future development projects was likewise expressly recognized and endorsed, in an appendix to the TRCRWA.

Response to Comment B.4-44:

Each of the referenced plans includes performance objectives and identifies feasible means of achieving those performance objectives, which is a form of mitigation measure commonly used and repeatedly confirmed as legally adequate in CEQA court cases. Please refer to response to Comment F.8-173, infra, for a summary of the performance standards and feasible measures for achieving the performance standard for referenced plants.

MM 7-1, as further clarified in response to Comment F.8-173, provides the required level of specificity and performance standard requirements to ensure the adequate mitigation of the impacted biological resources. In order to ensure that CDFW, as requested in the comment, has the ability to review and assess the adequacy of the Plan, the Final EIR also includes a

191 *Id.,* p. 5.7-63
192 *Id.,* pp. 5.7-16 to -18

revised MM 7-1 beginning on page 5.7-173. The second sentence of the first full paragraph on page 5.7-174 shall be modified as follows:

> The Project Applicant shall develop the Special Status Plant Species Restoration Plan and the County and CDFW shall approve it prior to any vegetation clearing or grading on the site.

Response to Comment B.4-45:

The evaluation and determination of the taxonomy of the crownscale populations detected on the Project site was initially confirmed by BonTerra Psomas botanist Jordan Zylstra and then verified by expert botanist Andy C. Sanders (University of California, Riverside Herbarium) as described in the 2015-2016 Special Status Plant Report. Mr. Sanders was confident with the identification and did not find evidence to indicate other potential identifications and as such, additional expertise is unwarranted. The taxonomy of the crownscale populations on the Project site has been sufficiently confirmed to warrant a determination of significant, and this is the determination given in the Draft EIR and the rationale for which mitigation for crownscale impacts has been incorporated into the Draft EIR as MM 7-1. Additionally, a portion of the population occurring north of SR-138 and east of the existing Cement Plant Road shall be avoided during Project construction (see MM 7-1). In an effort to provide additional protective measures on this population, signage will be used post-construction to lessen impacts on the population from human disturbance. In response to this comment, the following text is hereby added at the end of the second to last paragraph of MM 7-1 on page 5.7-175:

> Additional protective measures are included in MM 7-17.

The following text is hereby added to the second sentence of the first paragraph of MM 7-17 on pages 5.7-192 and 5.7-193:

> This program shall include signs that identify the boundaries of ecologically sensitive areas (including the avoided special status plant populations described in MM 7-1);

Response to Comment B.4-46:

The Commenter correctly notes that all known populations of the Piute Mountain navarretia are avoided by development, and are located in the open space preserve area, as depicted on Exhibit 5.7-7a, Special Status Plant Species Observations, of the Draft EIR. Multiple intensive focused special status plant surveys have been conducted on the Project site since 1999. Focused surveys have been conducted during years with relatively normal rainfall, and in various stages of drought. Potentially suitable Piute Mountains navarretia habitat has been thoroughly surveyed, with 100 percent coverage, many times (see Table 5.7-2, Biological Surveys Conducted on the Project Site [1999-2015]). The likelihood of populations occurring outside known areas is very low due to the enormous effort over the past 16 years of surveying for this plant. In the unlikely event that additional isolated plants are discovered, the fact that the Project preserves all known southern occurrences of these populations is

enough to conclude that the avoidance design of the Project makes impacts to Piute Mountains navarretia less than significant.

Response to Comment B.4-47:

The Commenter's recommendation that the Project Applicant consult directly with USFWS is noted. The Applicant is independently required to comply with all applicable legal requirements, including compliance with the federal Endangered Species Act, and this Act's prohibition on the 'take' of federally-listed ESA species without the requisite ESA permit. The Draft EIR assessed potential impacts to all federally-listed species with potential to occur and concluded there would not be a significant impact to any federally-listed species, directly or indirectly.[193] Therefore, no ESA 'take' of a federally-listed species is anticipated to occur as part of the Project. The required MMs for biological resource impacts will further decrease the potential for 'take' of a federally-listed species (MMs 7-1 through 7-22).[194] In addition, in order to be responsive to this comment and USFWS comments regarding the addition of Project efforts to further reduce any potential adverse effects of the Project on the California condor, MM 7-6 on Draft EIR pages 5.7-177 and 5.7-178 is revised in regard to construction monitoring, utility hazards, condor educational curriculum, microtrash, condor deterrent activities, and condor tracking as described in response to Comment B.4-21. See also, responses to Comments A.3-3, A.3-4, A.3-5, A.3-7, B.4-20, B.4-21, B.4-22, and B.4-23.

Response to Comment B.4-48:

Development does not need to be removed from south of SR-138 to protect the SEA. The proposed Project is consistent with the SEA Program and Ordinance. As stated in the Antelope Valley Area Plan (AVAP), under the existing SEA Ordinance, proposed development is required to be designed so that it is highly compatible with the biotic resources present—including setting aside appropriate and sufficient undisturbed areas; maintaining water bodies, watercourses, and their tributaries in their natural state; leaving wildlife movement corridors undisturbed and in a natural state; retaining sufficient natural vegetative cover and/or open spaces to buffer critical resource areas from the proposed development; providing fences or walls where necessary to buffer important habitat from development; and locating and designing roads and utilities so they do not conflict with critical resources. Under the AVAP, the SEA boundaries grew considerably, and in response, the Project disturbance areas shrunk considerably in order to conform to SEA boundaries and west Economic Opportunity Areas (EOAs). A new Exhibit B.4-48, Historical Disturbance Limits Comparison, has been prepared as part of this response to comment. New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. The AVAP determined placement for these EOAs with edge effects and appropriate buffering taken into consideration. SEA edges are analyzed in the Draft EIR as open space areas and mitigated for appropriately, and do not represent an additional constraint that must be analyzed and mitigated for separately.

193 DRP 2017, pp. 5.7-145 to -155
194 *Id.,* pp. 5.7-173 to -194

In addition, the Project Applicant has worked with the Los Angeles County SEATAC committee and the County staff biologist for several years assessing impacts and modifying mitigation to reduce impacts on the SEA. The Project design has been modified to entirely avoid all direct impact to the SEA. MM 7-4 requires fencing of all open space areas during construction activities to ensure that construction activities remain within the development footprint, preventing accidental direct impacts of the SEA.[195]

Potential indirect Project impacts on biological resources on and near the Project, which includes those occurring within the SEA south of SR-138, are analyzed and mitigated to a less than significant level in the Draft EIR.[196] Implementation MM 13-6 from Section 5.13, Visual Resources, which requires the Project Applicant to develop a Lighting Plan to reduce potential impacts to biological resources caused by light and glare, would reduce the level of the impact.[197] As stated on page 5.7-170 of the Draft EIR, in an effort to minimize operational noise impacts, the Conceptual Land Use Plan (see Exhibit 4-1) has been designed to maximize the distance between areas of high noise and preserved open space. Higher density housing and higher volume traffic roadways are near the center of developed areas, while the lower density housing and lower traffic roadways occur at the edge of the Project near open space areas. As a result, potential indirect wildlife impacts due to Project-related noise are reduced to a level considered less than significant.[198] The risk of invasion of Argentine ants into open space areas is mitigated to a less than significant level though implementation of MM 7-16, as modified by and further described in response to Comment B.4-41. To preclude the invasion of Argentine ants into open space areas and preserved populations of special status plants, a variety of methods shall be implemented, as described in MM 7-16, such as inspections of landscaping materials, quarterly monitoring of the development at potential infestation areas, and direct control of known infestations.[199] In order to control fire risk, MM 7-21 requires an Implementation Plan which shall be submitted as part of the tentative tract map that boarders an SEA or mitigation preserve area.[200] As stated on page 5.7-167, in order to reduce the potential for introduction and spread of invasive species, PDF 7-8 and MM 7-15 shall be implemented. These measures include the development of a Landscaping Plan (subject to County review) and will identify both a plant palette composed of non-invasive species and a list of invasive plant species prohibited from being planted on the Project site. These efforts are expected to minimize invasive species impacts of the Project and reduce the level of the impact to less than significant.

Potential impacts on adjacent open space areas from human disturbances are mitigated to a less than significant level through implementation of MM 7-15 and MM 7-17. MM 7-15 requires wildlife proof trash receptacles and informational pamphlets be provided to homeowners on the importance of not feeding wildlife.[201] MM 7-17 requires a public awareness program and various controls for domestic pets such as cats and dogs, including but not limited to: informational signage in front of open space areas, restriction of public

195 *Id.,* p. 5.7-177
196 *Id.,* pp. 5.7-166 to -170
197 *Id.,* p. 5.13-31
198 *Id.,* p. 5.7-170
199 *Id.,* pp. 5.7-168, -191, -192
200 *Id.,* p. 5.7-194
201 *Id.,* p. 5.7-191

access in open space areas to designated trails, dog leash requirements, dog bags provided in appropriate areas, cats and dogs are required to be neutered/spayed, and prohibition of domestic animals into open space areas except for designated trails (pages 5.7-192 and 5.7-193, inclusive of revisions made in this Response to Comments).

Response to Comment B.4-49:

The scale of the vegetation mapping is inclusive of all unique stands no matter the size. As described on page 5.7-25 of the Draft EIR, one acre minimum was used for non-unique stands such as grasslands, but unique stands, which are more likely to be special status, were mapped at a smaller scale. For instance, if a patch of scrub occurred at a ¼ acre scale within a large patch of grassland, the scrub would not likely get mapped. Ephemeral ponds and seeps were used as examples of unique stands which are representative of the Project site, but could have been any number of unique vegetation types. The Draft EIR will be modified to change the methods description to better explain the approach. The second sentence of the first full paragraph on page 5.7-25 will be changed as follows:

> The minimum mapping unit was set at approximately one acre, and patches of vegetation smaller than this were generally not mapped except for observed seeps~~, and~~ ephemeral ponds, and other unique stands.

Response to Comment B.4-50:

The Commenter's summary of oak tree mitigation measures is accurate, except that the Draft EIR does analyze Project impacts to oak woodlands as habitat types[202] and provides appropriate mitigation in MM 7-11, which requires a minimum 2:1 replacement of impacted mixed oak woodland (13.4 acres total).[203]

Response to Comment B.4-51:

The Project considers impacts to all oak trees as part of the oak woodland impact assessment described on pages 5.7-171 and 5.7-172. The specific tree assessment is provided only as required by County of Los Angeles Oak Tree Ordinance (No. 88-0157). However, the oak woodland mitigation (MM 7-11) has been modified to clarify that the habitat-level oak woodland mitigation plan (as revised at the end of bullet 4), includes additional woodland species which will be planted in appropriate locations and at the appropriate time to best ensure the success of the habitat creation/restoration. The monitoring period, presented on page 5.7-186, is not meant to see the woodland reach maturity, but rather to see the mitigation through to a point of a reasonable expectation for continued growth based on demonstration of growth, removed from irrigation for at least five years. Based on this, a monitoring period of ten years would be more than sufficient to demonstrate establishment and no evidence of the greater than ten years has been provided. However, implementation of the Ranch-wide Management Plan, included as Appendix 5.7-D of the Final EIR, provides for the management in perpetuity all mitigation lands, including oak woodlands, within the

202 *Id.,* pp. 5.7-36 to -38
203 *Id.,* p. 5.7-182

Mitigation Preserve. As such, long-term monitoring of the oak woodlands and other biological resources are incorporated. Furthermore, implementation of MM 7-11 includes 10:1 mitigation for impacts to heritage trees. Details of the mitigation will be listed within the Oak Woodland Habitat Mitigation Plan described in MM 7-11 on pages 5.7-182 through 5.7-187. In addition, the intent behind the recommendation to prohibit irrigation is understood and irrigation would be minimized to the maximum extent and eventually removed for at least five years prior to completion and approval of the Mitigation Plan.

The following additional text is hereby added to MM 7-11, beginning at the end of bullet number 4, on page 5.7-184 of the Draft EIR.

4. To provide overstory, midstory, and understory tree/plant coverage, some container plants and oak trees, grown from locally collected acorns, will be installed in addition to the application of native seed mixes. Since studies indicate that the younger the planting is, the more likely the chance is for successful establishment and long-term viability locally collected acorns as well as locally collected, nursery cultivated young oak trees (one-gallon or five-gallon containers of oaks) would be planted on site. The oak woodland planting and seeding palettes will include a diversity of locally-collected native shrubs, subshrubs, grasses, forbs, and ferns, to provide a beneficial mosaic of understory vegetation.

5. The oak mitigation program will include the extensive salvage (from the impacted oak habitat areas) and placement of coarse woody debris, brush piles, and boulders (as available) to immediately provide (a) suitable micro-habitats for the establishment of plant species with particular shade and moisture requirements (e.g., ferns) and (b) improved habitat resources (e.g., cover) for wildlife species.

~~4.~~6. Irrigation will be provided to the oak plantings in a manner that simulates natural rain events; i.e., infrequent, deep watering. Irrigation will be suspended during periods of substantial rainfall, and irrigation will be terminated at the earliest possible date (depending on seasonal weather patterns) in coordination with the County Forester, to optimize the drought resiliency and proper root development of the planted oaks. Additionally, all irrigation must be terminated for a minimum of five years before the oak mitigation areas will be eligible for final approval/sign-off.

It should also be noted that Project implementation will preserve 3,090 acres of oak woodland within the Mitigation Preserve. Furthermore, the preserved oak woodlands are very similar to the oak woodlands impacted by the Project.

Response to Comment B.4-52:

The Project uses Functional Capacity Units (FCU) as a way quantify functionality, in addition to acreage and linear feet. Page 5.7-29 of the Draft EIR explains that a wetland functional assessment of jurisdictional areas was conducted in order to characterize and evaluate the functions of the site's drainages and riparian habitats. A Hybrid Functional Assessment (HFA) method was then created by combining components of three different functional assessment methods (the Hydrogeomorphic [HGM] approach, the Landscape Level Functional Assessment, and CRAM). These three methods were adapted to perform a functional assessment at the Project site. At the time the combined functional assessment was created, CRAM was a method still in development. Since that time, CRAM has become a widely accepted functional assessment by all regulatory agencies. For this reason and because the combined functional assessment approach was never formally approved by the regulatory agencies, as described on page 5.7-29 of the Draft EIR, the observations and findings of previous surveys were combined with the observations during the 2015 field surveys to perform a CRAM evaluation of the various jurisdictional features on the site.

The approach of quantifying wetland functions and values and mitigating with the goal of replacing those lost functions and values has become increasingly widespread and preferred. As noted in JD-7 of Appendix 5.7-B of the Draft EIR, the evaluation of functions associated with compensatory mitigation sites relies on a function-based assessment tool such as the U.S. Army Corps of Engineers' USACE HGM Methodology. Such an approach is set forth in a Regulatory Guidance Letter (RGL) published by the USACE on December 24, 2002 and in a Special Public Notice published by the Los Angeles District on January 27, 2003. In both documents, the USACE encouraged the utilization of functional assessments for evaluating impacts to aquatic resources and determining appropriate mitigation ratios. On page 2 of the December 24, 2002 RGL, the USACE notes: *The Corps has traditionally used acres as a standard measure for determining impacts and required mitigation for wetlands and other aquatic resources, primarily because useful functional assessment methods were not available. However, Districts are encouraged to increase their reliance on functional assessment methods.*

In response to the comment, in addition to functional value replacement, the mitigation methodology in MM 7-12 may alternatively use the more traditional mitigation ratio approach at the following rates, as used in another recent Tejon Ranch project EIR. MM 7-12 shall hereby be modified in the third full paragraph on page 5.7-188 of the Draft EIR as follows:

> The purpose of the mitigation is to replace lost habitat value, as measured in FCU <u>(or other acceptable functional value units)</u> rather than based on a standard acreage ratio. <u>Alternatively, a more traditional mitigation ratio approach may be employed using following rates:</u>
>
> <u>a. Wetland Waters: 2:1, including 1:1 restoration and 1:1 enhancement, of wetland waters.</u>

b. Streams:

i. 1:1 preservation of ephemeral and/or intermittent streams for permanent impacts to ephemeral non-wetland waters of the state (non-riparian)

ii. 1:1 preservation of intermittent streams for permanent impacts to intermittent non-wetland waters of the state (non-riparian)

iii. 1:1 restoration of intermittent streams for temporary impacts to intermittent non-wetland waters of the state (non-riparian)

c. Riparian Vegetation: 2:1, including 1:1 restoration and 1:1 enhancement of riparian vegetation.

There are sufficient drainages in the Mitigation Preserve to meet these ratios. See responses to Comments B.4-14 and B.4-61.

Regarding the Commenter's concern that the approach does not guarantee in-kind replacement, most of the drainages on site are considerably degraded as a result of years of cattle grazing resulting in below average functional value scores as described in JD-7 and JD-8 of Appendix 5.7-B of the Draft EIR. Replacing the lost functions and values allow mitigation activities to enhance, restore, or create jurisdictional features with higher functional value than the features being impacted. In doing so, there is no net loss of the wetland functions even though there can be a reduction in overall acreage and/or linear feet. Additionally, the performance criteria to be described in the Streambed and Wetland Habitat Creation and Enhancement Plan as provided in MM 7-12 (see response to Comment F.8-173) include performance objectives and feasible actions for achieving those objectives, and shall be met to the satisfaction of the permitting agencies to demonstrate successful mitigation. The approach demonstrates that impacts to drainages and their associated habitats are mitigated sufficiently to reduce impacts to a level of less than significant pursuant to CEQA. Additionally, in an effort to ensure that riparian vegetation associated with jurisdictional drainage features are replaced with the same vegetation types that would be impacted by the Project, as listed beginning on page 5.7-160 of the Draft EIR (including riparian herb, rush riparian grassland, southern arroyo willow riparian, southern cottonwood willow woodland, southern willow scrub, unvegetated wash, valley oak riparian woodland, willow riparian forest, willow riparian woodland, alkali meadow, Baltic rush, and coastal and valley freshwater marsh), MM 7-12 on page 5.7-187 of the Draft EIR shall be revised to reflect a requirement for in-kind replacement of riparian vegetation.

Furthermore, MM 7-12, as noted on page 5.7-187, requires the Project Applicant/Developer to obtain the appropriate regulatory agency permits and/or agreements from the USACE, the CDFW, and the applicable RWQCB and comply with all conditions specified in the regulatory agency permits and/or agreements. Through this permitting process, other mitigation actions may be required above and beyond the minimum mitigation required to achieve a less than significant finding per CEQA as previously described. Consequently, the proposed mitigation described in MM 7-12 of the Draft EIR, inclusive of edits described above, is

expected to exceed the mitigation necessary to reduce impacts to a less than significant level. Estimated acreages of drainage features within the Mitigation Preserve are listed in the table below (also see response to Comment B.4-61):

Area Type	Total Mitigation Area (acres)
Ephemeral Streams	87.31
Intermittent Streams	96.26
Riparian Vegetation	96.26

Additionally, the first full paragraph on page 5.7-188 shall hereby be revised as follows:

> The extent of drainages and wetlands that would be preserved under the Project will provide opportunities to expand and enhance the drainages, wetlands, and riparian vegetation throughout the Mitigation Preserve ~~on the Project site~~.

Response to Comment B.4-53:

Although small mammals, such as rat and mouse species, and medium sized mammals, such as Virginia opossum, common raccoon, and coyote, may found in the developed areas, as discussed on page 5.7-50 and 5.7-168 of the Draft EIR, bears are not expected to occur within the developed portion of the Project site as they are uncommon even in in the Project site's undeveloped state. However, it is acknowledged that bears are present in the Tehachapi and Liebre ranges, and do on occasion enter existing developed areas in Los Angeles County – and could enter the Specific Plan area following development. It is also possible for an increase in occurrence in the future as bears explore new opportunities. However, standard LA County trash receptacles are wildlife resistant, and the Homeowners Association can specify the best waste receptacle model for individual home owners, in accordance with County Sanitation guidelines. Effective management of trash helps deter bears from re-entering developed areas. All common area trash receptacles must also be wildlife resistant per MM 7-15

Response to Comment B.4-54:

MM 7-15 on page 5.7-191 of the Draft EIR is hereby modified to add an additional paragraph to the end as follows:

> All vertical open pipes used for fence posts, property line stakes, signs, roof veneration, chimneys, vault toilets, and similar structures and metal fence stakes used on the Project site shall be capped. Capping can be accomplished using bolts or other materials to avoid raptor talons becoming entrapped within the bolt holes of metal fence stakes.

Response to Comment B.4-55:

These recommendations are partially included within MM 7-2 which states that a pre-construction/grading survey of all areas proposed for construction/grading activities that contain potentially suitable habitat for silvery legless lizard, coast horned lizard, and two-striped garter snake shall be conducted by a qualified Biologist. Surveys will consist of 1 pass-through by a qualified Wildlife Biologist walking 50-meter belt transects across areas to be impacted while visually searching for the species listed above. Surveys will be conducted no more than three days prior to the disturbance of the surveyed area. If any of these species or other wildlife species that can be easily moved are observed within the construction/grading zone, the Biologist (who must have a valid California Scientific Collecting Permit) shall relocate them to a suitable area outside the construction zone. Suitable areas would include appropriate habitats within the proposed open space areas in the northwestern portion of the Project site and would be identified in a Wildlife Relocation Plan (described below) prior to surveys but before construction begins. In order to capture additional recommendations in the comment, MM 7-2 is hereby modified by adding the following paragraph to the beginning of the measure on page 5.7-175 of the Draft EIR:

> All grubbing/grading within a phase of construction shall be scheduled and implemented to facilitate the voluntary movement of localized wildlife towards intact adjacent habitat. Islands of habitat should not be created during site disturbance unless they are to be retained as un-impacted following the Project buildout.

Response to Comment B.4-56:

As stated in MM 7-14, the width of the underpass will be 100 feet and then will flare out to a 150-foot width adjacent to the SR-138. The second sentence of MM 7-14, beginning on Draft EIR page 5.7-190 will be modified to clarify as follows:

> The width of the underpass shall be 100 feet as it passes under SR-138 and shall flare out on both sides of the highway as it moves away from SR-138 to a 150-foot width in the Project open space adjacent to the highway.

The flare out areas on either end of the underpass are intended to act as funnels to guide users toward the underpass. No portion of the underpass would be specifically dedicated. The entire underpass would be open for pedestrian and wildlife movement with an expectation that night time usage would be greater for wildlife.[204] The underpass is not intended to serve as a wildlife corridor between all open space portions of the Project and the Liebre Mountains. The passage is intended for local wildlife usage within the area and infrequent regional movement that may traverse from areas northwest of the Project site to areas south of the Project site. In addition, the additional underpass to be constructed for pedestrian and bike access is expected to provide some local movement for animals within the Project area.

[204] DRP 2017. pp. 5.7-57, -58

Response to Comment B.4-57:

The assessment of wildlife movement impacts is typically based on an understanding of movement science and the existing topography, vegetation, and species' life histories and behavior on the Project site, the Project site region, and beyond the Project site region. In addition, landscape features that may prohibit some or all types of wildlife movement need to be identified. This information is available through existing literature and Project field surveys[205], and does not rely on camera or other tracking station methods. Such methods are often problematic because they 1) rely heavily on capturing movement events that may not occur in the sampling period; or 2) may be missed for a variety of reasons resulting in a false negative. One of the most widely accepted studies of regional linkages in southern California is the South Coast Missing Linkages Project and more specifically for the Project region: Linkage Design for the Tehachapi Connection. These studies do not rely on tracking station data, but rather on theory and assumed barriers to movement and assumed opportunities for movement. The Draft EIR is able to adequately make the determination of significance using this approach and although tracking station data have potential to add data, they would not be necessary.

Response to Comment B.4-58:

Please see MM 7-5 on page 5.7-177 of the Draft EIR which requires focused surveys for applicable special status species within the appropriate season in the year prior to impacts, as suggested. As specified in MM 7-5, specific requirements include: 1) surveys with all potentially suitable habitat on the Project site; 2) within the year prior to disturbance and within the appropriate season; and 3) according to approved CDFW and or USFWS protocol guidelines. The applicable species for this measure include arroyo toad, Tehachapi slender salamander, California red-legged frog (concurrent with two-striped garter snake and western pond turtle focused surveys), western spadefoot, mountain plover, southwestern willow flycatcher, and least Bell's vireo. Buffer distances for surveys shall be consistent with the survey protocol guidelines. Other special status species are included in the pre-construction surveys described in MM 7-2 on page 5.7-175 of the Draft EIR, including silvery legless lizard, coast horned lizard, two-striped garter snake, burrowing owl, Swainson's hawk, and American badger.

In regard to the comment that surveys varied in their coverage and level of intensity, please note that some survey areas, such as survey areas for plants, were modified from year to year because the impact area was reduced over time. Consequently, the survey area similarly changed from year to year for some survey efforts. However, most survey areas have remained largely the same over the years and all surveys have been designed for maximum detectability and for determination of the status of occupation on the site for each subject species.

[205] *Id.,* pp. 5.7-23, -50 to -64

Response to Comment B.4-59:

The last paragraph in MM 7-3 on page 5.7-177 of the Draft EIR is modified to clarify as follows:

> In addition, a Biological Monitor will be on site during all initial vegetation removal and will employ salvage methods to minimize direct impacts to common wildlife species. Where feasible, the biological monitor will attempt to ensure wildlife are out of potential direct impact. ~~If a wildlife species is in harm's way and has not moved on its own, the Biologist will attempt to scare them away from the area. If wildlife does not move, and where feasible, the wildlife species will be relocated to suitable habitat.~~

Response to Comment B.4-60:

In an effort to make the plan for implementing grassland preservation and management available, the Ranch-wide Management Plan (RWMP) shall be adopted as the managing plan and no new plan will be prepared. Management of the Mitigation Preserve shall be in accordance with the RWMP, which incorporates BMPs for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions. The RWMP includes standards for management of the grasslands areas that will preserve the grasslands in perpetuity. The RWMP has been submitted for review and approval to CDFW and USFWS, as applicable. The RWMP provides a comprehensive framework, with the context of the Ranch-Wide Agreement (TRCRWA), for the effective preservation and management of the preserved open space lands located on Tejon Ranch, including the mitigation lands for the Project site. The RWMP shall be included in the Final EIR as a new appendix and the following edit is hereby made to page 5.7-62.

> Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-~~W~~wide Management Plan (RWMP) (Final EIR Appendix 5.7-D) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

Response to Comment B.4-61:

The Draft EIR and the attached Jurisdictional Delineation report (JD)[206] describe the regulatory definitions of State and federal waters[207]. The methods employed were consistent with these regulations and as described by the Commenter. Methodology for delineating CDFW jurisdiction can be found on page 5.7-134 of the Draft EIR where it states, "…all the drainages, adjacent wetlands, and riparian areas on the Project site are under the jurisdiction of the CDFW pursuant to Sections 1600–1616 of the California Fish and Game Code. CDFW jurisdiction extends to the top of the bank, at a minimum, and to the outer edge of the canopy

206 *Id.,* Appendix 5.7-B, JD-8
207 *Id.,* pp. 5.7-3 to -6

of riparian vegetation, if a canopy is present."[208,209] In addition, as discussed in response to Comment B.4-14, CDFW may adopt more expansive Section 1600 regulations which would increase the applicability of the Section 1600 permit program on the Project site.

The Project offsite mitigation areas also include preserved waters, wetlands and riparian areas, and provides opportunities for restoration, enhancement and creation, to satisfy all required Project mitigation requirements. The following tables identify estimated jurisdictional features by jurisdiction and type based on current statutes and regulations; if the MESA Memo is adopted as a regulation, it is anticipated that the expansion of the jurisdictional area in the offsite mitigation areas will be similar to the expansion of the jurisdictional area on the Project site as discussed further in response to Comment B.4-14.

TABLE B.4-61 A
MITIGATION PRESERVE JURISDICTIONAL
WETLANDS AND WATERS SUMMARY BY JURISDICTION

Agency with Jurisdiction	Mitigation Preserve WCB Easement Area	Offsite Mitigation Preserve Area (non-WCB)	Onsite Mitigation Preserve Area	Total Mitigation Area (acres)
USACE*	584,741ft	1,399,846ft	18,960ft	2,003,547ft
	40.20 ac	**96.26 ac**	**1.39 ac**	**133.85 ac**
CDFW	584,741ft	1,399,859ft	230,573ft	2,215,173ft
	40.20 ac	**96.26 ac**	**87.31 ac**	**219.77 ac**
RWQCB	584,741ft	1,399,859ft	230,573ft	2,215,173ft
	40.20 ac	**96.26 ac**	**71.29 ac**	**203.75 ac**

USACE: U.S. Army Corps of Engineers; CDFW: California Department of Fish and Wildlife; RWQCB: Regional Water Quality Control Board
* All of the USACE acreage consists of non-wetland waters
Source: BonTerra Psomas 2015a
Note- Off-site Mitigation Preserve drainage calculations based on desk-top analysis using topo data, National Wetlands Inventory and Cal Fire Vegetation data.

TABLE B.4-61 B
MITIGATION PRESERVE JURISDICTIONAL WETLANDS
AND WATERS SUMMARY BY TYPE

Area Type	Total Mitigation Area (acres)
Ephemeral Streams	87.31 ac
Intermittent Streams	96.26 ac
Riparian Vegetation	96.26 ac

208 BonTerra Psomas. 2015 (November). Jurisdictional Delineation Report, Centennial Project, Los Angeles County, California. Pasadena, CA: BonTerra Psomas.
209 DRP 2017, Appendix 5.7-B, JD-8

In addition, it is acknowledged that restoration/enhancement activities may result in impacts to jurisdictional areas and that such impacts would be subject to a 1600 agreement. The Project Applicant/Developer will notify CDFW through the permitting process and expects such impact to be self-mitigating based on the purpose of the activity and the benefits to plant and wildlife resources. However, based on the description of the mitigation measures (inclusive of revisions made to the Draft EIR through the response to comments process), no impact to State-listed species are expected to result from Project implementation, inclusive of proposed general restoration/enhancement activities. Therefore, no Incidental Take Permit (ITP) is required at this time. It is acknowledged that if changes in the occupation of the site or adjacent areas by State listed species would result in potential impacts to these species, consultation with CDFW would be required and potentially an ITP. Please also see discussion of coordination with CDFW in response to Comment B.4-1.

Response to Comment B.4-62:

Exhibit 5.7-9 and Exhibit 5.7-13 have been modified to increase the size of features to facilitate viewing ability as suggested. The footnote on the figures has been revised to indicate that some features appear larger than they actually are. Revised exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR.

Response to Comment B.4-63:

The Draft EIR notes that of the six areas of mitigation lands, two (Areas 3 and 4) are the subject of conservation easements. As noted by the Commenter, off-site mitigation lands acquired by the Wildlife Conservation Board (WCB) are not eligible for passive mitigation credit; however, these lands are eligible mitigation lands for enhancement, restoration, and creation of biological values (see WCB Easement Sections 6(b)(1)(B); and 1 (jj); see also Ranch-Wide Agreement Exhibit R, P.2 Bullet 3). The WCB easement areas include 7,490 acres of grasslands, not 12,145 acres (see revised Draft EIR Exhibit 5.7-10). While those areas continue to be available for enhancement, in response to comments and discussion with CDFW, the Applicant proposes to add additional Antelope Valley grasslands within Tejon Ranch to ensure the 2:1 preservation ratio is met. The additional offsite grasslands mitigation area, Area 7, is depicted in revised Exhibit 5.7-10, and comprises 7,877 acres of additional preserved grasslands located within the contiguous preserved open space areas of Tejon Ranch. The WCB conservation easement areas also remain part of the open space mitigation lands for the Project, but MM 7-1 (presented as MM 7-10 in the Draft EIR) has been revised to clarify that these areas are available only for enhancement, restoration, and creation mitigation and not for preservation. With the addition of the new mitigation preservation lands, the 2:1 preservation ratio is met without enhancement activities on WCB lands. Therefore, the following text in the third paragraph of PDF 7-1 on pages 5.7-135 and 5.7-136, is hereby revised as follows:

> These areas combine to form an extensive regional mitigation preserve system of ~~27,408~~ 43,079 acres (see revised Exhibit 5.7-10, Mitigation Preserve). Detailed floral sampling was conducted within grasslands on the Project site

including impact areas, as well as within the Mitigation Preserve (NRC 2006a, 2007a, 2007b, 2007c, 2008b). Generally, studies consisted of quadrat sampling (338 total quadrats) and analysis of data generated results on regional species composition, between-site species composition, and plant community-based analysis. within grasslands on the Project site within the impact area and mitigation areas (NRC 2008b) and 2016, and 2017 site reconnaissance surveys over a period of ~~four~~ five days, within mitigation areas.

The following text in the first sentence of the fourth paragraph of PDF 7-1 on page 5.7-136, is hereby revised as follows:

The proposed ~~27,408~~ 43,079-acre preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values which are described in each of the corresponding mitigation plans.

The following text in the second paragraph of PDF 7-2 on page 5.7-137, is hereby revised as follows:

Mitigation lands for impacts to biological resources would consist of approximately ~~3,861~~ 3,866 acres of unimpacted~~/~~ SEA lands on the site and ~~23,547~~ 39,213 acres within additional off-site areas, ~~including~~ consisting of areas on Tejon Ranch, referred to as Areas 1 through ~~6~~7. These mitigation lands comprise two on-site and ~~six~~ seven off-site areas which would provide sufficient land and biological resources to implement mitigation strategies to fully mitigate for Project impacts. ~~Two~~ The majority of three of these areas, Areas 3 ~~and~~, 4, and 5, are the subject of the Wildlife Conservation Board conservation easements that expressly allow for such mitigation use of these lands. These areas, although available for mitigation activities that include enhancement, restoration, or creation, are not available for preserved mitigation acreage since the existing Conservation Easement already requires preservation (but allows mitigation use for enhancement, restoration, or creation).

The following text after paragraph ten of PDF 7-2 on page 5.7-138, is hereby revised as follows:

Area 7 consists of two distinct areas that comprise 15,668 acres total. Area 7 is in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and borders Area 6 to the north. Approximately half of Area 7 is dominated by undifferentiated grasslands, which are scattered throughout but mostly occurring in the southern half of this mitigation area. The other half of Area 7 is covered in various scrub types such as mixed chaparral, desert scrub, and sagebrush, and at higher elevations oak woodland, montane chaparral, montane hardwood-conifer forest, and

pinyon-juniper forest. Several major northwest-to-southeast trending drainage features are found within Area 7 that contain riparian vegetation, oak woodland, and Joshua tree woodland.

The combined off-site Mitigation P~~p~~reserve area amounts to ~~23,547~~ 39,213 acres of mitigation lands. In total, the mitigation preserve system available for mitigation covers ~~27,408~~ 43,079 acres and includes both on- and off-site mitigation areas.

The following text is hereby inserted at the end of the last paragraph in PDF 7-2 on page 5.7-138 of the Draft EIR:

Appropriate lands with grassland resources have been included in the Mitigation Preserve to ensure a 2:1 replacement ratio in areas outside the existing WCB conservation easements. Furthermore, enhancement activities may be implemented within, but may not be limited to, Mitigation Preserve Areas 3, 4, and 5.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

Implementation of MM 7-10 would reduce these impacts to less than significant levels through preservation of ~~14,375~~ 14,908 acres of on-site and off-site grasslands.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

The grassland mitigation is based on site-specific characteristics including, for example, the existence of native grasslands in the ~~27,408~~ 43,079-acre on-site (unimpacted/SEA lands) and off-site preserve areas.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

Specifically, the Project proposes to preserve ~~14,375~~ 14,908 acres of grasslands within the ~~27,404~~ 43,079-acre on-site (unimpacted/SEA lands) and off-site mitigation preserve, which is part of a larger 240,000-acre conservation area (including dedication and acquisition areas).

The following text in the first paragraph and Table A of MM 7-10 on pages 5.7-180 and 5.7-181, is hereby revised as follows:

The Project Applicant/Developer shall preserve grasslands, including native perennial grassland and associated wildflower field vegetation types, at a minimum 2:1 ratio within the ~~approximate 27,408-acre~~ Mitigation P~~p~~reserve (see Table A). The Project would impact 6,416 acres of grasslands; therefore,

a total of 12,832 acres of grassland mitigation acreage is required to bring impacts to a less than significant level.

TABLE A
GRASSLAND MITIGATION ACREAGES

Mitigation Area	Grasslands	Total Acreage
On-Site Mitigation Preserve ~~Unimpacted/SEA~~		
On-Site Mitigation Preserve ~~Unimpacted/SEA~~	1,989	~~3,861~~ 3,866
Subtotal (Total On-Site Mitigation Area)	*1,989*	*~~3,861~~ 3,866*
Off-Site Mitigation Preserve ~~Open Space~~		
Area 1	~~1,641~~ 1,734	6,417
Area 2	~~1,602~~1,597	2,556
Area 3	~~3,059~~ 0	4,183
Area 4	~~4,429~~ 706	7,319
Area 5	~~643~~ 0	643
Area 6	~~1,012~~ 1,005	2,429
Area 7	7,877	15,668
Subtotal (Total Off-site Mitigation Area)	*~~12,386~~ 12,919*	*~~23,547~~ 39,213*
Total Mitigation Area	**~~14,375~~ 14,908****	**~~27,408~~ 43,079**
~~SEA: Significant Ecological Area~~ **Goal for 2:1 Grassland Mitigation is 12,832 Acres		

The following text in the first sentence of the third paragraph of MM 7-10 on page 5.7-182, is hereby revised as follows:

> As outlined in Table A above, the ~~14,375~~ 14,908 acres of grassland preservation will occur in open space areas on site and in the ~~six~~ seven other areas.

The following text is hereby revised in the last paragraph of MM 7-10 on page 5.7-182 of the Draft EIR:

> The ~~open space~~ Mitigation Preserve ~~preserve~~, including the grasslands within it, shall be preserved in perpetuity to offset Project impacts on native grasslands and wildflower fields prior to issuance of a grading permit for the Project site. The phasing of mitigation has been previously described. The preservation and management of these grasslands through the Ranch-wide Management ~~Native Perennial Grassland and Wildflower Field Mitigation~~ Plan will sufficiently offset and fully mitigate the impacts on native grasslands and wildflower fields associated with the Project.

The following text in the third sentence of the third paragraph of MM 7-11 on page 5.7-182, is hereby revised as follows:

> The combined acreage of oak woodland preserved both on site (unimpacted/Significant Ecological Area [SEA]) and within the off-site mitigation areas is ~~3,102~~ 3,090 acres and is expected to substantially exceed the required 50 percent of mitigation as preservation.

Additionally, in an effort to make the grassland preservation management plan available, the Ranch-wide Management Plan (RWMP) shall be included in the Final EIR as a new appendix and the following edit is hereby made to page 5.7-62.

> Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-~~W~~wide Management Plan (RWMP) (Final EIR Appendix 5.7-D) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

Response to Comment B.4-64:

This comment asserts that the Project is inconsistent with certain goals and policies of the Antelope Valley Area Plan (AVAP), citing Goal LU 2 specifically. The County disagrees with the Commenter's assertion. The Project is consistent with the goals and policies of the AVAP, as described in Draft EIR Table 5.8-1.

A lead agency's land use consistency determination is entitled to "great deference" and must be upheld unless "*no reasonable person* could have reached the same conclusion" as the agency (emphasis added).[210] "Because policies in a general plan reflect a range of competing interests, the governmental agency must be allowed to weigh and balance the plan's policies when applying them, and it has broad discretion to construe its policies in light of the plan's purposes."[211] As long as "officials considered the applicable policies and the extent to which the proposed project conforms with those policies," the agency's determination must be affirmed.[212] This highly deferential standard applies not just to a local government's determinations under the State's Planning & Zoning Law, but also to a lead agency's determination of plan consistency in a CEQA document, whether that determination is made in an Negative Declaration,[213] or, as here, in an EIR.[214]

With respect to Goal LU 2, it applies to the land use pattern of the AVAP as a whole; consistency with the AVAP does not require each individual project developed within the

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210 Pfeiffer v. City of Sunnyvale City Council (2011) 200 Cal.App.4th 1552, 1563 [quoting Save Our Peninsula Committee v. Monterey Cty. Bd. of Sup'rs ("Save Our Peninsula") (2001) 87 Cal.App.4th 99, 142) and A Local & Regional Monitor v. City of Los Angeles (1993) 16 Cal.App.4th 630, 648.)]

211 *Pfeiffer*, 200 Cal.App.4th at 389 [citing *Save Our Peninsula*, 87 Cal.App.4th at 142.]

212 *Ibid*.

213 Joshua Tree Downtown Business All. v. Cty. of San Bernardino (2016) 1 Cal.App.5th 677, 695-97

214 Pfeiffer, 200 Cal.App.4th at 1561-63; N. Coast Rivers All. v. Marin Mun. Water Dist. Bd. of Directors (2013) 216 Cal.App.4th 614, 632-33

AVAP planning area to provide a "land use pattern that protects environmental resources." This is evident from the plain text of the six AVAP policies adopted to implement AVAP Goal LU 2. Five of the six policies – i.e., Policies LU 2.2 through LU 2.6 – expressly exclude economic opportunity areas (EOAs.), for example. The remaining Policy LU 2.1 calls for limiting the amount of potential development in Significant Ecological Areas (SEA) through appropriate land use designations with very low residential densities, as indicated in the AVAP Land Use Policy Map.

The Project site is located entirely within the AVAP's West EOA.[215] Accordingly, it is exempt from five of the six AVAP policies adopted to implement Goal LU 2. Moreover, the Project is consistent with the remaining Policy LU 2.1 because all SEA land located within the Project boundary is designated as Open Space under the proposed Centennial Specific Plan, consistent with the AVAP's Land Use Policy Map. Furthermore, the proposed Project does not include any development within, and, therefore, no direct impacts on, SEA land.[216]

In addition, to clarify the scope of permitted uses within the open space areas associated with the Project, four open space subdesignations (three on-site, one off-site) are hereby added to page 4-24 of Section 4.0, Project Description of the Draft EIR, and conforming edits are made to the Specific Plan:

> CENTENNIAL OPEN SPACE DEFINITIONS
>
> Mitigation Preserve: The Mitigation Preserve encompasses 43,079 acres of land to be preserved and managed in perpetuity for biological resources values. The Preserve consists of an On-site Mitigation Preserve, comprised of approximately 3,866 acres within the Project boundaries, but outside of the development footprint, and an Off-site Mitigation Preserve made up of 39,213 acres within adjacent and nearby off-site lands. These mitigation lands provide sufficient land and biological resource values to implement mitigation strategies to fully mitigate for Project biological resource impacts.
>
> On-site Mitigation Preserve
>
> The On-site Mitigation Preserve is divided into two areas. The southern on-site mitigation area includes 968 acres located immediately south of the development footprint along south side of SR-138. The northern on-site mitigation area consists of 2,898 acres located to the north and west of the development footprint on the west side of the aqueduct. All of the lands within the on-site portion of the Mitigation Preserve are within Los Angeles County SEA No. 17.
>
> Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests.

215 DRP 2017, p. 4-4
216 *Id.,* p. 5.7-2

Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Off-site Mitigation Preserve

The Off-site Mitigation Preserve is divided into seven areas. Area 1 consists of 6,417 acres located adjacent to and immediately east of the southeastern corner of the Project site. Area 2 consists of 2,556 acres located adjacent and contiguous to the northwestern portions of the Project site. Nearly all of the land within these two preserve areas also occurs within SEA No. 17. Area 3 consists of 4,183 acres; this mitigation area is located in Kern County, immediately north of the Project site. Area 4 consists of 7,319 acres located on the northern slope of the Antelope Valley, northeast of both Area 3 and the Project site. Area 5 consists of 643 acres and is a square-shaped parcel located in Kern County on the northern slope of the Antelope Valley, immediately east of Area 4 and northeast of the Project site. Area 6 consists of 2,429 acres and is located in Kern County on the northern slope of the Antelope Valley, farthest to the northeast of the Centennial Project site. Area 7 (two distinct portions) consists of a combined15,668 acres located in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and boarders Area 6 to the north. The combined off-site Mitigation Preserve area amounts to 39,213 acres of mitigation lands. Cumulatively, both on and off-site, the Mitigation Preserve encompasses 43,079 acres of Project mitigation lands. The majority of three of these areas, Areas 3, 4, and 5 are the subject of conservation easements, therefore, although available for mitigation including enhancement, restoration, and creation, are not available for mitigation acreage value as preservation.

Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing

ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Green Space

Disturbed Green Space consists of areas within the project boundary that are impacted and will need to be mitigated. Disturbed Green Space will be amenities for the Project and could include one or more of the following uses: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. No Mitigation credit has been taken into account for the Project impacts from the Green Spaces. While Green Spaces could be impacted initially, the concept of these areas is to restore it for community amenities and visual aesthetics between neighborhoods of development.

Undisturbed Green Space consists of areas within the project boundary that are not impacted and require no mitigation. There is no project mitigation credit taken for preserving these areas. To preserve these areas and to make sure there is no future mitigation needed, the uses are restricted to the following: Continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

In addition, MM 7-23 is hereby added to EIR Section 5.7.7, as follows:

MM 7-23 Notwithstanding any provision of the Centennial Specific Plan to the contrary, land designated by the Centennial Specific Plan as On-Site Mitigation Preserve, Off-Site Mitigation Preserve, Disturbed Green Space, and Undisturbed Green Space shall only be used in a manner consistent with the following land use restrictions:

On-Site Mitigation Preserve: Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Off-Site Mitigation Preserve: Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Disturbed Green Space: Uses within Disturbed Green Space shall be restricted to one or more of the following: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities.

> Undisturbed Green Space: Uses within Undisturbed Green Spaces shall be restricted to one or more of the following: continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

These revisions ensure that buildout of the Specific Plan will result in a land use pattern that protects environmental resources in accordance with AVAP Goal LU 2 and that on-site hunting will be prohibited within the Specific Plan boundaries.

Response to Comment B.4-65:

This comment claims that allowing certain land uses on Project site lands designated as Open Space does not preserve value of such lands and may prohibit their use by special status species that currently use the Project site. Please see response to Comment B.4-64, which clarifies land use designations for various categories of open space under the Centennial Specific Plan so as to ensure that on-site biological resources are adequately protected and to address the concerns raised by this comment.

The vast majority of the Project's open space will be designated as On-Site Mitigation Preserve or Undisturbed Green Space. Pursuant to the new mitigation measure described in response to Comment B.4-64, within the On-Site Mitigation Preserve no improvements beyond what is necessary to maintain roads and fences will be allowed, with the exception of the placement of two water towers with a maximum disturbance of five acres each. Moreover, habitat enhancement, restoration and creation may only occur as described in the Project's Mitigation Preserve Management Plan and must be approved by the County. Public access and recreational hunting will also be prohibited on this land, though hiking and biking for private inholding owners and permitted Ranch guests would be permitted. Authorized motorized vehicles including, but not limited to Tejon Ranch employees, utility maintenance vehicles that have a Tejon Ranch permit, and emergency vehicles will be restricted to existing ranch roads and all recreational motorized vehicles will also be prohibited within the On-Site Mitigation Preserve. Grazing within the On-Site Mitigation Preserve will be allowed to continue strictly for resource management values and as directed by the Mitigation Preserve Management Plan.

Uses within Undisturbed Green Space shall be restricted to the continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding

owners and permitted Ranch guests. Public access, recreational motorized vehicles, and recreational hunting are prohibited in Undisturbed Green Space, whereas authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles will be restricted to existing ranch roads. Finally, uses with Disturbed Green Space will be limited to golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and/or mitigation activities.

With respect to the Residential/Entertainment and Residential land use designations applicable to the Project's proposed Village 9 on the west side of the Project site, north of State Route 138, such area is also located within the impact area analyzed by the Draft EIR.[217] Therefore, the land disturbance associated with these uses was also addressed by the Draft EIR's biological impact analysis, which includes an assessment of, and mitigates for, the effects of such disturbance on wildlife movement and edge effects.[218]

As the Commenter correctly notes, Section 4.9 of the Specific Plan allows for its proposed land use designations to be modified through a Specific Plan amendment adopted pursuant to California Government Code § 65453. However, the Specific Plan makes clear that such action would be discretionary and thus subject to further CEQA compliance.[219] Depending on the nature of the proposed Specific Plan amendment, a supplemental environmental analysis and additional mitigation may be required.[220]

Response to Comment B.4-66:

This comment mischaracterizes AVAP Policy LU 2.1 by quoting its text out of context. The full text of Policy LU 2.1 is as follows: "Limit the amount of potential development in Significant Ecological Areas, including Joshua Tree Woodlands, wildlife corridors, and other sensitive habitat areas, through appropriate land use designations with very low residential densities, as indicated in Land Use Policy Map (Map 2.1) of this Area Plan." Thus, per its plain text, Policy LU 2.1 is concerned with wildlife corridors to the extent they are located within the boundaries of an SEA. As explained in response to Comment B.4-64, all of the Project site land that is located within an SEA will be included within the Project's proposed Mitigation Preserves, where all new disturbance and development will be prohibited by conservation easement. Thus, any wildlife corridors located within such SEA lands will be protected and left undisturbed if the Project is approved. Accordingly, the County disagrees with the Commenter's claim that the Project is inconsistent with AVAP Policy LU 2.1.

With respect to the Commenter's claim that the Project does not sufficiently avoid or protect regional and local wildlife corridors, please see responses to Comments B.4-56 and B.4-57. See, also, responses to Comments B.4-64 and B.4-65.

217 DRP 2017, Exhibit 5.7-12
218 *Id.,* pp. 5.7-142 to -194
219 *Id.,* Appendix 4.0-A, p. 4-26
220 *Ibid*.

Response to Comment B.4-67:

This comment claims that the Project is inconsistent with AVAP Policy LU 2.5. The County disagrees with the Commenter. The plain text of Policy LU 2.5 expressly excludes economic opportunity areas (EOAs) from its application. The Project site is located entirely within the boundaries of the AVAP's West EOA.[221] Accordingly, AVAP Policy LU 2.5 does not apply to the Project.

With respect to this comment's concerns about the Project's potential impact on major drainage channels designated as Open Space, please see responses to Comments B.4-9 and B.4-10.

Response to Comment B.4-68:

This comment claims that the Project is inconsistent with AVAP Policy M 10.5. The County disagrees with the Commenter. The Commenter correctly notes that the Draft EIR and Specific Plan provide that new trails constructed as part of the Project will be located along roads and in greenways and designed to minimize adverse effects on adjacent land uses, as required by the Specific Plan's Green Development Program and Mobility Plan.[222] Also, as explained in the Draft EIR, no fencing that would restrict wildlife movement is proposed in Open Space areas that serve as wildlife corridors.[223]

The Commenter is incorrect that the Draft EIR does not require mitigation to ensure that Project trail design minimizes effects on biological resources. MM 7-17 requires the Project to implement a public awareness program in an effort to restrict public access to the riparian and Open Space area on the Project site to designated trails. This program must include (i) signs that identify the boundaries or ecologically sensitive areas, (ii) the use of temporary fencing around sensitive areas that appear to be receiving a high level of disturbance until the disturbance is revered, and (iii) the promotion of public education and awareness of such sensitive areas." MM 7-17 also provides that only passive recreational activities shall be permitted in Open Space areas and shall be restricted to trails, and that dogs must be leashed within designated Open Space areas. In addition, MM 7-15 requires the Project to install waste and recycling receptacles that discourage foraging by wildlife species adapted to urban environments in common areas, including along walking trails. Moreover, MM 13-2 and 13-6 require the Project Applicant to develop a lighting plan to reduce potential impacts to biological resources caused by light and glare. Project compliance with the Specific Plan's Green Development Program and Mobility Plan, along with implementation of MMs 7-17, 13-2, and 13-6 will ensure the Project designs trail routes in a manner that minimizes adverse effects on biological resources, consistent with AVAP Policy M 10.5.

221 *Id.,* p. 4-4
222 *Id.,* pp. 4-38, -39; Appendix 2-A of Appendix 4.0, p. 10; Appendix 2-C, p. 2
223 *Id.,* p. 5.8-45

In response to this comment's request for wildlife-friendly fencing, MM 7-17 has been revised as follows:

MM 7-17 The Project Applicant/Developer shall implement a public awareness program (prior to the first occupancy permit) in an effort to restrict public access to the riparian and open space areas on the Project site to designated trails and to prevent unleashed domestic animals from entering these areas. The program's educational materials shall discuss the presence of native animals (e.g., coyote, bobcat, and mountain lion), indicate that those native animals could prey on pets, indicate that no actions shall be taken against native animals should they prey on pets allowed outdoors, and indicate that pets must be leashed while using the designated trail system and/or in any areas within or adjacent to open space. The educational materials shall also discuss the impacts pets can have on native birds. Control of stray and feral cats and dogs will be conducted in open space areas on an as-needed basis. Feral cats and dogs may be trapped and deposited with the local Society for the Prevention of Cruelty to Animals or the Los Angeles County Department of Animal Control. This program shall include signs that identify the boundaries of ecologically sensitive areas (including the avoided special status plant populations described in MM 7-1); the use of temporary, wildlife-friendly fencing around sensitive areas that appear to be receiving a high level of disturbance until the disturbance is reversed; and promotion of public education and awareness of such areas. In addition to signage being located along the boundaries of the Mitigation Preserve, signage denoting the boundaries of ecologically sensitive areas and other pertinent information shall be included along the Pacific Crest Trail where it overlaps the Mitigation Preserve. The Project Applicant/Developer shall be responsible for the initial development of the public awareness program and installation of interpretive signs and wildlife-friendly fencing. The Homeowners Association, the Project Applicant/Developer, or an acceptable Land Manager/Agency (as approved by the County) shall be responsible for maintaining this program, including signs and wildlife-friendly fencing.

Only passive recreational activities shall be permitted within the designated natural open space areas and shall be restricted to trails. Some areas may allow slightly greater impacts if designated as picnic and/or camping areas.

> Domestic cats shall be prohibited from free-roaming (i.e., be allowed outdoors), and shall be required to have a microchip. All dogs shall be required to be leashed while in the designated natural open space areas, and bags for removing pet excrement will be provided at trail entrances and other appropriate locations. In addition, all dogs and cats shall be required to be neutered or spayed; all dogs shall be required to have a microchip; and potential owners shall show evidence prior to entry into the Centennial Development, as required by Los Angeles County Code (Section 10.20.350). These restrictions/features and their purpose will be described within educational material and distributed to new homeowners and made available to all homeowners as needed.

With respect to the comment's concern regarding the potential adverse effects of future Specific Plan amendments, all such amendments would require the County's discretionary approval and would thus be subject to CEQA compliance. Depending on the nature of the proposed Specific Plan amendment, a supplemental environmental analysis and additional mitigation may be required.[224]

Finally, the land disturbance associated with the Project's proposed trails plan[225] was included in the impact area assumed by the Draft EIR's biological impact analysis, which includes an assessment of, and mitigates for, the effects of such disturbance on biological resources.[226]

Response to Comment B.4-69:

This comment claims that the Project is inconsistent with AVAP Goal COS 4 and Policies COS 4.2 and 4.7. The County disagrees.

Per Goal COS 4, it is goal of the AVAP that sensitive habitats and species be protected to promote biodiversity. As explained in response to Comment B.4-64 and in the Draft EIR, of the 5,624 acres of designated Open Space within the Project site, approximately 5,116 acres (42 percent of the total Project site) are intended to (1) remain in their original natural condition; (2) be restored; and/or (3) be enhanced by weed abatement, fencing, and native species planting, among other means.[227] Of this amount, 3,866 acres are designated as SEA 17 to be preserved in perpetuity within the Project site boundaries.[228] Moreover, the Project would also preserve 39,213 acres of off-site sensitive habitat and open space.[229] The Project Applicant would provide a conservation easement to ensure the protection of both the off-

224 *Id.,* Appendix 4.0-A, p. 4-26
225 *Id.,* Exhibit 4-10a
226 *Id.,* pp. 5.7-142 to -194
227 *Id.,* p. 1-6
228 *Ibid*.
229 *Id.,* p. 4-44

site and on-site preservation areas in perpetuity.[230] Thus, the project is consistent with AVAP Goal GOS 4.

The text of AVAP Policy COS 4.2 is identical to the text of Policy LU 2.1. Please see response to Comment B.4-66 regarding the Project's consistency with Policy LU 2.1.

AVAP Policy COS 4.7 restricts, but does not prohibit, fencing in wildlife corridors. As explained in the Draft EIR, significant wildlife corridors on the Project site are located in SEA 17. As discussed above, all such land will be protected by conservation easement in its existing natural state. As explained in the Draft EIR, no fencing that would restrict wildlife movement is proposed in Open Space areas that serve as wildlife corridors.[231] Thus, the Project is consistent with Policy COS 4.7. See, also, responses to Comments B.4-64 through B.4-68.

Response to Comment B.4-70:

This comment states the Project is inconsistent with AVAP Policy COS 4.8. The County disagrees.

Policy COS 4.8 states: "Ensure ongoing habitat preservation by coordinating with the California Department of Fish and [Wildlife (CDFW)] to obtain the latest information regarding threatened and endangered species." This comment confirms that the Project has coordinated with CDFW in the past, and Draft EIR MMs 7-1, 7-2, 7-3, 7-6, 7-8, and 7-12 all require the Project to coordinate with CDFW during Project construction and to obtain all necessary CDFW permits and approvals prior to disturbance. Accordingly, the Project is consistent with Policy COS 4.8.

The current status of tricolored black bird is actually Candidate State Endangered as described in the Draft EIR. See, also, responses to Comments B.4-18 and B.4-19, which address the Commenter's concerns regarding tricolored black bird.

Response to Comment B.4-71:

The following additions have been made after the final full paragraph in MM 7-3 on pages 5.7-176 and 5.7-177:

> In order to further reduce impacts to special status wildlife, restrictions shall be placed on the Contractor. These restrictions are related to hours of operation and blasting requirements. Responsibilities of the Construction Contractor shall include:
>
> - All Project-related activities during construction shall be restricted to daylight hours. Night work and associated lighting shall not be permitted during and night work shall be prohibited throughout the

230 *Id.,* pp. 4-45 and -46
231 *Id.,* p. 5.8-45

Project site to reduce the potential adverse effect on special status species.

- Vehicle and equipment access within the Project site shall be restricted to existing roads and overland travel shall be minimized and confined to areas where development will occur to the greatest extent feasible.

Response to Comment B.4-72:

It is acknowledged that the Blasting Plan in MM 12-7 would not require additional CEQA review and would not allow CDFW an opportunity for review. In an effort to require adherence to measures that help mitigate adverse effects to special status species, MM 7-3 in Section 5.7, Biological Resources, will be amended to include specific guidelines in lieu of a Blasting Plan.

The following additions have been made to MM 7-3 (following the edits made in response to Comment B.4-71) on pages 5.7-176 and 5.7-177:

b. Vehicle and equipment access within the Project site shall be restricted to existing roads and overland travel shall be minimized and confined to areas where development will occur to the greatest extent feasible.

c. If blasting is required, applicable federal, State, and local requirements would be observed, and any necessary permits and authorizations would be obtained.

d. Best Management Practices Guidelines developed by the Institute of Makers of Explosives (IME) would be implemented.

e. To avoid impacts to special-status-biological resources, blasting would occur during the rough-grading activities of construction phase of the Project only between the hours of 10:00 am and 4:00 pm.

f. To avoid potential affects to birds, blasting would occur outside the nesting bird season (i.e. blasting shall occur only between September 15 and January 1). No blasting shall occur within 1 mile of the winter perch for bald eagle during the winter season (October 15 to March 15).

g. Prior to blasting, a blasting monitoring team including the Project biologist and one acoustician would be formed. The Project biologist would assess and provide guidance related to the criteria for impact on any nearby noise sensitive species. The acoustician should have a minimum of five years of acoustical measurement experience and would be responsible for the blast noise and vibration measurements.

h. Blasts should be measured with a calibrated Type 1 sound level meter set to the fast or impulse integration response. If possible, the low frequency cut off should be set as low as possible, ideally 2 Hz or lower. Peak sound levels should be measured at a known distance from blast between the blast site and the noise sensitive species habitat (identified by the Project

biologist). If the Project biologist sees fit, the low frequency cut off requirements may be waived or adjusted to address the sensitive species in the area. If measured peak levels exceed the criteria, blasts shall be altered in a way to reduce the impact. Such mitigation efforts may include: Reducing the explosive material, altering the packing and placement of the explosive material, or changing the location of the blasting efforts.

i. The biologist has the authority to stop blasting efforts or advise the blast team on the method of mitigation.

Response to Comment B.4-73:

The Draft EIR includes mitigation for the development of a Lighting Plan, however, the measure includes specific requirements for mitigating light pollution such as: restrictions on distance from open spaces and direction of light, mercury vapor and halide lighting, illumination levels, low-pressure sodium, lighting fixtures or flashing lights, exterior lighting standards and fixtures, lighting direction, security lighting fixtures. Additionally, time-control devices shall be utilized on exterior lighting sources; street, parking lot, and structural lighting fixtures shall provide adequate illumination while minimizing light spillover. The measure, as it is written, is comprehensive and reduces potentially significant impacts on special status species to levels less than significant.

Response to Comment B.4-74:

To clarify, neither the Parks and Recreation section nor the remainder of the Draft EIR, require this plan through mitigation or other methods. As stated on page 5.14-22 of the Section 5.14, Parks and Recreation, "Also, a Public Access Plan will be developed in connection with the development of the Ranch-wide Management Plan (RWMP) to ensure significant, but well-managed, public access into the Conservation Easement Area". The RWMP manages the approximately 240,000 acres encompassed by the Tejon Ranch Conservation and Land Use Agreement (TRCRWA).[232] Portions of the TRCRWA lands overlap the mitigation areas associated with the Project. The reference to public access pursuant to this Plan, to be developed by the RWMP as indicated in the Parks and Recreation section, was solely to demonstrate the recreation value that properly-managed access into selected open space areas proximate to the proposed land uses. The Public Access Plan applies to Conservation Easement areas, and is prepared by the Tejon Ranch Conservancy with consultation with and input from TRCRWA signatories (environmental organizations and Tejon Ranch), and applicable state and/or federal agencies for Conservation Easements held by the state of California (e.g., the Wildlife Conservation Board) or required as mitigation land for federal or state resource agency permits (e.g., US Fish and Wildlife Service and Department of Fish and Game). The Public Access Plan on these Conservation Easement Areas is neither part of the Project nor will it be prepared by the Applicant.

As discussed in Section 4.0, Project Description, "the Developer would provide a conservation easement for both the 3,861 on-site preserved acres and the 23,547 off-site

[232] Final EIR Appendix 5.7-E

preserved acres".[233] The area to be covered by a conservation easement, which accounts for areas used for Project mitigation rather than as part of the larger Tejon Ranch Conservation and Land Use Agreement, is referred to in the Draft EIR alternatively as the Project's Open Space Preserve or Mitigation Preserve. The on-site Open Space is shown on Exhibit 4-11, Centennial Project – On-Site Open Space/Mitigation Area, and the off-site Mitigation Preserve areas are shown on Exhibit 4-12, Centennial Project – Off-Site Mitigation Preserve. This graphic also depicts the Project's Mitigation Preserve in the content of the larger Tejon Ranch Conservation Area, which is not part of the Project.

This comment also states that the future preparation of the Public Access Plan does not provide the CDFW with an opportunity to assess potential species and habitat impacts, and recommends both revising the Draft EIR to include the Public Access Plan and that public access, development, and disturbance within the SEA is prohibited. As noted above, the Public Access Plan is neither part of the Centennial Project nor will it be prepared by the Applicant, but by the RWMP. Therefore, regarding public access into the SEA as part of the Public Access Plan, the contents of this plan is not under the control of the Applicant or otherwise part of the Project. The proposed Project expressly precludes disturbance within SEA 17.

Response to Comment B.4-75:

As discussed on page 5.7-166 of Draft EIR Section 5.7, Biological Resources, the Project has been designed to allow for local movement through the site. Open space areas, inclusive of undisturbed and green space areas, combine to create a network of connections throughout much of the Project site and connecting to off-site areas. A new Exhibit B.4-9, On-Site Open Space Areas, has been prepared and combines project design features from different Draft EIR exhibits and demonstrates the connectivity, which will allow local movement through the Project illustrates where most of the existing drainage corridors are retained as the general location of re-engineered drainages. New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. The Project's open space areas will allow for movement of more common species adapted to urban and suburban conditions, and impacts on local wildlife dispersal would be less than significant, and would not be cumulatively considerable. The Project would only affect portions of populations of species that are not considered to be of conservation concern, and dispersal impediments are not expected to substantially affect the likelihood of the regional population persistence of those species. The Project site was also modified from its original proposed boundaries, to the revised boundaries established in the Antelope Valley Area Plan (AVAP). This boundary modification excluded development in the designated Sensitive Ecological Areas (SEAs), adopted through the AVAP, and resulted in a pullback from the northwest portion of the originally-proposed project site and added additional acres of development on the eastern edge of the original Project boundaries consistent with the land use zoning of the AVAP. Regional movement has been shown to generally move around the currently proposed Project site.[234] As such, the design of the Project is not intended to change existing patterns and draw wildlife into the Project development, and specifically avoids drawing wildlife

[233] DRP 2017, p. 4-44

[234] *Id.,* pp. 5.7-56 to -62; *Id.,* Exhibit 5.7-6

away from the regional pathways in the avoided designated SEA areas. Additionally, as described on page 5.7-170 of the Draft EIR, impacts on wildlife movement are reduced through PDFs 7-7 and 7-8, and are further minimized with implementation of MMs 7-13 through 7-19, which incorporate planning and construction methods to reduce potential indirect impacts such as developing a Lighting Plan and Landscaping Plan and to create public awareness concerning multiple urban interface issues. With implementation of the identified PDFs and MMs, impacts to wildlife movement would be less than significant. Please also see response to Comment B.4-57. A redesign of the Project is unwarranted because the current design minimizes impacts on wildlife movement.

Regarding preservation of special status plants, a further redesign of the Project is unwarranted. The Project design has been modified substantially to reduce impacts on special status plants as well as other biological resources through multiple years of consultation with the Significant Ecological Area Technical Advisory Committee (SEATAC) as was required when the Project was proposed to develop in portions of an SEA. Subsequently, the County Board of Supervisors unanimously approved the current SEA boundaries through the adoption of the AVAP as well as the boundary for the West Economic Opportunity Area which includes the Specific Plan Area. The Project was redesigned to be consistent with these new boundaries and avoid all SEA designated areas. Furthermore, in response to comments submitted by CDFW, much more grassland was preserved, and plant mitigation measures were modified to require more preservation. These efforts have reduced the Project's impacts on special status plants considerably by avoiding a greater percentage of impacted populations along the southern boundary and avoiding some species entirely. In addition, Mitigation implementation is hinged on Project implementation, and Project implementation requires approval of the Final EIR. In general, project applicants are constrained from proceeding with mitigation until Project approval has been granted, as mitigation is part of the process and requires CEQA review. The Special Status Plant Species Restoration Plan and MM 7-1 on page 5.7-173 of the Draft EIR also include specific performance objectives and identifies feasible means of achieving those performance objectives, which is a form of mitigation measure commonly used and has been repeatedly confirmed as legally adequate in CEQA court cases. Please see the response to Comment B.4-44, which discusses performance objectives for this mitigation plan. The performance objectives provided are those necessary to ensure impacts to special status plant species are properly mitigated for, and functions and values of these communities are preserved and managed in perpetuity.[235]

As described in MM 7-1 on page 5.7-173 of the Draft EIR, the Special Status Plant Species Restoration Plan shall include methods for enhancement and restoration such as direct seeding, transplantation, non-native invasive weed control, grazing management, etc. The Plan shall also include appropriate locations for restoration that match the parameters of existing populations. The mitigation ratio for special status plants (2:1) is intended to ensure at least an equal or greater population is preserved.

[235] *Id.,* pp. 5.7-173 to -175

Mitigation lands have been surveyed, a literature review has been conducted, and a soils, slope, aspect analysis has been conducted to confirm similar conditions occur on the Project site and Mitigation Preserve. During these efforts, several of the special status species that have been documented on the Project site were found in the Mitigation Preserve.

The EIR also continues to include a mitigation requirement for the round-leaved filaree, because Los Angeles County considers it sensitive within the region, despite it having been recently removed from the CNPS and CNDDB list.

In addition, please see response to Comment B.4-43.

Response to Comment B.4-76:

Figure 3-2 of the Centennial Specific Plan shows regional circulation in relationship to the Specific Plan area. It depicts existing paved roads and private dirt roads as well as proposed circulation within the development footprint. Roads that appear within the Open Space designated areas (green color) are existing roads that will remain. The only paved road that will remain within the open space area is the existing Cement Plant access road. For reference, the proposed circulation within the specific Plan area is shown on Figure 3-1.

Response to Comment B.4-77:

Areas reflected as undisturbed open space or greenspace (parks and recreation and other uses) on the east side of the Aqueduct north of SR-138 are not proposed for mitigation purposes and are not part of the Mitigation Preserve. The revised Exhibit 5.7-10 depicts those areas that represent the Mitigation Preserve for the Project. Although some areas of the Project interior, which the development footprint avoids, are proposed to remain as undisturbed open space, they are not used to meet mitigation acreage requirements. All mitigation acreage requirements are contained within the Mitigation Preserve as described on Draft EIR page 5.7-135.

Response to Comment B.4-78:

The Project proponent is proposing to take responsibility for the construction of certain Project infrastructure and other improvements and facilities. Thereafter, upon completion of the facilities, the Project proponent and/or various private, governmental, and quasi-governmental entities will undertake the long-term operation and maintenance of those facilities. As development progresses, the details on the final list of entities and responsibilities will be required before any construction is authorized. One such entity will likely be one or more homeowner's associations (HOA) established to maintain certain Project amenities and common areas, and to enforce various policies required by the Project's proposed Specific Plan, among other tasks.

The creation and operation of an HOA is governed by the Davis-Stirling Common Interest Development Act, California Civil Code § 4000 *et seq*. (HOA Act). Under the HOA Act, an HOA for a master planned community is created with a "declaration" of covenants, conditions and restrictions (CC&Rs) that is recorded on title. An HOA may exercise the same broad powers

as a nonprofit mutual benefit corporation established pursuant to California Corporations Code § 7140. An HOA's authority, and its obligations, are set forth in the recorded CC&Rs, which are drafted by the project proponent.

The CC&Rs serve as the "Constitution" of a common interest development and the fundamental source of power of the HOA. CC&Rs must contain (i) a legal description of the development, (ii) a statement regarding the type of common interest development the declaration covers, (iii) the name of the HOA, (iv) the restrictions on the use and enjoyment of any portion of the common interest development that are intended to be enforceable by equitable servitudes, and (v) any other matters the declarant (i.e., the developer) or the HOA members consider appropriate.

Terms typically included in HOA CC&Rs concern HOA membership and voting rights, methods for calculating and collecting assessments, maintenance responsibilities, restrictions on the use and operation of separate and common interests in the development, accounting and insurance requirements, and mechanisms governing enforcement of the declaration. Once the first buyer accepts the declaration by purchasing a separate interest in a common interest development, the terms and conditions of the CC&Rs become enforceable equitable servitudes, unless unreasonable, and inure to the benefit of and bind all owners of separate interests in the development.

An HOA can be required to assume a development obligation in perpetuity, and neither the HOA nor its membership can eliminate or amend an assessment levied or an obligation established pursuant to the recorded CC&Rs. Additionally, as a backup in case of challenges or defaults of the HOA, the HOA may legally contract with an appropriate authority to maintain facilities to a specific standard and secure performance with CC&Rs and the remedies afforded thereunder, so long as the HOA has the authority within its organic document to do so.

HOAs are governed by a board, appointed initially by the project proponent and then later elected by the various property owners that are part of the HOA. The board of the HOA has control over the repair and maintenance of the common areas of the development. Moreover, the HOA is permitted to charge regular fees to homeowners within the development (comparable to taxes). These revenues are used for functions like paying for maintaining common areas like corridors, walkways, parking, landscaping, and amenities. The HOA can levy fines or sue homeowners for damages and/or injunctive relief to enforce the HOA's rules, CC&Rs and to collect fees.

Accordingly, the HOA will be empowered to raise the revenue necessary to perform its obligations under, and to enforce restrictions set forth in, the CC&R's. This includes all obligations regarding the ongoing maintenance of any Project improvements managed by the HOA, such as proposed parks and slopes. In addition, the HOA will be authorized to hire third-parties that are qualified to perform such tasks, as needed. For example, the Specific Plan provides that the Master HOA will hire a Community Forester trained in urban forestry, arboriculture, horticulture, landscape architecture, or closely related fields to undertake various responsibilities related to landscape maintenance, and plant palette selection and

enforcement).[236] The trained Community Forester will also develop policy for managing public trees, prepare an annual tree management plan, and prepare lists of plants permitted and prohibited within the Project area, subject to the review and approval of the County staff biologist).[237] Per MM 7-13, the approved list of permitted and prohibited plants will be incorporated into the Project Landscape Plan for review and approval of the County staff biologist. In addition, per the Specific Plan and MM 7-13, the HOA will be responsible for providing current information to homeowners about plant species that have been identified by the Community Forester and County staff biologist as prohibited within the community.[238]

With respect to the fuel modification zones, the Specific Plan provides that such areas shall be maintained by either an HOA or other designated entity. However, to govern such maintenance activities, MM 3-9 requires the Project Applicant/Developer to prepare a Fuel Modification Plan that complies with the requirements of Title 32 of the County of Los Angeles Code. Per Title 32, the Fuel Modification Plan must be submitted for preliminary approval by the Los Angeles County Fire Department prior to any subdivision of land. MM 3-9 further requires the Project Applicant/Developer to provide all new residents and business owners with recorded CC&Rs or disclosure statements that identify their responsibilities for maintaining fuel modification zone(s) on their properties, as defined in the approved Fuel Modification Plan, which must be submitted to the County for its review and approval.

With regard to the control of Argentine ants, MM 7-16 provides that all landscaping materials for common/public areas must be inspected and certified by landscape supplies as being "free" of Argentine ants prior to planting. Moreover, this mitigation measure requires that all container plants and other landscaping materials installed within common/public areas within 200 feet of open space areas be inspected by a qualified restoration specialist for the presence of ants and to reject any plants discovered with ants. In addition, upon initiating landscaping, MM 7-16 requires a qualified biologist to undertake quarterly monitoring for the presence of Argentine ants and, if detected, to implement direct control measures to prevent the invasion from worsening. Per MM 7-16, ant monitoring and control by a qualified biologist must continue for a period of five years following the initiation of landscaping and only after such five-year period will monitoring and control duties be transferred to the HOA, at which point the HOA can hire qualified personnel to undertake such tasks, as discussed above, funded by HOA fee revenues. Additionally, to further guard against Argentine ants, the HOA must discourage irrigated landscape planting through distribution of education information and other feasible methods.

As provided in the Specific Plan, the County shall impose, at the time of approval of each Project tentative map for residential uses, a condition of approval requiring the applicant to submit its form of CC&Rs for the review and approval of the County.[239] Moreover, per the Specific Plan, the Project's Master HOA must be formed, and its declaration of CC&R's

236 DRP 2017, Appendix 4.0-A, p. 1-6
237 *Id.,* Appendix 4.0-A, pp. 1-6, 3-42, 3-50
238 *Id.,* Appendix 4.0-A, p. 3-50
239 *Id.,* Appendix 2-B of Appendix 4.0-A, p. 7

recorded immediately after recordation of the first final map for a unit phase within the Project consisting of one or more residential lots. As final maps for additional unit phases are approved and recorded, such land will be annexed by the Master HOA and made subject to the CC&Rs.[240] In addition, all mitigation measures identified in the EIR will be incorporated into an enforceable Mitigation, Monitoring, and Reporting Program (MMRP) and made enforceable conditions of Project approval. These requirements will ensure that the Project's CC&Rs comply with the requirements of the Specific Plan and properly allocate responsibilities and duties identified in the Specific Plan to be undertaken by the Project HOA.

The County is entitled to presume to that the Project Applicant, HOA, and homeowners will comply with all applicable conditions of approvals, the MMRP, and the CC&Rs. Contrary to this comment's claim, CEQA does not obligate the Lead Agency to analyze speculative, indirect environmental effects to biological resources that might occur if the Project applicant, HOA, or the Project homeowners fail to meet their legal obligations under the Project approvals and/or CC&Rs. Such speculative effects are not a reasonably foreseeable consequence of Project approval.

Response to Comment B.4-79:

Project Design Feature (PDF) 7-8 requires the preparation of a list of invasive plants species to be prohibited from use within the Project site. Although the Centennial Specific Plan includes a partial list of prohibited plants, it should be noted that any list of invasive or detrimental plants is not entirely comprehensive because many non-native species, under favorable environmental conditions, can become invasive or detrimental. For this reason, this list may be modified over time by the community forester with approval from the County staff biologist. A more exhaustive list of these plants, periodically updated by region, is published by the California Invasive Plant Council (Cal-IPC). Cal-IPC's list of invasive plants will serve as the guideline for prohibited species at Centennial.

Additionally, as stated in the Centennial Specific Plan, vegetation selected for planting shall be subject to review by the County staff biologist. Prior to selecting non-native species for use, such species should be examined to see whether they have become invasive or detrimental in other areas. Species poisonous to humans and wildlife should generally be avoided. Seed mixes for herbaceous species (ground covers including lawns or hydroseed mixes) should be certified as weed-free and not containing any of the species on the prohibited species list. Please note the inclusion of Bermuda grass on the Cal-IPC inventory.

Response to Comment B.4-80:

As stated on Draft EIR page 5.7-87 in Section 5.7, Biological Resources, of the 1,370.8 acres of mixed oak woodland existing on the Project site, 1,364.6 acres would not be impacted by the Project (500.8 acres north of SR-138 and 870.0 acres south of SR-138). Additionally, of the 1,370.8 acres of mixed oak woodland existing on the Project site, 1,291.8 acres (473.2 north of SR-138 and 818.6 acres south of SR-138) would be preserved in the on-site

[240] *Id.,* Appendix 2-B of Appendix 4.0-A, p. 2

preservation areas (unimpacted areas within SEA 17). Consequently, 99 percent of the mixed oak woodlands on the Project site would be retained. Based on this information, it can be estimated that approximately 99 percent of the trees are preserved as well. The Specific Plan's Hillside Design Guidelines require that 50 percent or more of existing on-site trees and woodlands (particularly native and drought-tolerant species, and oak woodlands) be retained and incorporated into the overall Project landscaping plan. The Project's 99 percent preservation would exceed this Specific Plan requirement. In addition, all of the oak woodlands used to meet the Hillside Design Guideline of retaining and incorporating 50 percent or more of on-site trees and woodlands into the over Landscaping Plan are also located within the Los Angeles County SEA boundaries.

Although the Specific Plan Hillside Design Guidelines include guidance for the use of bridge design techniques that allow easy wildlife migration beneath bridges, the Draft EIR does not require mitigation for bridge design in regard to wildlife movement. Therefore, additional details for bridge design beyond the Specific Plan guidelines are not required. However, MM-14 on Draft EIR pages 5.7-190 and 5.7-191 describes some specific measures for the design of a highway underpass, which is intended for use by pedestrians as well as wildlife, consistent with the AVAP. As described, the width of the underpass shall be 100 feet and shall flare out on both sides of the highway to a 150-foot width in the Project open space adjacent to the highway. These specifications are expected to allow some local wildlife to safely pass between open space areas on opposite sides of the highway.

Response to Comment B.4-81:

The Project's mitigation lands, the Mitigation Preserve, do not include the open space areas described in the comment such as yards and parkways. The revised Exhibit 5.7-10 depicts the Mitigation Preserve areas for the Project. Although some interior areas, which the Project development footprint avoids, are proposed to remain as undisturbed open space, they are not used to meet mitigation acreage requirements. All mitigation acreage requirements are contained within the Mitigation Preserve as described starting on Draft EIR page 5.7-135.

The Open Space definition has been refined to provide more clarity to this issue. Revised open space designation definitions shall be incorporated into the Final Centennial Specific Plan. Also see response to Comment B.4-77.

Response to Comment B.4-82:

This concluding comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

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B.5

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

July 12, 2017

Samuel Dea
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Subject: Centennial Project
SCH#: 2004031072

Dear Samuel Dea:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on June 30, 2017. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project. B.5-1

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2004031072) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

CALIFORNIA
Water Boards

Lahontan Regional Water Quality Control Board

Edmund G. Brown Jr.
Governor

Matthew Rodriquez
Secretary for
Environmental Protection

late 6/30/17 E

July 11, 2017

File: Environmental Document Review
Los Angeles County

Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
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Governor's Office of Planning & Research
JUL 11 2017
STATE CLEARINGHOUSE

Comments - Draft Environmental Impact Report, Centennial Project, Los Angeles County, State Clearinghouse No. 2004031072

The California Regional Water Quality Control Board, Lahontan Region (Water Board) reviewed the Draft Environmental Impact Report (DEIR) for the Centennial Project (Project), received on May 17, 2017. The DEIR was prepared by BonTerra PSMOAS on behalf of Los Angeles County (County) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096.

The Water Board is pleased that the County integrated "Low Impact Development" (LID) strategies into various elements of the Project Plan and encourages the County to take this opportunity to also integrate strategies that promote watershed management and groundwater sustainability. As a whole, the DEIR describes a project that incorporates many water quality protection features and sustainable water saving components necessary in the arid high desert with hydrologically closed groundwater basins. This letter contains general and specific comments that we request be addressed, primarily: (1) a jurisdictional determination regarding waters of the United States must be established; (2) long-term groundwater pumping to satisfy Project water supply demand should consider cumulative growth in the Antelope Valley as a whole; and (3) we recommend that Project Alternative E (discussed below) be selected as the preferred alternative.

B.5-1 (cont.)

Project Description

The Project is a planned new 12,323 acre community development with residential, commercial, business, recreation and civic uses in Kern and Los Angeles Counties.

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The Project involves the development of nine villages that will each contain a mix of land uses. While not an exact description of the Project area, it is generally bounded to the south by the San Gabriel Mountains and the San Andreas Fault and to the north and west by the Tehachapi Mountains and the Garlock Fault. The West Branch of the State Water Project's (SWP) California Aqueduct bisects the Project. The East Branch of the SWP Aqueduct is along the northeast side of the Project. The Project site has historically been used for livestock grazing. The National Cement Plant is located approximately one mile north of the Project Site.

The Project would allow up to 19,333 dwelling units on approximately 4,987 acres of land. Project build-out will occur over a 20 year period through tracts and parcel maps approved by the County. Of the 5,624 acres designated Open Space, approximately 5,116 acres are intended to:

(1) Remain in their original natural condition;
(2) Be restored; and/or
(3) Be enhanced by native species planting, abatement and fencing.

Over 90% of the Project is within the Lahontan Water Board jurisdiction and less than 10% within the Los Angeles Water Board jurisdiction. The Project plan includes two wastewater reclamation facilities that will be constructed for the tertiary treatment of wastewater generated by the Project, both in the Lahontan Region. Produced recycled water will be used to reduce the Project's demand for imported water and groundwater resources to supply potable water needs.

B.5-1 (cont.)

The Project's water supply needs are not directly under the purview of the Water Board. However, the Project's water supply is from imported SWP water, groundwater, and 40% from recycled water. After EIR certification, it is anticipated that the Golden Valley Municipal Water District (currently serving the community of Gorman) will annex the Project into its service area and become responsible for providing water and wastewater treatment services.

Project development will occur within nine "villages," eight located east of the SWP Aqueduct, and one west of the Aqueduct. Over the Project life, 20 separate Tentative Tract Parcels will be separately vested, each having specific development conditions.

Water Board Authority

All groundwater and surface waters are considered waters of the State. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The Water Quality Control Plan for the Lahontan Region (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality

standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at: http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

General Comments

We recognize the effort put forth by the County to incorporate the policies and objectives of various state, regional and local and agencies into the Project plan and have the following general comments. The Project spans the jurisdiction of two Regional Boards, Lahontan and Los Angeles; our comments are germane only to that area of the Project within the Lahontan Region.

1. There may, or may not be, waters of the United States in the Project vicinity. *Before DEIR certification is considered by Los Angeles County, the proponent should establish with the United States Army Corps of Engineers and United States Environmental Protection Agency, Region VIX, whether or not waters of the United States are present in within the Project boundary.* This decision will dictate the applicable federal surface water protection requirements that may apply.

2. The Project water demand will be supplied from numerous sources: (1) imported SWP water, (2) recycled water, (3) imported water return flow, and (4) groundwater pumped from the Antelope Valley groundwater aquifer, which is court adjudicated because of pumping overdraft. SWP water availability is subject to many variables. Imported water return flow amounts appear speculative. The DEIR estimates a constant annual groundwater demand of 1,634 acre-feet per year (Table 5.18-10). The cumulative groundwater demand from projected development across the Antelope Valley as a whole may not be sustainable into the long-term. While Water Board staff supports the Water Resources Mitigation Measures identified in section 5.18, we also believe the water supply impact may not be "less than significant after mitigation" as stated on page 5-18-76. The DEIR did not evaluate the cumulative impact from continuous groundwater aquifer pumping from all current and projected future groundwater withdrawals in the Antelope Valley considering projected growth. *Clarify how the Project water supply will be sustained in the long-term considering the cumulative groundwater demand from all current and projected future development activities.*

3. The Water Board is encouraged by the foresight of Alternative E: Density Clustering East of the Aqueduct. This moves all of the developments to the east side of the aqueduct, thereby reducing the need for Village 9 and the small 0.34 million gallons per day (MGD) package plant that would service the development. This would prevent any threat to the drinking water conveyance and supply in the form of the State Water Project Aqueduct and Quail Lake. *The Water Board recommends Los Angeles County select Alternative E as the preferred Project alternative.*

B.5-1 (cont.)

SPECIFIC COMMENTS

Water Board staff provides the following specific comments regarding the Project that should be addressed in the Final EIR.

4. Hydromodification – Water Board staff support that the Project proponents have considered hydromodification, hydrology and flood control, and mapping out the 100 year floodplain to ensure LID and Best Management Practices (BMP) are met in the design of the project, and in particular the following mitigation measures (MMs): MM 2-1 for Hydromodification and Drainage system engineering, MM 2-2 Hydrology and flood-control BMPs that will provide capital flood protection, capital storm event, and MM 2-3 Tentative Maps depicting the 100 year floodplain mapped by the Federal Emergency Management Agency (FEMA).

5. Water Resources – Water Board staff believes that MM 18-2 (Water Use Reports) are a very important Project plan element that should be adhered to and modified only when development is not proceeding at the predicted rate. This measure should be coordinated with the zoned density and build-out milestones. We are pleased that for Water Resource MM 18-1 (Water Efficiency Measures) that the county has planned to meter water use, reduce potable water use with on-site recycled water, require water efficient appliances, require water efficient irrigation, and budget water based on water rates.

6. Wastewater Collection - For Wastewater Collection mitigation measures MM 19-1 thru MM 19-3 and MM 19-5, the Water Board requests to remain notified through each stage of development in order to provide input as development proceeds and balance workload as water quality permit actions are requested. For MM 19-4 and MM 19-5 (West and East wastewater treatment plants, respectively), Water Board staff is concerned about the proximity of these plants to the SWP Aqueduct and protection of that invaluable resource to overall water supply for southern California.

7. Page 3-5 – The text indicates that 90% of the Project is within Region 6 (Lahontan Region) and 10% is within Region 4 (Los Angeles Region). Page 5-54 states that 93% of the Project is within the Region 6. Elsewhere, the appendices state that 96% of the Project is within Region 6 and 4% in Region 4. *Clarify portions of the Project within each regional board jurisdiction consistently throughout the DEIR.*

8. Page 5.2-25 and page 5.4-2 – The DEIR states that the Project must comply with the state General Construction Permit. *Clarify whether the entirety of the Project will comply with the state General Construction Permit whether or not federal receiving waters of the United States are present.* The Water Board requests the Project proponents to comply with the state General Construction Permit in the Antelope Valley regardless of whether federal waters are present and to implement appropriate construction and post-construction BMPs.

9. Page 5.2-49 – Section 6.2.7 discusses Hydrology and Flood Mitigation Measures. The Water Board's November 4, 2015 letter providing comments on the Notice of Preparation (NOP) (item 5) indicated that maintenance of post-construction BMPs

B.5-1 (cont.)

should encourage deep rooted plants that are trimmed, not eradicated. *Include a Mitigation Measure requiring BMP maintenance that encourages stabilized native grasses and/or deep rooting plants to minimize sediment transport.*

10. Page 5.3-20 – The Homestead Area section indicates that there is an onsite historical well that will be destroyed in accordance with the California Well Standards. *Include a Mitigation Measure requiring destruction of this well in accordance with the California Well Standards.* We appreciate the Project proponent's intent to properly destroy this well. However, a mitigation measure should be added ensuring this activity is carried out to protect groundwater resources from possible contamination.

11. Page 5.4-69 – Table 5.4-12 indicates there is no Lahontan Basin Plan groundwater quality objective for nitrate as nitrogen. While this is correct, it is also misleading. The Lahontan Basin Plan, page 3-13, indicates that groundwater quality objectives are based on state drinking water standards. The state drinking water standard for nitrate as nitrate is 45 milligrams per liter (mg/L), which is the equivalent of 10 mg/L nitrate as nitrogen. *Clarify the text and Table 5.4-12 with respect to the Lahontan Basin Plan nitrate groundwater quality objective.*

12. Page 5.4-90 – Two Water Quality Mitigation Measures are identified, MM 4-1 to use BMPs and incorporate LID for Project construction and MM 4-2 to integrate integrated pest management measures. The Water Board is pleased that the Project will implement LID and water quality control BMPs that will retain storm water runoff, specifically permeable pavement. The Project will result in significant site grading as the various villages are developed. We request that an additional construction related BMP be specifically identified and utilized. During construction, native topsoil should be retained, temporarily stored, and used as top soil cover for disturbed areas to the maximum extent feasible. Efforts should be taken to ensure that native seeds contained within removed and temporarily stored native topsoil are appropriately nurtured to germinate disturbed areas. *Include as a Mitigation Measure the retention and reuse of native topsoil during grading to re-establish native plants for soil stabilization to the maximum extent feasible.*

13. Page 5.4-90 – Water Board staff's November 4, 2015 letter on the NOP requested that a Restoration and Revegetation Monitoring Plan be prepared (item 10). The list of mitigation measures included with the Biological Resources section of the DEIR (chapter 5.7) does not include this plan intended to ensure that revegetation efforts are successful. *Include as a Mitigation Measure a Restoration and Revegetation Monitoring Plan to ensure successful revegetation efforts, along with metrics for success.*

14. Page 5.4-91 – The DEIR does not seem to reference the Salt and Nutrient Management Plan for the Antelope Valley. This plan was developed as required by the State Board's Recycled Water Policy. See: http://www.ladpw.org/wwd/avirwmp/docs/saltplan/Salt%20and%20Nutrient%20Management%20Plan%20for%20Antelope%20Valley_May%202014.pdf

B.5-1 (cont.)

Significant elements of that plan are monitoring (Section 5) and salt and nutrient source reduction implementation measures (Section 6). The monitoring section indicates that groundwater monitoring well information is limited in some parts of the Antelope Valley. Section 6.3 of that plan identifies additional implementation measures that should be considered, including, but not limited to, reducing salt/nutrient loading into the basin using ultrafiltration or reverse osmosis, and replacing chlorine disinfection with ultraviolet disinfection. The Project proponent should:

a. *Reference the Salt and Nutrient Management Plan for the Antelope Valley in the EIR.*

b. *Identify or install appropriate groundwater monitoring wells that will be incorporated into the Antelope Valley monitoring network to evaluate Project impacts over time, in conjunction with other Antelope Valley groundwater impacts.*

c. *Identify, evaluate, and incorporate specific best management practices that will be employed now and over the Project life to reduce salt and nutrient loading into the Antelope Valley groundwater basin.*

d. *Include in the EIR Mitigation Measures for an ongoing commitment to participate in collective groundwater basin monitoring efforts and reduce salt and nutrient loading over the Project life.*

B.5-1 (cont.)

15. Appendix 5.4-A (Centennial Project Water Quality Technical Report), about page 36 – While referenced on page 5.18-13, the State Board adopted general water recycling and waste discharge requirements for the use of recycled water that is managed by an administrator (Order WQ-2016-0068-DDW). This Order is an appropriate regulatory tool for the use of recycled water. *Include reference to the State Board Order WQ-2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use.*

16. Appendix 5.19-B (Centennial Project Wastewater Treatment Report) – The Project at build-out will include two wastewater reclamation facilities (WRF) designed for an average daily flow as follows: WRF East a 4.28 MGD, and WRF West at 0.34 MGD. Both plants are projected to use membrane bioreactor technology to achieve tertiary effluent standards. Storage reservoirs will be constructed to temporarily store water prior to distribution in recycled water pipelines. The following comments relate to wastewater collection and treatment.

a. NOP Comments - Water Board staff's November 4, 2015 letter on the NOP requested additional information regarding wastewater collection, treatment, and disposal (Item 13). The DEIR did not provide all of the information requested. *Include in the EIR the information requested in Item 13 of Water Board staff's November 4, 2015 letter.*

b. Wastewater collection and treatment – Page 4-60 indicates that eight sewer lift stations will be required. *Mitigation measures should be added requiring sewer lift stations, wastewater treatment, and effluent storage facilities to be equipped with emergency backup power sources and spill containment features in the event that power failure occurs*. This is especially critical for the Project features immediately up stream of the SWP Aqueduct and adjacent to streams.

c. Nitrogen reduction – The text is silent on whether nitrogen reduction technology will be utilized. *Mitigation measures should be added indicating that the WRFs will be required to achieve total nitrogen levels of less than 10 mg/L to ensure that any incidental recharge from the use of recycled water will not adversely affect receiving groundwater*.

d. Disinfection – The text indicates that chlorine disinfection will be used. There is no indication that alternative disinfection measures were evaluated. *Mitigation measures should be added requiring an evaluation of alternative disinfection including ultraviolet disinfection*. The Water Board strongly recommends ultraviolet disinfection to ensure that disinfection byproducts are not produced, incidental recharge from the use of recycled water will not adversely affect receiving groundwater, and effluent total dissolved solids concentrations are lower.

e. Effluent storage – The text does not indicate the location, size, volume, or construction method for the storage reservoirs. *The EIR should include this information.* While the EIR states that storage reservoirs will be lined, *the EIR should specify the type of liner and method of construction*. Liners must be of appropriate materials to prevent degradation and/or pollution of receiving groundwater. *If all effluent is to be contained for recycled water use, then sufficient capacity must exist to store winter flow when recycled water demand decreases. If some effluent will be percolated, then a groundwater degradation analysis must be provided*. The proposed method of monitoring potential reservoir leakage, including groundwater monitoring, should be stated.

f. Biosolids handing – To address greenhouse gas emissions and the effects of climate change, the digesters should be equipped with methane gas recovery used for onsite power generation needs. *The location and proposed construction method of onsite sludge drying beds should be discussed*.

B.5-1 (cont.)

Permitting Requirements

A number of activities that will be implemented under the Project have potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following.

17. Streambed alteration and/or discharge of dredge and/or fill material to a surface water, including water diversions, may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the United States) or dredge and fill Waste Discharge Requirements for impacts to non-federal waters.

18. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-006-DWQ, obtained from the State Water Board, or an individual storm water permit obtained from the Lahontan Water Board.

19. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2014-0049 for diverted stream flows or dredge spoils dewatering, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board.

20. Wastewater collection systems are subject to the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order 2006-0003-DWQ.

21. Wastewater treatment is subject to individual waste discharge requirements issued by the Water Board. This requires that a report of waste discharge be filed with the Water Board no less than 140 days before discharge occurs.

22. If waters of the United States are present at the wastewater treatment plant sites, then storm water runoff must be covered under the statewide General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ.

23. Recycled water use is subject to water reclamation requirements issued by the Water Board, after the State Board Division of Drinking Water approves an Engineering Report to satisfy Title 22, California Code of Regulations. Alternately, an Administrator may file for coverage under Statewide Water Reclamation Requirements for Recycled Water Use, Order WQ 2016-0068-DDW.

Project proponents should consult with Water Board staff early on should project implementation result in activities that trigger these permitting actions. Information and application forms for these permits can be found at http://www.waterboards.ca.gov/lahontan/.

B.5-1 (cont.)

Thank you for the opportunity to comment on the DEIR. If you have any questions regarding this letter, please contact me at (760-241-2434 (jehiel.cass@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse No. (2004031072) and Project name (Centennial Ranch) in the subject line.

Jehiel Cass, P.E.
Senior Water Resources Control Engineer

B.5-1 (cont.)

Enc: Water Board Comments on NOP of DEIR (November 4, 2015)

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Lahontan Regional Water Quality Control Board

November 4, 2015

File: Environmental Doc Review
Los Angeles County

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Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Centennial Development Project, Los Angeles County, State Clearinghouse Number 2004031072

The Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the above-referenced project (Project) was prepared by the County of Los Angeles Planning Department (County) and circulated for public comment in compliance with provisions of the California Environmental Quality Act (CEQA). As a responsible agency, the California Regional Water Quality Control Board, Lahontan Region (Water Board) is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations, title 14, section 15096. Based on our review of the proposed Project, we recommend that several issues be considered in the preparation of the Notice of Preparation (NOP), particularly: 1) established numerical and narrative water quality objectives and standards should be used when evaluating thresholds of significance for Project impacts; (2) post-construction best management practices (BMPs) for stormwater control are an essential part of project planning and should be discussed in the DEIR; and 3) all potential downstream impacts to hydrology and water quality must be evaluated as a result of Project implementation. Our comments on the Project are outlined below.

B.5-1 (cont.)

Project Overview

The Centennial Project is a large residential-commercial development that will include 19,333 dwelling units on an area of a total of 12,323 acres in western Antelope Valley, 36 miles west of Lancaster. Approximately 6,700 acres of land will be developed into a series of communities over a 20 year period, and approximately 5,600 acres of land will be preserved for open space for drainages and conservation. New infrastructure facilities including shopping centers, water treatment facilities, water banking facilities will be built on approximately 180 acres, while approximately 140 acres will be set aside for K-12 schools. Commercial buildings will occupy approximately 100 acres, hospitals, medical facilities, and higher education buildings will occupy approximately 110 acres, and recreational and entertainment facilities will occupy approximately 80 acres.

Water Board's Authority

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

Specific Issues to be Considered in the NOP

Based on our review of the information provided, we recommend that the following issues be considered in preparation of the DEIR.

1. The DEIR should identify all the applicable water quality standards that pertain to this project and identify which standards could potentially be violated by Project alternatives and use these standards when evaluating thresholds of significance for impacts. Water quality objectives and standards, both numerical and narrative, for all waters of the State within the Lahontan Region, including surface waters and groundwater, are outlined in Chapter 3 of the Basin Plan. Water quality objectives and standards are intended to protect the public health and welfare, and to maintain or enhance water quality in relation to the existing and/or potential beneficial uses of the water.

2. The Project area is located within the Neenach Hydrologic Area of the Antelope Hydrologic Unit, 626.00. The Project area lies over the Antelope Valley groundwater basin (Department of Water Resources unit 6-44). We note that the NOP in section 3.e. does not include the Basin Plan in its list of relevant plans. The beneficial uses of minor surface waters and wetlands are listed in Chapter 2 of the Basin Plan. The DEIR should identify and list all the beneficial uses of the surface water and groundwater resources within the Project area, and include an analysis of the potential impacts to water quality and hydrology with respect to those beneficial uses.

3. Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (i.e. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of the Antelope Hydrologic Unit, including groundwater. The DEIR should discuss the project components and their potential impacts to watersheds on the project area.

B.5-1 (cont.)

4. The DEIR should describe a proposed long-term maintenance and monitoring plan that will be implemented to evaluate and maintain the established baseline conditions. Specific routine and non-routine activities should be identified, such as dredging/excavation and re-contouring, and the thresholds that will trigger when maintenance activities are warranted.

5. The DEIR should describe the long-term post-construction best management practices (BMPs) maintenance plan. It is understood that routine sediment removal is necessary to maintain the function of a basin, and the removal of accumulated sediments in the bottom of a basin would completely remove any vegetation that may have been present. However, we also recognize the benefits of vegetation for water quality by filtering sediments and constituents of concerns from water. We *strongly recommend* that the County proponent include in their long term maintenance plan provisions for mowing rather than eradication, so that vegetation can more easily reestablish itself post-maintenance. Maintaining healthy deep-rooted vegetation is crucial to soil stabilization. Re-contouring and vegetation grubbing should only be done on an as-needed basis.

6. The DEIR should describe the project design standards used for sizing and constructing hydraulic features. Surface waters support a variety of beneficial uses including municipal and agricultural uses, groundwater and fresh water recharge, habitat, flood attenuation, and water quality enhancement. To ensure that no net loss of function and value will occur as a result of Project implementation, we request that culverts be designed to (1) pass storm flows without impoundment upstream, (2) with sufficient energy dissipation provided at the outlet to reduce flow velocities to pre-Project conditions, and (3) sufficiently sized to allow for habitat connectivity across/beneath the roadway.

7. All rock slope protection and energy dissipation rip-rap placed within stream channels should be **ungrouted** and the minimum amount necessary to provide scour protection and energy dissipation to prevent erosion. The DEIR should describe channel design and energy dissipation to prevent erosion. The DEIR should describe channel design criteria.

8. Construction and post-construction storm water management must be considered a significant Project component, and BMPs that effectively treat storm water runoff should be included as part of the Project. The DEIR should specify those temporary and permanent long-term sediment and erosion control BMPs that will be implemented to mitigate potential water quality impacts related to stormwater. The temporary BMPs need to be implemented for the Project until such time that vegetation has been restored to pre-Project conditions. We request that vegetation clearing be kept to a minimum and, where feasible, existing vegetation be mowed so that vegetation could more readily reestablish post-construction. A long-term BMP maintenance plan should be included in the DEIR.

9. The DEIR should identify all impacts to water resources and describe how impacts were avoided, minimized, or proposed to be mitigated. The Water Board requires that impacts to water resources be avoided where feasible and minimized to the extent practical. Compensatory mitigation will be required for all unavoidable permanent impacts to surface water resources. Water Board staff coordinate all mitigation requirements with staff from other federal and state regulatory agencies,

B.5-1 (cont.)

including the USACE and the California Department of Fish and Wildlife. In determining appropriate mitigation ratios for impacts to waters of the State, Water Board staff considers Basin Plan requirements (minimum 1.5:1 mitigation ratio for impacts to wetlands) and utilizes *12501-SPD Regulatory Program Standard Operating Procedure for Determination of Mitigation Ratios*, published December 2012 by the USACE, South Pacific Division.

10. All temporary impacts to water resource and upland areas should be restored (recontoured and revegetated) to match pre-Project conditions. A Restoration and Revegetation Monitoring Plan should be prepared and described in the DEIR that requires monitoring for some period of time (usually no less than 3 years), outlines a schedule with performance measures to be met in order for the restoration/revegetation to be deemed successful, and contains adaptive management criteria in the event performance measures are not being met.

11. Equipment staging areas, excavated soil stockpiles, and hazardous materials (i.e. oils and fuels) should be sited in upland areas outside surface waters and adjacent flood plain areas. We recommend that a comprehensive Spill Prevention and Response Plan be prepared and described in the DEIR that outlines the site-specific monitoring requirements and lists the BMPs necessary to prevent hazardous material spills or to contain and cleanup a hazardous material spill, should one occur.

12. Buffer areas should be identified and exclusion fencing used to protect water resources and to prevent unauthorized vehicles or equipment from entering or otherwise disturbing the surface waters. Equipment should use existing roadways to the extent feasible. These features should be described in the DEIR.

13. The project plans to construct and operate a domestic wastewater treatment plant. The plant will produce recycled water for use within the project area. Onsite disposal of treated wastewater must not cause pollution and minimize degradation. Denitrification should be included in the plant design. The DEIR should fully describe the following.

    a. Treatment plant and disposal pond locations,
    b. Treatment plant design criteria,
    c. Storage and disposal pond design criteria,
    d. Expected wastewater quality,
    e. Receiving groundwater quality,
    f. Expected receiving groundwater degradation (nature and extent) resulting from the discharge according to State Board Resolution 68-16,
    g. Background receiving groundwater quality and direction of flow established from a statistically significant data set,
    h. Location and well construction design of monitoring wells installed to evaluate groundwater quality,
    i. Lift station locations and design,
    j. Backup power features,
    k. Recycled water storage, delivery, and use area design standards, and
    l. Entity responsible for owning and operating the treatment plant and recycled water infrastructure.

B.5-1 (cont.)

Permitting Requirements

A number of activities associated with the proposed Project have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following.

14. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.

15. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board if water of the United States are affected. The DEIR should identify where waters of the United States are present with in the project area. The Water Board may establish individual waste discharge requirements to address stormwater impacts to state only waters.

16. New industrial operations may require coverage under the Industrial General Stormwater Permit (2014-0057-DWQ) if waters of the United States are affected. Information on the Industrial General Stormwater Permit is available on the State Water Board's web site at http://www.swrcb.ca.gov/water_issues/programs/stormwater/industrial.shtml. These permits must be obtained from the Lahontan Water Board.

17. Disposal from wastewater treatment facilities will require a waste discharge requirements which must be obtained from the Lahontan Water Board. Information on what information is needed in a report of waste discharge is available on the State Water Board's web site at http://www.waterboards.ca.gov/water_issues/programs/land_disposal/waste_discharge_requirements.shtml

18. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2014-0049, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board. The DEIR should identify any and all proposed diversion or dewatering actions.

19. Recycled water uses are subject to water reclamation and waste discharge requirements issued by the Water Board. An Engineering Report must be submitted to the Water Board and State Division of Drinking Water, which also must approve the Engineering Report.

Please be advised of the permits that may be required for the proposed Project, as outlined above. The specific Project activities that may trigger these permitting actions should be identified in the appropriate sections of the NOP. The Project proponent should consult with Water Board staff early on should Project implementation result in activities that trigger

B.5-1 (cont.)

these permitting actions. Information regarding these permits, including application forms, can be downloaded from our web site at http://www.waterboards.ca.gov/lahontan/.

Thank you for the opportunity to comment on the NOP. If you have any questions regarding this letter, please contact me at (760) 241-7391 thomas.browne@waterboards.ca.gov or Jehiel Cass, Senior Water Resource Control Engineer, at (760) 241-2434 jehiel.cass@waterboards.ca.gov.

Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse Number, when available, and Project name in the subject line.

B.5-1 (cont.)

for Jehiel W. Cass P.E.

Tom Browne, PhD, PE
Water Resource Control Engineer

cc: USEPA Wetlands Regulatory Office, Region 9 (R9-WTR8-Mailbox@epa.gov)
Daniel Swenson, USACE (Daniel.P.Swenson@usace.army.mil)
CA Dept. of Fish and Wildlife (askR5@wildlife.ca.gov)
Shu-Fang Orr, Division of Drinking Water (shu-fang.orr@waterboards.ca.gov)

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STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

July 17, 2017

Samuel Dea
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Subject: Centennial Project
SCH#: 2004031072

Dear Samuel Dea:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on June 30, 2017. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

B.5-1 (cont.)

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2004031072) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
District 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0673
FAX (213) 897-1337
www.dot.ca.gov

Serious Drought.
Making Conservation
a California Way of Life.

July 14, 2017

Governor's Office of Planning & Research
JUL 14 2017
STATE CLEARINGHOUSE

Mr. Jodie Sackett
County of Los Angeles
Dept. of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

RE: Centennial Project
Draft Environmental Impact Report
SCH# 2004031072
IGR# 07-LA-2016-00925-FL
Vic. LA/ 5/ PM 82.625
LA/ 138/ PM 0.415 – 4.106

Dear Mr. Sackett:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

The proposed project (Project) involves the development of a new community of 9 villages with each contain a mix of land uses, such as residential, commercial, business park, recreational/entertainment, and institutional/civic uses. It is in the northwestern portion of the Antelope Valley in unincorporated Los Angeles County.

The Project allows up to 19,333 dwelling units on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light manufacturing uses) on approximately 597 gross acres and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes conceptual site locations for up to 4 new fire stations and a new sheriff's station, and 2 wastewater reclamation facilities. The Project would also require the implementation of off-site features consisting of roadway improvements and connections and upgrades to existing off-site utility systems, and preserve 5,624 acres of on-site open space within the Open Space designation.

Caltrans noted that the Project buildout would be implemented in phases based on future market conditions over an approximate 20-year period through a series of future tract and parcel maps.

B.5-1
(cont.)

If residential development occurs prior to the commercial, business, and employment center, the typical morning and evening commutes could occur, thus establishing a sprawl type of development. To avoid an unsustainable scenario, the County as the lead agency should plan the phasing of the development accordingly. Both residential and employment centers should be developed concurrently.

Furthermore, the Project included an Affordable Housing Program that provides Very Low-, Low, and Moderate-Income affordable housing opportunities in several housing categories, including for-sale units and/or rental units. Caltrans would like to remind that the provision of affordable housing for the various income levels is critical to minimize long-distance peak hour commutes. Special attention should be given to the phasing-in of development and housing affordability.

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "*provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability.*"

The entire development should be pedestrian and bicycle friendly with bicycle and pedestrian connections to the outside community. Internal circulation of public transit and adequate bike parking should be provided throughout. To provide good connectivity within each community and between communities the grid pattern is preferred over the cul-de-sac design. Park-and-ride areas should be included and designed to accommodate regional transit. The different communities should be designed to accommodate Neighborhood Electric Vehicles (NEV's).

B.5-1 (cont.)

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians and that meet ADA standards and requirements are critical at every on and off ramp and freeway terminus intersections. Caltrans will work with the County to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists.

As a follow-up to a tele-conference meeting on July 13, 2017 between County of Los Angeles and Caltrans in regarding to Project's traffic analysis report and the proposed mitigation measures. Please see below for Caltrans' comments regarding the Project's DEIR and the Traffic Study.

- In reviewing the Project' DEIR and the Traffic Study, there were references to the Northwest SR-138 Corridor Improvement project (NW SR-138 project); Caltrans recommend that a brief summary of the NW SR-138 project be included in the DEIR and the Traffic Study. Such as the purpose, proposals, alternatives, and how it relates to the Project.

  Caltrans selected Alternative 2 of the NW SR-138 project as the Preferred Alternative. The Project's proposed improvements should be consistent with what was already approved in the NW SR-138 project.

- The traffic data, results, and conclusions indicated in the Project's DEIR and Traffic Study should be consistent with the NW SR-138 project' Traffic Study. This will avoid conflicting data.

- Intersection Control Evaluation (ICE) Report pertaining to State Routes, should be consistent with NW SR-138 project, since the ICE Policy has been established.

  However, if the Project chooses to include its own intersection analysis on State Routes, it should be amended to what was previously concurred with in the NW SR-138 project, and submitted to Caltrans for review prior to the Final Environmental Impact Report (FEIR).

- To further address the Project's potential significant impacts to State Routes, as agreed to during the teleconference held on July 13, 2017 with Caltrans, the County of Los Angeles and its traffic consultants, a follow-up meeting is necessary to further discuss and refine the details regarding proposed mitigation measures and fair share contributions, including a Mitigation Agreement with Caltrans. Such that the Project is to be developed over time according to market demands and so would the transportation improvements. Therefore, Caltrans requests that the Transportation facilities necessary to accommodate build-out of the entire Project should be identified at this stage, along with a plan that indicates which improvements will be would be implemented by each phase and the amount of the fair share contributions that will be due at that time.

B.5-1 (cont.)

In the spirit of mutual cooperation, Caltrans would like to request a meeting with the Lead Agency and consultants to evaluate traffic impacts, identify potential improvement, and established a funding mechanism that helps mitigate cumulative transportation impacts in the project vicinity.

If you have any questions, please feel free to contact the project coordinator, Ms. Frances Lee, at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

DIANNA WATSON
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

July 18, 2017

Samuel Dea
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Subject: Centennial Project
SCH#: 2004031072

Dear Samuel Dea:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on June 30, 2017. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

B.5-1 (cont.)

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2004031072) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

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

late 8/3/17

July 17, 2017

Governor's Office of Planning & Research
JUL 17 2017
STATE CLEARINGHOUSE

Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, California 90012
JSackett@planning.lacounty.gov

Subject: Draft Environmental Impact Report (DEIR) and Centennial Specific Plan (CSP) for the Centennial Project (State Clearinghouse number 2004031072).

Dear Mr. Sackett:

The California Department of Fish and Wildlife (CDFW) has reviewed the DEIR and CSP submitted by Los Angeles County (Lead Agency) for the proposed Centennial Project (Project). The Project is located approximately 35 miles north of the City of Santa Clarita in Los Angeles County; approximately 50 miles south of the City of Bakersfield in Kern County; and approximately 36 and 43 miles west of the Cities of Lancaster and Palmdale, respectively, in Los Angeles County. State Route 138 (SR 138) bisects the southern portion of the Project site in an east-west orientation, just south of the Kern County/Los Angeles County boundary in the immediate vicinity of Quail Lake. The California Aqueduct splits into a west and east branch just to the north of the Project site. The west branch of the California Aqueduct continues south bisecting the western portion of the Project site. The east branch of the California Aqueduct continues in an easterly direction and borders the Project site to the north.

The proposed Project includes the development of a new community with residential, commercial, business, recreational/entertainment, and institutional/civic uses. The Project site is comprised of approximately 12,323 acres and would allow up to 19,333 dwelling units on approximately 4,987 acres. Other land uses include approximately 7,363,818 square feet (sf) of business park uses (office, research and development, warehouse and light manufacturing) on approximately 597 acres and approximately 1,034,550 sf of commercial uses on approximately 102 acres. Proposed institutional/civic uses (schools, medical facilities, libraries, etc.) encompass approximately 1,568,160 sf on approximately 110 acres. In addition, the Project will provide parks, public and private recreational amenities, schools, public services, helipads, transit centers, and water and waste water treatment facilities. Proposed land uses will allow for the development of new oil and gas wells and extraction facilities, including surface mining; the development of new renewable energy resources, including solar, wind and other renewable energy generation facilities; shooting ranges; and hunting, camping and hiking activities.

There are several drainages on the Project site, including drainages within Oso Canyon and Tentrock Canyon, and an unnamed drainage that parallels SR 138 on its north side. Portions of the Project site will be left as open space, primarily within Significant Ecological Area (SEA) 17, which is located along the northwestern and southeastern edges of the Project site, and within the creeks and drainages that will not be filled, as well as drainage features that will be

B.5-1 (cont.)

recreated after Project development. Primary access to the Project site will be from SR 138, with additional access available from 300th Street West and 290th Street West and the relocated National Cement Plant Road. Upgrades to SR 138 and Interstate 5 (I5) are planned through a separate California Department of Transportation (Caltrans) development project to accommodate increasing traffic usage of the aforementioned roadways. Offsite facilities are also proposed as a part of the Project to accommodate the new infrastructure to serve the Project site. Current land use on the Project site predominantly consists of annual grassland grazing with agriculture production occurring along the eastern edge of the Project site.

The Project area and the surrounding Tejon Ranch lands are one of the largest, most-intact, privately-held, natural habitat areas remaining in California, and support a diverse assemblage of vegetation communities and special status species. Vegetation communities known to occur on the Project site include, but are not limited to, Wright's buckwheat scrub, mixed oak woodland, alluvial scrub, cottonwood woodland, riparian herb, rush riparian grassland, southern arroyo willow riparian, southern cottonwood-willow woodland, southern willow scrub, valley oak riparian woodland, unvegetated wash, willow riparian forest, willow riparian woodland, alkali meadow, Baltic rush, coastal and valley freshwater marsh, seeps and ephemeral ponds, and native perennial grasslands, wildflower fields, and native and nonnative annual grasslands.

Special status species known to occur on or within the vicinity of the Project site include but are not limited to, the State and federally endangered and State fully protected California condor (*Gymnogyps californianus*); State and federally endangered least Bell's vireo (*Vireo bellii pusillus*) and southwestern willow flycatcher (*Empidonax traillii extimus*); State endangered tricolored blackbird (*Agelaius tricolor*) and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*); State threatened Swainson's hawk (*Buteo swainsoni,* SWHA) and Tehachapi slender salamander (*Batrachoseps stebbinsi*); State fully protected golden eagle (*Aquila chrysaetos*), and white-tailed kite (*Elanus leucurus*); California Rare Plant Rank (CRPR) 1B.1 Piute Mountains navarretia (*Navarretia setiloba*); CRPR 1B.2 round-leaved filaree (*California macrophyllum*) and State Species of Special Concern burrowing owl (*Athene cunicularia,* BUOW), silvery legless lizard (*Anniella pulchra pulchra*), coast horned lizard (*Phrynosoma blainvillii*), two-striped garter snake (*Thamnophis hammondii*), northern harrier (*Circus cyaneus*), American badger (*Taxidea taxus*) and Tehachapi pocket mouse (*Perognathus alticolus inexpectatus*). The Project site is also one of the largest remaining perennial and annual grassland habitat areas in Los Angeles County. The Project as proposed would result in a cumulatively significant impact to native perennial grasslands and regional wildlife movement.

B.5-1 (cont.)

Our specific comments follow and are organized in the same sequence as the sections in the DEIR.

Department Jurisdiction

Trustee Agency Authority: CDFW is a Trustee Agency with the responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact plant, fish and wildlife resources. Pursuant to Fish and Game Code Section 1802, CDFW has jurisdiction over the conservation, protection and management of fish, wildlife, native plants and habitat necessary for biologically sustainable populations of those species. As a Trustee Agency for plant, fish and wildlife resources, CDFW is responsible for providing, as available,

biological expertise to review and comment on environmental documents and impacts arising from project activities, as those terms are used under CEQA.

Responsible Agency Authority: CDFW has regulatory authority over projects that could result in "take" of any species listed or is a candidate for listing by the State (State-listed) as threatened or endangered, pursuant to the California Endangered Species Act (CESA). For this or any other project which impacts listed species, an incidental take permit (ITP) is the mechanism for providing take authorization under CESA. CEQA requires a Mandatory Finding of Significance if a project is likely to substantially impact threatened or endangered species (sections 21001{c}, 21083, Guidelines sections 15380, 15064, 15065). Impacts must be avoided or mitigated to less than significant levels unless the CEQA Lead Agency makes and supports a Statement of Overriding Consideration (SOC). A CEQA Lead Agency's SOC would not preclude the Project proponent's obligation to comply with CESA.

Lake and Streambed Alteration Notification: CDFW has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource, pursuant to Fish and Game Code sections 1600 *et seq.* Section 1602(a) of the Fish and Game Code requires an entity to notify CDFW before engaging in activities that would substantially change the bed, channel, or bank of a stream or substantially divert or obstruct the natural flow of a stream. Project activities are proposed that will involve work within the bed, bank, or channel (which may include associated riparian resources) of several CDFW jurisdictional resources; therefore, CDFW recommends the Project applicant submit a Lake and Streambed Alteration Notification to CDFW for the Project.

Other Rare Species: Species of plants and animals need not be listed as Endangered, Rare or Threatened (E, R or T) pursuant to CESA and/or the Federal Endangered Species Act (ESA) to be considered E, R or T under CEQA. If a species can be shown to meet the criteria for a listing as E, R or T under CESA and/or ESA as specified in the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15380), it should be fully considered in the environmental analysis for the Project.

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Take of any fully protected species is prohibited, and CDFW cannot authorize their take except under the provisions of a Natural Communities Conservation Plan (NCCP), 2081.7 or a Memorandum of Understanding for scientific purposes. Neither the Lead Agency nor Project proponent are plan participants of an NCCP; 2081.7 does not apply to the proposed Project, and a development project is not considered a scientific purpose.

Several fully protected species are known to occur on the Project site. This status, and the absence of an NCCP for the Project, precludes CDFW from authorizing any amount of incidental take for fully protected species. When projects show the potential to cause take of fully protected species, we advise on appropriate measures to avoid take. Given the legal status of fully protected animals, take avoidance measures must meet very high standards of effectiveness, substantially greater than the measures to minimize take required under ITPs.

Bird Protection: CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Sections of the Fish and

B.5-1 (cont.)

Game Code that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Potential Impacts and Recommendations

Draft Environmental Impact Report:

Project Description (Section 4.0): Exhibit 4-7 in the DEIR shows that the current Cement Plant Road will be upgraded from the current 2-lane road to a 6-lane major highway. The northern portion of Cement Plant Road is located in the northern portion of the SEA. The DEIR states that the SEA will not be impacted. No dimensions are provided as to the current and proposed upgraded footprint (including width) of Cement Plant Road so it is unclear to CDFW if the current footprint of Cement Plant Road is wide enough to support an upgrade to a 6-lane major highway without impacting the SEA.

The DEIR states that the cable and internet provider has not been identified at this point in time, but would be provided by one of the two available providers within the Project area. Depending on the provider chosen, the new cable and internet line may be extended either 4 or 8 miles from its existing location to reach the Project site. The Biological Resources section of the DEIR did not address the potential routes of the telecom line extension, nor conduct biological surveys to identify potential impacts to species that may result from the installation of the telecom line extension. CDFW recommends the DEIR be revised to include survey results and a biological analysis of potential impacts from the installation of the telecom line.

B.5-1 (cont.)

CDFW also recommends that all new and existing dry utilities be installed underground to minimize impacts to migratory birds, including California condor.

Hydrology and Flood (Section 5.2): The Hydrology and Flood Section of the DEIR discloses that existing onsite drainages will be integrated into the Project's storm drain system. Integration activities include removal, reengineering, and reduction of drainage areas due to diversion and re-route of Project runoff. Channels within the Project site will be avoided, integrated into the storm drain system or be reengineered after site grading. Most Project runoff will be subject to control and treatment in a regional system that consists of 28 detention and retention basins located throughout the Project site, with 11 of these basins occurring within or adjacent to a channel (Exhibit 5.2-4 and 5.2-5). In addition to capturing Project site runoff, onsite basins and reengineered natural streams will also be designed to capture potential mudflows and may be revegetated or enhanced with drought tolerant and native species, some of which do not currently exist on the Project site.

The aforementioned modifications to the drainages and channels on the Project site are a substantial change in the biological function and composition of these features and may result in adverse impacts to CDFW jurisdictional areas (e.g., streams), wildlife and special status species and their associated habitats, as well as additional offsite resources, and would require acquisition of a lake and streambed alteration agreement from CDFW pursuant to Fish and Game Code Section 1600 et seq. CDFW recommends the DEIR be revised to include a detailed analysis of the biological impacts of these modifications, including increased pollutant,

chemical, and fertilizer loads in jurisdictional areas from site runoff, changes in species composition and habitat use from revegetation and reengineering of jurisdictional features, in-channel hydromodification measures (plunge pools, bank stabilization, flow diversion, culverts, etc.) and increased sediment deposit.

The Hydrology and Flood Section of the DEIR also states that the Project will conform to the County's flood and hydrology control standards (during a 50-year design storm event) by either reducing offsite flows and volumes or by maintaining existing site conditions. According to Table 5.2-7 in the DEIR, existing offsite flow conditions will only remain unchanged in the Gorman Watershed. All other watersheds will have a reduction in existing offsite flow/volume conditions. CDFW recommends the DEIR be revised to include an analysis of the biological impacts of a reduction in offsite flow/volume and include a discussion as to whether offsite flows will exit the Project site in the same location as pre-Project conditions in order to maintain offsite connectivity and existing offsite biological resources. In addition, CDFW is unclear if these basins will also be used for recreational or multi-use purposes. The DEIR discusses a potential fishing lake in Section 4.5.6 (Parks/Recreation); however, additional details such as, but not limited to, the location, size, fish species stocked, vegetation, fencing, and any additional recreational uses are not described in the Biological Resources section of the DEIR. Since fishing lakes may serve as a point source for introduced and/or invasive species, CDFW recommends the DEIR be revised to further describe and analyze the potential siting of lakes, ponds, and other perennial waterbodies and their locations. The impacts of these features need to be fully described, disclosed, and analyzed in the Biological Resources Section of the DEIR. These impacts include, but are not limited to the introduction of sport fish, the potential for introduction of invasive species from the general public (such as non-native fish, amphibians, and reptiles), the impacts of these introductions on native species within and adjacent to the Project site, and specific measures to reduce these impacts to less than significant.

B.5-1 (cont.)

Hazards and Fire Safety (Section 5.3): An abandoned mine shaft, approximately four feet high by five feet wide (at the entrance), and partially blocked by soil, extends approximately eight feet into the side of a hill near Quail Lake. In order to eliminate potential risks and prevent future access into the abandoned mine, the DEIR proposes to permanently close the mine. However, the DEIR does not provide any information on any potential wildlife species that may be using the mine, nor does it provide information on any surveys that have been done to monitor wildlife species' potential use of the mine. Abandoned mines are known to provide habitat for a variety of wildlife species, including, but not limited to, maternity and/or roosting habitat for bat species. CDFW recommends the Project Applicant conduct focused bat and wildlife surveys, over the course of one year (to account for seasonal use), to determine potential species' use of the mine. CDFW further recommends this section, as well as the Biological Resources section, of the DEIR be revised to include the results of these surveys, an analysis of the impacts to special status species from the potential closure of the mine, and specific measures to avoid, minimize, and mitigate these impacts.

Mitigation Measure 3-2 of the Hazards and Fire Safety section of the DEIR requires the access way into the Project site be paved or treated with environmentally safe dust-control agents (i.e., dust palliatives). The DEIR also allows for the use of these dust-control agents in other areas of the Project site. The location, extent of use, and environmental safety of these dust-control agents has not been described in the DEIR, nor have they been analyzed in regards to potential special status species and habitat impacts in the Biological Resources

section of the DEIR. The use of dust control agents and paved access roads may impact special status species and their associated habitats (e.g., changes in soil moisture infiltration rates, obstruction of movement pathways, increased salt concentrations from dust control agents, etc.) and this is not discussed in the DEIR. Therefore, CDFW recommends the Biological Resources section of the DEIR be revised to include and further describe these activities and their locations; fully analyze the potential impacts of dust control agents on biological resources, and the specific measures to avoid, minimize and fully mitigate these impacts. .

Mitigation Measure 3-9 of the Hazards and Fire Safety section of the DEIR requires the future development of a Fuel Modification Plan. This Plan will described the extent and location of the fuel modification zone, clearance area, plant pallet and planting locations. The deferred development of this Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of this Plan is not required. CDFW recommends the DEIR be revised to include the Fuel Modification Plan for CDFW review.

Water Quality (Section 5.4): The Water Quality section of the DEIR states that the Lahontan Regional Water Quality Control Board (RWQCB) and the Los Angeles RWQCB have issued permits for the Project governing construction-related dewatering and discharge operations. The Lahontan RWQCB permit regulates construction dewatering, diverted stream flows, dredge spoils dewatering and subterranean seepage dewatering among other activities. The Los Angeles RWQCB permit regulates construction-related dewatering discharges, and addresses discharges from temporary dewatering operations associated with construction and permanent dewatering operations associated with development. The location, extent of dewatering and discharges, and environmental impacts from these activities have not been described in the DEIR, nor have they been analyzed in regards to potential special status species and habitat impacts. Since these actions may impact special status species and their associated habitats and requires the submission of a Lake and Streambed Alteration Notification to CDFW for these activities, CDFW recommends the Biological Resources section of the DEIR be revised to further describe and analyze these potential activities and related biological impacts.

Project Design Feature (PDF) 4-2 in the Water Quality section of the DEIR describes the development of an Integrated Pest Management (IPM) and landscaping best management practices (BMP) that will be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The Plan and BMPs will be consistent with Section 3.3 of the CSP. However, the CSP only provides a guideline to the development of the Plan and BMPs and is subject to change, and therefore, may not be incorporated into the Plan and BMPs. In addition, the DEIR does not include these guidelines as Mitigation Measures and therefore they are not enforceable. The deferred development of the BMPs and Landscaping Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan and BMPs are not required. In addition, the guidelines in the CSP are not included as Mitigation Measures in the DEIR, are not enforceable, and are subject to change during each tract map application. CDFW recommends the DEIR be revised to include the IPM BMPs, the landscaping BMPs, and the Landscaping Plan for CDFW review and comment.

B.5-1 (cont.)

CDFW also recommends the IPM prohibit the use of all rodenticides containing anticoagulants or other toxins that may result in secondary poisoning in non-target wildlife. This prohibition needs to be implemented via notification to homebuyers through their home purchase contracts and CC&Rs and as part of the larger natural area maintenance plan for the Project. If use of rodenticides that may result in secondary poisoning in non-target wildlife cannot feasibly be prohibited from use on the Project site, CDFW recommends regular monitoring of blood samples drawn from predator species on the Project site and within adjacent Tejon Ranch lands to document any indication of secondary toxicity health concerns. An adaptive management plan that includes: measures to remedy secondary toxicity problems, further enforcement, public awareness efforts, capture and treatment of infected wildlife with vitamin K supplements as directed by a veterinarian, and an established baseline for representative predator species in the Project area before Project related rodenticide pest control measures are likely to occur. All of these activities need to be incorporated into a Project resource management plan, included in the DEIR as a Mitigation Measure, and funded by the Project Applicant for the life of the Project. CDFW further recommends the DEIR be revised to include a Mitigation Measure for the above recommendations related to the IPM and BMP.

Land Resources (Section 5.5): PDF 5-1 in the Land Resources section states that grazing operations on portions of the Open Space preserve areas will be continued as a management tool for grassland conservation, subject to the specifications of the Native Perennial Grassland and Wildflower Field Mitigation Plan to be prepared as part of Project implementation. Several PDFs in the DEIR are not included as Mitigation Measures in the DEIR and are therefore not enforceable. PDF 5-1 is one of these measures. The lack of enforceability and the delayed development of this plan, which may have a significant role in potentially protecting and reducing impacts to several important biological resources on the site, does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of this plan is not required. CDFW recommends the DEIR be revised to include the Native Perennial Grassland and Wildflower Field Mitigation Plan for CDFW review and comment and the DEIR be further revised to incorporate all PDFs as enforceable Mitigation Measures.

B.5-1 (cont.)

Biological Resources (Section 5.7):

Tricolored Blackbird: Tricolored blackbird (TCBB) is a State endangered species. Breeding colonies of tricolored blackbird occur at Quail Lake and at a pond on the north central portion of the Project site. Oso Creek also provides additional onsite habitat for this species. In addition to breeding habitat, the Project site also provides foraging habitat for this species. The DEIR proposes a no-disturbance buffer of 400 feet for permanent impacts and the allowance of temporary impacts within 400 feet during non-breeding season for the Oso Creek TCBB colonies. A no-disturbance buffer is not identified in the DEIR for the TCBB colony at the pond location. The ecological rationale for instituting this size buffer is not discussed or supported by the reproductive, foraging, and habitat needs for all life stages of the species. Foraging habitat adjacent to and available in close proximity to nesting sites must be sufficient in size to support a robust population of insects and seed to sustain the colony year after year and preclude edge effects from the development to cause degradation of both nesting and foraging habitat. The invasion of rats, feral dogs and cats, pesticide use impacts on insect prey species and poisoning from development encroachment in close proximity to the breeding colonies needs to be fully

analyzed and subsequently utilized to inform and quantify all no-disturbance buffers in the DEIR.

CDFW does not concur that the no-disturbance buffers currently proposed in the DEIR are sufficient to fully avoid and preclude take (as defined under Section 86 of Fish and Game Code) of TCBB. Therefore, CDFW is recommending consultation and acquisition of an ITP pursuant to Fish and Game Code Section 2081 in advance of Project implementation.

California Condor: "Based upon the pre-historic range of the California condor and that of pronghorn antelope and other ungulates, the proximity of the Antelope Valley to the Tehachapi and San Gabriel Mountains probably meant that the west end of the Antelope Valley floor (including Centennial) was used for foraging by condors at least on an infrequent basis (Bloom 2009: DEIR Appendix)." Increasingly, condors are expanding their current flight paths to include more frequent flights over the west end of the Antelope Valley floor, including the Project site. United States Fish and Wildlife Service (USFWS) telemetry data has also documented an occurrence of a condor landing (possibly to feed on a carcass) on the Project site. In addition, condors released from captive breeding programs appear to be more curious and adaptive to human presence than those that were in the wild prior to 1987 (when the last condor was captured for captive breeding) (Bloom 2009: DEIR Appendix). "The presence of human structures, pets, and livestock can actually serve as an attractant to condors, particularly along the development/Open Space interface" (Bloom 2009: DEIR Appendix).

CDFW disagrees with the DEIR's conclusion that Project implementation is not expected to result in impacts to California condor due to "condor not occupying the low valley floor areas that are likely to incur the greatest level of disturbance from future development". Specifically, the *Environmental Assessment of the Centennial Specific Plan Project Site on the California Condor (Gymnogyps californianus)*, included as an appendix to the DEIR, determines that the Project site will result in direct impacts to condors in the loss of potential foraging habitat and indirect impacts to condors through increased human and domestic animal use of the Project site and within the Project vicinity (Bloom 2009: DEIR Appendix). CDFW recommends that the Measures to Avoid, Minimize, Mitigate Potential Impacts and the Measures to Contribute to the Conservation and Recovery of the Condor, within the *Environmental Assessment of the Centennial Specific Plan Project Site on the California Condor (Gymnogyps californianus)* be incorporated as Mitigation Measures into a revised DEIR; including the aforementioned measures related to microtrash, illegal shooting, and global positioning system (GPS) tracking. B.5-1 (cont.)

CDFW also disagrees with the DEIR's conclusion that the Tehachapi Uplands Multiple Species Habitat Conservation Plan (TUMSHCP) will provide for the long-term preservation of essential condor areas that would offset potential impacts from the Project. Projects impacts were not contemplated under the TUMSHCP and therefore, mitigation lands that have been preserved under the TUMSHCP to offset impacts to condor cannot be considered in the DEIR as additional available habitat that would aid in offsetting Project impacts. Similarly, the Ranchwide Agreement requires permanent protection of 178,000 acres within 30 years of receiving the first development entitlement, which was conferred to Tejon Mountain Village in 2009. The conservation of a portion of these mitigation lands is dependent on development milestones of Tejon Mountain Village and should not be considered as additional available adjacent habitat that may aid in offsetting Project impacts when to date, no lands have been conserved other than the 62,000 acres purchased by the State in 2010, and it is unknown when additional future

conservation will occur. Therefore, CDFW does not agree that impacts to habitat and some species, including the California condor, by the Project will be mitigated to less than significant because of their ability to use habitat lands included in the Ranchwide Agreement and the TUMSHCP. Moreover, the Ranchwide Agreement will allow some activities (e.g., hunting, filming, recreational use, etc.) that may be incompatible with species protection and recovery. In addition, the ability for the Project to develop energy production measures (e.g., solar and wind facilities, etc.) within the Open Space mitigation lands further reduces the quality of the proposed onsite mitigation lands and may have detrimental impacts on several special status species, including but not limited to, California condor.

As described above, California condor is a State and federal endangered and State fully protected species. The avoidance buffers listed in Mitigation Measure 7-6 for California condor are not sufficient to ensure full avoidance of this species. CDFW recommends the Project Applicant consult with CDFW and USFWS to determined appropriate avoidance buffers for California condors and these measures be included in a revised DEIR.

Burrowing Owl: BUOWs are known to occur on and adjacent to the Project site. CDFW recommends the Lead Agency require the *Staff Report on Burrowing Owl Mitigation* (dated March 7, 2012), be followed in its entirety and without modification, including the listed no-disturbance buffers, mitigation and relocation recommendations and that these measures be added to the DEIR as enforceable conditions. The staff report can be found on our website at www.dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf. CDFW recommends that a qualified biologist conduct a survey no more than 30 days before the onset of any Project activities in each construction area. If Project activities are delayed or suspended for more than 30 days, the area should be resurveyed.

B.5-1 (cont.)

As outlined in the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012), burrow exclusion in and of itself will not always avoid or minimize and mitigate BUOW impacts to less than significant levels, and eviction of BUOWs is a potentially significant impact under CEQA. When temporary or permanent burrow exclusion and/or burrow closure is implemented, BUOWs should not be excluded from burrows unless or until:

1. A BUOW Exclusion Plan is developed and approved by the Lead Agency and CDFW;

2. Permanent loss of occupied burrow(s) and habitat and temporary exclusion is mitigated;

3. Site monitoring is conducted prior to, during and after exclusion of BUOWs from their burrows sufficient to ensure take is avoided; and

4. Excluded BUOWs are documented using artificial or natural burrows on an adjoining mitigation site.

Swainson's Hawk: SWHAs are known to occur on the Project site in a non-nesting capacity (DEIR 2017) and may nest on the Project site in the future. Because of the known site fidelity (repeated use of the same nest site annually) demonstrated by SWHA, CDFW considers any documented SWHA nest to be active unless it is demonstrated by protocol-level surveys

conducted during the nesting season (January 1 through September 15) to be unoccupied. Annual grasslands, alfalfa, fallow fields, dry-land and irrigated pasture, non-flooded rice land, cereal grain crops (including corn after harvest), as well as beet, tomato and other low-growing row or field crops are all considered SWHA foraging habitat (CDFG 1994). CDFW recommends the Lead Agency require surveys for nesting SWHA and that the surveys be conducted within a 0.5-mile buffer around each construction area, before starting any Project-related activities, following the survey methodology developed by the SWHA Technical Advisory Committee (SWHA TAC 2000). In the event that SWHA is detected within a 0.5 mile, consultation with CDFW is recommended to discuss how to implement the Project and avoid take (e.g., minimize impacts). CDFW also recommends the Lead Agency require the Project developer follow the measures outlined in the *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (Bueto swainsoni) in the Central Valley of California* (CDFG 1994). If take cannot be avoided, acquisition of an ITP would be warranted in advance of Project implementation for Project-related incidental take of SWHA. Please note, that encroachment within the 0.5-mile no-disturbance buffer is not recommended without prior acquisition of an ITP (since such encroachment has been demonstrated to cause nest failure).

Raptors and Migratory Birds: For the protection of raptors and migratory song birds and to assist in avoiding take of avian species as required by Fish and Game Code sections 3503, 3503.5 and 3513, if Project-related activities will occur during the breeding season (January through mid-September), CDFW recommends the Lead Agency require surveys be conducted by a qualified biologist no more than 14 days prior to the beginning of any Project-related activity likely to impact raptors and migratory song birds, for each construction area. If Project activities are delayed or suspended for more than 14 days during the breeding season, repeat the surveys. If nesting raptors and migratory song birds are identified, CDFW recommends the Lead Agency require the active nest be monitored by a qualified biologist for the first 24 hours prior to any construction related activities to establish a behavioral baseline. Once work commences, all nests should be continuously monitored to detect any behavioral changes as a result of the Project. If behavioral changes are observed, the work causing that change should cease and CDFW be consulted for additional avoidance and minimization measures. If monitoring of identified nests by a qualified biologist is not feasible, the following minimum no-disturbance buffers are advised to be implemented:

1. 250 feet around active passerine (perching birds and songbirds) nests,
2. 500 feet around active non-listed raptor nests and
3. 0.5 mile around active listed bird nests.

These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

Other Avian Species: Since Project build-out will occur over many years, and avoidance of certain listed species is being assumed, we recommend repeating focused surveys (protocol-level where applicable) in all areas with potentially suitable habitat for species such as Least Bell's vireo and southwestern willow flycatcher, in the season prior to construction of any given construction area of the development.

B.5-1 (cont.)

American Badger: To minimize potential Project-related impacts to American badger, CDFW recommends mitigation measures be revised to require wintering surveys be conducted no more than 14 days prior to the initiation of construction related impacts in each construction area and within a 100-foot buffer. If Project activities are delayed or suspended for more than 14 days, repeat the surveys. Occupied dens should be clearly marked with fencing or flagging and a 100-foot no-disturbance buffer zone placed around the den in a manner that does not isolate the badger from intact adjacent habitat or prevent the badger from accessing the den. If den avoidance is infeasible, CDFW shall be contacted. Please note that trapping, flushing and/or collapsing of occupied badger dens would result in take as defined in Fish and Game Code Section 86. Similarly, CDFW recommends mitigation measures be included to require natal den surveys be conducted no more than 14 days prior to the initiation of construction-related impacts in each construction area and within a 200-foot buffer. Occupied natal dens should be clearly marked with fencing or flagging and a 200-foot no-disturbance buffer zone placed around the den in a manner that does not isolate the badger from intact adjacent habitat or prevent the badger from accessing the den. The 200-foot no-disturbance buffer shall remain in place until a qualified biologist has determined, and CDFW has agreed in writing, that young have left the den and are no longer reliant upon the den or parental care for survival.

Bats: The DEIR does not adequately describe the potential for impacts to bats, nor does the DEIR provide any alternative discussion or avoidance strategies to mitigate the loss of occupied bat habitat. The DEIR concludes the Project site contains suitable foraging habitat for several bat species. However, the DEIR incorrectly concludes no suitable maternity or hibernation roost locations are known to be present on or in the immediate vicinity of the site. As previously discussed above, the Project intends to permanently close an old mine shaft which could be currently utilized by bats. Tree cavities can also be used by bats for roosting and maternity habitat. Mitigation Measure 7-9 of the DEIR indicates a field survey for bats would occur no earlier than 20 days prior to any grading activity that would occur during the breeding season (April-August) to determine if active roosts of special status bats are present.

Bats are considered non-game mammals and are protected by state law from take and/or harassment (Fish and Game Code § 4150, CCR § 251.1). Several bat species are also considered Species of Special Concern, which meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines §15065). CDFW considers adverse impacts to a Species of Special Concern, for the purposes of CEQA, to be significant without mitigation. Mitigation is more than avoiding maternity roosts, wintering sites, night roosts, mating roosts and foraging sites; mitigation is also providing similarly functioning habitat to replace what is impacted.

To minimize potential Project-related impacts to bat species, CDFW recommends the Lead Agency revise Mitigation Measure 7-9 to require the developer to conduct preconstruction surveys to establish areas of occupancy the year prior to the start of construction in each construction area and that surveys be conducted by a minimum of two CDFW-approved biologists and consist of:

- Two spring surveys (April through June) and two winter surveys (November through January)

B.5-1 (cont.)

- Each survey consists of one dusk emergence survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat on the Project site
- Conduct each survey within one 24-hour period
- Focus visual inspections on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering)
- Use bat detectors, bat call analysis and visual observations during all dusk emergence and pre-dawn re-entry surveys

Data Collection for Each Survey:

- Whether bats are, or have been, present on the Project site
- Assemblage of species using the site
- Frequency of site use (including seasonal changes)
- Type of roost (i.e., maternity roost, day roost, night roost, feeding perch, mating roost, satellite roost, transitional roost or winter hibernaculum)
- Location, ambient temperature, internal dimensions and the aspect and orientation of the roost
- Spatial and temporal distribution of bat activity
- Flight paths, exit and entrance points
- Intensity of bat usage (i.e., number of bats, time and duration of use)
- Identification of any survey constraints

If bats are found to occupy the Project site, CDFW recommends the Lead Agency require the Project developer implement the general bat avoidance, minimization and mitigation measures outlined below. CDFW is available to discuss and refine these measures with the Lead Agency and the Project developer:

- Avoid direct and indirect impacts to roosting sites by establishing a no-disturbance buffer of 300 feet around roost sites.
- Prohibit clearing and grubbing adjacent to the roost site and lighting use near the roost site where it would shine on the roost or interfere with bats entering or leaving the roost. Prohibit the operation of internal combustion equipment, such as generators, pumps and vehicles within 300 feet of the roost site. Prohibit the use of bird netting.
- If avoidance of roost sites is infeasible, maintain portions of the features that provide naturalized habitat to the greatest extent possible and improve existing roost sites and/or provide new roost sites on buildings or on the Project site. Implement these measures only after consultation with CDFW.

B.5-1 (cont.)

- New roost sites must be in place prior to the initiation of Project-related activities to allow enough time for bats to relocate.
- Design and locate new and enhanced roost sites to be compatible with the bats' search image and habitat requirements (i.e., thermal regulation, interior size, ventilation, etc.). Design new and enhanced roost sites in consultation with CDFW.
- Exclude bats from directly affected work areas selectively and only to the extent necessary to prevent morbidity or mortality to the colony. Use one-way bat exclusion devices, installed in a bat-safe way, to exclude bats and then use expandable foam, steel wool or other method to block the entrance, after the bats have gone. Exclude bats only after consultation with CDFW, at a time that is compatible with the species' normal behavior patterns (i.e., breeding, feeding, hibernating, etc.). In general, exclusions shall not occur during the maternity/pup-rearing season nor during the hibernation season, as determined by conditions at the Project site.

Pronghorn (Antilocapra americana): Pronghorn numbers and habitat use of the Project site, as described in the DEIR, appear to be antidotal and potential Project impacts appear to minimize the status of pronghorn on the Project site and within the region. The DEIR states, "Although not classified as a special status species, the relatively small population of reintroduced pronghorn antelope on the Project site is considered of interest due to limited numbers and historical presence in the region. Project implementation would reduce the amount of available foraging habitat for this population. However, impacts on a reintroduced population of a non-special status species that may result from Project implementation would be considered adverse but less than significant under applicable CEQA significance thresholds. As part of the Ranchwide Management Plan, which is an implementation tool of the Ranchwide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures that are also supported by CDFW. Potential measures could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation; completing further evaluation of modeling tools at a site-specific level (such as those used on the Carrizo Plain), and incorporating volunteer involvement with supportive activities such as fencing retrofits."

B.5-1 (cont.)

The presence of pronghorn on the Project site and within the region rises to a higher level of CEQA impact consideration than cited in the DEIR. This determination is based on the local and regional ecosystem value of pronghorn reintroduction into portions of Kern and Los Angeles Counties' Antelope Valley Region. This species once existed in the region, but was extirpated prior to reintroduction efforts in the 1980s on Tejon Ranch. CDFW recommends that unmitigated Project impacts to pronghorn be considered significant by the Lead Agency under CEQA. CEQA directs that a special emphasis be placed on environmental resources that are rare or unique to the region and would be affected by a proposed project (CEQA §15125 (c)). Lead Agencies have a duty under CEQA to avoid or minimize environmental damage where feasible (CEQA Section 15021).

CDFW recommends a revised DEIR be completed and a map included documenting pronghorn sighting data points and sighting dates on and adjacent to the Project site. The Department of Water Resources has documented pronghorn occurrences in grassland habitat that the DEIR currently describes as pronghorn having limited access to because of restrictions. CDFW also recommends the revised DEIR describe the most likely California Aqueduct crossing locations

used by pronghorn to gain habitat access and incorporate Mitigation Measures into the DEIR to enhance these crossing locations on the Project site and within Tejon Ranch lands to further facilitate access to existing grassland habitat for pronghorn.

The Pronghorn population has persisted in the region for decades and its small size places it in great peril of local extinction. CDFW concurs with the DEIR that any activity employed to improve habitat quality and fawn survival for pronghorn in the Project area would benefit this species. However, the Project will result in greater stressors to the pronghorn population because of loss of habitat, continued loss of already restricted movement opportunities for pronghorn to access habitat south of SR 138 and west of I5, increased threat from vehicle collision, and harassment and predation by domestic pets and humans. In July 2017, a pronghorn was observed on the Peterson Ranch Habitat Mitigation Bank approximately 25 miles southeast of the Project site in Los Angeles County which further demonstrates CDFW's concern for the persistence of this species in the region and providing for unrestricted movement across SR 138. Therefore, CDFW recommends further evaluation on the direct, indirect and cumulative effects of the Project, during and after full buildout, including use of habitat by pronghorn on the Project site and movement through the site and offsite habitats. This evaluation should be based on precise Pronghorn composition counts that can be replicated and serve as reliable estimates of population size and habitat use. The use of telemetry tracking of pronghorn individuals would further the understanding of habitat use, mortality factors, and movement trends on the Project site and within the region. Movement monitoring of pronghorn would have been invaluable in determining the movement route taken by the pronghorn individual observed on the Peterson Ranch Mitigation Bank in July 2017 to inform habitat movement pathway preservation and Project mitigation measures for this species.

Ring-tailed Cat: The Biological Resources section of the DEIR concludes that the Project site does not support habitat for the State fully protected ring-tailed cat (*Bassariscus astutus*). However, ring-tailed cat is a secretive, nocturnal species that can be easily missed in survey and impact assessment efforts. Therefore, CDFW recommends additional survey efforts for ring-tailed cat and avoidance of occupied habitat for this species since ring-tailed cat is a State fully protected species. Take of ring-tailed cat or any State fully protected species is prohibited and cannot be authorized by CDFW (Fish and Game Code Sections 3511, 4700, 5050, and 5515).

Western Pond Turtle: Western pond turtle (*Emys marmorata pallida*) has the potential to occur adjacent to Quail Lake and within several areas of the Project site. CDFW recommends a Mitigation Measure be incorporated into the DEIR to require protection for western pond turtle during their breeding season and require a no-disturbance buffer of 475 feet from the outside edge of Quail Lake into the Project site to protect nesting areas. CDFW is recommending a 475-foot buffer since female pond turtles can move overland for up to 325 feet to find suitable sites for egg-laying. In addition to avoiding a minimum of 325 feet from the edge of a water feature, CDFW recommends an additional 150 feet beyond the 325-foot overland travel range to protect nests and nesting sites from direct and indirect Project disturbance. CDFW also recommends focused surveys for western pond turtles be conducted in all areas of the Project site that provide potential habitat for western pond turtle and survey results be incorporate into a revised DEIR to allow CDFW to make specific recommendations and comments on additional mitigation measures proposed to minimize impacts to this species.

B.5-1 (cont.)

Western Spadefoot: Western spadefoot (*Spea hammondii*) aestivate underground in upland habitat and emerge during heavy rainfall events in order to migrate to nearby water bodies (including those that are ephemeral in nature) to breed. Western spadefoot may occur on the Project site. If breeding sites for western spadefoot are identified in the Project site during pre-construction surveys, CDFW recommends the Lead Agency require the Project developer consult with CDFW prior to the implementation of the Project to develop a plan to avoid impacts to western spadefoot, and obtain CDFW's written concurrence with the plan prior to plan implementation.

Argentine Ants: CDFW recommends revising Mitigation Measure 7-16 to establish argentine ant control "dry zones" of a minimum of 650 feet and encourage landscape plans to incorporate these same "dry zones" landscaping and require all nursery plant material within 700 feet of Open Space areas, preserved populations, and mitigation lands be inspected and certificated as being free of argentine ants. Irrigation of Open Space areas, preserved fauna populations, and mitigation lands are also strongly discouraged and plantings within these areas should be hand watered only if absolutely necessary. Restoration should be timed to take advantage of the natural rainy season.

Special Status Plants: Mitigation Measure 7-1 in the Biological Resources section of the DEIR relies on the future completion of focused plant surveys to confirm the proposed mitigation lands support populations of California androsace (*Androsace elongate* ssp. *acuta*), crownscale (*Atriplex coronate var. coronata*), round-leaved filaree, Mojave spineflower (*Chorizanthe spinosa*), sylvan scorzonella (*Microseris sylvatica*) and adobe yampah (*Perideridia pringlei*) to confirm compliance with the DEIR's proposed 2:1 mitigation ratio for impacts to these species.

The 2:1 replacement to impact ratio is not substantiated within the DEIR and does not describe nor demonstrate that successful rare plant mitigation is attainable. Scientific literature does not support the assertion that transplanting plants into areas of microhabitat where they do not occur is viable in assuring long-term persistence of the species. Therefore, CDFW does not support transplantation of rare plants as a mitigation strategy. CDFW recommends avoidance of rare plant populations by delineation and observation of a no-disturbance buffer from the outer edge of the plant population(s) or specific habitat type(s) required by special status plant species, including a sufficient buffer area that ensures habitat is available for pollinators, maintains the current topography and drainage conditions of existing plant populations, and minimizes anthropogenic impacts. Because the collection of seed and establishment of new sensitive status plant populations has not been substantiated in the literature, transplantation is experimental in nature, and CDFW is not aware of any long-term studies that document the viability and persistence of either transplanted or seeded populations of these particular special status plant species. If full avoidance of existing populations or clusters of individual plants cannot be achieved, CDFW recommends avoidance in combination with conservation, funding, and management of existing, healthy populations in perpetuity as the preferred mitigation method. Furthermore, mitigation for impacts to special status plant species need to be completed prior to the initiation of Project-related activities.

Mitigation Measure 7-1 also relies on the future development of a Special Status Plant Species Restoration Plan. The deferred development of the Special Status Plant Species Restoration Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan is not required. CDFW recommends

B.5-1 (cont.)

the DEIR be revised to include the Special Status Plant Species Restoration Plan for CDFW review and comment.

Eight populations of crownscale, totaling more than 16,000 plants, were identified during surveys on the Project site. The identifying characteristics exhibited on these plants were mixed between the more common crownscale and the federal endangered San Jacinto Valley crownscale (*Atriplex coronata var. notatior*) which is only known to occur 100 miles to the east of the Project. Based on distribution and on a single taxonomic verification, the DEIR determines the onsite occurrences are the more common crownscale species. However, CDFW recommends consulting multiple experts and conducting genetic work to determine if this is an unrecognized species, or an isolated occurrence of San Jacinto Valley crownscale in Los Angeles County before removing this population. Additionally, if this is an isolated population, outside of its known range, CDFW recommends conducting an additional analysis to determine how removal of this species potentially shrinks the species' range.

Piute Mountains navarretia is a CRPR 1B.1 species. Before surveys for the Project site were conducted this species was only reported to occur in Kern and Tulare Counties. To date, surveys on the Project site have identified three (3) populations of Piute Mountains navarretia with approximately 20,100 individuals. Known occurrences of Piute Mountains navarretia on the site are currently outside of the proposed impact area. CDFW recommends additional protocol surveys for this species be completed prior to Project implementation, for the entire site in potentially suitable habitat, following a good rain year, in an effort to detect additional populations. CDFW also recommends this species be fully avoided and managed to preserve these populations in perpetuity.

Federally Listed Species: CDFW also recommends consulting with the USFWS on potential impacts to federally listed species. Take under ESA is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with ESA is advised well in advance of Project implementation.

Significant Ecological Area: CDFW recommends that development south of SR 138 be removed from the Project. Introducing development to the area south of SR 138 will have negative impacts to the SEA, specifically creation of a large edge effect on the adjacent SEA, including light, noise, temperature increase, increased albedo, increased Argentine ant risk, increased fire risk, point source for invasive species introduction, and human disturbances (e.g., trash, dogs, loitering, etc.), thereby lowering its conservation value. In addition, by removing development south of SR 138, the Project will also avoid several special status plant occurrences.

Vegetation Mapping: The vegetation mapping units used in the DEIR were set at a scale of approximately 1 acre, and patches of vegetation smaller than 1 acre were generally not mapped except for observed seeps and ephemeral ponds. CDFW is concerned the smaller scale variation of vegetation assemblages are not accurately reflected in the DEIR vegetation mapping. CDFW recommends all unique stands or polygons be recorded, no matter the size. Providing detailed mapping enables CDFW to assess the value and the appropriateness of proposed mitigation accurately. CDFW recommends conducting vegetation mapping following the standards of mapping all unique, homogenous stands, no matter the size, and including this

B.5-1 (cont.)

revised information in the DEIR. CDFW is unable to accurately assess impacts or values of the vegetation assemblage within the Project area, nor the proposed mitigation lands until revised mapping is completed.

Oak Woodlands: The DEIR determines that significant impacts to oak tree resources would be reduced to less than significant levels with implementation of Mitigation Measures 7-11 and 7-19 through 7-20, in accordance with the County of Los Angeles Oak Tree Ordinance and in compliance with the Los Angeles County Oak Woodlands Conservation Management Plan. The DEIR analyzes impacts to oak trees over eight inches in diameter at breast height (DBH), proposes to use existing oak woodlands, counts planting within these areas as creation, only includes a five (5) year monitoring period, does not require grazing in all of these areas, and does not account for the acreage of oak woodland as a community with an existing density of trees.

CDFW recommends the DEIR be revised to reflect a 4-inch DBH when considering which oak trees, and trees in general, require mitigation. More importantly, the oak woodland community needs to be considered in its entirety when considering mitigation to replicate the habitat function. Oak trees are a dense, slow growing hardwood requiring decades to mature. CDFW recommends revising the mitigation measures to require monitoring oak trees/oak woodlands for a minimum of 15 years and up to 20 years to determine success. To reestablish the oak woodlands, CDFW recommends three planting seasons. The first planting season, year 0, being the acorn and sun tolerate ground covers; the second planting season occurring at approximately year 5, introducing sun/shade tolerate species; and the third planting season at year 10 with the introduction of more shade tolerate understory species. To determine the appropriate species and density of the oak woodlands, three representative oak woodland sites need to be analyzed for species composition, density, and richness. The created sites, once established, need to reflect the representative sites. Furthermore, CDFW recommends the creation site be deemed successful only after 10 contiguous years without irrigation. However, CDFW recommends irrigation be prohibited in establishing oak woodlands as the trees grow at an abnormal rate and establish a root system that will not optimally sustain the tree once irrigation has been removed. CDFW recommends a revision to Mitigation Measure 7-11 to reflect the temporal loss in creating oak woodlands. CDFW also recommends the creation of 18.6 acres to compensate for the loss of non-heritage oaks/oak woodlands and an additional 10:1 ratio for heritage oak trees. These areas should be protected against anthropogenic impacts for the life of the project.

B.5-1 (cont.)

Riparian, Wetland and Stream Features: The DEIR states that significant impacts to jurisdictional drainages, wetlands, and riparian vegetation from the Project would be reduced to less than significant levels with implementation of Mitigation Measure 7-12, which states that (1) all lost functional values shall be replaced; (2) appropriate regulatory agency permits and/or agreements shall be obtained; and (3) the mitigation measures stipulated in those permits/agreements shall be implemented. Mitigation Measure 7-12 also states that Functional Capacity Units (FCU) will be used to determine the mitigation level necessary to restore riparian functions. CDFW does not agree with the use of FCUs as the basis for determining mitigation requirements. FCUs do not guarantee that wetland/riparian habitat is mitigated to the level necessary to be called "in-kind". Plant species assemblages for each unique wetland/riparian patch need to be maintained to be considered in-kind mitigation. CDFW recommends full avoidance of both wetland features, as well as any lake, river, or stream under Section 1600 of

the Fish and Game Code. This would eliminate the need to create the proposed 78.4 acres of wetland/riparian habitat, the creation of which would in turn impact another vegetation community that would require mitigation. CDFW also recommends developing success criteria (Mitigation Measure 7-12) tied to on the ground species richness, abundance, percent cover, and diversity, by vegetation layer. Additionally, the monitoring period for replacement planting success should not start until all irrigation and weed control has been completed and removed. Irrigation and weed control are considered part of the establishment period and monitoring during these periods would provide data that is heavily skewed. Success criteria need to be based on trends; no positive trend in weed cover (weed control should be completed prior to planting and during the establishment period, nor during monitoring) and no negative trends of native vegetation over the monitoring period. This trend analysis provides a more thorough indication of the trajectory of the success of the restored habitat.

Refuse: To reduce urban wildlife conflicts that often result in mortality to bears and other wildlife species, CDFW recommends Mitigation Measure 7-15 in the DEIR be revised to require the use of bear-proof trash cans throughout the entire Project site, including during Project construction, after full Project build-out and for the life of the Project. CDFW also recommends Mitigation Measure 7-15 be revise to require the use of bear-proof trash cans at all individual homes and not limit use to common areas as specified in Mitigation Measure 7-15.

Fencing: CDFW recommends the DEIR be revised to include capping of all vertical open pipes used for fence posts, property line stakes, signs, roof ventilation, chimneys, vault toilets, and similar structures and metal fence stakes used on the Project. Capping can be accomplished using bolts or other materials to avoid raptor talons becoming entrapped within the bolt holes of metal fence stakes. Further information on this subject may be found at: http://kern.audubon.org/death_pipes.htm.

Grubbing and Grading: CDFW recommends the DEIR be revised to require that any grading/grubbing be done in phases in order to facilitate pushing wildlife of higher mobility towards intact adjacent habitat. Islands of habitat should not be created during site disturbance where wildlife will enter and then be subject to mortality when these areas are grubbed and/or graded. Attempts to salvage species of low mobility should be made prior to the initiation of ground disturbance activities. Salvaged species should be salvaged out of harm's way onto adjacent suitable habitat not disturbed by the project in areas with enough intact suitable habitat to support these species home range sizes.

Wildlife Movement Corridors: Mitigation Measure 7-14 of the DEIR describes a designated SR 138 underpass where the highway crosses the Project's western border. The proposed underpass will be 100 feet wide and will flare out on both sides of the highway to a 150 foot width in Project Open Space adjacent to the highway. The DEIR states that these design specifications are expected to allow some local wildlife to safely pass between Open Space areas on opposite sides of SR 138.

CDFW is unclear what the width of the underpass will be throughout the entire length of the underpass structure since the DEIR only specifies that the underpass will flare out where it meets SR 138. If the underpass does maintain the 150 foot width throughout the entire length of the structure, this would only allow for 25 feet of extra clearance on each side of the multi-use pathway that will go through the center of the structure to allow for wildlife movement. It is also

B.5-1 (cont.)

unclear if the additional 25 feet on each side will be dedicated to wildlife movement and if design features will be incorporated to limit human and domestic animal encroachment into these corridors and encourage species use. In addition, CDFW would like to note that such a limited corridor width would not be sufficient to serve as a wildlife movement corridor for the Project site. CDFW also recommends the other planned underpass and overpass bridge crossings that will be constructed across SR 138 to facilitate both pedestrian and bike access to employment centers be designed to also facilitate wildlife movement across the site. In addition, CDFW recommends the unnamed drainage that parallels SR 138 to the north be avoided by Project development so that it may continue to "serve as a valuable foraging resource" and wildlife movement area across the site.

A camera station study of wildlife movement observations along the I5 was conducted; however, a wildlife movement study throughout the remainder of the Project site has not been completed and wildlife movement information throughout the remainder of the Project site. Based on the information provided in the DEIR, this information appears to be anecdotal in nature. CDFW recommends the Lead Agency require a complete systematic, long-term wildlife movement study that encompasses the entire Project site and extends to offsite areas of existing wildlife habitat. CDFW recommends the study be conducted over a period of at least two years and consider all directions through and around the Project site. Camera stations and tracking medium should be used at each of the California Aqueduct, I5, and SR 138 crossings. CDFW also recommends the study consider species life histories, behavior, and an assessment of how the Project may modify species behavior and movement. Based on this study, a mitigation strategy should be developed that incorporates the study's findings, site specific information, and includes Open Space planning to enable wildlife to move safely through and around the entirety of the Project site.

B.5-1 (cont.)

Focused Protocol Surveys: CDFW recommends the DEIR incorporate an enforceable measure to require focused protocol surveys to be conducted in all areas of potentially suitable habitat for the entirety of the Project impact area, and a 500-foot buffer, prior to the initiation of construction-related activities for all special status species that have a potential to occur on the Project site. The surveys should be conducted in the year prior to disturbance for each construction area. This CDFW recommendation is necessary because previous surveys varied in their areas of coverage and levels of intensity and were not designed for maximum species detectability. For more information on species specific protocols see https://www.wildlife.ca.gov/Conservation/Survey-Protocols. .

Additional Mitigation Measure Comments: CDFW recommends Mitigation Measure 7-3 be revised to remove the following statement: "If a wildlife species is in harm's way and has not moved on its own, the Biologist will attempt to scare them away from the area. If wildlife does not move, and where feasible, the wildlife species will be relocated to suitable habitat." Implementation of this portion of the mitigation measure would result in take through harassment and direct mortality of wildlife species (if relocation is deemed not feasible) and is prohibited under Fish and Game Code.

Grazing: Grazing operations will be directed under the Grassland Mitigation Plan, which is a component of the Mitigation Preserve Management Plan and/or the Ranchwide Management Plan. The deferred development of this Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of this

plan is not required. CDFW recommends the DEIR be revised to include the Grassland Mitigation Plan for CDFW review and comment.

Jurisdictional Features: The Jurisdictional Delineation Report discloses that jurisdictional features were mapped to the extent of the Ordinary High Water Mark (OHWM) and edge of riparian vegetation, where applicable. The DEIR acknowledges that CDFW jurisdiction can extend beyond the OHWM to the edge of riparian habitat where this habitat type is present. However, at a minimum, CDFW jurisdiction extends to the back edge of the bank, includes associated riparian habitat, and may also include terracing and the adjacent floodplain, depending upon site indicators. The OHWM is a definition used by the United States Army Corps of Engineers to determine the extent of its jurisdiction under the federal Clean Water Act. CDFW jurisdiction is separate from, and unrelated to, that of the Clean Water Act, and in most cases extends beyond the OHWM. Therefore, the extent of impacts to CDFW jurisdictional features is likely greater than what is disclosed in the Jurisdictional Delineation Report and included in the DEIR. In addition, implementation of the restoration and enhancement activities proposed in the DEIR would also require notification pursuant to Fish and Game Code Section 1600 et seq. and may also require acquisition of an ITP because the proposed activities have the potential to impact State-listed species. Potential impacts to all special status species and habitats within the area of the proposed offsite activities also need to be evaluated in the DEIR for CEQA review.

CDFW also recommends Exhibit 5.7-9 in the Biological Resources section of the DEIR be revised. The jurisdictional features on this exhibit have been kept to scale and therefore the majority of CDFW jurisdictional features are not visible. CDFW cannot determine if these features are not visible because of the mapping scale or because they have been omitted.

B.5-1 (cont.)

Offsite Mitigation: The DEIR proposes a total of 23,547 acres of offsite mitigation lands, comprised of six separate Areas, as depicted on Exhibit 5.7-10 in the Biological Resources section. Area 1 contains 6,417 acres; Area 2 contains 2,556 acres; Area 3 contains 4,183 acres; Area 4 contains 7,319 acres; Area 5 contains 643 acres; and Area 6 contains 2,429 acres of proposed offsite mitigation lands. As noted in the DEIR, these lands are a part of the Ranchwide Agreement.

The lands in Areas 3, 4, and 5 (totaling 12,145 acres) have already been conserved through an agreement and purchase of a conservation easement using funds entirely provided by the State of California. The easement was conveyed to the State and is currently held by the Wildlife Conservation Board (WCB). The conservation easement precludes the use of the lands in Areas 3, 4, and 5 in baseline habitat condition from serving as mitigation for any proposed development projects, including Centennial. The lands in Areas 3, 4, and 5 may serve as mitigation only in the event that enhancement actions are implemented and performed in perpetuity that will add functional habitat value to the lands above baseline. Further, all enhancement actions are required to be reviewed and approved by WCB. As currently discussed and contemplated in the DEIR, Areas 3, 4, and 5 are not intended to undergo enhancement activities and are considered as mitigation in baseline condition. However, in accordance with the terms and conditions of the conservation easement conveyed over these areas, these lands cannot be used to offset impacts from the implementation of the Project. Therefore, with the removal of the offsite 12,145 acres that constitute Areas 3, 4, and 5 from consideration as compensatory mitigation for the Project, the remaining Areas (1, 2 and 6)

contain a total of only 11,402 acres. This effectively reduces the available compensatory habitat mitigation for the Project to a 2:1 mitigation ratio and cannot effectively reduce the loss of the varied and rare habitat types from Project impacts to a less than significant level.

Land Use, Entitlements and Planning (Section 5.8): This section of the DEIR includes the Antelope Valley Area Plan (AVAP) Consistency Analysis (Table 5.8-1). This analysis evaluates the Project's consistency with the requirements of the AVAP. CDFW disagrees with several statements of consistency in the aforementioned table. For example, Goal Land Use (LU) 2 of the AVAP is: "a land use pattern that protects environmental resources". The DEIR determines that the Project is consistent with this goal through the preservation of the SEA, biological mitigation lands, Tejon Ranch land preserved under the Tejon Ranch Land Use and Conservation Agreement and the Project's land use plan. The SEA is designated as Open Space in the DEIR and the CSP. As described in the DEIR and further detailed in the CSP, the Open Space land use designation allows for a variety of uses, including, but not limited to: golf courses; information centers; apiaries; fish hatcheries; nurseries (growth and sales); commercial greenhouses; stables; trails (bike, equestrian, pedestrian); helispots; helipads; monuments and interpretive sites; wineries; cemeteries; amusement rides: bike, motor scooter and boat rentals; campgrounds; lakes; swimming pools; photovoltaic panels; outdoor festivals and fairs; filming; crop production and agricultural uses; storage and maintenance yards; special events; model home complexes; and other accessory uses and structures. The continuation of hunting activities are also allowed in SEA 17 (as described in Noise section 5.12 of the DEIR) but not included in the land use designation table in the CSP.

Allowing these and similar uses within the Open Space lands does not preserve the value of these lands and in many cases would prohibit the use of these Open Space areas (including those Open Space areas within the center of the Project site) for use by special status species (plant and animals) that currently use the lands on the Project site. It would also impede the use of any potential wildlife movement corridors, across and in some cases, adjacent to the Project site. Furthermore, provisions in the CSP allow for the current land use designations to be changed. This would allow for the possibility that current Open Space areas may be changed to other designated uses, including but not limited to: residential, industrial, and commercial. This level of built-in flexibility, combined with the lack of detailed design plans and descriptions in the DEIR does not provide CDFW with enough information to determine what the Project impacts will be. As stated above, the allowed land uses in lands adjacent to Open Space areas may also impact the ability of wildlife to use and move through the Open Space areas. As one example, there is a recreation/entertainment and residential area located on the west side of the Project site, north of SR 138, directly adjacent to a potential wildlife movement corridor. The land uses in these development areas allow for amphitheaters; solar and renewable energy generation (including photovoltaic panels, microturbines, and associated facilities); and outdoor festivals and fairs among other uses, which may severely impact the ability of wildlife to continue to use this area of the Project site as a movement corridor.

The goal of Policy LU 2.1 in Table 5.8-1 is "to limit the amount of potential development in....wildlife corridors." The DEIR states that the Project preserves important regional wildlife corridors and biological connectivity of regional open space. However, the DEIR also states that cumulative impacts to regional wildlife movement will be significant with mitigation. Due to significant impacts in regional wildlife movement, and for the reasons outlined in the sections above, CDFW disagrees with the DEIR's determination that the Project is consistent with Policy

B.5-1 (cont.)

LU 2.1. Regional and local wildlife movement corridors occur on the Project site and are not sufficiently avoided and protected or replaced by the Project.

Policy LU 2.5 in Table 5.8-1 refers to limited development in riparian areas. The DEIR states that the Project is consistent with this policy by avoiding or minimally impacting riparian areas on the site by designating major drainage channels on the site as Open Space. While the Project has designated major drainage channels as Open Space, they have also allowed these channels to be reengineered, revegetated and altered to collect site runoff, mudflows, serve as recharge and retention basins and incorporated adjacent multi-use trails. Also, as mentioned above, Open Spaces have a variety of allowable land uses that are not all consistent with minimizing impacts to riparian areas. Therefore, CDFW does not agree with the DEIR's determination that the Project is consistent with Policy LU 2.5 with respect to riparian conservation.

The goal of Policy M 10.5 in Table 5.8-1 is to locate and design trail routes to minimize impacts to sensitive environmental resources and ecosystems. The DEIR states that trails will be located along roads and in greenways and have been designed to minimize impacts to sensitive environmental resources and ecosystems. The DEIR also states that signs will be posted along trails cautioning against disturbance and trails will be designed to discourage people and pets from entering sensitive drainages. As discussed above, trail design (e.g., lighting requirements, fencing, location, signage, etc.) is discussed in the DEIR and the CSP; however, all of these items are not included as Mitigation Measures in the DEIR and are only discussed as guidelines in the CSP, which are subject to change and/or omission during final site design. Therefore, CDFW does not agree with the DEIR's determination that the Project is consistent with Policy M 10.5. CDFW recommends wildlife friendly fencing be designed and included in a revised DEIR to minimize potential impacts to the SEA and other Open Space areas from human and pet-related disturbances and protect the sensitive resources and habitats that occur within these areas.

Goal COS 4 in Table 5.8-1 is a goal to protect sensitive habitat and species to promote biodiversity. The DEIR states that the Project will protect sensitive habitat and species through the protection of Open Space, authorized Open Space uses and measures. Policy COS 4.2 refers to limiting the amount of potential development in the SEA, wildlife corridors, and other sensitive habitat areas. The DEIR states that the Project is consistent with this policy by avoiding SEA development and protecting Open Space that protects wildlife corridors and other sensitive habitat areas, including SEAs. Policy COS 4.7 in Table 5.8-1 refers to development standards that maximize opportunities for wildlife movement. The DEIR states that no fencing that would restrict wildlife movement is proposed in Open Space areas, which serve as wildlife corridors. CDFW does not agree with the DEIR's determination that the Project is consistent with the aforementioned policies and goals. Please refer to the discussions above for further detail on land use within the SEA.

The goal of Policy COS 4.8 is to ensure ongoing habitat preservation by coordinating with CDFW to obtain the latest information regarding threatened and endangered species. The DEIR states that the Project is consistent with this policy by providing for ongoing habitat preservation within designated Open Space and states that the latest information regarding sensitive plant and wildlife species is incorporated in the Biological Resources section. CDFW would like to note that while discussions for the Project have occurred in the past, recent

B.5-1 (cont.)

discussions (within the last 3 years) have not occurred between CDFW and the Project Applicant, with the exception of two preliminary reviews of a draft jurisdictional report and one site visit to discuss jurisdictional features. In addition, CDFW also notes that the status of tricolored black bird (*Agelaius tricolor*), described in the Biological Resources section, has changed from State Candidate to State Endangered.

Noise (Section 5.12): The Noise section includes a statement that limits construction to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday, in compliance with County code requirements. However, CDFW recommends that all Project-related activities be restricted to daylight hours and nightwork be prohibited throughout the entire Project site to reduce the potential to adversely affect special status species, their movement and their associated habitat use on and adjacent to the Project site. CDFW also recommends vehicle and equipment access within the Project site be restricted to existing roads and overland travel be minimized and confined to areas where development will occur. CDFW also recommends the DEIR be revised to incorporate these recommendations as Mitigation Measures in the DEIR.

Mitigation Measure 12-7 in the Noise section requires the preparation of a Blasting Plan. The Blasting Plan will include information such as a pre-blast survey, the location and hours of blasting and other additional items. Blasting has the potential to adversely affect special status species and their associated habitat on and adjacent to the Project site. The deferred development of the Blasting Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan is not required. CDFW recommends the DEIR be revised to include the Blasting Plan for CDFW review and comment.

Visual Resources (Section 5.13): Mitigation Measure 13-6 in the Visual Resources section of the DEIR requires the development of an Exterior Lighting Plan (also referred to as the Dark Sky Plan). This Plan applies to all proposed structures and development areas that border natural Open Space resources. Exterior lighting on the Project site has the potential to adversely affect special status species, their movement and their associated habitat on and adjacent to the Project site. The deferred development of the Exterior Lighting Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan is not required. CDFW recommends the DEIR be revised to include the Exterior Lighting Plan for CDFW review and comment.

Parks and Recreation (Section 5.14): The Parks and Recreation section of the DEIR requires the development of a Public Access Plan "to ensure significant, but well managed, public access into the Conservation Easement Areas." CDFW is unclear if this Plan will incorporate public access into both the SEA and the offsite mitigation lands since the Conservation Easement Areas are not clearly and consistently defined in the DEIR. The DEIR states that "there would be no disturbance or development within the designated SEA" (see page1-6 of the DEIR); however, allowing public access within the SEA would be considered a Project impact and would need to be analyzed in the Biological Resources section of the DEIR. In addition, impacts from public use of the mitigation lands should also be analyzed in the Biological Resources section of the DEIR. Furthermore, the deferred development of the Public Access Plan does not provide CDFW with an opportunity for review to assess potential species and habitat impacts since additional CEQA review of the Plan is not required. CDFW recommends

B.5-1 (cont.)

the DEIR be revised to include the Public Access Plan for CDFW review and comment and that public access, development and disturbance within the SEA be prohibited.

Cumulative Impacts (Section 7.0): The Cumulative Impacts section of the DEIR makes the determination that the Project will result in a cumulatively significant impact to native grasslands and regional wildlife movement. CDFW agrees with this determination. Based on the current design of the Project, CDFW has also determined that development of the Project will result in significant impacts to local wildlife movement and special status plant species. CDFW recommends the Project be redesigned to allow for local and regional wildlife movement through the site (including grassland and drainage areas east of the California Aqueduct) and avoid and preserve a significantly larger proportion of special status plant species occurring in the grassland areas of the Project site east of the California Aqueduct.

Centennial Specific Plan (CSP): Figure 3-2 in the CSP appears to indicate the presence of roads within the SEA. It is unclear from this map if these are existing or newly proposed roads since they are not labeled in the map legend. These roads have not been described in any other area of the DEIR or the CSP. The DEIR and CSP states that Project-related impacts will not occur within the SEA. Please clarify the presence and intended use of the roads within the SEA.

The CSP and DEIR include the Open Space lands to the east of the California Aqueduct as part of the Project's onsite mitigation. As previously discussed, these areas as currently designed, do not support species movement and/or use in these Open Space areas of the Project site, and therefore should be removed from the onsite mitigation acreages until the Project is redesigned to address these species issues.

B.5-1 (cont.)

The CSP leaves several items of enforcement and control under the responsibility of the Home Owners Association (HOA). These items include, but are not limited to, the maintenance of internal and transitional slopes, the maintenance of fuel modification zones, the control of Argentine ants, the enforcement of drought-tolerant planting and education, the enforcement of prohibited plant species and the eradication efforts of these species. It is unclear to CDFW where the funding, training and dedicated staffing will come from to enforce these policies. CDFW would also like to note that previous projects that have proposed and implemented similar measures have had mixed success with implementation of these measures. The failure to implement these measures may significantly impact sensitive biological resources on the Project site and needs to be evaluated in the DEIR.

The planting guidelines in the CSP allow for the use of ground covers and turf grasses. Because of their potential to quickly spread into adjacent native vegetation and Open Space areas, CDFW recommends prohibiting the use of ground covers and Bermuda grass in Open Space areas and areas adjacent to Open Space and native vegetation.

The CSP Hillside Design Guidelines (HDG) include a guideline to retain and incorporate 50 percent or more of the existing onsite trees and woodlands into the overall Landscaping Plan. It is unclear to CDFW if this percentage will include the lands within the SEA or if this requirement focuses on the remainder of the Project site. If this guideline includes the SEA area, CDFW would like to know what percentage of the SEA will be counted toward achieving the 50 percent success metric. The HDG also includes a guideline to use bridge design techniques that "allow easy wildlife migration" beneath the bridge with a minimum 6-foot vertical

and horizontal clearance. However, the details of the bridge design techniques are not provided in the CSP nor discussed in the DEIR. CDFW recommends the DEIR and Biological Resources section be revised to include information on the bridge design techniques and an analysis for potential wildlife movement. This is necessary to demonstrate the bridge design techniques will be functionally permeable and facilitate use by wildlife. As previously mentioned, the CSP is a guidance document and is subject to change; therefore, CDFW also recommends the bridge design techniques be included as a Mitigation Measure in the DEIR.

The Single Family Detached (SFD) Average Fee Lot figure in the Housing Glossary section of the CSP includes an Open Space designation, which is defined as the front yard, fenced side yard, rear yard and street parkway. CDFW requests clarification as to whether the acreages associated with the SFD Open Space designation are included in the Open Space acreage calculations for onsite mitigation lands.

B.5-1 (cont.)

Thank you for the opportunity to comment on the DEIR and CSP. If you have any questions regarding these comments, please contact Lori Bono, Senior Environmental Scientist (Specialist), at (559) 243-4014, extension 350, or lori.bono@wildlife.ca.gov.

Sincerely,

Julie A. Vance
Regional Manager

cc: United States Fish and Wildlife Service
Palm Springs Office
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, California 92262

ec: Derek Abbott
Tejon Ranch Company
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B.5-1 (cont.)

Responses to Comment Letter B.5
Governor's Office of Planning and Research, State Clearinghouse and Planning Unit
July 12, 2017

Response to Comment B.5-1:

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR. The attachments to the Commenter's letters have already been incorporated into this Final EIR and have been addressed in responses to Comments B.3-1 through B.3-11, B.4-1 through B.4-82, and D.3-1 through D.3-22. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

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C. County Agencies

CENTENNIAL

at TEJON RANCH

C.1

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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

GRACE ROBINSON HYDE
Chief Engineer and General Manager

May 30, 2017

Ref. Doc. No.: 4154776

Mr. Jodie Sackett
Zoning Permits North Section
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Mr. Sackett:

Response to DEIR for the Centennial Project

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on May 17, 2017. We offer the following comment:

- The project area is located outside the Districts' sphere of influence as adopted by the Local Agency Formation Commission. C.1-1

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

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

DOC: #4161689.D99

Recycled Paper

Responses to Comment Letter C.1
County Sanitation Districts of Los Angeles
May 30, 2017

Response to Comment C.1-1:

Thank you for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

2017 JUN 12 PM 4:52

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

June 6, 2017

Jodie Sackett, AICP
Department of Regional Planning
Zoning Permits North
320 West Temple Street
Los Angeles, CA 90012

Dear Jodie Sackett:

NOTICE OF COMPLETION AND AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT, "THE CENTENNIAL PROJECT," INVOLVES THE DEVELOPMENT OF A NEW COMMUNITY WITH RESIDENTIAL, COMMERCIAL, BUSINESS PARK, RECREATIONAL/ENTERTAINMENT, AND INSTITUTIONAL/CIVIC USES, CITYWIDE, ANTELOPE VALLEY, FFER 201700062

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

The following are their comments:

PLANNING DIVISION:

Under Section 1.6.16 Fire and Law Enforcement Services, Fire Services, we have the following correction:

The first paragraph should be corrected to state that Fire Station 77 is staffed with a three-person assessment engine company which is an engine company with some limited paramedic capabilities.

C.2-1

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. Additional Fire Department comments will be addressed with further review of plans for the proposed development. C.2-2

2. This property is located within the area described by the Forester and Fire Warden as a Very High Fire Hazard Severity Zone. All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance, and fuel modification plans must be met. C.2-3

3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department access road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. C.2-4

4. Public and/or private streets or private driveways serving single family detached homes within the development shall be provided with the following: C.2-5

    a) Provide 36 feet in-width on all streets where parking is allowed on both sides.

    b) Provide 34 feet in-width on cul-de-sacs up to 700 feet in-length. This allows parking on both sides of the street.

    c) Provide 36 feet in-width on cul-de-sacs from 701 to 1,000 feet in-length. This allows parking on both sides of the street.

    d) Note: In Appendix 4.0-a of The Centennial Specific Plan, Figure 3.8 "Collector with Median" the roadway width shall be increased to 26 feet when fire hydrants are required. The 26-foot width shall be maintained for a minimum of 25 linear feet on each side of the hydrant location.

5. For private driveways serving detached single family dwellings provide a minimum unobstructed width of 20 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky." Fire Apparatus Access Roads to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building. The C.2-6

required 20-foot wide driving surface shall be increased to 26 feet when fire hydrants are required. The 26-foot width shall be maintained for a minimum of 25 linear feet on each side of the hydrant location. C.2-6 cont.

6. For multi-family, commercial/ industrial, and mixed used developments with buildings no greater than 30 feet to the top of the eave line or to the top of the parapet provide a minimum unobstructed width of 26 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky." Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building. C.2-7

7. For multi-family, commercial/ industrial, and mixed used developments with buildings greater than 30 feet to the top of the eave line or to the top of the parapet provide a minimum unobstructed width of 28 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky." Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Apparatus Access Road is more than 30 feet high or the building is more than three stories. C.2-8

   a) The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official.

   b) The public street may be used for ladder truck access when the building wall is within 20 feet of the public street and there are no obstructions such as street parking, power and telephone lines, trees, etc.

8. Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. C.2-9

9. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation. C.2-10

10. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs. C.2-11

11. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Department Regulation 8. C.2-12

12. All required public fire hydrants shall be installed, tested, and accepted prior to beginning construction and all private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy. C.2-13

13. The required fire for the public fire hydrants for single family residential homes less than a total square footage of 3600 feet is 1250 gpm at 20 pounds psi residual pressure for two hours with one public fire hydrant flowing. Any single family residential home 3601 square feet or greater shall comply with Table B105.1 of the Fire Code in Appendix B. C.2-14

14. The fire hydrant spacing for single family detached homes shall be 600 feet and shall meet the following requirements: C.2-15

    a) No portion of lot frontage shall be more than 450 feet via vehicular access from a public fire hydrant.

    b) When cul-de-sac depth exceeds 450 feet on a residential street, hydrants shall be required at the corner and mid-block.

    c) Additional hydrants will be required if hydrant spacing exceeds specified distances.

15. The development may require fire flows up to 8,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration non-single family detached buildings. Final fire flows will be based on the size of buildings, types of construction used, and the installation of an approved automatic fire sprinkler system. C.2-16

16. The fire hydrant spacing for no-single family detached homes shall be 300 feet and shall meet the following requirements: C.2-17

    a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

    b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.

    c) Additional hydrants will be required if hydrant spacing exceeds specified distances.

    d) Cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.

17. An approved automatic fire sprinkler system is required for the proposed buildings within this development. C.2-18

For any questions regarding the report please contact FPEA Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed. C.2-19

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that environmental impacts identified in the draft Environmental Impact Report acquire environmental oversight by the appropriate authorized government agencies such as the Lahontan Regional Water Quality Control Board, the California Division of Oil Gas & Geothermal Resources, and the California Department of Toxic Substances Control (DTSC). Also, the construction of any new public schools at the project site would require environmental oversight specifically by the DTSC. C.2-20

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

Very truly yours,

Michael Y. Takeshita

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

Responses to Comment Letter C.2
Los Angeles County Fire Department
June 6, 2017

Response to Comment C.2-1:

In response to this comment, the following changes have been made to the Draft EIR.

The first sentence under Fire Services (sixth paragraph) on page 1-23 in Section 1.6.16, Fire and Law Enforcement Services, of the Draft EIR has been revised as follows:

> Fire services and emergency response for fire incidents during the initial development phases of the Project would be provided from Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person assessment engine company, which is an engine company with some limited paramedic capabilities.

The first sentence under Fire Services (fourth paragraph) on page 5.16-1 in Section 5.16, Fire and Law Enforcement Services, of the Draft EIR has been revised as follows:

> Fire services and emergency response for fire incidents during the initial development phases of the Project would be provided from Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person assessment engine company, which is an engine company with some limited paramedic capabilities.

The first sentence on page 5.16-12 in Section 5.16, Fire and Law Enforcement Services, of the Draft EIR has been revised as follows:

> Fire services and emergency response for fire incidents during the initial construction phases of the Project would be provided from LACFD Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person assessment engine company.

The last column of second row in Table 5.16-1 on page 5.16-7 in Section 5.16, Fire and Law Enforcement Services, of the Draft EIR has been revised as follows:

> 3-person assessment engine company**

The last row in Table 5.16-1 on page 5.16-7 in Section 5.16, Fire and Law Enforcement Services, of the Draft EIR has been revised to add:

> ** an engine company with some limited paramedic capabilities

These changes do not alter the analysis or conclusions related to Project impacts on Fire Services.

Response to Comment C.2-2:

The Draft EIR reflects this comment and states that the Project will comply with all applicable LACFD code and ordinance requirements for construction, access, water mains, fire flows, and hydrants. Specifically, the Draft EIR discusses building construction requirements and states that "construction activities would be required to comply with all applicable building and fire code requirements for such items as roofing materials, building construction, brush clearance, water mains, fire hydrant flows, hydrant spacing, access and design, and other hazard-reduction programs…"[241] In addition, MM 3-7 requires the Project to prepare and implement an Emergency Response Plan that will be updated with each new tract map. As discussed on page 5.3-24, the Emergency Response Plan would be reviewed and approved by the Department of Regional Planning, which would facilitate review by the LACFD and the Sheriff's Department. This review would ensure a Project-specific comprehensive emergency response planning effort that does not conflict with or impair the *Los Angeles County Operational Area Emergency Response Plan*. Thus, development of the Project would comply with applicable County Fire Department codes and ordinances, which would be verified by the Fire Department during the individual plan check processes for all proposed development on the Project site.

Response to Comment C.2-3:

This comment states that the Project site is within a Very High Fire Hazard Severity Zone (VHFHSZ) area, and as such the Project must meet all applicable code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance, and fuel modification plans. The Draft EIR reflects this comment. The second paragraph under "Environmental Setting" on page 5.3-33 states, "Portions of the Project site are designated as a VHFHSZ and portions are designated as a HFHSZ"; and the fourth paragraph on page 5.3-36 states, "The Project would comply with State law and with all County requirements related to development in a designated VHFHSZ or HFHSV. Specifically, as required by Section 4908.1 of the County of Los Angeles Code (Title 32, Fire Code), a Fuel Modification Plan would be submitted with any subdivision of land located in an area designated as a Fire Hazard Severity Zone in a State Responsibility Area, which includes the entirety of Project site". To further reduce potential wildfire hazards, "MM 3-9 requires that new property owners are informed of their individual responsibilities for maintaining fuel modification zones on their property, either via the Covenants, Conditions, and Restrictions (CC&Rs) or disclosure statements".[242] Also, please see response to Comment C.2-2 above. Thus, development of the Project would comply with applicable County Fire Department codes and ordinances related to location in VHFHSZ- and HFHSZ-designated areas, which would be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

241 DRP 2017, p. 5.16-11
242 *Id.,* p. 5.3-39

Response to Comment C.2-4:

This comment states that every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. This request describes the requirements of California Fire Code Sections 503.1.1, 503.2.3 and 504.1, which the Los Angeles County Code of Ordinances (County Code) adopts by reference. As stated in the Draft EIR, the Project is required to comply with all applicable requirements of the Los Angeles County Code of Ordinances.[243] Accordingly, the Project will be required to satisfy the roadway and access walkway specifications described in this comment. This includes compliance with County's requirements for firefighting apparatus and firefighter access to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

Response to Comment C.2-5:

This comment states that public and/or private streets or private driveways serving single family detached homes within the development shall be provided with streets having widths ranging from 34 feet to 36 feet depending on the type of street and parking. Median streets shall have a minimum roadway width of 26 feet for a distance of 25 feet on either side of a fire hydrant. This request describes the requirements of County Code Title 32, Sections 503.2.1 and 503.4, and County Code Title 21, Section 21.24.090. As stated in the Draft EIR, the Project is required to comply with all applicable requirements of the County Code.[244] Accordingly, the Project is required to comply with all applicable County Code requirements regarding access and roadway design. This would include compliance with County's requirements for emergency ingress and egress to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

Response to Comment C.2-6:

This comment states that private driveways serving detached single-family dwellings shall provide a minimum unobstructed width of 20 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky". Additionally, the driving surface shall be increased to 26 feet for a minimum distance of 25 feet either side of a fire hydrant. This comment describes the requirements of County Code Title 32, Section 503.2.1 and Title 32, Chapter 83, Appendix D, Section D103.3. As stated in the Draft EIR, the Project is required to comply with all applicable requirements of the County Code.[245] Accordingly, the Project will be required to comply with all applicable County Code requirements for access and roadway design. This would include compliance with County's requirements for emergency ingress and egress to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

243 *Id.,* pp. 5.16-11, -12
244 *Id.,* p. 5.16-11
245 *Ibid*.

Response to Comment C.2-7:

This comment states that for multi-family, commercial/industrial, and mixed-use developments with buildings no greater than 30 feet to the top of the eave line or to the top of the parapet provide a minimum unobstructed width of 26 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky". This comment describes the requirements of County Code Title 32, Chapter 83, Appendix D, Section D103.2, as well as the requirements of California Fire Code Section 503.1.1, which the County Code adopts by reference. As stated in the Draft EIR, the Project will be required to comply with all applicable LACFD code and ordinance requirements for access and roadway design.[246] This would include compliance with County's requirements for emergency ingress and egress to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

Response to Comment C.2-8:

This comment states that for multi-family, commercial/industrial, and mixed-use developments with buildings greater than 30 feet to the top of the eave line or to the top of the parapet provide a minimum unobstructed width of 28 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky". Additionally, the access roadway shall be located within prescribed distances from the building and aligned parallel to one entire side of the building. This comment describes the requirements of County Code Title 32, Chapter 83, Appendix D, Sections D103.2, D104.3 and D104.4, as well as the requirements of California Fire Code Section 503.1.1, which the County Code adopts by reference. As discussed in the Draft EIR, the Project will be required to comply with all applicable LACFD code and ordinance requirements for access and roadway design.[247] This would include compliance with County's requirements for emergency ingress and egress to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

Response to Comment C.2-9:

This comment states that Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. This comment describes the requirements of County Code Title 32, Chapter 83, Appendix D, Section D103.5. As discussed in the Draft EIR, the Project will be required to comply with all applicable LACFD code and ordinance requirements for access and roadway design.[248] This would include compliance with County's requirements for emergency ingress and egress to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

246 *Ibid*.
247 *Ibid*.
248 *Ibid*.

Response to Comment C.2-10:

This comment states that all proposal for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts etc.) shall be submitted to the Fire Department for review prior to implementation. This comment describes the requirements of California Fire Code Section 503.4.1, which the County Code adopts by reference. As discussed in the Draft EIR, the Project will be required to comply with all applicable LACFD code and ordinance requirements for access and roadway design.[249] This would include compliance with County's requirements for emergency ingress and egress to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

Response to Comment C.2-11:

This comment states that a Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs. This comment describes the requirements of County Code Title 21, Section 21.25.180 and Title 32, Chapter 83, Section D103.6. As discussed in the Draft EIR, the Project will be required to comply with all applicable LACFD code and ordinance requirements for access and roadway design.[250] This would include compliance with County's requirements for emergency ingress and egress to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

Response to Comment C.2-12:

This comment states the County's fire hydrant requirements for size, material, and installation. This comment describes the requirements of County Code Title 20, Sections 20.16.140, 20.16.190 and 20.16.200 and the Los Angeles County Department of Public Works Standard Plans applicable to fire hydrants (e.g., LADPW Standard Plans W-8, W-9). As explained in the Draft EIR, the Project will be required to comply with all applicable LACFD code and ordinance requirements, including those regarding fire hydrant construction standards, among others.[251] This will include compliance with the County's fire hydrant requirements, to be verified by the Fire Department during the individual plan check processes for all proposed developments on the site.

Response to Comment C.2-13:

This comment states that all public and private fire hydrants shall be installed, tested and accepted by the Fire Department prior to construction or building occupancy. This comment describes the requirements of California Fire Code Sections 901.5 and 901.5.1, which the County Code incorporates by reference. As explained in the Draft EIR, the Project is required to comply with all applicable LACFD code and ordinance requirements, including those applicable to for fire hydrants, among others.[252] This will include compliance with the

249 *Ibid*.
250 *Ibid*.
251 *Ibid*.
252 *Ibid*.

County's fire hydrant requirements, to be verified by the Fire Department during the individual plan check and construction inspection processes for all proposed developments on the site.

Response to Comment C.2-14:

This comment states the County's fire flow requirements for single-family residential homes. This comment describes the requirements of County Code Title 20, Section 20.16.060. As described in the Draft EIR, the water system for the Project has been designed to meet peak demand and County-required fire flows, and the Project will be required to comply with all applicable LACFD code and ordinance requirements, including those regarding minimum fire flows, among others.[253] The fire flows for residential uses will be verified by the Fire Department during the individual plan check and construction inspection processes for all proposed residential developments on the site.

Response to Comment C.2-15:

This comment states the County's fire hydrant spacing requirements for single-family detached homes. This comment describes the requirements of County Code Title 32, Chapter 83, Appendix C, Sections C105.1, C105.2, C105.4 and C106.1. As described in the Draft EIR, the Project will be required to comply with all applicable LACFD code and ordinance requirements, including those regarding fire hydrant spacing requirements, among others.[254] This will include compliance with the County's fire hydrant spacing requirements, to be verified by the Fire Department during the individual plan check and construction inspection processes for all proposed residential developments on the site.

Response to Comment C.2-16:

This comment states the County's fire flow requirements for non-residential uses. This comment describes the requirements of County Code Title 20, Section 20.16.060. As stated in the Draft EIR, the water system for the Project has been designed to meet peak demand and County-required fire flows, and the Project will be required to comply with all applicable LACFD code and ordinance requirements, including those regarding minimum fire flows, among others.[255] The fire flows for non-residential uses will be verified by the Fire Department during the individual plan check and construction inspection processes for all proposed non-residential developments on the site.

Response to Comment C.2-17:

This comment states the County's fire hydrant spacing requirements for land uses other than single-family detached homes. This comment describes the requirements of County Code Title 32, Chapter 83, Appendix C, Sections C105.1, C105.3, C105.4 and C106.1. As described in the Draft EIR, the Project will be required to comply with all applicable LACFD code and

253 *Ibid*.
254 *Ibid*.
255 *Ibid*.

ordinance requirements, including those regarding fire hydrant spacing, among others.[256] This will include compliance with the County's fire hydrant spacing requirements, to be verified by the Fire Department during the individual plan check and construction inspection processes for all proposed non-residential developments on the site.

Response to Comment C.2-18:

This comment states that an automatic fire sprinkler system is required for the proposed buildings. This comment describes the requirements of County Code Title 32, Section 903.2.11.7. As discussed in the Draft EIR, the Project would be constructed to have the necessary fire alarm and sprinkler systems.[257] This will be verified by the Fire Department during the individual plan check and construction inspection processes for all proposed developments on the site.

Response to Comment C.2-19:

This comment states that the statutory responsibilities of the LACFD's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones (VHFHSZ) or Fire Zone 4, archaeological and cultural resources, and the County Oak Tree Ordinance. This comment requests that these topics be addressed in the Draft EIR.

Erosion Control and Watershed Management

Erosion control and watershed management is addressed in Section 5.2, Hydrology and Flood, and Section 5.4, Water Quality. As discussed in Section 5.2, the proposed Project has been designed to meet or exceed Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit, LID Standards Manual and LID requirements hydromodification and hydrology (flood control) requirements for new development. The Project incorporates MMs 2-1 and 2-2 that require Project compliance with hydromodification and flood-control performance standards be confirmed in a Drainage System Engineering and Planning Report submitted to the County during the review and approval of each Project tract map. Project runoff will not exceed the planned storm drain capacity and will not require construction of additional drainage facilities not considered in the Draft EIR and that could have significant environmental effects.

As required by MM 2-3, portions of the Project site along the northern and eastern site boundaries located within a 100-year floodplain will be subject to a Specific Plan Floodplain Safety Overlay that precludes habitable residential, commercial, school and institutional structures in the floodplain. All applications for Project tract maps that would locate any structures not precluded by the Floodplain Safety Overlay in the floodplain must include a Drainage System Engineering and Planning Report that provides a detailed description of the floodplain boundaries and a description of applicable flood protection measures. This report must demonstrate that, after construction, structure designs and floodplain flows will

256 *Ibid*.
257 *Id.,* p. 5.16-14

comply with all applicable FEMA and County of Los Angeles floodplain flood flow and development standards. If required, a conditional letter of map revision (CLOMR) from FEMA will be obtained prior to any construction within a mapped 100-year floodplain. There will be no housing development in on-site floodplains, and no significant impacts will occur from placing structures within a floodplain.

Potential mudflow impacts will be reduced to less than significant levels by capturing debris flows in on-site basins and engineered and natural stream channels and by minimizing disturbance in on-site locations with slopes in excess of 25 percent that could generate mudflows. Storm water basins will be managed to avoid potential mosquito-borne health vectors by implementing California Department of Public Health (CDPH) recommendations and fully discharging captured storm water within 96 hours.

As discussed in Section 5.4, the Project will implement site-design, source-control, Low Impact Development (LID), and hydromodification-control Best Management Practices (BMP) requirements. The Project's water quality performance standard is consistent with County requirements for new development and is incorporated in MM 4-1. With mitigation, the Project would not have a significant impact on surface water or groundwater quality. Developed area runoff constituent concentrations would be below all water quality objectives and criteria. Qualitatively assessed constituents in post-development runoff would not occur at levels that would exceed water quality standards or adversely affect beneficial uses of receiving surface or ground waters. Implementation of the planned BMPs in compliance with the County MS4 Permit, LID Ordinance, and LID Standards Manual would meet or exceed the requirements of the federal, State, and County standards for water quality. The two proposed wastewater reclamation facilities (WRFs) will produce recycled water treated to unrestricted reuse standards under Title 22 of the *California Code of Regulations.* The WRFs will be issued Waste Discharge Requirements (WDRs) by the Lahontan Regional Water Quality Control Board (RWQCB) and will be operated in accordance with the WDRs to protect surface and groundwater quality and designated beneficial uses. MM 19-5 in Section 5.19, Wastewater Collection, requires that WRF compliance with Title 22 and WDR requirements be confirmed in documentation submitted to the County prior to the issuance of building permits for Project development.

Rare and Endangered Species and Vegetation

The Project's potential impacts related to rare and endangered species and vegetation are discussed in Section 5.7, Biological Resources. Development and implementation of the Project would result in significant direct and indirect impacts to special status plants; special status wildlife; nesting birds; native grasslands, wildflower fields, and other special status vegetation types; jurisdictional drainages, wetlands, and riparian vegetation; wildlife movement and wildlife habitat; and regulated oak trees. All of these direct and indirect impacts would be reduced to less than significant levels with implementation of the Project's mitigation measures and Mitigation Monitoring and Reporting Program (MMRP). Cumulative impacts would remain significant and unavoidable for regional wildlife movement and impacts to native grasslands, even after mitigation.

Fuel Modification and Fire Safety

The Project's potential impacts related to fire safety and fuel modification are discussed in Section 5.3, Hazards and Fire Safety, and Section 5.16, Fire and Law Enforcement. With adherence to requirements for fuel modification zone management (MM 3-9) and emergency access (MM 3-7), the Project's potential impact related to wildfires would be less than significant. MM 3-9 requires property owner notification of their responsibilities for maintaining the fuel modification zone(s) on their property. The Project would not result in significant impacts related to proximity of a land use representing a potential fire hazard.

The Project includes conceptual site locations for up to four new fire stations on the Project site. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department's (LACFD's) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Project Applicant/Developer would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project.

The Project Applicant/Developer would also provide funding for the construction of fire protection facilities in accordance with the approved Project, in lieu of paying established developer fees at the time building permits are issued (MMs 16-1 through 16-3). Implementation of MMs 16-1 through 16-3 would provide for fire station sites and funding for fire protection services to serve the Project. Therefore, impacts on fire services would be reduced to a less than significant level.

Archaeological and Cultural Resources

The Project's potential impacts related to archaeological and cultural resources are analyzed in Section 5.6, Cultural Resources. California Register of Historical Resources (CRHR) cultural resources eligibility evaluations were completed in 2012 and 2015 for sites in areas where impacts associated with development were anticipated. CRHR-eligible resources in the development area (CA-LAN-3201, CA-LAN-3240 and CA-LAN-3242) were defined and MMs were developed to be implemented either prior to the issuance of grading permits or prior to the completion of construction activities. Excavated finds shall be offered to the County of Los Angeles and/or its designee (i.e., the Tejon Tribe) on a first refusal basis; the Tejon Tribe can then make a determination whether the find is a significant tribal cultural resource and opt to accept the resource for curation in its facility.

The Paleo Environmental Associates report has classified rock units on the Project site according to their likelihood of containing resources of paleontological importance, and geologic evidence from adjacent areas with similar sedimentary formations indicates a high likelihood of encountering such resources during Project development.[258] Impacts, should

[258] Paleo Environmental Associates (PEA). 2009 (April). Paleontologic Resource Inventory and Impact Assessment Technical Report prepared in support of Centennial Specific Plan, western Antelope Valley, northern Los Angeles County, California. Altadena, CA: PEA (Appendix 5.6-F).

they occur, would be reduced to a level considered less than significant through the application of MMs 6-5 through 6-9. There is no evidence for the presence of Native American burial sites and associated human remains within the Project area because none of the sites recorded and evaluated on the Project area were found to contain human remains, nor were there any data to suggest they were present. However, the presence of known cultural resources sites increases the likelihood that they may be present. MM 6-10 is provided to address these potential occurrences, should they be realized.

Oak Tree Ordinance

The Project's compliance with the County Oak Tree Ordinance is analyzed in Section 5.7, Biological Resources. Significant impacts to oak tree resources that would result from implementing the Project would be reduced to less than significant levels with implementation of MM 7-11 and MMs 7-19 through 7-20, in accordance with the County of Los Angeles Oak Tree Ordinance and in compliance with the Los Angeles County Oak Woodlands Conservation Management Plan. For the impacts to oak woodlands, mitigation is proposed in accordance with these County documents and California State law by creating, enhancing, and/or restoring oak habitats and by preserving existing oak woodlands.

Response to Comment C.2-20:

The Lead Agency agrees that responsible agencies with jurisdiction over the Project are important partners in ensuring the Project is implemented in accordance with applicable law and with appropriate regulatory oversight. As explained in the Draft EIR, Lahontan RWQCB and Los Angeles Region RWQCB approvals will be required for the following activities within their respective areas of the Project site: waste Discharge Requirements (WDRs) for the fill or alteration of "waters of the State" on the Project site located in Lahontan RWQCB's jurisdiction; WDRs and Wastewater Reclamation Requirements or a Master Reclamation Permit for approval and operation of the Project's proposed wastewater reclamation facilities; Water Quality Certifications under Section 401 of the Federal Clean Water Act. In addition, the Draft EIR explains that consultation with the Department of Toxic Substances Control (DTSC) and other applicable agencies may be required if hazardous materials are encountered on the Project Site.[259] The Draft EIR also explains that, per MM 3-4, any historic wells located on the Project site must be abandoned in accordance with the requirements of the California Division of Oil Gas & Geothermal Resources.[260]

With regards to new public schools that would be constructed on the site, these schools would be the responsibility of the Gorman Joint School District, Westside Union Elementary School District, and/or Antelope Valley Union High School District. The Developer will be providing the school sites and contributions to facilitate the financing, construction, and operation of new school facilities, in accordance with the School Facilities and Funding Agreements with the school districts. As stated in Section 5.15, Education, school site

259 DRP 2017, p. 5.3-20
260 *Id.,* p. 5.3-27

location, sizing, and other details would be subject to Title 5 of the *California Code of Regulations*, which requires school district coordination with DTSC.[261]

[261] *Id.,* pp. 5.15-18, -20, -21

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D. Regional Agencies

CENTENNIAL

at TEJON RANCH

Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649
661.723.8070

D.1

In reply, please refer to AV0517/046

May 26, 2017

Mr. Jodie Sackett
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012

RE: Draft Environmental Impact Report (DEIR) for the Centennial Project, CUP No. 02-232

Mr. Sackett:

The Antelope Valley Air Quality Management District (District) has received the Notice of Completion and Availability of the DEIR for the proposed Centennial Project

We have reviewed the DEIR and based on the information available to us at this time, we have no comment. D.1-1

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (661) 723-8070 x2.

Sincerely,

Bret Banks
Executive Director/APCO

BSB/bl

Printed on recycled paper

Responses to Comment Letter D.1
Antelope Valley Air Quality Management District
May 26, 2017

Response to Comment D.1-1:

Thank you for your comment and your participation in this public process. Thank you for confirming that the AVAQMD has reviewed the Draft EIR and has no comments at this time. This comment will be noted for the record and provided to the Regional Planning Commission and Board of Supervisors for consideration.

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Eastern Kern
Air Pollution Control District

Glen E. Stephens, P.E.
Air Pollution Control Officer

June 1, 2017

Mr. Jodie Sackett, Senior Planner
Department of Regional Planning
320 West Temple St.
Los Angeles, CA 90012

SUBJECT: Comments for Draft EIR of Centennial Project at Tejon Ranch

Dear Mr. Sackett:

Eastern Kern Air Pollution Control District (District) has received your Notice of Hearing Examiner Public Hearing and Availability of the Draft Environmental Impact Report for the Centennial Project at Tejon Ranch. The Centennial Project seems to be well thought-out community with a variety of housing types and integrated shopping.

However, the District has concerns, in regards to the community proximity to an existing cement manufacturing plant, currently operating in compliance with District and the Environmental Protection Agency Rules and Regulations. Parts of the Centennial Project community are located within a mile of the cement manufacturing plant. Please be aware, a cement plant (different than a concrete batch plant) operates 24-hours a day and has associated truck traffic. Residences not familiar with this type of industry may be disappointed; thereby, leading to the NIMBY phenomenon, which is often developed by new residents moving into areas adjacent to industrial facilities. This proposed project creates a rather complex scenario where:

- The cement plant is located in Kern County, under the District jurisdiction; and
- Residences will be located in Los Angeles County, under the jurisdiction of South Coast Air Quality Management District or Antelope Valley Air Quality Management District

The District is not opposed to the project (in concept); however, we would like you to be aware of probable negative consequences of the project. If you have any questions or concerns, feel free to contact Samuel Johnson of my staff at (661) 862-5250 or johnsonsam@co.kern.ca.us.

D.2-1

Sincerely,

Glen E. Stephens, P.E.
Air Pollution Control Officer

GES:SJ:tf

Responses to Comment Letter D.2
Eastern Kern Air Pollution Control District
June 1, 2017

Response to Comment D.2-1:

The Draft EIR provides a thorough discussion of the National Cement plant, including potential traffic, air quality and hazards impacts. Facts concerning the Cement Plant and its environmental effects are disclosed throughout the Draft EIR.[262] In addition, the proximity of the Cement Plant to the Project site and Kern County boundaries is depicted on Draft EIR Exhibits 3-2, 3-3, and 5.3-1.

As disclosed in the Draft EIR, the Cement Plant manufactures cement and is located over one mile from the northern boundary of the Project site.[263] Residential uses within the Project site will be located even farther away from the Cement Plant, as can be seen by comparing Draft EIR Exhibits 3-2 and 4-1. The Cement Plant would be approximately 1.85 miles to the northwest from the edge of the nearest graded lot with proposed residential land uses. Moreover, the Cement Plant is separated from the Project site by the foothills of the Tehachapi Mountains.[264] Although this comment does not identify specific environmental effects associated with the Cement Plant that concern the Commenter, the Draft EIR determined that operation of the Cement Plant would have no impact, or a less than significant impact, with respect to the Project related to hazards and fire safety, land resources, land use, emergency access, air quality, noise, and visual resources.[265]

With respect to truck traffic along National Cement Plant Road, the Draft EIR explains that a portion of this road would be realigned within the Project boundaries to access State Route 138 from the western side of Quail Lake rather than from the current connection on the east side of the lake.[266] This realignment provides a shorter route of access for cement trucks to I-5, separates cement truck traffic form Project-generated vehicle trips, eliminates concrete truck travel over the bridge that crosses the west bank of the California Aqueduct, and eliminates cement truck traffic from traversing through one of the entrances to the Project site.[267] The realigned roadway would be a private-use facility with clearly marked signs prohibiting public access and would not be a part of the Project's circulation system and, therefore, potential direct conflicts with existing traffic on the National Cement Plan Road and future vehicular and other traffic (pedestrian, bicyclists) introduced by the Project would be eliminated because the two streams of traffic would be fully separated.[268] The

262 DRP 2017, pp. 1-3, 7; 3-1, 2, 16, 17, 21; 4-63, 66, 67, 69; 5.2-19; 5.3-8, 9, 10, 20, 21, 38; 5.4-20; 5.5-20; 5.7-10, 12, 14, 60, 76, 85; 5.8-15, 16, 19, 34, 49, 50; 5.10-15; 5.11-29, 71, 72; 5.12-14, 19, 22, 27, 28, 35; 5.13-2, 7, 11, 28; 5.20-7, 16, 23

263 *Id.,* pp. 3-2, 5.12-19

264 *Id.,* p. 5.12-19

265 *Id.,* pp. 5.3-21; 5.5-20, -21; 5.8-19; 5.10-140; 5.11-71, -72; 5.12-35; 5.13-16, -28

266 *Id.,* p. 4-39

267 *Id.,* pp. 4-39, 5.10-140

268 *Id.,* p. 5.3-21; *Id.,* Exhibit 5.10-8

Commenter's note that it does not oppose the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

CALIFORNIA Water Boards

Edmund G. Brown Jr. GOVERNOR

Matthew Rodriquez SECRETARY FOR ENVIRONMENTAL PROTECTION

Lahontan Regional Water Quality Control Board

July 11, 2017

File: Environmental Document Review
Los Angeles County

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Comments - Draft Environmental Impact Report, Centennial Project, Los Angeles County, State Clearinghouse No. 2004031072

The California Regional Water Quality Control Board, Lahontan Region (Water Board) reviewed the Draft Environmental Impact Report (DEIR) for the Centennial Project (Project), received on May 17, 2017. The DEIR was prepared by BonTerra PSMOAS on behalf of Los Angeles County (County) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096.

The Water Board is pleased that the County integrated "Low Impact Development" (LID) strategies into various elements of the Project Plan and encourages the County to take this opportunity to also integrate strategies that promote watershed management and groundwater sustainability. As a whole, the DEIR describes a project that incorporates many water quality protection features and sustainable water saving components necessary in the arid high desert with hydrologically closed groundwater basins. This letter contains general and specific comments that we request be addressed, primarily: (1) a jurisdictional determination regarding waters of the United States must be established; (2) long-term groundwater pumping to satisfy Project water supply demand should consider cumulative growth in the Antelope Valley as a whole; and (3) we recommend that Project Alternative E (discussed below) be selected as the preferred alternative.

Project Description

The Project is a planned new 12,323 acre community development with residential, commercial, business, recreation and civic uses in Kern and Los Angeles Counties.

The Project involves the development of nine villages that will each contain a mix of land uses. While not an exact description of the Project area, it is generally bounded to the south by the San Gabriel Mountains and the San Andreas Fault and to the north and west by the Tehachapi Mountains and the Garlock Fault. The West Branch of the State Water Project's (SWP) California Aqueduct bisects the Project. The East Branch of the SWP Aqueduct is along the northeast side of the Project. The Project site has historically been used for livestock grazing. The National Cement Plant is located approximately one mile north of the Project Site.

The Project would allow up to 19,333 dwelling units on approximately 4,987 acres of land. Project build-out will occur over a 20 year period through tracts and parcel maps approved by the County. Of the 5,624 acres designated Open Space, approximately 5,116 acres are intended to:

(1) Remain in their original natural condition;
(2) Be restored; and/or
(3) Be enhanced by native species planting, abatement and fencing.

Over 90% of the Project is within the Lahontan Water Board jurisdiction and less than 10% within the Los Angeles Water Board jurisdiction. The Project plan includes two wastewater reclamation facilities that will be constructed for the tertiary treatment of wastewater generated by the Project, both in the Lahontan Region. Produced recycled water will be used to reduce the Project's demand for imported water and groundwater resources to supply potable water needs.

The Project's water supply needs are not directly under the purview of the Water Board. However, the Project's water supply is from imported SWP water, groundwater, and 40% from recycled water. After EIR certification, it is anticipated that the Golden Valley Municipal Water District (currently serving the community of Gorman) will annex the Project into its service area and become responsible for providing water and wastewater treatment services.

Project development will occur within nine "villages," eight located east of the SWP Aqueduct, and one west of the Aqueduct. Over the Project life, 20 separate Tentative Tract Parcels will be separately vested, each having specific development conditions.

Water Board Authority

All groundwater and surface waters are considered waters of the State. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The Water Quality Control Plan for the Lahontan Region (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality

standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at: http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

General Comments

We recognize the effort put forth by the County to incorporate the policies and objectives of various state, regional and local and agencies into the Project plan and have the following general comments. The Project spans the jurisdiction of two Regional Boards, Lahontan and Los Angeles; our comments are germane only to that area of the Project within the Lahontan Region.

1. There may, or may not be, waters of the United States in the Project vicinity. *Before DEIR certification is considered by Los Angeles County, the proponent should establish with the United States Army Corps of Engineers and United States Environmental Protection Agency, Region VIX, whether or not waters of the United States are present in within the Project boundary.* This decision will dictate the applicable federal surface water protection requirements that may apply. D.3-1

2. The Project water demand will be supplied from numerous sources: (1) imported SWP water, (2) recycled water, (3) imported water return flow, and (4) groundwater pumped from the Antelope Valley groundwater aquifer, which is court adjudicated because of pumping overdraft. SWP water availability is subject to many variables. Imported water return flow amounts appear speculative. The DEIR estimates a constant annual groundwater demand of 1,634 acre-feet per year (Table 5.18-10). The cumulative groundwater demand from projected development across the Antelope Valley as a whole may not be sustainable into the long-term. While Water Board staff supports the Water Resources Mitigation Measures identified in section 5.18, we also believe the water supply impact may not be "less than significant after mitigation" as stated on page 5-18-76. The DEIR did not evaluate the cumulative impact from continuous groundwater aquifer pumping from all current and projected future groundwater withdrawals in the Antelope Valley considering projected growth. *Clarify how the Project water supply will be sustained in the long-term considering the cumulative groundwater demand from all current and projected future development activities.* D.3-2

3. The Water Board is encouraged by the foresight of Alternative E: Density Clustering East of the Aqueduct. This moves all of the developments to the east side of the aqueduct, thereby reducing the need for Village 9 and the small 0.34 million gallons per day (MGD) package plant that would service the development. This would prevent any threat to the drinking water conveyance and supply in the form of the State Water Project Aqueduct and Quail Lake. *The Water Board recommends Los Angeles County select Alternative E as the preferred Project alternative.* D.3-3

SPECIFIC COMMENTS

Water Board staff provides the following specific comments regarding the Project that should be addressed in the Final EIR.

4. Hydromodification – Water Board staff support that the Project proponents have considered hydromodification, hydrology and flood control, and mapping out the 100 year floodplain to ensure LID and Best Management Practices (BMP) are met in the design of the project, and in particular the following mitigation measures (MMs): MM 2-1 for Hydromodification and Drainage system engineering, MM 2-2 Hydrology and flood-control BMPs that will provide capital flood protection, capital storm event, and MM 2-3 Tentative Maps depicting the 100 year floodplain mapped by the Federal Emergency Management Agency (FEMA). D.3-4

5. Water Resources – Water Board staff believes that MM 18-2 (Water Use Reports) are a very important Project plan element that should be adhered to and modified only when development is not proceeding at the predicted rate. This measure should be coordinated with the zoned density and build-out milestones. We are pleased that for Water Resource MM 18-1 (Water Efficiency Measures) that the county has planned to meter water use, reduce potable water use with on-site recycled water, require water efficient appliances, require water efficient irrigation, and budget water based on water rates. D.3-5

6. Wastewater Collection - For Wastewater Collection mitigation measures MM 19-1 thru MM 19-3 and MM 19-5, the Water Board requests to remain notified through each stage of development in order to provide input as development proceeds and balance workload as water quality permit actions are requested. For MM 19-4 and MM 19-5 (West and East wastewater treatment plants, respectively), Water Board staff is concerned about the proximity of these plants to the SWP Aqueduct and protection of that invaluable resource to overall water supply for southern California. D.3-6

7. Page 3-5 – The text indicates that 90% of the Project is within Region 6 (Lahontan Region) and 10% is within Region 4 (Los Angeles Region). Page 5-54 states that 93% of the Project is within the Region 6. Elsewhere, the appendices state that 96% of the Project is within Region 6 and 4% in Region 4. *Clarify portions of the Project within each regional board jurisdiction consistently throughout the DEIR*. D.3-7

8. Page 5.2-25 and page 5.4-2 – The DEIR states that the Project must comply with the state General Construction Permit. *Clarify whether the entirety of the Project will comply with the state General Construction Permit whether or not federal receiving waters of the United States are present*. The Water Board requests the Project proponents to comply with the state General Construction Permit in the Antelope Valley regardless of whether federal waters are present and to implement appropriate construction and post-construction BMPs. D.3-8

9. Page 5.2-49 – Section 6.2.7 discusses Hydrology and Flood Mitigation Measures. The Water Board's November 4, 2015 letter providing comments on the Notice of Preparation (NOP) (item 5) indicated that maintenance of post-construction BMPs D.3-9

should encourage deep rooted plants that are trimmed, not eradicated. *Include a Mitigation Measure requiring BMP maintenance that encourages stabilized native grasses and/or deep rooting plants to minimize sediment transport.* D.3-9 cont.

10. Page 5.3-20 – The Homestead Area section indicates that there is an onsite historical well that will be destroyed in accordance with the California Well Standards. *Include a Mitigation Measure requiring destruction of this well in accordance with the California Well Standards.* We appreciate the Project proponent's intent to properly destroy this well. However, a mitigation measure should be added ensuring this activity is carried out to protect groundwater resources from possible contamination. D.3-10

11. Page 5.4-69 – Table 5.4-12 indicates there is no Lahontan Basin Plan groundwater quality objective for nitrate as nitrogen. While this is correct, it is also misleading. The Lahontan Basin Plan, page 3-13, indicates that groundwater quality objectives are based on state drinking water standards. The state drinking water standard for nitrate as nitrate is 45 milligrams per liter (mg/L), which is the equivalent of 10 mg/L nitrate as nitrogen. *Clarify the text and Table 5.4-12 with respect to the Lahontan Basin Plan nitrate groundwater quality objective.* D.3-11

12. Page 5.4-90 – Two Water Quality Mitigation Measures are identified, MM 4-1 to use BMPs and incorporate LID for Project construction and MM 4-2 to integrate integrated pest management measures. The Water Board is pleased that the Project will implement LID and water quality control BMPs that will retain storm water runoff, specifically permeable pavement. The Project will result in significant site grading as the various villages are developed. We request that an additional construction related BMP be specifically identified and utilized. During construction, native topsoil should be retained, temporarily stored, and used as top soil cover for disturbed areas to the maximum extent feasible. Efforts should be taken to ensure that native seeds contained within removed and temporarily stored native topsoil are appropriately nurtured to germinate disturbed areas. *Include as a Mitigation Measure the retention and reuse of native topsoil during grading to re-establish native plants for soil stabilization to the maximum extent feasible.* D.3-12

13. Page 5.4-90 – Water Board staff's November 4, 2015 letter on the NOP requested that a Restoration and Revegetation Monitoring Plan be prepared (item 10). The list of mitigation measures included with the Biological Resources section of the DEIR (chapter 5.7) does not include this plan intended to ensure that revegetation efforts are successful. *Include as a Mitigation Measure a Restoration and Revegetation Monitoring Plan to ensure successful revegetation efforts, along with metrics for success.* D.3-13

14. Page 5.4-91 – The DEIR does not seem to reference the Salt and Nutrient Management Plan for the Antelope Valley. This plan was developed as required by the State Board's Recycled Water Policy. See: http://www.ladpw.org/wwd/avirwmp/docs/saltplan/Salt%20and%20Nutrient%20Management%20Plan%20for%20Antelope%20Valley_May%202014.pdf D.3-14

Significant elements of that plan are monitoring (Section 5) and salt and nutrient source reduction implementation measures (Section 6). The monitoring section indicates that groundwater monitoring well information is limited in some parts of the Antelope Valley. Section 6.3 of that plan identifies additional implementation measures that should be considered, including, but not limited to, reducing salt/nutrient loading into the basin using ultrafiltration or reverse osmosis, and replacing chlorine disinfection with ultraviolet disinfection. The Project proponent should:

a. *Reference the Salt and Nutrient Management Plan for the Antelope Valley in the EIR.*

b. *Identify or install appropriate groundwater monitoring wells that will be incorporated into the Antelope Valley monitoring network to evaluate Project impacts over time, in conjunction with other Antelope Valley groundwater impacts.*

c. *Identify, evaluate, and incorporate specific best management practices that will be employed now and over the Project life to reduce salt and nutrient loading into the Antelope Valley groundwater basin.*

d. *Include in the EIR Mitigation Measures for an ongoing commitment to participate in collective groundwater basin monitoring efforts and reduce salt and nutrient loading over the Project life.*

D.3-14 cont.

15. Appendix 5.4-A (Centennial Project Water Quality Technical Report), about page 36 – While referenced on page 5.18-13, the State Board adopted general water recycling and waste discharge requirements for the use of recycled water that is managed by an administrator (Order WQ-2016-0068-DDW). This Order is an appropriate regulatory tool for the use of recycled water. *Include reference to the State Board Order WQ-2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use.*

D.3-15

16. Appendix 5.19-B (Centennial Project Wastewater Treatment Report) – The Project at build-out will include two wastewater reclamation facilities (WRF) designed for an average daily flow as follows: WRF East a 4.28 MGD, and WRF West at 0.34 MGD. Both plants are projected to use membrane bioreactor technology to achieve tertiary effluent standards. Storage reservoirs will be constructed to temporarily store water prior to distribution in recycled water pipelines. The following comments relate to wastewater collection and treatment.

    a. NOP Comments - Water Board staff's November 4, 2015 letter on the NOP requested additional information regarding wastewater collection, treatment, and disposal (Item 13). The DEIR did not provide all of the information requested. *Include in the EIR the information requested in Item 13 of Water Board staff's November 4, 2015 letter.*

D.3-16

b. Wastewater collection and treatment – Page 4-60 indicates that eight sewer lift stations will be required. *Mitigation measures should be added requiring sewer lift stations, wastewater treatment, and effluent storage facilities to be equipped with emergency backup power sources and spill containment features in the event that power failure occurs*. This is especially critical for the Project features immediately up stream of the SWP Aqueduct and adjacent to streams. D.3-17

c. Nitrogen reduction – The text is silent on whether nitrogen reduction technology will be utilized. *Mitigation measures should be added indicating that the WRFs will be required to achieve total nitrogen levels of less than 10 mg/L to ensure that any incidental recharge from the use of recycled water will not adversely affect receiving groundwater*. D.3-18

d. Disinfection – The text indicates that chlorine disinfection will be used. There is no indication that alternative disinfection measures were evaluated. *Mitigation measures should be added requiring an evaluation of alternative disinfection including ultraviolet disinfection*. The Water Board strongly recommends ultraviolet disinfection to ensure that disinfection byproducts are not produced, incidental recharge from the use of recycled water will not adversely affect receiving groundwater, and effluent total dissolved solids concentrations are lower. D.3-19

e. Effluent storage – The text does not indicate the location, size, volume, or construction method for the storage reservoirs. *The EIR should include this information.* While the EIR states that storage reservoirs will be lined, *the EIR should specify the type of liner and method of construction*. Liners must be of appropriate materials to prevent degradation and/or pollution of receiving groundwater. *If all effluent is to be contained for recycled water use, then sufficient capacity must exist to store winter flow when recycled water demand decreases. If some effluent will be percolated, then a groundwater degradation analysis must be provided*. The proposed method of monitoring potential reservoir leakage, including groundwater monitoring, should be stated. D.3-20

f. Biosolids handing – To address greenhouse gas emissions and the effects of climate change, the digesters should be equipped with methane gas recovery used for onsite power generation needs. *The location and proposed construction method of onsite sludge drying beds should be discussed*. D.3-21

Permitting Requirements

A number of activities that will be implemented under the Project have potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following. D.3-22

17. Streambed alteration and/or discharge of dredge and/or fill material to a surface water, including water diversions, may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the United States) or dredge and fill Waste Discharge Requirements for impacts to non-federal waters.

18. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-006-DWQ, obtained from the State Water Board, or an individual storm water permit obtained from the Lahontan Water Board.

19. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2014-0049 for diverted stream flows or dredge spoils dewatering, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board.

20. Wastewater collection systems are subject to the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order 2006-0003-DWQ.

21. Wastewater treatment is subject to individual waste discharge requirements issued by the Water Board. This requires that a report of waste discharge be filed with the Water Board no less than 140 days before discharge occurs.

22. If waters of the United States are present at the wastewater treatment plant sites, then storm water runoff must be covered under the statewide General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ.

23. Recycled water use is subject to water reclamation requirements issued by the Water Board, after the State Board Division of Drinking Water approves an Engineering Report to satisfy Title 22, California Code of Regulations. Alternately, an Administrator may file for coverage under Statewide Water Reclamation Requirements for Recycled Water Use, Order WQ 2016-0068-DDW.

Project proponents should consult with Water Board staff early on should project implementation result in activities that trigger these permitting actions. Information and application forms for these permits can be found at http://www.waterboards.ca.gov/lahontan/.

D.3-22 cont.

Thank you for the opportunity to comment on the DEIR. If you have any questions regarding this letter, please contact me at (760-241-2434 (jehiel.cass@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse No. (2004031072) and Project name (Centennial Ranch) in the subject line.

Jehiel Cass, P.E.
Senior Water Resources Control Engineer

Enc: Water Board Comments on NOP of DEIR (November 4, 2015)

cc: State Clearinghouse (state.clearinghouse@opr.ca.gov)
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RB6V/Shared/Units/Jays Unit/Jay/CEQA/Centennial Project – Tejon Ranch

California Water Boards

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Matthew Rodriquez, Secretary for Environmental Protection

Lahontan Regional Water Quality Control Board

November 4, 2015

File: Environmental Doc Review
Los Angeles County

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Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Centennial Development Project, Los Angeles County, State Clearinghouse Number 2004031072

The Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the above-referenced project (Project) was prepared by the County of Los Angeles Planning Department (County) and circulated for public comment in compliance with provisions of the California Environmental Quality Act (CEQA). As a responsible agency, the California Regional Water Quality Control Board, Lahontan Region (Water Board) is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations, title 14, section 15096. Based on our review of the proposed Project, we recommend that several issues be considered in the preparation of the Notice of Preparation (NOP), particularly: 1) established numerical and narrative water quality objectives and standards should be used when evaluating thresholds of significance for Project impacts; (2) post-construction best management practices (BMPs) for stormwater control are an essential part of project planning and should be discussed in the DEIR; and 3) all potential downstream impacts to hydrology and water quality must be evaluated as a result of Project implementation. Our comments on the Project are outlined below.

Project Overview

The Centennial Project is a large residential-commercial development that will include 19,333 dwelling units on an area of a total of 12,323 acres in western Antelope Valley, 36 miles west of Lancaster. Approximately 6,700 acres of land will be developed into a series of communities over a 20 year period, and approximately 5,600 acres of land will be preserved for open space for drainages and conservation. New infrastructure facilities including shopping centers, water treatment facilities, water banking facilities will be built on approximately 180 acres, while approximately 140 acres will be set aside for K-12 schools. Commercial buildings will occupy approximately 100 acres, hospitals, medical facilities, and higher education buildings will occupy approximately 110 acres, and recreational and entertainment facilities will occupy approximately 80 acres.

Water Board's Authority

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

Specific Issues to be Considered in the NOP

Based on our review of the information provided, we recommend that the following issues be considered in preparation of the DEIR.

1. The DEIR should identify all the applicable water quality standards that pertain to this project and identify which standards could potentially be violated by Project alternatives and use these standards when evaluating thresholds of significance for impacts. Water quality objectives and standards, both numerical and narrative, for **all** waters of the State within the Lahontan Region, including surface waters and groundwater, are outlined in Chapter 3 of the Basin Plan. Water quality objectives and standards are intended to protect the public health and welfare, and to maintain or enhance water quality in relation to the existing and/or potential beneficial uses of the water.

2. The Project area is located within the Neenach Hydrologic Area of the Antelope Hydrologic Unit, 626.00. The Project area lies over the Antelope Valley groundwater basin (Department of Water Resources unit 6-44). We note that the NOP in section 3.e. does not include the Basin Plan in its list of relevant plans. The beneficial uses of minor surface waters and wetlands are listed in Chapter 2 of the Basin Plan. The DEIR should identify and list all the beneficial uses of the surface water and groundwater resources within the Project area, and include an analysis of the potential impacts to water quality and hydrology with respect to those beneficial uses.

3. Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (i.e. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of the Antelope Hydrologic Unit, including groundwater. The DEIR should discuss the project components and their potential impacts to watersheds on the project area.

4. The DEIR should describe a proposed long-term maintenance and monitoring plan that will be implemented to evaluate and maintain the established baseline conditions. Specific routine and non-routine activities should be identified, such as dredging/excavation and re-contouring, and the thresholds that will trigger when maintenance activities are warranted.

5. The DEIR should describe the long-term post-construction best management practices (BMPs) maintenance plan. It is understood that routine sediment removal is necessary to maintain the function of a basin, and the removal of accumulated sediments in the bottom of a basin would completely remove any vegetation that may have been present. However, we also recognize the benefits of vegetation for water quality by filtering sediments and constituents of concerns from water. We *strongly recommend* that the County proponent include in their long term maintenance plan provisions for mowing rather than eradication, so that vegetation can more easily reestablish itself post-maintenance. Maintaining healthy deep-rooted vegetation is crucial to soil stabilization. Re-contouring and vegetation grubbing should only be done on an as-needed basis.

6. The DEIR should describe the project design standards used for sizing and constructing hydraulic features. Surface waters support a variety of beneficial uses including municipal and agricultural uses, groundwater and fresh water recharge, habitat, flood attenuation, and water quality enhancement. To ensure that no net loss of function and value will occur as a result of Project implementation, we request that culverts be designed to (1) pass storm flows without impoundment upstream, (2) with sufficient energy dissipation provided at the outlet to reduce flow velocities to pre-Project conditions, and (3) sufficiently sized to allow for habitat connectivity across/beneath the roadway.

7. All rock slope protection and energy dissipation rip-rap placed within stream channels should be **ungrouted** and the minimum amount necessary to provide scour protection and energy dissipation to prevent erosion. The DEIR should describe channel design and energy dissipation to prevent erosion. The DEIR should describe channel design criteria.

8. Construction and post-construction storm water management must be considered a significant Project component, and BMPs that effectively treat storm water runoff should be included as part of the Project. The DEIR should specify those temporary and permanent long-term sediment and erosion control BMPs that will be implemented to mitigate potential water quality impacts related to stormwater. The temporary BMPs need to be implemented for the Project until such time that vegetation has been restored to pre-Project conditions. We request that vegetation clearing be kept to a minimum and, where feasible, existing vegetation be mowed so that vegetation could more readily reestablish post-construction. A long-term BMP maintenance plan should be included in the DEIR.

9. The DEIR should identify all impacts to water resources and describe how impacts were avoided, minimized, or proposed to be mitigated. The Water Board requires that impacts to water resources be avoided where feasible and minimized to the extent practical. Compensatory mitigation will be required for all unavoidable permanent impacts to surface water resources. Water Board staff coordinate all mitigation requirements with staff from other federal and state regulatory agencies,

including the USACE and the California Department of Fish and Wildlife. In determining appropriate mitigation ratios for impacts to waters of the State, Water Board staff considers Basin Plan requirements (minimum 1.5:1 mitigation ratio for impacts to wetlands) and utilizes *12501-SPD Regulatory Program Standard Operating Procedure for Determination of Mitigation Ratios*, published December 2012 by the USACE, South Pacific Division.

10. All temporary impacts to water resource and upland areas should be restored (recontoured and revegetated) to match pre-Project conditions. A Restoration and Revegetation Monitoring Plan should be prepared and described in the DEIR that requires monitoring for some period of time (usually no less than 3 years), outlines a schedule with performance measures to be met in order for the restoration/revegetation to be deemed successful, and contains adaptive management criteria in the event performance measures are not being met.

11. Equipment staging areas, excavated soil stockpiles, and hazardous materials (i.e. oils and fuels) should be sited in upland areas outside surface waters and adjacent flood plain areas. We recommend that a comprehensive Spill Prevention and Response Plan be prepared and described in the DEIR that outlines the site-specific monitoring requirements and lists the BMPs necessary to prevent hazardous material spills or to contain and cleanup a hazardous material spill, should one occur.

12. Buffer areas should be identified and exclusion fencing used to protect water resources and to prevent unauthorized vehicles or equipment from entering or otherwise disturbing the surface waters. Equipment should use existing roadways to the extent feasible. These features should be described in the DEIR.

13. The project plans to construct and operate a domestic wastewater treatment plant. The plant will produce recycled water for use within the project area. Onsite disposal of treated wastewater must not cause pollution and minimize degradation. Denitrification should be included in the plant design. The DEIR should fully describe the following.

    a. Treatment plant and disposal pond locations,
    b. Treatment plant design criteria,
    c. Storage and disposal pond design criteria,
    d. Expected wastewater quality,
    e. Receiving groundwater quality,
    f. Expected receiving groundwater degradation (nature and extent) resulting from the discharge according to State Board Resolution 68-16,
    g. Background receiving groundwater quality and direction of flow established from a statistically significant data set,
    h. Location and well construction design of monitoring wells installed to evaluate groundwater quality,
    i. Lift station locations and design,
    j. Backup power features,
    k. Recycled water storage, delivery, and use area design standards, and
    l. Entity responsible for owning and operating the treatment plant and recycled water infrastructure.

Permitting Requirements

A number of activities associated with the proposed Project have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following.

14. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.

15. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board if water of the United States are affected. The DEIR should identify where waters of the United States are present with in the project area. The Water Board may establish individual waste discharge requirements to address stormwater impacts to state only waters.

16. New industrial operations may require coverage under the Industrial General Stormwater Permit (2014-0057-DWQ) if waters of the United States are affected. Information on the Industrial General Stormwater Permit is available on the State Water Board's web site at http://www.swrcb.ca.gov/water_issues/programs/stormwater/industrial.shtml. These permits must be obtained from the Lahontan Water Board.

17. Disposal from wastewater treatment facilities will require a waste discharge requirements which must be obtained from the Lahontan Water Board. Information on what information is needed in a report of waste discharge is available on the State Water Board's web site at http://www.waterboards.ca.gov/water_issues/programs/land_disposal/waste_discharge_requirements.shtml

18. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2014-0049, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board. The DEIR should identify any and all proposed diversion or dewatering actions.

19. Recycled water uses are subject to water reclamation and waste discharge requirements issued by the Water Board. An Engineering Report must be submitted to the Water Board and State Division of Drinking Water, which also must approve the Engineering Report.

Please be advised of the permits that may be required for the proposed Project, as outlined above. The specific Project activities that may trigger these permitting actions should be identified in the appropriate sections of the NOP. The Project proponent should consult with Water Board staff early on should Project implementation result in activities that trigger

these permitting actions. Information regarding these permits, including application forms, can be downloaded from our web site at http://www.waterboards.ca.gov/lahontan/.

Thank you for the opportunity to comment on the NOP. If you have any questions regarding this letter, please contact me at (760) 241-7391 thomas.browne@waterboards.ca.gov or Jehiel Cass, Senior Water Resource Control Engineer, at (760) 241-2434 jehiel.cass@waterboards.ca.gov.

Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse Number, when available, and Project name in the subject line.

for Jehiel W. Cass P. E.

Tom Browne, PhD, PE
Water Resource Control Engineer

cc: USEPA Wetlands Regulatory Office, Region 9 (R9-WTR8-Mailbox@epa.gov)
Daniel Swenson, USACE (Daniel.P.Swenson@usace.army.mil)
CA Dept. of Fish and Wildlife (askR5@wildlife.ca.gov)
Shu-Fang Orr, Division of Drinking Water (shu-fang.orr@waterboards.ca.gov)

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Responses to Comment Letter D.3
Lahontan Regional Water Quality Control Board
July 11, 2017

Response to Comment D.3-1:

Thank you for your comment and your participation in this public process. This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.3-2:

The potential delivery reliability and variability of Project State Water Project supplies is discussed in Draft EIR Section 5.18, Water Resources.[269] The Draft EIR analysis of State Water Project supplies utilizes the 82-year model results for the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is also utilized in the 2015 Urban Water Management Plan adopted by the Antelope Valley-East Kern Water Agency, the State Water Project contractor for Antelope Valley and for the Project. The Early Long Term scenario incorporates more significant assumptions regarding potential climate change impacts than the Delivery Capability Report base scenario, including 2025 emission levels and a 15-centimeter sea level rise. The average year State Water Project delivery rate in the Early Long Term scenario is lower than the Delivery Capability Report base scenario rate. Consistent with the Antelope Valley-East Kern Water Agency methodology, the Early Long Term scenario was further modified to more conservatively evaluate Project water supplies by using a lower single dry year delivery rate of 5 percent than identified in the Delivery Capability Report. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. The comment does not raise a specific concern regarding the discussion of the potential delivery reliability and variability of State Water Project supplies for the Project in the Draft EIR.

The volume of imported water return flows that would be used by Project is not speculative and is derived directly from the approved Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015. The Adjudication Judgment and Physical Solution provides that imported water used to meet urban demand in the Antelope Valley Basin may be recovered by the importing party in an amount equal to 39 percent of the average imported water use over the prior five years.[270] The analysis of return flow supplies in the Draft EIR is conservative because the Adjudication Judgment and

269 DRP 2017, pp. 5.18-20 to -34, -36, -54 to -64
270 *Id.,* p. 5.18-64

Physical Solution allows for the additional production of return flows generated by urban imported water use in the Antelope Valley watershed as well as in the Basin with watermaster approval. The Project water supplies discussed in the Draft EIR do not include potential return flows supplies for watershed urban use because these have not yet been approved by the watermaster.

As discussed in Section 5.18 of the Draft EIR, all Project groundwater use, return flow production and water banking activities will be regulated by and comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[271] The Adjudication Judgment and Physical Solution was approved by the Court to allocate rights to Antelope Valley Basin groundwater, imported water return flows and basin storage for the purpose of sustainably managing Antelope Valley groundwater resources over time. As a result, groundwater use, return flow production and water banking activities that are consistent with the Adjudication Judgment and Physical Solution also take account of and avoid potential long-term, cumulative impacts to the Antelope Valley Basin. Section 1.5 of the Adjudication Judgment and Physical Solution states that after the Phase 3 trial of the proceedings, the Court determined that the safe yield of the Antelope Valley Basin is 110,000 acre-feet per year. Section 3.5.43 of the Adjudication Judgment and Physical Solution defines safe yield to mean the amount of annual extractions of water from the Basin over time equal to the amount of water needed to recharge the Groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Section 3.4 of the Adjudication Judgement and Physical Solution states that the physical solution governs groundwater, imported water and Antelope Valley Basin storage space to ensure that the Antelope Valley Basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield.[272] The Adjudication Judgment and Physical Solution provides that, after a seven-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the amount of the overlying production right of 1,634 acre feet per year allocated to Tejon Ranch Company in the adjudication. The fact that the Adjudication Judgment and Physical Solution, including the annual groundwater allocation to the Tejon Ranch Company, takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain overdrafted or stressed state groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts

271 *Id.,* Appendix 5.18-D
272 *Ibid*.

for and allocates water uses, avoids long term, cumulative groundwater impacts and ensures that cumulative groundwater use will be sustainable over time.

MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-68 to 5.18-71 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified. Consequently, if Project and other Basin user water supplies regulated by the Adjudication Judgment and Physical Solution were to be reduced by the watermaster in the future, MM 18-2 ensures that the Project's potential long-term, cumulative impacts to the Antelope Valley Groundwater Basin will be less than significant.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-3:

This comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. The project is designed to prevent impacts to the Aqueduct and State Water Project facilities through the management of drainage and the location of the West WRF, as well as compliance with the Waste Discharge Requirements that will be imposed on the design and operation of the West WRF by the Lahontan Regional Board. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.3-4:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.3-5:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.3-6:

As stated in MM 19-2 and summarized at the bottom of the third paragraph on page 5.19-1 in Section 5.19, Wastewater Collection, of the Draft EIR, the construction and operation of the proposed on-site wastewater reclamation facilities (WRFs) would be subject to waste discharge requirements (WDRs) and other applicable standards and regulations of the Lahontan RWQCB. The first paragraph on page 5.4-73 also states that "Each of the proposed WRFs will be required to obtain WDRs from the Lahontan RWQCB that include enforceable operational, treatment, conveyance, discharge, water quality, and monitoring requirements before wastewater treatment and recycled water operations may commence." This regulatory compliance will involve notification of the RWQCB during the consultation, coordination, permitting, and inspection of the WRFs.

With regard to the two WRFs proximity to the State Water Project (SWP) Aqueduct. As noted above, the construction and operation of the proposed WRFs would be subject to WDRs and other applicable standards and regulations of the Lahontan RWQCB. Pages 5.4-73 through 5.4-74 discuss the potential impacts of the WRFs to surface water bodies and the regulations and mitigation measures that would be implemented to prevent significant adverse impacts. The discussion includes the wastewater treatment processes at the WRFs, including compliance with Title 22 of the *California Code of Regulations* and the Porter-Cologne Act. Thus, the construction and operation of the WRFs will meet the Lahontan Basin Plan's surface and groundwater quality objectives. The Lahontan RWQCB is expected to require the Project to include design features, such as berms, levees, spill containment features, and other topographical elevation features, to protect the WRFs during large flood events and to protect adjacent properties under any emergency conditions.

As shown on Exhibit 4-14, Centennial Project – Conceptual Wastewater System, in the Draft EIR, there are no sewer pipelines or force mainlines that would cross over the SWP Aqueduct; therefore, there is no risk of sewer line rupture over the SWP Aqueduct. In addition, the SWP Aqueduct contains a levee system that protects its waters from stormwater flooding or other surface flows. Thus, the WRFs are not expected to have any adjacency impacts to the SWP Aqueduct, or any other sensitive resources or land uses.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the

topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-7:

In response to this comment, the following changes have been made to the Draft EIR to match the numbers in Appendix 5.2-B:

The fourth and fifth sentences in the third paragraph on page 3-5 of the Draft EIR have been revised to read:

> Approximately 4.2 ~~ten~~ percent of the Project site is within the Gorman Drainage Area and the Los Angeles RWQCB (Region 4). However, ~~90~~ 95.8 percent of the Project site is located within the jurisdiction of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB), which has been designated "Region 6" by the SWRCB (see Exhibit 5.2-1, Regional Water Quality Control Board Boundaries).

The first and second sentences in the third paragraph on page 4-54 have been revised to read:

> Approximately ~~93~~ 95.8 percent of the Project site is within the jurisdiction of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB); this area is not covered by an MS4 Permit due to the lack of development in the area. The remaining approximately ~~7~~ 4.2 percent of the Project site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB); an MS4 permit has been approved by the Los Angeles RWQCB and is applicable to the portion of the site under the Los Angeles RWQCB's jurisdiction.

These changes do not alter the analysis or conclusions related to Project impacts on Hydrology.

Response to Comment D.3-8:

Project compliance with the California General Construction Permit issued by the State Water Resources Control Board (CAR000002, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-0006-DWQ) is discussed in the second paragraph of page 5.2-2 and the first full paragraph on page 5.2-26, in Section 5.2, Hydrology and Flood, and in the second full paragraph on page 5.4-2 of Section 5.4, Water Quality. MM 2-4 is hereby added to the Draft EIR in response to this comment:

MM 2-4 The Project shall comply with the California General Construction Permit issued by the State Water Resources Control Board (CAR000002, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-0006-DWQ) during all Project construction activity that meets or exceeds the applicable levels of land disturbance and other applicable coverage criteria in the California General Construction Permit notwithstanding the potential absence or presence of Waters of the United States in any Project construction location.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hydrology and water quality can be found in these documents: Section 5.9 of the AVAP EIR, and Section 3.10 of the RTP/SCS EIR.

Response to Comment D.3-9:

This comment addresses the use of Best Management Practice (BMP) maintenance measures that encourage stabilized native grasses and/or deep rooting plants to minimize sediment transport. MM 2-5 is hereby added to the Draft EIR in response to this comment:

MM 2-5 The Project shall implement maintenance measures in consultation with a qualified biologist that encourage stabilized native grasses and/or deep rooting plants to minimize sediment transport within applicable post-construction facilities that incorporated Best Management Practices for hydrology and flood control facilities.

Response to Comment D.3-10:

With regard to the Project's proposed destruction of an historic water well on the site in compliance with California Department of Water Resources (DWR) Well Standards, as described on page 5.3-20, the DWR has responsibility under the Water Code for developing well construction, alteration, and destruction standards for the purpose of protecting groundwater quality. MM 3-10 is hereby added to the Draft EIR in response to this comment:

MM 3-10 The Project Applicant/Developer shall be responsible for ensuring the destruction of the historic water well associated with the former homestead in the central portion of the site is

> completed in full compliance with the requirements of the California Department of Water Resources' Water Well Standards, including Chapter II, Part III, Section 23 (Requirements for Destroying Wells). The applicable Local Enforcement Agency for implementation of the DWR's Well Standards is the Los Angeles County Department of Health Services, Drinking Water Program (LACDHS). The Project Applicant/Developer shall present documentation that is has complied with the DWR Well Standards to the LACDHS.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of hazards and hazardous materials can be found in these documents: Section 5.8 of the AVAP EIR, and Section 3.9 of the RTP/SCS EIR.

Response to Comment D.3-11:

The following modifications to the Draft EIR are hereby made in response to this comment:

Table 5.4-9 on page 5.4-62 of the Draft EIR is hereby revised as follows:

TABLE 5.4-9
COMPARISON OF NUTRIENT CONCENTRATIONS WITH WATER QUALITY CRITERIA FOR THE PROJECT

Parameter	Predicted Average Annual Concentration (mg/L)	Los Angeles Basin Plan Surface Water Quality Objectives (mg/L)	Lahontan Basin Plan Surface Water Quality Objectives (mg/L)
Total Phosphorus	0.3	Waters shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growth causes nuisance or adversely affects beneficial uses.	Waters shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growths cause nuisance or adversely affect the water for beneficial uses whereby discharges are not to cause excessive algae growth in receiving waters.
Total Nitrogen	3.2		
Nitrate-N + Nitrite-N	0.7	10[a]	10[b]
Total Ammonia	0.4	1.24[~~c~~b]	8.5[d~~e~~]

mg/L: milligrams per liter; ELS: early life stage; pH: hydrogen potential; C: degrees Celsius; F: degrees Fahrenheit

[a] Waters shall not exceed 10 mg/L nitrogen as nitrate-nitrogen plus nitrite-nitrogen (NO3-N + NO2-N), 45 mg/L as nitrate (NO3), 10 mg/L as nitrate-nitrogen (NO3-N), or 1 mg/L as nitrite-nitrogen (NO2-N).

[b] Waters designated as MUN shall not contain concentrations of chemical constituents in excess of the maximum contaminant level (MCL) or secondary maximum contaminant level (SMCL) based upon drinking water standards specified in Title 22 of the California Code of Regulations. Waters shall not exceed 10 mg/L nitrogen as nitrate-nitrogen plus nitrite-nitrogen (NO3-N + NO2-N), 10 mg/L as nitrate-nitrogen (NO3-N), or 1 mg/L as nitrite-nitrogen (NO2-N).

[~~c~~b] 30-day average, ELS present, based on average pH (7.97) and average temperature of 25 °C.

[d~~e~~] Total Ammonia Water Quality Objective calculated using pH = 7.5 (log mean pH) and Temperature = 30°C (86°F), which is very conservative.

Source: Geosyntec Consultants 2016b

Table 5.4-12 on page 5.4-69 of the Draft EIR is hereby revised as follows:

> As discussed in Section 5.4.5, chloride and nitrate have a greater potential for infiltration because these constituents are more mobile and could reach groundwater by infiltration. Table 5.4-12 compares the predicted average annual nitrate-N and chloride concentrations in Project post-development runoff with applicable groundwater quality objectives from the Los Angeles and Lahontan Basin Plans. As shown in Table 5.4-12, under developed conditions and including the proposed regional and distributed or parcel-specific LID BMPs, predicted average annual nitrate-N and chloride concentrations in Project runoff would be significantly below the nitrate-N groundwater quality objective in the Los Angeles Basin Plan ~~(no nitrate-N groundwater objective is included in the Lahontan Basin Plan)~~ and the Lahontan Basin Plan and the chloride groundwater objectives in both Basin Plans.

TABLE 5.4-12
COMPARISON OF ~~PREDICTED~~ NITRATE-N AND CHLORIDE CONCENTRATIONS WITH WATER QUALITY CRITERIA ~~GROUNDWATER QUALITY OBJECTIVES~~ FOR THE PROJECT SITE

Predicted Average Annual Concentration in Storm Water (mg/L)		Los Angeles Basin Plan Water Groundwater Quality Objectives (mg/L)		Lahontan Basin Plan Groundwater Quality Objectives (mg/L)[a]	
Nitrate-N	Chloride	Nitrate-N	Chloride	Nitrate-N	Chloride
0.7	17.3	10	~~100~~ 50	~~N/A~~ 10	250

mg/L: milligrams per liter~~; N/A: not applicable~~

[a] Waters designated as MUN shall not contain concentrations of chemical constituents in excess of the maximum contaminant level (MCL) or secondary maximum contaminant level (SMCL) based upon drinking water standards specified in Title 22 of the California Code of Regulations. Waters shall not exceed 10 mg/L nitrogen as nitrate-nitrogen plus nitrite-nitrogen (NO3-N + NO2-N), 10 mg/L as nitrate-nitrogen (NO3-N), or 1 mg/L as nitrite-nitrogen (NO2-N). ~~There is no Lahontan Basin Plan surface water quality objective for chloride in the Project site's receiving waters.~~

Source: Geosyntec Consultants 2016b.

Response to Comment D.3-12:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. MM 4-3 is hereby added to the Draft EIR in response to this comment:

MM 4-3 The Project shall, to the maximum extent feasible, retain, temporarily store and use native topsoil as topsoil cover in disturbed areas of the Project, and shall, in consultation with a qualified plant biologist, implement measures to encourage the germination of native plants in locations where native topsoil is used as a topsoil cover within the Project.

Response to Comment D.3-13:

With regard to the use of a restoration and revegetation monitoring plan in conjunction with Project revegetation efforts, MM 4-4 is hereby added to the Draft EIR:

MM 4-4 The Project Applicant/Developer shall prepare, in consultation with a qualified biologist, a Restoration and Revegetation Monitoring Plan for the Project. The Restoration and Revegetation Monitoring Plan shall include appropriate metrics, as determined by the qualified biologist, for determining the success of Project revegetation efforts, including revegetation implemented in compliance with the approved Mitigation and Monitoring Plan for the Project. The Restoration and Revegetation Monitoring Plan shall be submitted to the County

and updated as appropriate during the review and approval process for each tract map application.

Response to Comment D.3-14:

The following text is hereby added after the fourth paragraph on page 5.4-70 of the Draft EIR in response to this comment to address the Antelope Valley Salt and Nutrient Plan:

A Salt and Nutrient Management Plan (SNMP) was developed for the Antelope Valley Groundwater Basin in May 2014. The baseline water quality analyses for the Antelope Valley Groundwater Basin included in the SNMP indicates that overall groundwater quality with respect to the SNMP constituents of concern is below the SNMP water quality management goals. These goals are consistent with the Regional Board's Basin Plan to protect the beneficial uses of the water. The analysis of future water quality (through 2035) indicates slowly increasing trends in the overall basin groundwater salt and nutrient quality that will remain below the SNMP water quality management goals. Therefore, no new implementation measures as part of the SNMP process are recommended at this time. Nevertheless, existing measures or practices are already in place to manage water quality, and frequent monitoring is recommended to assess trends in water quality.

The SNMP developed for the Antelope Valley Groundwater Basin in May 2014 proposes a monitoring plan to track the water quality in the basin. Results will be used to determine whether the concentrations of salt and nutrients over time are consistent with the SNMP predictions and the applicable SNMP water quality management goals. The monitoring program includes 32 municipal water supply wells that are currently monitored by the California Department of Public Health. The results from these existing monitoring programs will be downloaded from the State Board's Geotracker Groundwater Ambient Monitoring and Assessment (GAMA) database and included in the monitoring report prepared by the SNMP stakeholders or the appointed Antelope Valley Groundwater Basin Watermaster, if applicable. Imported, recycled, and treated potable water supply to the region will also be monitored and results included in the report. The Project must comply with all applicable requirements of the SNMP, including the identification or installation of appropriate groundwater monitoring wells in consultation with the SNMP stakeholders or the appointed Antelope Valley Groundwater Basin Watermaster, if applicable, to supplement the Antelope Valley SNMP monitoring program as necessary to implement the SNMP monitoring program in the Project area.

Salt and nutrient management implementation measures that are incorporated into the Project include:

- Municipal wastewater management. The proposed wastewater reclamation facilities (WRFs) s will incorporate tertiary treatment

processes that include nitrification-denitrification treatment processes to control nitrate concentration in the effluent and recycled water. The WRFs will use ultraviolet light (UV) disinfection to reduce chloride concentrations as opposed to chlorination disinfection processes consistent with the Lahontan RWQCB and Title 22 requirements (see MM 19-2).

- Industrial waste management. The WRFs will implement industrial waste management measures (i.e., pretreatment program, educational outreach, and coordination with customers).

- Recycled water irrigation management. The implementation of recycled water is regulated by the Title 22 California Code of Regulations. Numerous BMPs and operating procedures will be followed when using recycled water for irrigation as required by Regional Board permits. These BMPs and operating procedures include water quality monitoring at the treatment plant; applying irrigation water at a rate that does not exceed the demand of the plants, with respect to water and nutrients; a site supervisor will be responsible for regulatory and permit compliance at all times; irrigation will not be allowed to occur at any time when unauthorized runoff may occur, such as during times of rainfall or very low evapotranspiration, and any excessive overspray must be controlled.

- Low impact development techniques. As stormwater has low to no concentrations of salt and nutrients, the Project incorporates low impact development stormwater management techniques that promote groundwater recharge (see MM 4-1).

- Landscaping BMPs to limit nutrients in runoff. The Project will implement integrated pest management (IPM) and landscaping BMPs consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program. The IPM and landscaping BMPs will be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application (see MM 4-2).

Results of the monitoring will be used to determine whether additional implementation measures are necessary to maintain the SNMP water quality management goals. Monitoring report results that indicate ambient groundwater quality exceeding 50 percent of the baseline assimilative capacity or significant increases may require additional modeling and/or evaluation to determine what mitigation action, if any, is necessary and

appropriate. Such measures, which would be implemented by appropriate regional authorities in conjunction with the SNMP, may include:

- Reducing the amount of salts added to groundwater via source water – modified wastewater treatment processes such as increased retention time or blending prior to use for irrigation.

- Reducing the amount of salts and nutrients added to water via anthropogenic sources – BMPs, public outreach, and land management guidelines.

- An ordinance or ban on water softeners that uses salts may result in reduced chloride and slightly reduced TDS concentrations in the wastewater and ultimately reduced concentrations in the recycled water produced.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-15:

As noted in this comment the Draft EIR discusses Order WQ-2016-0068-DDW in the first full paragraph of page 5.18-13 in Section 5.18, Water Resources, and includes the Order as a reference in Draft EIR Section 5.18.9, References. The comment does not raise a specific concern regarding the discussion content of Order WQ-2016-0068-DDW in the Draft EIR. The comment indicates that a discussion of the Order should also be included in Appendix 5.4-A of the Draft EIR. In response to this comment, the following text is hereby added immediately before the italicized heading, "*Municipal Recycled Water Landscape Irrigation Use Permit*" on page 36 of Appendix 5.4-A of the Draft EIR:

Water Reclamation Requirements for Recycled Water Use

In June 2016, the State Water Resources Control Board adopted General Order No. 2016-0068-DDW. The Order provides a streamlined Notice of Applicability process for the beneficial, non- potable use of recycled water consistent with the California Uniform Statewide Recycling Criteria, except recycled water use to replenish groundwater resources, the disposal of treated wastewater in percolation ponds, and excessive hydraulic loading of recycled water in use areas where the primary purpose of the activity is disposal of

> treated wastewater and direct potable reuse. General Order No. 2016-0068-DDW encourages recycled water use and reduced demand on potable water supplies by (1) maintaining a streamlined approach in permitting new recycled water users through a water recycling program and (2) providing the option for a single recycled water use permit coverage for larger users that typically need permit coverage from multiple Regional Water Boards. The Order is applicable to recycled water projects where recycled water is used or transported for non-potable uses, such as landscape irrigation, irrigation of crops and pasture land, construction, fire suppression, and hydrostatic testing. The Order does not regulate the treatment of wastewater, and compliance with the Order does not relieve producers or distributors from the obligation to comply with applicable Waste Discharge Requirements (WDRs) for discharges from wastewater treatment plants, other than the recycled water uses described in the Order.
>
> An applicant must submit a notice of intent (NOI) to obtain coverage under the Order. The applicant must declare responsibility for the administration of the water recycling program authorized pursuant to the Order and describe a program the applicant will administer to ensure that recycled water use complies with the requirements of the Uniform Statewide Recycling Criteria and the Order. Once coverage is authorized, the applicant then becomes the administrator for the covered water recycling program. The Order includes specific recycled water recycling administration requirements and other reporting and monitoring requirements.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-16:

The referenced November 4, 2015 comment letter was reviewed and considered in the preparation of the Draft EIR and is included in Appendix B of this Final EIR. Item 13 in the NOP comment letter lists the wastewater reclamation facility (WRF) design and features related to this comment. The table below identifies the information provided in the Draft EIR that provides the requested information in Item 13 of the Lahontan RWQCB NOP comment letter.

Items Listed in Comment 13 From Lahontan RWQCB Letter	Draft EIR Location and Response
Treatment plant and disposal pond locations	Exhibit 4-14 and Figures 5 and 6 of Appendix 5.19-B provide the WRF locations and the pond locations within the plants, respectively.
Treatment plant design criteria	Section 5.19 discusses the proposed WRFs, with more details provided in Section 3.0 of Appendix 5.19-B, which discusses the wastewater flow estimates, and Section 4.0, which addresses the locations, peak flows, sizes, water quality objectives, treatment, solids handling, disinfection and other considerations used for plant design.
Storage and disposal pond design criteria	Sections 4.3, 4.4, and 4.5 of Appendix 5.19-B discusses wastewater design and treatment processes; Section 4.6 discusses solids handling; and 4.8 discusses recycled water storage.
Expected wastewater quality	Section 4.2 of Appendix 5.19-B addresses water quality objectives; Section 4.3 discusses treatment processes; and Section 4.7 discusses disinfection.
Receiving groundwater quality	Pages 5.4-26 through 5.4-29 discusses water quality in the Antelope Valley Groundwater Basin, including monitoring data conducted in 2007 and 2010. Detailed information is provided in Appendix 5.4-A.
Expected receiving groundwater degradation (nature and extent) resulting from the discharge according to State Board Resolution 68-16	Page 4-61 discusses the treated wastewater's use for outdoor irrigation at community-wide landscaped areas. Page 4-59 states the wastewater would be treated at the WRFs to unrestricted reuse standards under Title 22 of the California Code of Regulations, prior to reuse. The WDRs would also include wastewater treatment requirements that would have to be implemented to protect groundwater quality, as stated on page 5.19-11.
Background receiving groundwater quality and direction of flow established from a statistically significant data set	Pages 5.4-26 through 5.4-29 discusses water quality in the Antelope Valley Groundwater Basin, including monitoring data conducted in 2007 and 2010, with more detailed information in Appendix 5.4-A.
Location and well construction design of monitoring wells installed to evaluate groundwater quality	Figure 2-1 of the groundwater sample results in Appendix 5.4-A shows the approximate well locations. These were existing wells on/near the site, with two wells owned by the Tejon Ranch Company and one well owned by the Department of Water Resources.
Lift station locations and design	The lift stations are discussed in the 5th paragraph on page 4-60 and shown in Exhibit 4-14. A total of 8 small sewer lift stations would pump wastewater from development areas. Section 4.0 in Appendix 5.19-B discusses lift station design.
Backup power features	The 5th paragraph on page 4-60 and the 3rd paragraph on page 5.19-10 state that backup emergency power generators would be provided.

Items Listed in Comment 13 From Lahontan RWQCB Letter	Draft EIR Location and Response
Recycled water storage, delivery, and use area design standards	Pages 4-61 through 4-62 discuss the proposed recycled water system and Exhibit 4-15 shows the conceptual recycled water system.
Entity responsible for owning and operating the treatment plant and recycled water infrastructure.	As stated on pages 4-51, 4-55 and 4-109, the GVMWD or other Public Utility District would become the operator of the potable and recycled water systems, wastewater system, and storm water facilities servicing the Project.

The locations of sewer main lines, pump stations, force mains, WRF sites and capacities, and general treatment processes that would be implemented to serve future development under the Specific Plan and as general information on the construction and operation of these WRFs are discussed on pages 4-59 through 4-61 in Section 4.0, Project Description, of the Draft EIR. Appendix 5.19-B is the Wastewater Treatment Report, which estimates wastewater flow generation from the anticipated development and proposed sewer system and facilities to serve development. As stated on pages 4-63 and 4-108, WDRs/permits from the Lahontan RWQCB would be obtained for the proposed WRFs. As stated in MM 19-2 and summarized at the bottom of the third paragraph on page 5.19-1 in Section 5.19, Wastewater, of the Draft EIR, the construction and operation of the proposed on-site WRFs would be subject to waste discharge requirements (WDRs) and other applicable standards and regulations of the Lahontan RWQCB. The bulleted list in Item 13 will be included in the engineering design of the sewer system and WRFs that would then be presented to the Lahontan RWQCB for review and approval prior to the start of construction activities on the site.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-17:

In Section 4.0, Project Description, the fifth paragraph on page 4-60 states that "Pump stations would be sized to accommodate peak flows and would be equipped with backup emergency power generators" and the first paragraph on page 4-61 states that the pump stations would have "an emergency generator and automatic transfer switch to provide continued operation in the event of an electrical power failure". The third paragraph on page 5.19-10 in Section 5.19, Wastewater, states that generators would be provided for stand-by power.

The third paragraph on page 5.19-1, the fifth paragraph on 5.19-11, and MM 19-2 on page 5.19-14 state that the Project would have to comply with applicable regulations of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB). Thus, it is anticipated that waste discharge requirements issued by the Lahontan RWQCB for the WRFs would include enforceable operational, treatment, conveyance, discharge, water quality, and monitoring requirements, including any required emergency backup power sources and spill containment features for sewer lift stations, wastewater treatment, and effluent storage facilities. Per the Commenter's request, MM 19-2 has been augmented to include these requirements.

MM 19-2 The Project Applicant/Developer shall demonstrate that the Project has either been annexed into an existing qualified public utility district (e.g. Golden Valley Municipal Water District) or that a new public utility district (e.g. Project Water Purveyor) has been created to serve the Project. The Project Water Purveyor or alternate qualified public utility district shall be responsible for the design, construction, and operation of the wastewater facilities, and shall ensure compliance with all applicable standards and regulations, including all Lahontan RWQCB and Title 22 requirements of the California Code of Regulations.

Wastewater treatment facilities, effluent facilities, and sewer lift stations shall be designed with emergency backup power sources and spill containment features, which shall be provided to the satisfaction of the Lahontan RWQCB.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-18:

PDF 19-1 and MM 19-2 in the Draft EIR state the WRFs would be constructed in accordance with Title 22 of the *California Code of Regulations*. In response to this comment, MM 19-6 has been added to ensure the achievement of appropriate nitrogen levels in recycled water generated by the Project.

MM 19-6 Recycled water from Project Wastewater Reclamation Facilities that is used in a manner that could accidentally recharge groundwater shall meet the groundwater quality objectives in the Lahontan Basin Plan for nitrate as nitrogen, or 10 milligrams per liter based on the California state drinking water standard as referenced in the Lahontan Basin Plan for groundwater quality objectives of 45 milligrams per liter of nitrate as nitrate.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-19:

Page 4-9 of Section 4-7 of Appendix 5.19-B, Wastewater Treatment Report, proposes the use of chlorine for disinfection, as well as the option of using UV disinfection. Chlorine was initially proposed for disinfection because the recycled water system and reservoirs should maintain residual levels of chlorine to prevent development of bacteria and to manage potential odors. As stated in MM 19-2 and summarized at the bottom of the third paragraph on page 5.19-1 in Section 5.19, Wastewater, of the Draft EIR, the construction and operation of the proposed on-site wastewater reclamation facilities would be subject to waste discharge requirements (WDRs) and other applicable standards and regulations of the Lahontan Regional Water Quality Control Board. In response to this comment, MM 19-7 has been added to include these requirements.

MM 19-7 The Project Applicant/Developer shall provide an evaluation of alternate disinfection measures, including the use of ultraviolet disinfection, for water treatment at the eastern wastewater reclamation facility (WRF East) and the western wastewater reclamation facility (WRF West), and provide a recommendation regarding the most efficient and effective means of disinfection to the Lahontan Regional Water Quality Control Board (Lahontan RWQCB) for review. The WRF East and WRF West shall be designed to the satisfaction of the Lahontan RWQCB, with appropriate disinfection measures to ensure that any incidental recharge from the use of recycled water will not adversely affect receiving groundwater.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-20:

MM 19-4 states that wastewater reclamation facility (WRF) West would be located on a 3-acre site near National Cement Plant Road and WRF East would be located on a 33-acre site at the northeastern edge of the site.[273] WRF West would have a 0.34 million gallon daily capacity and WRF East would have a 4.28 million gallon daily capacity. A conceptual layout of the WRF East site, including the general locations of storage ponds and recharge basin, is provided in Figure 5 of Appendix 5.19-B, Wastewater Treatment Report. A conceptual layout of the WRF West site, including the location of the emergency storage pond, is provided in Figure 6 of the same Appendix 5.19-B.

Page 4-10 of Appendix 5.19-B also provides seasonal analysis of the recycled water supply and demand to determine the volume of seasonal storage required to be contained within the storage ponds and system-wide recycled water storage reservoirs. Page 4-11 of Appendix 5.19-B states the WRF site layouts will be refined during the preliminary design stage "to include all components of the WRFs and facility sizes based on the design flow rates" and the "preliminary design process will be reviewed and approved by the eventual operator (Water Agency) and the Lahontan Regional Board".

With regard to the type of liners proposed at the storage reservoirs, the following changes have been made to the Draft EIR:

The fourth paragraph on page 5.19-11 of the Draft EIR has been revised to read:

> As discussed in Section 5.19.2, Title 22 of the California Code of Regulations establishes criteria for recycled water, treatment, conveyance, and water quality testing and is administered by the SWRCB Division of Drinking Water. State surface and groundwater quality, including discharge from the WRFs, is further regulated by the Lahontan RWQCB under the Porter Cologne Act. Each of the proposed WRFs will be required to obtain WDRs from the Lahontan RWQCB that include enforceable operational, treatment, conveyance, discharge, water quality and monitoring requirements before wastewater treatment and recycled water operations may commence. <u>The engineering design and permitting process for the WRF East will include details related to</u>

[273] DRP 2017, Exhibits 4-14 and 5.19-1

> the size, volume, liners, and construction methods for the storage reservoirs, which will be determined at the start of the design process in consultation with the Lahontan RWQCB. Details regarding the type of impervious liner required to prevent infiltration of recycled water and prevent the degradation of the groundwater, including any required monitoring systems to detect leakage in the seasonal storage pond liners, will be provided to the satisfaction of the Lahontan RWQCB, as required through the permitting process. The WDRs issued by the Board will be consistent with the RWQCB's wastewater treatment requirements (Psomas 2017b).

The storage ponds would be fully lined to elimination percolation of effluent; therefore, no groundwater degradation analysis is required. As stated in the third paragraph on page 5.19-1 and PDF 19-3, "…storage ponds would be provided at the WRF East site to temporarily store recycled water during periods of lower demand..." Page 4-10 of Appendix 5.19-B says that 1,000 acre-feet of storage will be constructed to balance seasonal demand and supply, which is the approximate amount of excess supply during the winter months and the difference in demand in warmer months. The last sentence of the second paragraph on page 4-10 of Appendix 5.19-B states "The recycled water supply will be managed so it is all utilized to achieve a balance in supply and demand." Thus, percolation of effluent is not proposed, and sufficient storage capacity for winter flows would be provided, subject to review and approval by the Lahontan Regional Water Quality Control Board.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-21:

MM 21-9 in the Draft EIR states that the Project wastewater reclamation facilities (WRFs) shall include equipment to capture and reuse biogas for energy production. This issue is further discussed in the Draft EIR with PDF 19-1 on page 5.19-8 and MMs 19-4 and 19-5 on pages 5.19-14 and 5.19-15, which state that "Biosolids shall be hauled to a suitable landfill or used for conversion into fertilizer products."

Page 4-9 of Section 4.6 of Appendix 5.19-B states that "disposal truck trips could be reduced by using onsite sludge drying beds to increase the solids content of the sludge; thus, reducing the hauling volume." Details on sludge processing, handling, storage, and disposal, including methane gas recovery systems and sludge drying beds, would be developed during the engineering design and permitting processes for the WRFs, as reviewed and approved by the

Lahontan Regional Water Quality Control Board (Lahontan RWQCB). Other sludge dewatering techniques, such as centrifuges or belt filter presses, could also be evaluated for appropriate use on the Project at the start of the design process, in consultation with the Lahontan RWQCB.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.3-22:

The Draft EIR discloses that the Project may be subject to a variety of state and federal permitting requirements relating to waters of the State and Waters of the United States and implements mitigation requiring Project compliance with all such permitting requirements. For example, as discussed in Section 5.7, Biological Resources, MM 7-12 requires, among other things, that prior to any fill of or alteration to drainage tributaries, wetlands, and/or riparian vegetation on the Project site, the Project Applicant/Developer must obtain the appropriate regulatory agency permits and/or agreements from the U.S. Army Corps of Engineers (USACE), the California Department of Fish and Wildlife (CDFW), and the applicable Regional Water Quality Control Board (RWQCB). The Project Applicant/Developer must also comply with all mitigation measures specified in the regulatory agency permits and/or agreements. Pursuant to the permit requirements, the Project Applicant/Developer will develop a Storm Water Pollution Prevention Plan (SWPPP) that incorporates Best Management Practices (BMPs) for reducing or eliminating construction-related pollutants in the site runoff.

Similarly, as discussed in Section 5.19, Wastewater, MMs 19-1 through 19-5 require that the proposed Project's wastewater and recycled water systems comply with all the wastewater treatment and recycling waste discharge requirements (WDRs) issued by the Lahontan RWQCB prior to the Project's operation of any wastewater recycling facility (WRF). With mitigation, Project implementation would not exceed the wastewater treatment requirements of the Lahontan RWQCB and potential impacts would be less than significant.

As discussed in Section 5.4, Water Quality, the Project will implement a comprehensive system of site design, source control, low impact development, and hydromodification BMPs that meet or exceed the water quality and hydrology (storm water runoff) standards for new development in the County Low Impact Development (LID) Ordinance, the LID Standards Manual, and the MS4 Permit. All water quality controls, including regional, distributed and parcel-specific measures, are designed to meet or exceed the LID performance standards

consistent with the requirements of the MS4 Permit, the LID Ordinance, and the LID Standards Manual. The Project will also implement integrated pest management and landscaping BMPs consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program. Compliance with the LID performance standards and integrated pest management and landscaping BMP requirements will be reconfirmed in drainage and landscape plans to be submitted to the County in conjunction with each Project tract map review and approval process. These requirements are incorporated in MMs 4-1 and 4-2. During construction, the Project will comply with the state Construction General Permit, the Lahontan RWQCB Limited Threat Discharge Permit, and the Los Angeles RWQCB General Dewatering Permit, and it will implement BMPs that comply with all applicable waste discharge requirements and applicable water quality standards. With implementation of MMs 4-1 and 4-2 and with compliance with applicable laws and regulations (including the state Construction General Permit and the Lahontan RWQCB Limited Threat Discharge Permit), the Project will not otherwise degrade water quality; impacts will be less than significant with mitigation.

As further discussed in Section 5.4, Water Quality, and in Section 5.19, Wastewater Collection, the Project's two WRFs will be operated in conformance with all Lahontan RWQCB and Title 22 requirements, which will be reconfirmed in documentation and to be submitted to the County prior to the issue of building permits. These requirements are incorporated into MM 19-5. During construction, the Project will comply with the state Construction General Permit, the Lahontan RWQCB Limited Threat Discharge Permit, and the Los Angeles RWQCB General Dewatering Permit. Potential surface water quality impacts are discussed in Section 5.4 and will be less than significant after mitigation. With implementation of MMs 4-1, 4-2, and 19-5 as well as compliance with applicable laws, regulations, and WRF permits, potential Project impacts from construction or post-construction runoff that would violate applicable storm water NPDES permits or that would otherwise significantly affect groundwater quality would be less than significant.

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

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July 13, 2017

Draft Environmental Impact Report (Draft EIR) for the Centennial Project ("Proposed Project") (SCH No. 2004031072)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP[1] is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment. Achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. D.4-1

SCAQMD staff understands that one of the project objectives is to create a healthy and sustainable community by integrating alternative transportation choices, including transit use, renewable energy, water conservation, community wellness, and other green development features to the proposed project's designs. The proposed project will provide a broad range of residential (including affordable housing), commercial, institutional, recreational, and employment-generating land use types[2], which will make nearly half of daily vehicular trips occur within the proposed project area[3]. Additionally, the Centennial Green Development Program encompasses a broad range of sustainable development practices for all development phases of the proposed project and deploys innovative and green technologies over time[4]. This project exemplifies the County of Los Angeles's (County or Lead Agency) leadership in promoting sustainable communities development – a commitment that is reassured by the County in its Strategic Plan 2015-2020[5]. SCAQMD staff believes that the proposed project supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin. D.4-2

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[1] South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan.* Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

[2] Draft EIR. Section 3.0, *Environmental Setting*. Pages 3-19 and 20. Section 4.0, *Project Description*. Pages 4-4 and 5.

[3] *Ibid.* Section 5.11, *Air Resources*. Page 5.11-19. "The Project would generate an estimated 146,154 daily trips at Buildout, with approximately 48 percent (70,246 trips) being internal trips."

[4] *Ibid.* Section 1.0, *Executive Summary*. Page 1-5. Section 4.0. Pages 4-70 through 72.

[5] Los Angeles County Department of Regional Planning. June 2015. *Strategic Plan 2015-2020.* Accessed at: http://planning.lacounty.gov/assets/upl/general/strategic-plan_2015-2020.pdf.

Project Description and Project Location

The Lead Agency proposes to develop land use strategies to allow the future development of 19,333 residential units, 7,363,818 square feet of office and warehousing uses, 1,034,550 square feet of commercial uses, 1,568,160 square feet of education and medical uses, and 5,624 acres of open space on 12,323 acres[6]. The proposed project is located near the northeast corner of State Route 138 (SR-138) and Interstate Highway 5 (I-5) in the vicinity of Quail Lake south of the Kern County and Los Angeles County boundary line. The Lead Agency will also prepare a Centennial Specific Plan to create a planning framework, development standards and design guidelines[7]. The proposed project will be developed in phases over a 20-year period[8]. Construction "was assumed to begin in 2016, with buildout complete in 2035, although the actual start of construction and buildout are likely to occur later than 2016 and 2035, respectively"[9]. "As construction progresses, it is likely that various construction stages would occur at the same time"[10]. D.4-3

The proposed project is under the jurisdiction of two different air districts. "Approximately 91 percent of the site is within the boundaries of the Antelope Valley Air Quality Management District (AVAQMD), while approximately 9 percent of the southwest portion of the Project site is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD).[11]" Additionally, "there are two Not a Part (NAP) areas shown within the southwestern portion of the Project area, encompassing 25.2 and 1.9 acres"[12]. Based on a review of Exhibit 4-1, *Conceptual Land Use Plan* and Exhibit 4-3, *Villages and Core Areas* of the Draft EIR, SCAQMD staff found that the portion within the SCAQMD's jurisdiction will include commercial uses and open space, and is within the Centennial Specific Plan Village 9 planning areas[13].

Air Quality and Health Risk Assessment Analyses

The Lead Agency quantified the propose project's construction and operational emissions and compared them to SCAQMD's and AVAQMD's air quality CEQA significance thresholds to determine the significance of air quality impacts. The Lead Agency found that the construction emissions would exceed SCAQMD's regional air quality CEQA significance thresholds for VOCs and NOx after incorporating Mitigation Measure (MM) 11-2 and MM 11-3[14], and that the localized construction impacts could be significant and unavoidable since construction activities in one or several planning areas may affect already-established sensitive uses within the proposed project area[15]. The Lead Agency also found that at buildout, in 2035, the proposed project's long-term operational emissions of VOCs, NOx, CO, PM10, and PM2.5 would exceed SCAQMD's air quality CEQA significance thresholds[16]. After mitigation, these impacts would remain significant and unavoidable[17]. For the proposed project's long-term health risks, the Lead Agency found that the highest estimated cancer risk for a 30-year exposure would be 0.2 in a million[18]. D.4-4

[6] *Ibid.* Section 1.0. Page 1-4. Section 4.0. Page 4-6.
[7] *Ibid.* Section 3.0. Page 3-1 and 2.
[8] *Ibid.* Section 4.0. Page 4-6.
[9] *Ibid.* Page 4-90.
[10] *Ibid.* Section 5.11. Page 5.11-18.
[11] *Ibid.* Section 1.0. Page 1-3.
[12] *Ibid.* Section 3.0. Page 3-9. Section 4.0. Page 4-3. Section 5.11. Exhibit 5.11-1, *Air District and Basin Boundaries.*
[13] *Ibid.* Section 4.0.
[14] *Ibid.* Section 1.0. Pages 1-18 and 19.
[15] *Ibid.* Section 5.11. Page 5.11-60.
[16] *Ibid.* Section 1.0. Pages 1-18 and 19.
[17] *Ibid.*
[18] *Ibid.* Section 5.11. Page 5.11-74.

General Comments

SCAQMD staff has comments on the proposed project's Mitigation Measures for Air Resources. These comments are intended to further reduce construction and operational emissions. Additionally, SCAQMD staff recommends that the Lead Agency revise the health risk assessment (HRA) to disclose the potential health risks to the people who will live and work at the proposed project. Additional details are included in the attachment. D.4-5

Conclusion

In closing, SCAQMD staff encourages the County to continue creating livable, sustainable, and healthy communities that can benefit air quality and ensure that the Basin is on track to attain the NAAQS. Pursuant to the Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, the Lead Agency is required to provide SCAQMD with written proposed responses to all comments contained herein prior to the certification of the Final EIR. SCAQMD staff is available to work with the Lead Agency to address any other air quality and health risk questions that may arise. Please contact me at (909) 396-3308 or lsun@aqmd.gov, if you have any questions regarding these comments. D.4-6

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
JW:LS
LAC170705-01
Control Number

ATTACHMENT

SCAQMD's Air Quality CEQA Thresholds of Significance

1. Based on the proposed project's construction schedule[19], construction and operation activities are expected to overlap during a 20-year development period. The Lead Agency combined the construction and operational emissions and disclosed the calculations in the Draft EIR for information. In the case of overlapping construction and operation activities, SCAQMD staff recommends adding the construction and operational emissions and comparing those emissions to SCAQMD's air quality CEQA significance thresholds for operation[20] to determine the level of significance. D.4-7

Health Risk Assessment from Mobile Sources

2. Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of SCAQMD's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways, SCAQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

   The goal of an EIR is to inform government agencies and the public of the environmental impacts of a proposed project (CEQA Guidelines Section 15003(c)). Based on a review of the Project Description, SCAQMD staff found that the proposed project is located in proximity to I-5 and SR-138. Although the small portion of the proposed project that is within the SCAQMD's jurisdiction includes only open space and commercial uses (no residential homes), to facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the Lead Agency consider the impacts of air pollutants on people who will live at the proposed project by revising the HRA to place additional receptors at future residential development to disclose the potential health risks to the people who will live and work at the proposed project in the Final EIR. D.4-8

Guidance Regarding Residences Sited Near a High-Volume Freeway

3. Numerous health studies have demonstrated potential adverse health effects associated with living near highly travelled roadways. In traffic-related studies, the additional non-cancer health risk attributable to proximity is seen within 1,000 feet and is strongest within 300 feet[21]. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet[22]. As a result of these studies, the California Air Resources Board (CARB) developed the Air Quality and Land Use Handbook[23] that recommends avoiding new sensitive land uses (such as housing) within 500 feet of a freeway. Additional research has shown that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging[24]. D.4-9

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[19] *Ibid*. Section 4.0. Pages 4.0-6 and 90. Section 5.11. Page 5.11-18.

[20] South Coast Air Quality Management District. *SCAQMD Air Quality Significance Thresholds*. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

[21] California Air Resources Board. April 2005. "*Air Quality and Land Use Handbook: A Community Health Perspective*". Page 6. Accessed at: http://www.arb.ca.gov/ch/landuse.htm.

[22] *Ibid*.

[23] *Ibid*.

[24] See Chapter 9 of the 2012 AQMP for further information. Accessed at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf.

Guidance[25] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF. D.4-9 cont.

Enforceability of Existing Mitigation Measures for Air Resources: MM 11-1 through MM 11-11

4. CEQA requires that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (California Public Resources Code Section 21081.6 (b) and CEQA Guidelines Section 15126.4 (a)(2)). Based on a review of the Air Resources section, SCAQMD staff found that the Lead Agency is committed to eleven mitigation measures. SCAQMD staff recommends that the Lead Agency provide more details in the Final EIR such as the Mitigation Monitoring and Reporting Program (MMRP) for the proposed project to ensure that these mitigation measures are fully enforceable. In the event that any mitigation measure is later found or proved to be infeasible after the Final EIR is certified, this constitutes substantial changes that require a new environmental assessment by the Lead Agency to determine if there will be a substantial increase in the severity of the air quality impacts triggering the preparation of a supplement to the EIR (CEQA Guidelines Sections 15162 and 15163). D.4-10

Recommended Changes to Existing Mitigation Measure: MM 11-10

5. In MM 11-10, the Lead Agency requires that "[…] any land uses involving the public congregation of sensitive receptors (e.g. residential, schools, hospital, daycare center) are not within 150 feet of the near edge of the SR-138 traffic lanes"[26]. As described above in Comment No. 3, CARB recommends avoiding new sensitive land uses (such as housing) within 500 feet of a freeway. Therefore, SCAQMD staff recommends that the Lead Agency revise MM 11-10 as follows: D.4-11

   MM 11-10 The Project's plans and specifications shall demonstrate that any land uses involving the public congregation of sensitive receptors (e.g. residential, schools, hospital, daycare center) are not within ~~150~~ 500 feet of the near edge of the SR-138 traffic lanes.

Consideration of Limits to Enhanced Filtration Units: MM -11

6. Many strategies are available to reduce exposure, including, but are not limited to, building filtration systems, sounds walls, vegetation barriers, etc.[27] Because of the potential adverse health risks involved with siting housing near a freeway, it is essential that any proposed strategy must be carefully evaluated before implementation. When enhanced filtration units on housing residents are proposed, the Lead Agency should consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters,[28] costs were expected to range from $120 to $240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and it does not account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of any filtration units should therefore be D.4-12

[25] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. Accessed at: https://www.arb.ca.gov/ch/landuse.htm.

[26] Draft EIR. Section 5.11. Page 5.11-82.

[27] CARB. April 2017. *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*.

[28] This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see also 2012 Peer Review Journal article by SCAQMD: http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf.

evaluated in more detail prior to assuming that they will sufficiently alleviate near roadway exposures. D.4-12 cont.

Additional Recommended Mitigation Measures to Further Reduce Operational Emissions

7. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. In addition to the MM-4, MM-5, and MM-6 that proposed in the Draft EIR starting on page 5.11-79, SCAQMD staff recommends that the Lead Agency include additional mitigation measures for residential buildings in the Final EIR to further reduce the significant operational impacts.
   a) Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing residence or a common electrical charging area. Therefore, SCAQMD staff recommends the Lead Agency require the residential buildings of the proposed project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. For residences, SCAQMD staff recommends that homes be appropriately wired from the electrical panel to later allow residents to install electrical chargers, if desired. At a minimum, residential electrical panels should appropriately-sized to allow for future expanded use. D.4-13
   b) Residential parking shall include community electric vehicle charging station(s). Recommend 5% of parking spaces

Permits

8. The Lead Agency stated that the proposed project will include stationary sources, including, but not limited to, "boilers, emergency generators, spray booths, restaurant broilers, gasoline service stations, solvent storage tanks, small source PM-generators, and dry cleaners"[29]. In the event that a permit from SCAQMD is required, SCAQMD should be identified as a responsible agency for the proposed project in the Final EIR. Should there be any questions on permits, please contact the SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit the SCAQMD webpage, at: http://www.aqmd.gov/home/permits. D.4-14

Other Comment

9. Based on a review of the information on Pages 5.11-54 through 56, SCAQMD staff found that there were inconsistencies in terms the year representing the reasonable worst-case scenario for combined construction and operational emissions during development. The Lead Agency stated that "as a reasonable worst-case scenario, it is assumed that the Project would be 90 percent operational in Year 18 and consequently 90 percent of operational phase emissions were combined with construction emissions occurring in Year 18.[30]" However, as shown in Table 1 below, Year 11 was included as the worst-case scenario for SCAQMD. Therefore, it is recommended that the Lead Agency correct the inconsistency or provide additional clarifications in the Final EIR. D.4-15

[29] Draft EIR. Section 5.11. Page 5.11-20.
[30] *Ibid.* Section 5.11. Page 5.11-54.

Table 1
Copy of Table 5.11-21, Estimated Annual Mid-Project Combined Emissions
(SCAQMD Units [lbs/day]

Source	Emissions (lbs/day) VOC	NOx	CO	SOx	PM10	PM2.5
Unmitigated Emissions						
Year 18 Construction	**94**	**137**	207	1	73	33
Year 18 Operations	**1,319**	**761**	**3,948**	13	**1,430**	**410**
Combined Year 11 Emissions	**1413**	**898**	**4155**	2	**1503**	**443**
SCAQMD Operations Thresholds	55	55	550	150	150	55
Exceeds Threshold	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**
Mitigated Emissions						
Year 11 Construction	**75**	43	272	**1**	37	14
Year 11 Operations	**1,319**	**761**	**3,948**	13	**1,430**	**410**
Combined Year 11 Emissions – construction	**1,394**	**804**	**4,220**	2	**1,467**	**424**
SCAQMD Operations Thresholds	55	55	550	150	150	55
Exceeds Threshold	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less.

Note: Totals may not add due to rounding.

Bold indicates emissions exceeding threshold

Sources: SCAQMD 2015 (thresholds). Emissions calculations can be found in Appendix 5.11-A

D.4-15 cont.

Responses to Comment Letter D.4
South Coast Air Quality Management District
July 13, 2017

Response to Comment D.4-1:

Thank you for your comment and your participation in this public process. This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.4-2:

The Lead Agency acknowledges that the proposed Project supports the goals of the South Coast Air Quality Management District's 2016 Air Quality Management Plan. The County also agrees that the proposed Project will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the South Coast Air Basin. This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.4-3:

The Lead Agency acknowledges this comment's summary of the Project description. This comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.4-4:

The Lead Agency acknowledges this brief summary of certain conclusions of the Draft EIR's air quality analysis. This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.4-5:

This comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. With respect to this comment's request that the Draft EIR's Health Risk Assessment be revised, please see response to Comment D.4-8. Please also see response to Comments D.4-7 through D.4-15.

Response to Comment D.4-6:

This comment's offer of cooperation is noted with appreciation. This closing comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment D.4-7:

As suggested by this comment, the Draft EIR evaluated concurrent construction and operations phase emissions on pages 5.11-54 through 5.11-56. As shown in Table 5.11-21, the Year 18 combined construction and operations daily emissions would exceed the SCAQMD significance thresholds for the operations phase. The Draft EIR explains that the exceedance of the SCAQMD threshold for operations is due to the larger proportion of emissions generated during the operations phase, and the finding of a significant impact for the combined construction and operation phases is consistent with the finding of a significant impact for emissions occurring for solely the operations phase of the Project.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of utilities and service systems can be found in these documents: Section 5.17 of the AVAP EIR, and Section 3.18 of the RTP/SCS EIR.

Response to Comment D.4-8:

As the Commenter correctly notes, in *CBIA v. BAAQMD*,[274] the California Supreme Court held that CEQA generally does not require the Draft EIR to analyze how existing environmental conditions (*e.g.*, existing air pollutants generated by non-Project-related traffic traveling along SR-138) might impact the Project's future users or residents. Nevertheless, as recommended by this comment, at pages 5.11-63 through 5.11-74, the Draft EIR does consider the impacts of air pollutants on people who will live at the proposed Project. Though not legally required to do so, per *CBIA v. BAAQMD*, in the interest of full disclosure, the Draft EIR evaluates the potential adverse impacts of toxic air contaminants (TACs) and diesel particulate matter exposure generated by existing off-site sources at pages 5.11-71 through 5.11-74. In addition, Draft EIR Appendix 5.11-C includes an HRA that assesses the potential health risks for new and existing sensitive receptors near SR-138.

The HRA used the Centennial Specific Plan's land use plan to determine the Project-site location of all future sensitive receptors that would be located within 500 feet of SR-138, and

274 *CBIA v. BAAQMD* at 269

evaluated cancer risk from diesel exhaust using a receptor grid with 40 meter spacing.[275] The 500 foot buffer was selected on the basis of the California Air Resources Board's (CARB) 2005 guidance manual on land use development, *Air Quality and Land Use: A Community Perspective*.[276] The CARB guidance manual recommends a 500 foot buffer between freeways and sensitive receptors, indicating that further analysis may be in order if the proposed sensitive receptor is located within this buffer.[277] Since the HRA evaluated all future sensitive receptors generated by the Project with the potential to be located within the CARB-recommended 500 foot buffer area, there is no need to revise the HRA as the Commenter suggests. We note, however, that the text of the Draft EIR inaccurately states that the HRA only evaluated future sensitive receptors that could located within 150 feet of the SR-138 travel lanes, rather than the greater 500-foot buffer area actually analyzed in HRA included as Draft EIR Appendix 5.11-C. Accordingly, to correct this typographical error, the first sentence of the second full paragraph on Draft EIR page 5.11-73 is hereby revised as follows:

> Because the Project would generate traffic on SR-138, the receptors evaluated included 3 existing residences within 500 feet of SR-138, as well as the proposed residential and institutional areas that could be located within ~~150~~ 500 feet of the freeway.

With respect to diesel particulate matter exposure from vehicles traveling on SR-138, the HRA shows that incremental cancer risks for the 70-year exposure duration are below 10 in 1 million at locations greater than 150 feet from the travel lanes and thus would not exceed applicable thresholds of significance.[278,279] The estimated hazard index for all proposed sensitive receptors would be significantly less than one at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.[280] This determination is consistent with the Antelope Valley Area Plan EIR, which concluded that potential adverse effects to sensitive receptors located in proximity to SR-138 would be less than significant with mitigation.[281] Moreover, as more stringent vehicular greenhouse gas emission and criteria air pollution standards take effect, and as transportation fuels and vehicles become cleaner over time, the number of diesel powered vehicles on roadways as well as emissions from remaining newer diesel engines are expected to further reduce diesel-related health risks at the Project site.[282]

To address the potential impact to sensitive receptors located within 150 feet of the SR-138 travel lanes, MM 11-10 imposes a 150-foot buffer from such travel lanes within which the Project will be prohibited from siting new sensitive receptor uses. As an added layer of protection, MM 11-11 further requires that prior to future tract map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138, an additional dispersion modeling study must be conducted to estimate

275 DRP 2017, Appendix 5.11-C, pp. 2, 3
276 *Id.*, Appendix 5.11-C, p. 1
277 *Ibid*.
278 *Id.*, p. 5.11-73
279 *Id.*, Appendix 5.11-C, p. 3
280 *Ibid*.
281 DRP 2014a, p. 5.3-43
282 DRP 2017, pp. 5.21-7, -8, -23

diesel PM air concentrations. If the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then effective TAC reduction measures must be implemented to mitigate for interior air quality, such as filtration technologies or equivalent protections against TACs from vehicle emissions.

In addition, MM 11-11 has been revised in response to this comment to further insure that sensitive receptors are protected at the Project site from emissions generated by high-volume roadways:

MM 11-11 Prior to the approval of any tract map that includes an air quality sensitive receptor (e.g. residential, day care, schools, hospital) located within 500 feet of the SR-138 and/or any "high volume roadway" (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), the Project Applicant/Developer shall provide to the Air Pollution Control District(s) with jurisdiction over the mapped area a dispersion analysis prepared in accordance with each applicable Air District's methodological requirements to calculate the health risks from vehicle emissions from SR-138 and/or high volume roadway, as relevant. If the study concludes that ~~health risks would be significant at the location of a proposed sensitive receptor~~ any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices (or future more stringent thresholds as may be adopted by the applicable Air District(s) and approved by the County for use on projects subject to the County's lead agency authority under the California Environmental Quality Act)(District TAC Thresholds), then the applicant shall submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of District TAC Thresholds, shall be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan, TAC exposure reduction measures shall be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed District TAC Thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map. ~~effective design measures must be~~

~~implemented into the structures to mitigate for interior air quality, such as ventilation systems that include MERV13 filters or equivalent protections against TACs from vehicle emissions. Confirmation of compliance shall be provided to the County prior to occupancy that include sensitive receptors within 500 feet of the SR-138.~~

As shown above, MM 11-11 has been revised to, among other things, require preparation of a dispersion analysis to calculate the health risks from vehicle emissions whenever the Project proposes a tentative map that would locate sensitive receptors within 500 feet of a "high-volume" roadway (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), in addition to SR-138.

The Project site is located approximately one mile east of Interstate 5 (I-5).[283] Thus the Project site falls well beyond the outer boundary of every buffer area recommended by CARB to protect sensitive receptors from existing sources of emissions, including but not limited to the CARB-recommended 500-foot buffer for high-volume roadways.[284] Accordingly, emissions associated with vehicle travel on I-5 would not pose a significant health risk to sensitive receptors within the Project site.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of air quality can be found in these documents: Section 5.3 of the AVAP EIR, and Section 3.3 of the RTP/SCS EIR.

Response to Comment D.4-9:

As disclosed in the Draft EIR at page 5.11-72, CARB's *Air Quality and Land Use Handbook* recommends a 500-foot buffer between freeways and sensitive receptors, indicating that further analyses may be necessary if the proposed sensitive land use is located within this recommended buffer. As discussed in this comment and in the Draft EIR, the basis for CARB's recommendation include epidemiological studies demonstrating additional cancer and non-cancer health risks associated with proximity to roadways, and attributing the risk to diesel PM. Consistent with this comment, and as disclosed in the Draft EIR, the highest concentration of pollutants emitted from freeways dissipates rapidly within the first 300 feet of a freeway, and California studies show an approximate 70 percent drop off in particulate pollution levels at 500 feet, and lifetime cancer risk from exposure to diesel PM is expected

283 DRP 2017, p. 1-2

284 California Air Resources Board (CARB). 2005 (April). *Air Quality and Land Use Handbook: A Community Health Perspective* (p. 4, Table 1-1). Sacramento, CA: CARB. http://www.arb.ca.gov/ch/handbook.pdf.

to be lowered proportionately. The CARB guidance manual does not provide a quantitative acceptable threshold of risks from diesel PM from freeways in its recommendations of buffer distances between freeways or high traffic roadways and sensitive land uses, nor does it discuss the important factor of meteorology, which substantially affects pollutant concentrations if receptors are upwind or downwind of a freeway.

Consistent with this comment, and as discussed in more detail in response to Comment D.4-8, an HRA was prepared for the Project that assesses the potential health risks for new and existing sensitive receptors near SR-138. The HRA demonstrates that incremental cancer risks for the 70-year exposure duration are below 10 in 1 million at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.[285,286] The estimated hazard index for all proposed sensitive receptors would be significantly less than one at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.[287] As further discussed in response to Comment D.4-8, the Project would be required to implement MMs 11-10 and 11-11 to ensure that Project sensitive receptors are not exposed to TAC emissions generated by high-volume roadways in excess of applicable thresholds of significance.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of air quality can be found in these documents: Section 5.3 of the AVAP EIR, and Section 3.3 of the RTP/SCS EIR.

Response to Comment D.4-10:

This comment concerns the need to ensure that Project mitigation measures are enforceable and it accurately describes the requirements of California *Public Resources Code* Section 21081.6(b) and CEQA Guidelines Section 15126.4(a)(2). The Project will be required to implement an extensive list of feasible air quality mitigation measures, as set forth in Draft EIR pages 5.11-78 through 5.11-82. All mitigation measures identified in the Draft EIR will be incorporated into an enforceable Mitigation Monitoring and Reporting Program (MMRP) and meet the requirements of CEQA. A copy of the Project's MMRP, which includes every mitigation measure identified in the Draft EIR, is set forth in Final EIR Appendix 2.0-C.Rev. Moreover, all mitigation measures will be made conditions of approval of the Project and will be fully enforceable as required by California *Public Resources Code* Section 21081.6(b) and CEQA Guidelines Section 15126.4(a)(2). This comment does not raise any specific concerns

285 DRP 2017, p. 5.11-73
286 *Id.,* Appendix 5.11-C, p. 3
287 *Ibid*.

about the Project or the adequacy of the Draft EIR. Therefore, no further response is required. This comment is noted and will be provided to the Planning Commission and Board of Supervisors for consideration. Please also see response to Comment D.4-14.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of air quality can be found in these documents: Section 5.3 of the AVAP EIR, and Section 3.3 of the RTP/SCS EIR.

Response to Comment D.4-11:

The proposed revision to MM 11-10 to increase its mandatory buffer between State Route 138 (SR-138) and any land uses involving the public congregation of sensitive receptors from 150 feet to 500 feet is unnecessary, in light of MM 11-11, as revised by response to Comment D.4-8.

As discussed in the Draft EIR, MM 11-11 requires that prior to future tentative map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138 or any high-volume roadway, an additional dispersion modeling study must be conducted to estimate diesel PM air concentrations. Per MM 11-11, if the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then the applicant must submit a TAC Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of applicable thresholds, must be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan, TAC exposure reduction measures must be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed applicable thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map. Accordingly, the Draft EIR identifies mitigation measures sufficient to mitigate potential impacts related to diesel particulate matter exposure from vehicles traveling on SR-138 or other high-volume roadways. Therefore, County disagrees with the necessity for this comment's proposed revision to MM 11-10.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of air quality can be found in these documents: Section 5.3 of the AVAP EIR, and Section 3.3 of the RTP/SCS EIR.

Response to Comment D.4-12:

As noted in the footnotes cited in this comment, in April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, which is intended to provide information on strategies to reduce exposures to traffic emissions near freeways and other high-volume roadways. In the technical advisory, CARB explains that the scientific literature supports various effective strategies including but not limited to: indoor high efficiency filtration that removes pollution from the air; solid barriers such as sound walls; urban design that promotes air flow and reduces the concentration of pollution along street corridors; vegetation that reduces the concentration of pollution.

To reduce the impact of diesel particulate matter (PM) emissions from existing State Route 138 (SR-138), MM 11-10 requires the Project's plans and specifications to demonstrate that any land uses involving the public congregation of sensitive receptors are not located within 150 feet of the near edge of the SR-138 traffic lanes. Furthermore, MM 11-11, as revised by response to Comment D.4-8, requires that, prior the approval of any tentative map that includes an air quality sensitive receptor (e.g. residential, day care, schools, hospital) located within 500 feet of the SR-138 or other high-volume roadway, the Project Applicant/Developer shall provide a dispersion analysis to calculate the health risks from vehicle emissions from SR-138. If the study concludes that health risks would be significant at the location of a proposed sensitive receptor, then the applicant must submit a TAC Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of applicable thresholds, must be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan, TAC exposure reduction measures must be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed applicable thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map.

As revised, MM 11-11 permits HVAC filtration devices, which may include MERV 13 or better filters, as one type TAC exposure reduction measure that may be included a TAC Emission Reduction Plan and implemented by the Project, if required. As this comment correctly notes, air filters are most effective in removing particulate matter, rather than toxic gases, are most effective when windows and doors are closed, must be replaced over time, and have energy costs associated with their operation. Nevertheless, the SCAQMD study cited in footnote 28 of this comment concludes that the installation of air filtration devices is an important mitigation measure to minimize exposure to indoor pollutants of outdoor origin. The CARB technical advisory discussed above also recommends the use of such filters to mitigate the impact of locating sensitive receptors in the vicinity of high-volume roadways. However, given their current limitations and associated costs, MM 11-11, as revised, does not mandate the use of air filters, but allow any required TAC Emission Reduction Plan to incorporate other effective reduction measures, such as those described in the CARB technical advisory discussed above. Please see response to Comment D.4-8.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of air quality can be found in these documents: Section 5.3 of the AVAP EIR, and Section 3.3 of the RTP/SCS EIR.

Response to Comment D.4-13:

The Lead Agency agrees with the Commenter that it is important that the Project provide adequate infrastructure to support and encourage the use of electric vehicles and other alternative fuel vehicles to reduce emissions associated with fossil fuel powered vehicles. To that end, the Project's Green Development Program, set forth in Appendix 2-A of the Centennial Specific Plan,[288] encompasses a range of sustainable development practices that have been incorporated into the Project at all phases of site development (i.e., from land use planning to long-term resource conservation) and it encourages environmentally sustainable development in two ways. First, in addition to satisfying all mandatory measures of the California Green Building Standards (CALGreen) Code, all residential and non-residential development within the *Centennial Specific Plan* shall be required to satisfy the measures necessary to achieve CALGreen Tier 1 applicable at the time of development. Second, the Specific Plan's Green Development Program includes additional measures for Centennial that exceed applicable State, regional, and local requirements, including but not limited to exceeding 2016 CALGreen Tier 1 standards. With this approach, Project development will meet and exceed the mandatory standards of the CALGreen Code,

[288] Final EIR Appendix 4.0-A.Rev

CALGreen Tier 1, and the requirements of the County's "Green Building Ordinances" that exist on the date of adoption of the *Centennial Specific Plan.*

Among other requirements, the Green Development Program requires the Project Master Developer to establish a Transportation Management Association (TMA) to develop linkages with other Antelope Valley/Santa Clara Valley TMAs or like organizations in order to maximize transit efficiencies and services. As described it the Green Development Program, the TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many Project riders as possible, to promote multi-modal transportation services and options, and to reduce resident and employee use of single-occupancy automobiles for offsite commuting and internal travel within the Specific Plan. In addition, the Green Development Program requires the TMA to cooperate with automotive dealers to help promote alternative fuel vehicles.

With respect to Project infrastructure to support the use of alternative fuel vehicles, the Green Development Program requires the Project Applicant/Developer to provide plans and specifications to the County demonstrating that alternative energy fueling stations and other parking requirements commensurate with this comment's recommendations are implemented as follows:

- Business Park and Institutional land use designations will provide a minimum of one alternative energy fueling station (i.e., a 208/240 VAC electrical vehicle charging station or station providing another new or improved technology, such as compressed natural gas or hydrogen fuel cell) on-site for the first 50,000 square feet of usable floor space and an additional alternative energy fueling station for each additional 50,000 square feet of usable floor space thereafter;
- Loading docks will provide a 240 kV outlet in the vicinity of the loading dock;
- The Town Center and each Village Center will provide a minimum of one alternative energy fueling station with multiple outlets;
- Designated transit hubs will provide a minimum of one alternative energy vehicle fueling station;
- Parking structures and parking lots with 20 or more parking spaces will include a minimum of five percent preferentially located parking spaces for alternative-fueled vehicles. In addition, the parking facility will include at least one alternative energy fueling station and electric lines that are designed and sized to add additional fueling stations for up to three percent of the total parking spaces when a demand is demonstrated;
- Each multi-family projects will provide a minimum of 10 percent of total site parking places dedicated to shared vehicles and or alternative fuel vehicles. Additionally, each multi-family project will provide a minimum of one alternative energy fueling station for the first 17 residential units and an additional alternative energy vehicle fueling station for each additional 17 residential units thereafter;

- Each single-family residential unit will include one 208/240 kV outlet suitable for use for electric vehicles;
- A refueling facility for alternative fuels will be installed to meet demand once the TMA has determined that 5 percent of residential or employment vehicles are powered by fuels other than petroleum and electricity.

As explained in the Specific Plan's Green Development Program, technological advances and emerging practices related to sustainable community development and green building are rapidly advancing. The Green Development Program is designed to adapt to this changing landscape and assumes flexibility to respond to future technological advances and sustainable community opportunities. The Green Development Program recognizes that Green legal standards, as well as the sustainability measures identified in the Green Development Program's Table 2-A-1, may be superseded by changing legal standards, changing technologies, and evolving work, home, and transportation patterns.

Changes to legal standards, for example, are likely to include additional requirements to reduce greenhouse gas emissions. Advances in technology are inherently difficult to predict and account for; it is, for example, possible that predicted advances in autonomous vehicle technology make private ownership of cars less prevalent among homeowners and employees, which could reduce the need for parking at residential and commercial buildings while increasing the need for centralized parking and autonomous vehicle servicing facility. The Green Development Program is intended to address potential changes in laws, technologies, and practices by allowing development pursuant to the Specific Plan to continue to comply with applicable legal standards, and to adapt to changing technologies and practices by substituting alternate measures ("Innovation and Adaption Measures") for those measures identified in Table 2-A-1 of the Green Development Program, provided the Innovation and Adaption Measures achieve equal or greater environmental benefits of the Table 2-A-1 measures and do not result in any new significant adverse environmental impacts.

The master developer will be responsible for implementing the applicable provisions of the Green Development Program in the tentative tract and site planning process, as well as in the "horizontal construction" phase (i.e., rough grading; road construction; pubic infrastructure construction). Developers constructing residential and nonresidential buildings will be responsible for implementing Green Development Program measures applicable to the "vertical construction" phase (i.e., fine grading, building construction, development of parking facilities, etc.). The requirements at the horizontal construction phase will be assured through conditions of approval prepared at the time of tentative tract map and site plan approvals, and for other applicable infrastructure permit approvals. The requirement at the vertical construction phase, including CALGreen Tier 1 requirements, will be assured through verification mechanisms at the time of building permit or site plan review, and with occupancy approvals. Innovation and Adaption Measures may be proposed by the Master Developer or horizontal construction developer in the same development review process steps included in the corresponding measures identified in Table 2-A-1.

In addition, the Project will be required to comply with all applicable legal requirements regarding the provision of alternative energy fueling stations and related infrastructure to serve` alternative fuel vehicles.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of air quality can be found in these documents: Section 5.3 of the AVAP EIR, and Section 3.3 of the RTP/SCS EIR.

In response to this comment, page 14 of Appendix 2-A, Green Development Program in Draft EIR Appendix 4.0-A is hereby revised as follows to correct inadvertent typographical errors:

> **Alternative Fuels Including Electric Vehicle Infrastructure.**
>
> The Applicant/Developer shall provide plans and specifications to the County demonstrating that "alternative energy fueling stations" and other parking requirements shall be installed as follows. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel.
>
> - Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on-site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter.
> - Loading docks shall provide a 240 kV outlet in the vicinity of the loading dock.
> - The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle ~~charging~~ fueling station with multiple outlets.
> - Designated Transit Hubs shall provide a minimum of one alternative energy vehicle ~~charging~~ fueling station.
> - Parking structures and parking lots with 20 or more parking spaces shall include a minimum of 5 percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles, at least one of which shall be equipped

with alternative energy vehicle fueling station. Electrical lines shall be designed and sized to add additional ~~charging~~ alternative energy vehicle fueling stations for up to 3 percent of the total parking spaces when a demand is demonstrated. The design and installation shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, of the CALGreen Code.

- For multi-family projects, provide a minimum of 10 percent of total site parking places dedicated to shared vehicles and/or alternative fuel vehicles. Additionally, projects with ~~provide~~ at least ~~20~~ 17 residential shall provide a minimum of one alternative energy vehicle fueling station for the first ~~twenty (20)~~ 17 residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty (20)~~ 17 residential units thereafter.
- Installation shall be consistent with Section A5.106.5.3, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code.
- Each single-family residence shall include one 208/240 kV outlet, suitable for use for electric vehicles. The installation shall comply with requirements of the ~~2013~~ 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction.
- The TMA shall encourage the use of the best feasible alternative fuel technology to be used in transit, solid waste management, HOA, CFD, fleet and other community service vehicles.
- A refueling facility for alternative fuels shall be installed to meet demand once the TMA has determined that 5 percent of residential or employment vehicles are powered by fuels other than petroleum and electricity.

In response to this comment, the last full paragraph on page 1 of Appendix 2-A to Draft EIR Appendix 4.0-A is hereby revised as follows to correct inadvertent typographical errors:

Centennial's Green Development Program encourages environmentally sustainable development in two additional ways:

- First, in addition to satisfying all mandatory measures of the CALGreen Code, all residential and non-residential development within the Specific Plan shall be required to satisfy the required measures necessary to achieve 2016 CALGreen Tier 1 ~~then are currently applicable~~.
- Second, this Green Development Program includes additional measures for Centennial that exceed applicable state, regional and local requirements, including but not limited to exceeding ~~2013~~ 2016 CALGreen Tier 1.

> With this approach, development within the Specific Plan will meet and exceed the standards of ~~2013~~ 2016 CALGreen Tier 1 as well as the requirements of the County's Green Building Ordinances.

In response to this comment, the last partial paragraph on page 8 and the first partial paragraph on page 9 of Appendix 2-A to Draft EIR Appendix 4.0-A is hereby revised as follows to correct inadvertent typographical errors:

> Notwithstanding the foregoing, in order to recognize equivalent programs, any residential development project that achieves certification by Build it Green provided for a Green Point Rated certification, the National Association of Home Builders for compliance with the National Green Building Standard, or certification by the U.S. Green Building Council for performance under the Leadership in Energy and Environmental Design (LEED) will be considered consistent with the intent of the Centennial Green Development Program for the proposed development project, so long as such certification otherwise exceeds ~~both~~ the mandatory requirements of the CALGreen Code in effect on the date of application for a building permit and the voluntary measures required to achieve CALGreen Tier 1 as described in the 2016 version of the CALGreen Code.~~, which exceed required CALGreen measures.~~ Any commercial project (as defined within a business park, light industrial or commercial land use designation), that is awarded LEED Silver Certification or better will be considered consistent with the Program, so long as such certification otherwise exceeds the mandatory nonresidential requirements of the CALGreen Code in effect on the date of application for a building permit and the measures required to achieve CALGreen Tier 1 as described in the 2016 version of the CALGreen Code. The comprehensiveness of these certification programs guarantees, for their respective types of development, the achievement of a high minimum standard equivalent to CALGreen Tier 1 and the unique measures otherwise required by Table 2-A-1.

Response to Comment D.4-14:

Consistent with this comment, SCAQMD is identified as a responsible agency on Draft EIR page 4-110. Moreover, Draft EIR pages 5.11-4 and 5.11-56 disclose that stationary sources are typically required to obtain permits to construct and to operate from the applicable air pollution control agencies, which would include SCAQMD with respect to qualifying Project stationary sources proposed within SCAQMD's jurisdictional boundary. Finally, MM-1 provides that the Project's plans and specifications shall require stationary sources to comply with the parameters stated in Stationary Source Types, Size Limits, and Quantity Estimates, which is included as Attachment A to the Project's Mitigation Monitoring and Reporting Program. Should there be a need for a stationary source exceeding the prescribed limits, the Project Applicant/Developer must apply for source-specific permit from the Antelope Valley Air Quality Management District (AVAQMD) or SCAQMD, as applicable. This comment's provision of pertinent contact information and its offer of assistance are noted with appreciation.

In response to this comment page C-78 of Final EIR Appendix 2.0-C.Rev, Mitigation Monitoring and Reporting Program, is hereby revised to include AVAQMD and SCAQMD as responsible agencies for purposes of MM 11-1, as follows:

5.11	**Air Resources**	**MM 11-1** The Project's plans and specifications shall require stationary sources to comply with the parameters stated in Stationary Source Types, Size Limits, and Quantity Estimates, which is included as Attachment A to the Project's Mitigation Monitoring and Reporting Program. Should there be a need for a stationary source exceeding the prescribed limits, the Project Applicant/Developer shall apply for source-specific permit from the Antelope Valley Air Quality Management District (AVAQMD) or South Coast Air Quality Management District (SCAQMD), as applicable.	Require stationary sources to comply with the parameters stated in Attachment A	Prior to issuance of applicable construction permits	Project Applicant/ Developer, AVAQMD and SCAQMD	County Department of Regional Planning

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of air quality can be found in these documents: Section 5.3 of the AVAP EIR, and Section 3.3 of the RTP/SCS EIR.

Response to Comment D.4-15:

This comment correctly identifies a typographical error in Table 5.11-21 of the Draft EIR. Page 5.11-54 of the Draft EIR accurately describes its assumed reasonable worst-case impact scenario as occurring in Year 18 of the Project. However, some rows in Table 5.11-21 of the Draft EIR are mislabeled as "Year 11," rather than "Year 18" (note that this error is not shown in Table 5.11-20 of the Draft EIR). The correct "Year 18" emission quantities are shown on the mislabeled rows, as confirmed by reference to Section 2.0 of Draft EIR Appendix 5.11-A. Thus, to correct this typo, all references to "Year 11" on Table 5.11-21 need only be revised to read "Year 18." None of the table's listed emission quantities are inaccurate and they were all included in Draft EIR Appendix 5.11-A. Table 5.11-21 is hereby revised with the corrected text as follows:

TABLE 5.11-21
ESTIMATED ANNUAL MID-PROJECT COMBINED EMISSIONS
(SCAQMD UNITS [LBS/DAY])

Source	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Unmitigated Emissions						
Year 18 Construction	**94**	**137**	207	1	73	33
Year 18 Operations	**1,319**	**761**	**3,948**	13	**1,430**	**410**
Combined Year ~~11~~18 Emissions	**1413**	**898**	**4155**	2	**1503**	**443**
SCAQMD Operations Thresholds	55	55	550	150	150	55
Exceeds Threshold	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**
Mitigated Emissions						
Year ~~11~~18 Construction	**75**	43	272	1	37	14
Year ~~11~~18 Operations	**1,319**	**761**	**3,948**	13	**1,430**	**410**
Combined Year ~~11~~18 Emissions – construction	**1,394**	**804**	**4,220**	2	**1,467**	**424**
SCAQMD Operations Thresholds	55	55	550	150	150	55
Exceeds Threshold	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less.

Note: Totals may not add due to rounding.

Bold indicates emissions exceeding threshold

Sources: SCAQMD 2015 (thresholds). Emissions calculations can be found in Appendix 5.11-A

The above revision to Table 5.11-21 merely clarifies the Draft EIR analysis and does not constitute significant new information.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of air quality can be found in these documents: Section 5.3 of the AVAP EIR, and Section 3.3 of the RTP/SCS EIR.

E. Local Agencies

CENTENNIAL

at TEJON RANCH

City of
SANTA CLARITA

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196
Phone: (661) 259-2489 • FAX: (661) 259-8125
www.santa-clarita.com

August 10, 2017

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
Los Angeles, CA 90012

Dear Mr. Sackett,

Subject: Comments on Notice of Completion and Availability of the Draft Environmental Impact Report (DEIR) for the Centennial project

Thank you for the opportunity to review and comment on the above referenced Notice of Completion and Availability.

The Centennial project would consist of new residential, commercial, recreational/entertainment, business park, and institutional/civic uses on a 12,323-acre site in the northwestern portion of the Antelope Valley in unincorporated Los Angeles County (County), approximately 35 miles north of the City of Santa Clarita (City). The project would allow for up to 19,333 dwelling units, 7,363,818 square feet of business park uses, approximately 1,034,550 square feet of commercial uses, and 1,568,160 square feet of institutional/civic uses. Additional facilities contemplated in the conceptual site plan include locations for up to four new fire stations and a new Sheriff's station. Further, the project would preserve 5,624 acres of on-site open space. E.1-1

The City requests additional specific discussion and/or particular analytic emphasis in the following areas:

Traffic Analysis and Mitigation

1. The traffic study indicates that 60% of project trips will be internal to Centennial at buildout of the project. More information should be provided regarding the derivation of this figure. E.1-2
2. Even with the proposed improvements along I-5, many segments will remain LOS E/F. The applicant should provide additional analysis as to whether Centennial will cause additional traffic to divert from I-5 onto SCV roads and the degree of impact, if any. E.1-3

Jobs/Housing Balance

The topic of jobs/housing balance has been an important issue addressed by the County in the Santa Clarita General Plan and the Santa Clarita Valley Area Plan. The existing jobs/housing imbalance within the Santa Clarita Valley results in existing impacts to traffic, air quality, and greenhouse gas emissions. Due to the proximity of the project to the Santa Clarita Valley, the E.1-4

City has concerns regarding the projected jobs/housing balance for the project. Section 5.9, Population, Housing, and Employment, of the DEIR includes a discussion regarding the 2012 and 2040 projected jobs/housing ratios for the project, the North Los Angeles County Subregion, and the County as a whole. The anticipated jobs/housing ratio for the Centennial project is 1.22 to 1. Although no State, regional, County, or local requirements exist at the present time for the project area, the City of Santa Clarita strongly encourages consideration be given to modify the project to achieve a 1.5 to 1 jobs/housing balance as required within the Santa Clarita Valley Area Plan, or at minimum a 1.3 to 1 jobs/housing balance as required within the Antelope Valley Area Plan.

E.1-4 cont.

Water Supply Assessment

Section 5.18, Water Resources, of the DEIR includes a summary of the Water Supply Assessment prepared pursuant to Senate Bill (SB) 610 for the project. Key principles of the Centennial Water Supply/Demand element of the Management Strategy are:

- To comply with SB 610
- To maximize water conservation
- To maximize use of recycled water
- To minimize use of State Water Project supplies
- To incorporate water banking to provide supplies for project demand during single and multiple dry-year conditions
- To provide water supplies from multiple sources, including local groundwater, recycled water, Antelope Valley-East Kern Water Agency (AVEK) water, banked water, return flows, and other purchased water supplies from outside the AVEK service area in order to increase water supply reliability in years of normal or average hydrology, as well as single and multiple dry year conditions

The City of Santa Clarita strongly encourages that the project be developed and managed in a manner consistent with these key principles, and that significant efforts be made to adopt and implement additional strategies that may accomplish the stated goals of the management strategy into the future.

E.1-5

Thank you again for the opportunity to comment on the DEIR. The City looks forward to reviewing the FEIR when it is available. If you have any additional questions, please contact me at (661) 255-4305.

E.1-6

Sincerely,

Thomas B. Cole
Director of Community Development

TC:MM:cf
S:\CD\PLANNING DIVISION\CURRENT\County Monitoring\2017\Centennial\Centennial NOA DEIR comments 7-17-17.doc

cc: Jason Crawford, Planning Manager

Responses to Comment Letter E.1
City of Santa Clarita
August 10, 2017

Response to Comment E.1-1:

Thank you for your comment and for your participation in this public process. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment E.1-2:

This comment addresses the derivation of the estimated percentage of total trips that will be internal to the Project area. As discussed on pages 5.10-49 to 5.10-51 of the Draft EIR, the Project analysis includes a discussion of internal and external "tripends" and "trips." A "trip end" refers to a trip start or destination point. An internal tripend is a trip that starts or begins in the Project site, such as from a residence. A "trip" includes a starting tripend and ending tripend. An internal trip is a trip that both starts and ends within the Project site. An external trip is a trip with either a starting or ending point outside of the Project site.

As discussed on Draft EIR pages 5.10-2 to 5.10-5, the Draft EIR uses the most recent version of the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County, including the Project site. This version of the model was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. The updated North County Sub-Area Model provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. The model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be internal to the site, and 35 percent will be external to the site.

The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model updated by the County are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As discussed on Draft EIR page 5.10-50, the Project includes schools, parks, and retail shopping areas within the Project site located and sized to meet the Project's residential and workforce needs. The Project site is relatively isolated and most of the trips generated by travel to and from these locations will be internal to the Project area. In addition, at buildout, the Project will include approximately 10.1 million square feet (sf) of commercial office, shopping/retail, and industrial land uses that will provide approximately 23,675 jobs, many of which would be filled by future Centennial residents. In comparison, applicable traffic models for the Lancaster/Palmdale area, which is larger than the Project but also relatively isolated, project that 70 percent of all tripends are internal to

the region.[289] Similarly, traffic models indicate that 74 percent of the total tripends in the Santa Clarita Valley will be internal when the region is built out.[290]

The North County Sub-Area Model estimates of the Project's average daily internal and external trips and tripends at buildout is consistent with available census bureau data of the percentage of residents who work within or outside of their places of residence for communities with similar locational characteristics as the Project. The table below summarizes the 2011-2015 American Community Survey (ACS) 5-Year Estimates of the percentage of all workers aged 16 or older working in their own community, or internal to 11 communities that are relatively isolated from other locations and that have approximately the same average total workforce as the Project at full buildout.

	Total Workforce Over 16 Years of Age	**Percent Working in Own Community**
Santa Maria California	43,861	60%
El Centro California	15,368	57%
Tehachapi California	3,343	54%
Porterville California	18,810	53%
Barstow California	7,927	51%
Paso Robles California	14,771	48%
Madera California	18,525	46%
Lancaster California	53,503	46%
Watsonville California	22,271	45%
Santa Clarita California	84,987	37%
Palmdale California	55,867	32%
AVERAGE	**30,839**	**48%**
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table S0810		

The ACS data indicates that the percentage of workers that are employed within their own community ranges from 60 percent in Santa Maria, California to 46 percent in Lancaster, California and 32 percent in Palmdale, California. The average percentage of residents who work within their communities is 48 percent. As discussed on Draft EIR page 5.10-50, most of the Project trips will be generated by residential land uses, and an average single-family residential unit generates approximately nine home-based trips per day. About two of these nine trips are home-based work trips related to travel directly to and from work. The remaining trips are related to travel between residential units for a non-work activity such as school, shopping, or recreation, which may be trips that are entirely local or may represent one leg of a journey between home and the workplace. The percentage of internal trips and tripends for non-work activity in locations such as the Project which provide schools, recreational facilities and shopping opportunities that are relatively far from other options is generally higher than for work-related trips. Residents in relatively isolated locations are more willing to utilize local school, shopping, and recreational facilities than to modify or

289 Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale
290 Santa Clarita Valley Consolidated Traffic Model Version 4.1, City of Santa Clarita and the County of Los Angeles

change employment even if the desired work requires a significant daily commute. The internal trip rate for the Project that results from the North County Sub-Area Model is approximately the same as the average internal trip rate for work commutes in similarly isolated communities in California (48 percent). Since more daily trips in a community are related to non-work purposes, and the percentage of non-work internal trips is typically higher than for employment purposes, these data indicate that the North County Sub-Area Model internal and external trip estimates for the Project are reasonable. The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[291] This comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

Response to Comment E.1-3:

This comment concerns the possibility that the Project will divert additional traffic from Interstate 5 (I-5) to local Santa Clarita Valley roads. With the exception of The Old Road, which extends from the now-closed former Ridge Route south and to the west and east of I-5 to the intersection of I-5 with State Route (SR) 14, Santa Clarita Valley roadways do not provide practical alternatives to I-5. All of the major arterials connecting with I-5 in the region, such as Newhall Ranch Road, Valencia Boulevard, Magic Mountain Parkway, McBean Parkway and Lyons Canyon Road, extend east and west from I-5 through traffic-controlled intersections and urbanized areas with relatively low speed limits.

At present, the most significant congestion in the Santa Clarita Valley along the I-5 corridor is related to travel to and from locations to the south of the region in the greater Los Angeles area. Development of the Project provides a new origin and destination to the north, in the opposite direction from the currently congested southern routes, for trips generated in the Santa Clarita Valley. The net effect of the Project in the region will be to shift a portion of the current Santa Clarita Valley average daily trips (ADT) from more-congested southern to less congested northern I-5 facilities. The Project will not result in an increase in the number of trips generated in the Santa Clarita Valley. Instead, the total number of Santa Clarita Valley trips using the northern portions of I-5 towards the Project will increase from a projected level of 11,000 ADT without the Project to 52,000 ADT with the Project.[292] As a result, the Project will benefit Santa Clarita residents and employers by providing new options for employment north of the Santa Clarita Valley, shifting trips from the highly-traveled Newhall Pass and more congested southern portions of I-5 to the less congested areas to the north.

Response to Comment E.1-4:

The AVAP does not require the Project to achieve a jobs/housing balance of 1.3 jobs for every Project household. Rather, the AVAP provides for a jobs-to-household ratio of approximately 1.3 jobs for every household across the entire AVAP planning area, which is a fair improvement from the 0.2:1 jobs-to-household ratio provided by the previous 1986

[291] Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal (1988) 47 Cal.3d 376, 410; National Parks & Conserv. Ass'n v. County of Riverside (1999) 71 Cal.App.4th 1341, 1362

[292] Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale

Antelope Valley Areawide General Plan.[293] The AVAP focuses future development in Economic Opportunity Areas (EOA) to allow for the preservation of ecological resources in open space conservation areas. The Economic Development Element of the AVAP designates areas along major transportation corridors for light and heavy industrial uses and a concentration of skilled labor force in EOAs. The Project would be located in the West EOA and is consistent with the land use designations in the AVAP Land Use Policy Map. The Project would have an on-site jobs-housing ratio at buildout of 1.22. Thus, it would be contributing to the attainment of the approximately 1.3 jobs/housing ratio for the entire AVAP planning area, as envisioned in the AVAP.

Moreover, the projected 1.22 jobs/housing balance for the Project is a conservative estimate as it does not include Project residents who don't work for an on-site employer, but do work from home for off-site employers. According to published reports, in 2016, 43 percent of Americans spent some time telecommuting, which represents a four percent increase since 2012.[294] In addition, those who do telecommute do so more frequently.[295] From 2012 to 2016, the segment of telecommuters that worked a day or less per week from home fell to 25 percent from 34 percent.[296] During the same period, the segment of telecommuters that worked from home increased from 24 percent to 31 percent.[297] These national trends are also evident locally. According to the Southern California Association (SCAG) of Governments, telecommuting is growing in the region.[298] This appears to be particularly true among younger generations. According to SCAG, in 1983, 19 year olds were a bigger percentage of all drivers than those 70 or older but, by 2008, 19 year olds were less than half the percentage of the driving population age 70 or older.[299] Also, in 1980, only 1.3 percent of workers age 25 to 34 telecommuted from home but, by 2010, that number rose to 3.2 percent.[300] These numbers are likely to increase because SCAG's *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* commits $6.9 billion to regional Transit Demand Management strategies that expressly include incentives for telecommuting.[301]

Based on SCAG's growth forecast, as presented in the 2016-2040 RTP/SCS, the jobs-to-housing ratio for the region in 2015 was 1.35 and the projected ratio for 2040 is 1.33.[302] With changing workforce patterns, such as an increase in home-based workers for all portions of

293 DRP 2015, p. ED-2; DRP 2017, p. 5.9-30, 31

294 Chokshi, N. 2017 (Feb. 15). Out of the Office: More People Are Working Remotely, Survey Finds. The New York Times. https://www.nytimes.com/2017/02/15/us/remote-workers-work-from-home.html?_r=0 (last accessed August 31, 2017).

295 *Ibid*.

296 *Ibid*.

297 *Ibid*.

298 SCAG 2016c

299 Choi. S. and Cho J. and Wen F. (2014) Millennials: Who Are They? Implications on Regional Planning. Southern California Association of Governments' Community, Economic & Human Development Committee. http://www.scag.ca.gov/Documents/IndustryImpactByMillennials_CEHD100214.pdf (last accessed August 31, 2017).

300 *Ibid*.

301 SCAG 2016c

302 Southern California Associated Governments (SCAG). 2016 (April, adopted). Demographics & Growth Forecast (p. 11). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

the work week, the Project may well achieve a 1.3 jobs-to-housing ratio. Since the Draft EIR conservatively assumes existing 5-day commute patterns and office occupancy ratios, it likely understates the Project's jobs-to-housing balance and overstates commuter-related transportation impacts.

Please also see Section 5.13 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.14 of the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

In response to this comment, the following documents are added to the administrative record:

Chokshi, N. 2017 (Feb. 15). Out of the Office: More People Are Working Remotely, Survey Finds. The New York Times. https://www.nytimes.com/2017/02/15/us/remote-workers-work-from-home.html?_r=0 (last accessed August 31, 2017).

Choi. S. and Cho J. and Wen F. (2014) Millennials: Who Are They? Implications on Regional Planning. Southern California Association of Governments' Community, Economic & Human Development Committee. http://www.scag.ca.gov/Documents/IndustryImpactByMillennials_CEHD100214.pdf (last accessed August 31, 2017).

Response to Comment E.1-5:

The Commenter correctly notes the Project's key water principles. As a condition of approval of all qualifying tentative subdivision maps, the Project will also be required to provide a written verification pursuant to California Government Code § 66473.7 stage to confirm that the total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection will meet the projected demand associated with the proposed subdivision. This written verification process provides an additional opportunity to integrate water management improvements that may become available in the future.

The Project's water supplies are discussed in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. The Project has been designed to achieve the key principles noted in the comment. Water conservation measures are required by MM 18-1 and include: monitoring all non-construction potable and non-potable water use using appropriate metering equipment throughout the site; the use of on-site wastewater treatment and conveyance facilities that provide recycled water to reduce potable water demand; installation of water-efficient major appliances; installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses; the use of water smart/evapotranspiration-based controllers and low water use plants and shrubs in all irrigated slope areas; the implementation of water budget based rates in compliance with all applicable legal requirements, including indoor residential water use of 55 gallons per capita per day

consistent with proposed state indoor water conservation objectives; and outdoor residential water use of 55 percent and outdoor commercial, industrial, and institutional outdoor use of 45 percent of the reference evapotranspiration rate for the Project site. These measures are discussed on pages 5.18-40 to 5.18-50 of the Draft EIR and will ensure that the Project will achieve higher levels of water use efficiency than in most existing Antelope Valley developed areas.

Project recycled water use is discussed on page 5.18-67 of the Draft EIR and in Section 5.19, Wastewater Collection, and will be generated by the treatment of indoor wastewater in onsite facilities to California Title 22 standards. As shown in Draft EIR Table 5.18-10, at buildout these facilities will produce approximately 4,577 acre feet per year of recycled water and will meet 40 percent of total Project water demand. The Project's use of State Water Project (SWP) supplies is discussed on pages 5.18-62 to 5.18-64, and the delivery reliability of these supplies is discussed on pages 5.18-20 to 5.18-28 and 5.18-54 to 5.18-64 of the Draft EIR. Other water supplies that will be used by the Project include recycled water, groundwater and return flows from urban use in the Antelope Valley Basin in accordance with the Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015, certain supplies from the Antelope Valley-East Kern Water Agency to be provided as repayment for water provided to the Agency in prior years. As shown in Table 5.18-10, taking account of the anticipated average annual delivery reliability of SWP supplies to the Antelope Valley[303], on average SWP water will be used to meet 37 percent of total Project buildout demand and 63 percent of Project water demand will be met by using other water supplies.

Draft EIR Tables 5.18-10 to 5.18-12 analyze the sufficiency of Project water supplies, including water banking in wetter years for use in drier years, during average, single dry and multiple dry years in accordance with California Water Code Requirements. The tables and analysis show that the Project's supplies are sufficient to meet demand in all such years and on a sustainable basis over time while maintaining a significant water reserve in the two water banking facilities that will serve the Project. MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified. MM 18-2 ensures that the Project water supplies and demand will be managed in accordance with the key principles summarized in the comment,

303 DRP 2017, pp. 5.18-20 to -28, -54 to -64

including the implementation of additional strategies to accomplish the Project's water supply and demand management goals as may be required in the future.

Please also see Section 5.17 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.18 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment E.1-6:

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

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F. Organizations

CENTENNIAL

at TEJON RANCH

Subject: FW: Centennial Project Draft EIR, Antelope Valley, Unincorporated Los Angeles County, CA

From: Diane Versaggi [mailto:dversaggi@sanmanuel-nsn.gov]
Sent: Tuesday, May 30, 2017 10:46 AM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: Centennial Project Draft EIR, Antelope Valley, Unincorporated Los Angeles County, CA

Dear Mr. Sackett:

On May 20, 2017, the Cultural Resources Management Department for San Manuel Band of Mission Indians (SMBMI) received your correspondence regarding the Draft EIR for the Centennial Project (County Project No. 02-232) located in the northwestern portion of the Antelope Valley in unincorporated L.A. County. I am writing today to inform you and the Los Angeles County Department of Regional Planning that the above-referenced project exists outside of Serrano ancestral territory and, as such, SMBMI will not be requesting consulting party status under CEQA nor requesting to participate in the scoping, development, and/or review of documents created pursuant to these legal and regulatory mandates. F.1-1

Should you have any questions about the content of this communication, please do not hesitate to contact Ms. **Lee Clauss** at your convenience.

Respectfully,

Diane Versaggi on Behalf of
Lee Clauss
Cultural Resources Management Director
SAN MANUEL BAND OF MISSION INDIANS
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SAN MANUEL
BAND OF MISSION INDIANS

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Response to Comment Letter F.1
San Manuel Band of Mission Indians
(c/o D. Versaggi)
May 30, 2017

Response to Comment F.1-1:

Thank you for you your comment and your participation on this public process. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

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June 30, 2017

Samuel Dea
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

VIA EMAIL TO:
sdea@planning.lacounty.gov

Re: *Centennial Project DEIR, SCH No. 2004031072*

Dear Mr. Dea and the County of Los Angeles:

On behalf of the Golden State Environmental & Social Justice Alliance, a California Social Purpose Corporation, Entity #4017878, we hereby submit comments under the California Environmental Quality Act ("CEQA") on the Draft Environmental Impact Report ("DEIR") for the Centennial Project (the "Project").

I. Failure to Implement All Feasible Mitigation Measures to Reduce Emissions

The DEIR determines that emissions generated during Project construction would exceed the Antelope Valley Air Quality Management District's (AVAQMD) significance threshold for annual NO_x emissions (Table 5.11-9, p. 5.11-44), and would exceed the South Coast Air Quality Management District's (SCAQMD) significance thresholds for mass daily VOC and NO_x emissions, resulting in a significant air quality impact (Table 5.11-10, p. 5.11-45). Even after applying mitigation to the Project's construction emissions in an effort to reduce emissions to less than significant levels, the DEIR concludes that the Project would result in a significant and unavoidable air quality impact. The DEIR states, F.2-1

> "Based on the AVAQMD annual thresholds and SCAQMD mass daily thresholds, construction-related emissions of VOC and NOx would result in significant impacts. MM 11-1 and MM 11-2 would be implemented to reduce emissions; however, the impacts would remain significant and unavoidable." (p. 5.11-58).

While it is true that the proposed Project would result in significant construction-related VOC and NO_x impact, the DEIR's conclusion that these impacts are "significant and unavoidable" is entirely incorrect. According to CEQA, and as stated by the San Joaquin Valley Air Pollution Control District (SJVAPCD):

> "CEQA requires Lead Agencies to mitigate or avoid significant environmental impacts associated with discretionary projects. Environmental documents for projects that have any significant environmental impacts must identify all feasible mitigation measures or alternatives to reduce the impacts below a level of significance. If after the identification of all feasible mitigation measures, a project is still deemed to have significant environmental impacts, the Lead Agency can approve a project, but must adopt a Statement of Overriding Consideration to explain why further mitigation measures are not feasible and why approval of a project with significant unavoidable impacts is warranted."[1]

F.2-1 cont.

Therefore, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. Review of the Project's VOC and NO_x mitigation measures, however, demonstrates that not all feasible mitigation is being implemented. As a result, additional mitigation measures should be identified and incorporated in order to reduce the Project's air quality impact to the maximum extent possible. Until all feasible mitigation is reviewed and incorporated into the Project design, impacts from construction-related VOC and NO_x emissions cannot be considered as significant and unavoidable.

In the sections below, we identify several additional mitigation measures that the DEIR can incorporate to reduce the Project's VOC and NO_x emissions, potentially to less than significant levels.

Use of Zero-VOC Emissions Paint

The DEIR states that the Project will use paints with an average VOC content that "would not exceed 50 grams per liter (g/L) for all interior surfaces, 100 g/L for residential exterior surfaces, and 150 g/L for non-residential exterior surfaces" (p. 5.11-43). However, the Project Applicant should consider the use of low VOC coatings. The use of zero-VOC emission paint has been required for numerous projects that have undergone CEQA review. Zero-VOC emission paints are commercially available. Other low-VOC

F.2-2

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1 http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf, p. 115 of 125.

standards should be incorporated into mitigation including use of "super-compliant" paints, which have a VOC standard of less than 10 g/L.[2]

F.2-2 cont.

Use of Material that do Not Require Paint
Using materials that do not require painting is a common mitigation measure where VOC emissions are a concern. Interior and exterior surfaces, such as concrete, can be left unpainted.

F.2-3

Use of Spray Equipment with Greater Transfer Efficiencies
Various coatings and adhesives are required to be applied by specified methods such as electrostatic spray, high-volume, low-pressure (HVLP) spray, roll coater, flow coater, dip coater, etc. in order to maximize the transfer efficiency. Transfer efficiency is typically defined as the ratio of the weight of coating solids adhering to an object to the total weight of coating solids used in the application process, expressed as a percentage. When it comes to spray applications, the rules typically require the use of either electrostatic spray equipment or HVLP spray equipment. The SCAQMD is now able to certify HVLP spray applicators and other application technologies at efficiency rates of 65 percent or greater.[3]

F.2-4

The following mitigation measures can be implemented to reduce NO_x emissions generated by Project construction. NO_x is a byproduct of diesel fuel combustion, and is emitted by on-road vehicles and by off-road construction equipment. Mitigation for NO_x emissions should include consideration of the following measures in an effort to reduce construction emissions:

Use of Tier 3 Construction Equipment and Selective Catalyst Reduction Systems
As stated above, after concluding that the Project's construction-related VOC and NO_x emissions would exceed the AVAQMD and SCAQMD's significance thresholds, the DEIR applies mitigation to the Project's emissions. Specifically, the DEIR models the Project's emissions for the average construction year and peak grading year assuming that the Project's entire construction fleet would be equipped with Tier 4 Final engines (p. 5.11-48). Based off of the emission estimates provided in Tables 5.11-14, 5.11-15, 5.11-16, and 5.11-17 of the DEIR (p. 5.11-48 - 5.11-50), which estimates the Project's criteria air pollutant emissions after implementation of Tier Final 4 engines, the DEIR states the following:

F.2-5

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2 http://www.aqmd.gov/home/programs/business/business-detail?title=super-compliant-coatings

3 http://www.aqmd.gov/home/permits/spray-equipment-transfer-efficiency

> "As shown in Table 5.11-15 and Table 5.11-17, the use of all Tier 4 Final construction equipment would reduce daily NOx emissions to less than the SCAQMD significance threshold for both the average grading years and the peak grading year. VOC emissions reductions resulting from the use of Tier 4 Final equipment would exceed the SCAQMD thresholds for both the average and peak grading years. In summary, construction emissions of VOC would be significant and would be unavoidable because (1) it cannot be known if Tier 4 Final construction equipment could be feasibly and reasonably provided for enough construction equipment to result in emissions less than AVAQMD thresholds for all years and (2) even if Tier 4 Final construction equipment would be available, the SCAQMD daily VOC emissions threshold may be exceeded in some average years" (p. 5.11-50 - 5.11-51).

As a result, the DEIR determines that because there is limited availability of Tier 4 Final off-road construction equipment, the Project would result in a significant and unavoidable VOC and NO_x impact (p. 5.11-58). However, as previously stated, the DEIR cannot state that impacts are significant and unavoidable without first implementing all available, feasible mitigation. While we agree that the availability of Tier 4 Final engines is limited and that it is unlikely that the Project Applicant would be able to obtain Tier 4 Final engines for all 75 pieces of off-road construction equipment that the Project proposes to use throughout Project construction (Appendix 5.11-A, pp. 27, pp. 214, pp. 372), we believe that the use of Tier 3 engines in conjunction with the use of engine exhaust retrofit devices would reduce emissions to less than significant levels.

F.2-5 cont.

Engine exhaust retrofit devices are installed in vehicle exhaust systems to reduce emissions, and therefore do not impact engine or vehicle operation.[4] Selective catalytic reductions (SCR), for example, are air pollution control devices that reduce NO_x emissions through use of a reductant, such as urea, which is commercially available as Diesel Exhaust Fluid (DEF).[5] According to the Environmental Protection Agency (EPA), SCRs are capable of reducing NO_x emissions by approximately 70% - 90%.[6] The use of SCR devices require DEF to be replenished regularly by the vehicle operator. For light-heavy duty vehicles,

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4 http://www3.epa.gov/otaq/diesel/technologies/index.htm

5 "Draft Final Off-Road Equipment White Paper" SCAQMD, September 2015, available at: http://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-offroad-draftfinal.pdf?sfvrsn=2

6 "Air Pollution Control Technology Fact Sheet," United States Environmental Protection Agency, *available at*: https://www3.epa.gov/ttncatc1/dir1/fscr.pdf

DEF refills are required around the same time as an oil change. In heavy-duty vehicles, the DEF refill requirement is dependent upon operating conditions, usage, miles traveled, etc.[7] When DEF supplies in a vehicle equipped with a SCR device reach near-empty levels, the vehicle's operating system becomes locked, preventing the user from starting the vehicle without adequate levels of DEF.[8] This ensures that vehicles equipped with SCR devices do not emit higher NO_x levels when DEF levels – which the device relies on to reduce NO_x emissions – are too low. In addition to reducing NO_x emissions, SCRs have also been found to moderately reduce particulate emissions.[9]

F.2-5 cont.

Use Electric and Hybrid Construction Equipment

CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures*[10] report also proposes the use of electric and/or hybrid construction equipment as a way to mitigate emissions. When construction equipment is powered by grid electricity rather than fossil fuel, direct emissions from fuel combustion are replaced with indirect emissions associated with the electricity used to power the equipment. Furthermore, when construction equipment is powered by hybrid-electric drives, emissions from fuel combustion are also greatly reduced. Electric construction equipment is available commercially from companies such as Peterson Pacific Corporation,[11] which specialize in the mechanical processing equipment like grinders and shredders. Construction equipment powered by hybrid-electric drives is also commercially available from companies such as Caterpillar[12]. For example, Caterpillar reports that during an 8-hour shift, its D7E hybrid dozer burns 19.5 percent fewer gallons of fuel than a conventional dozer while achieving a 10.3 percent increase in productivity. The D7E model burns 6.2 gallons per hour compared to a conventional dozer which burns 7.7 gallons per hour.[13] Fuel usage and savings are dependent on the make and model of the construction equipment used. The Project

F.2-6

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7 "About Clean Diesel: What is SCR?" Diesel Technology Forum, available at: http://www.dieselforum.org/about-clean-diesel/what-is-scr

8 *Ibid.*

9 "Draft Final Off-Road Equipment White Paper" SCAQMD, September 2015, available at: http://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-offroad-draftfinal.pdf?sfvrsn=2

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

11 Peterson Electric Grinders Brochure, available at: http://www.petersoncorp.com/wp-content/uploads/peterson_electric_grinders1.pdf

12 Electric Power Products, available at: http://www.cat.com/en_US/products/new/power-systems/electric-power-generation.html

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

Applicant should calculate project-specific savings and provide manufacturer specifications indicating fuel burned per hour.

F.2-6 cont.

When combined together, these measures offer a feasible way to effectively reduce the Project's construction-related VOC and NO_x emissions, potentially to less than significant levels. As such, an updated DEIR must be prepared to include additional mitigation measures to ensure that the necessary mitigation measures are implemented to reduce construction emissions. Furthermore, the Project Applicant needs to demonstrate commitment to the implementation of these measures prior to Project approval to ensure that the Project's emissions are reduced to the maximum extent possible.

F.2-7

II. Artificially Reduced Particulate Matter Construction Emissions

The DEIR artificially reduces the Project's PM10 and PM2.5 emissions during Project construction, without providing any sort of justification as to why these reductions were applied. As a result, the Project's construction-related air quality impacts are underestimated.

The DEIR relies upon the California Emissions Estimator Model Version CalEEMod.2016.3.1 ("CalEEMod")[14] to estimate the Project's construction and operational emissions (p. 1-27). The CalEEMod output files, provided in Appendix 5.11-A of the DEIR, indicate that the Project's construction activities would produce a maximum of approximately 125 tons per year (tons/yr) of PM10 emissions and a maximum of approximately 58 tons/yr of PM2.5 emissions (see excerpt below) (Appendix 5.11-A, pp. 19).

F.2-8

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2034	9.8303	7.3901	14.0823	0.0376	1.8364	0.1351	1.9715	0.4915	0.1345	0.6260	0.0000	3,335.6863	3,335.6863	0.1153	0.0000	3,338.5687
2035	9.7373	6.7438	13.9369	0.0375	1.8364	0.0841	1.9206	0.4915	0.0835	0.5750	0.0000	3,320.2469	3,320.2469	0.1079	0.0000	3,322.9447
Maximum	14.7171	62.9666	51.1797	0.0866	121.8430	2.8836	124.6540	55.3606	2.6747	58.0160	0.0000	8,064.6856	8,064.6856	1.7094	0.0000	8,072.6545

Because the DEIR relies upon the emission estimates provided above to determine the significance of the Project's VOC, NO_x, and CO-related air quality impact (Table 5.11-9, p. 5.11-44), the DEIR should have also used the PM10 and PM2.5 emission estimates demonstrated in the table to determine the significance of the Project's PM-related air quality impact. The emissions estimates provided in Table 5.11-9 of the DEIR, however,

14 CalEEMod website, *available at*: http://www.caleemod.com/

indicate that annual PM emissions generated during Project construction would produce a maximum of approximately 12 tons/yr of PM10 emissions and approximately 7 tons/yr of PM 2.5 emissions, not 125 tons/yr and 58 tons/yr, as estimated by the DEIR's air pollution model (see excerpt below) (DEIR, p. 5.11-44).

TABLE 5.11-9
AVERAGE YEAR ESTIMATED ANNUAL CONSTRUCTION EMISSIONS (AVAQMD THRESHOLDS)

	Emissions (tons/year)					
Year	VOC	NOx	CO	SOx	PM10	PM2.5
Year 1	1	14	9	<1	9	5
Year 2	5	**56**	40	<1	12	7
Year 3	13	**63**	51	<1	12	6
Year 4	15	**58**	49	<1	12	6
Year 5	14	**53**	46	<1	11	6
Year 6	14	**48**	43	<1	11	6
Year 7	13	**43**	41	<1	11	5
Year 8	13	**39**	40	<1	11	5
Year 9	13	**37**	39	<1	10	5
Year 10	12	**32**	36	<1	10	5
Year 11	12	**32**	35	<1	10	5
Year 12	12	**31**	35	<1	10	5
Year 13	12	**31**	35	<1	10	5
Year 14	12	**31**	35	<1	10	5
Year 15	12	18	27	<1	9	4
Year 16	12	18	27	<1	9	4
Year 17	12	18	27	<1	9	4
Year 18	12	18	27	<1	9	4
Year 19	10	7	14	<1	2	1
Year 20	10	7	14	<1	2	1
Maximum	15	**63**	51	<1	12	7
AVAQMD Thresholds (Table 5.11-6)	***25***	***25***	***100***	***25***	***15***	***12***
Exceeds AVAQMD Thresholds?	**No**	**Yes**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; AVAQMD: Antelope Valley Air Quality Management District

Bold indicates emissions exceeding threshold

Source: AVAQMD 2016b (thresholds). Emissions calculations can be found in Appendix 5.11-A

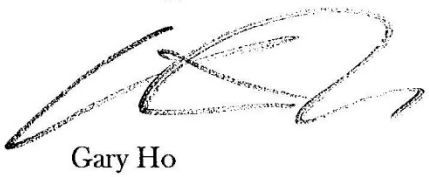
As demonstrated above, the DEIR relies upon a PM10 emissions estimate of 12 tons/yr – which is approximately 10 times lower than what was estimated in CalEEMod – and upon a PM2.5 emissions estimate of 7 tons/yr – which is approximately 8 times lower than what was estimated in CalEEMod – to determine Project significance. The DEIR fails to provide any evidence to demonstrate the origin of these emissions reductions, and as a result, we find the significance determination provided in the DEIR to be incorrect, as it artificially reduces the Project's construction PM10 and PM2.5 emissions to avoid a finding of significance. Because the DEIR fails to provide substantial evidence that indicates the origin of these reductions, the DEIR's reduced PM emissions cannot and should not be relied upon to determine Project significance. Therefore, additional mitigation measures

F.2-8 cont.

should be identified and incorporated in an updated DEIR to adequately address and mitigate the Project's potential air quality impacts.

F.2-8 cont.

Sincerely,



Gary Ho
Blum | Collins, LLP

Responses to Comment Letter F.2
Blum Collins, LLP on behalf of
Golden State Environmental & Social Justice Alliance
June 30, 2017

Response to Comment F.2-1:

This introductory comment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Project has committed to an extensive list of feasible air quality mitigation measures, as set forth Draft EIR pages 5.11-78 through 5.11-82. The mitigation measures will be incorporated into a Mitigation Monitoring and Reporting Program (MMRP) and meet the requirements of CEQA. All mitigation measures will be made conditions of approval of the Project and will be fully enforceable as required by CEQA section 21081.6(b). In response to comments received on the Draft EIR, MM 5.11-2 has been revised as discussed in responses to Comments F.2-2 and F.2-5 to further reduce the Project's VOC and NOx emissions. However, even with implementation of the revised MM 11-2, the Project's potential impacts related to VOC and NOx emissions remain significant and unavoidable based on quantitative emissions thresholds established by the South Coast Air Quality Management District (SCAQMD). The size of the Project is a major factor in the Project's exceedance of these quantitative thresholds, which apply to both large and small projects. However, in its comment letter on the Draft EIR, SCAQMD determined that the Project's proposed mix of land uses and Green Development Program "exemplifies the [County's] leadership in promoting sustainable communities development" and confirmed its view "that the proposed project supports the goals of the 2016 [Air Quality Management Plan] and will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2.)

The Air quality impacts of associated with development and operation of the Project and related cumulative development were also considered in Section 5.3 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035). Please refer to those documents for additional information on the topic.

Response to Comment F.2-2:

In regard to the comment's request that the Project be required to utilize low VOC coatings, this comment misstates the text of the Draft EIR. The Draft EIR does not state that "the Project will use paints with an average VOC content that 'would not exceed 50 grams per liter (g/L) for all interior surfaces, 100 g/L for residential exterior surfaces, and 150 g/L non-residential exterior surfaces.'" Rather, the Draft EIR explains that its air quality analysis assumed that the VOC content of the Project's architectural coatings would not exceed such stated amounts.[304] Furthermore, as recommended by this comment, the Draft EIR explains

[304] DRP 2017, p. 5.11-43

that the Project is required to use architectural coatings that are compliant with Antelope Valley Air Quality Management District Rule 1113 and South Coast Air Quality Management District (SCAQMD) Rule 1113, which impose strict restrictions on the VOC content of architectural coatings used within each district. Reducing the VOC content of architectural coatings is among many ongoing regulatory and scientific undertakings to reduce VOC emissions, but until these materials have been approved by the appropriate expert regulatory agencies it is not legally feasible for the Lead Agency to mandate use of only those architectural coatings with the lowest VOC content. Although VOC emissions remain significant and unavoidable, given the limited jurisdiction and control of the Lead Agency in regulating the VOC content of architectural coatings, mitigation measures mandating use of architectural coatings with "Zero-VOC" content is not required by CEQA.

However, as noted by the Commenter, the SCAQMD has published a list of companies that have informed SCAQMD that they manufacture one more "Super-Compliant Architectural/Industrial (AIM) Coatings" with VOC contents well below the regulatory limits of SCAQMD Rule 1113.[305] The SCAQMD website clarifies, however, that "[t]he SCAQMD's listing of these manufactures does not constitute or imply an endorsement by the SCAQMD nor does it certify their ability to meet the requirements of Rule 1113 Architectural Coatings." In light of SCAQMD's acknowledgement that there may be "Super-Compliant Architectural/Industrial (AIM) Coatings" on the market with VOC contents well below the regulatory limits of SCAQMD Rule 1113, the use of which could further reduce the Project's VOC emissions, MM 11-2 is hereby revised to add the following bullet point to its existing list:

- <u>Construction contractors shall use Super-Compliant Architectural/Industrial (AIM) Coatings to the extent that they are commercially available and certified to meet the applicable requirements of Antelope Valley Air Quality Management District Rule 1113 and South Coast Air Quality Management District Rule 1113.</u>

In response to this comment, the following documents are added to the administrative record:

South Coast Air Quality Management District (SCAQMD). 2017 (August). Super-Compliant Architectural Coatings Manufactures and Industrial Maintenance Coatings List. http://www.aqmd.gov/home/regulations/compliance/architectural-coatings/super-compliant-coatings.

South Coast Air Quality Management District (SCAQMD). 2017 (August). Super-Compliant Coating Manufactures. http://www.aqmd.gov/docs/default-source/planning/architectural-coatings/super-compliant-manf-list.pdf?sfvrsn=19.

[305] South Coast Air Quality Management District (SCAQMD). 2017 (August). Super-Compliant Coating Manufactures. http://www.aqmd.gov/docs/default-source/planning/architectural-coatings/super-compliant-manf-list.pdf?sfvrsn=19.

Response to Comment F.2-3:

In regard to construction materials that do not require painting, construction at the Project site must comply with all applicable legal requirements, including Building Codes and other standards that specify required building materials. Reducing the VOC content of building materials is among many ongoing regulatory and scientific undertakings to reduce VOC emissions, but until these materials have been approved by the appropriate regulatory agencies it is not legally feasible for the Lead Agency to mandate use of only those construction materials with the lowest VOC content. Likewise, mitigation measures that mandate interior and exterior surfaces be left unpainted are not feasible, as explained below.

CEQA Guidelines section 15364 defines the term "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, legal, social, and technological factors." As explained in Draft EIR section 5.13, *Visual Resources*, the Project's impact on visual resources will be minimized by implementing the Design Principles as outlined in Appendix 2-B of the Specific Plan.[306] At buildout of the Project, it is anticipated that the full range of building architecture, colors, and roofing materials would be represented on the Project site and that all buildings will be designed in a manner consistent with the Deign Principles. The ultimate building materials and colors would be determined at the time individual elements of the Project are submitted for building permits.

As discussed and depicted in Section 2-B of the Specific Plan, the Design Principles are founded on traditional and timeless American town planning principles that respect the natural setting by using resource efficient materials and a variety of earth tone colors. A mitigation measure that mandates that exterior surfaces be left unpainted would conflict with the Design Principles and undermine their mitigating effect with respect to the Project's visual impact, thus exacerbating the Project's significant and unavoidable aesthetic impact. The social and environmental benefits of the Design Principles would be lost with implementation of a mitigation measure that prohibits painting exterior Project surfaces. Moreover, it is unlikely that a mitigation measure that mandates that interior surfaces be left unpainted would be effective or quantifiable because future residents and business owners would likely decorate the interiors of their homes and business according to their personal tastes. Moreover, such a mandate would be unenforceable because the Lead Agency lacks the resources and legal authority to regulate the manner in which individual homeowners and business owners decorate the interior of their private properties using paints and coatings legally available on the commercial market. Accordingly, this comment's recommended mitigation measure is not required by CEQA because it is infeasible, taking into account legal, environmental and social factors.

See, also, Section 5.3 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

306 DRP 2017, p. 5.13-24

Response to Comment F.2-4:

This comment requests that the Draft EIR include a new mitigation measure regarding coating and adhesive spray equipment. As this comment correctly notes, the current air district regulations already require the Project developer to use a specific type of spray equipment that has been certified by the air district. For example, South Coast Air Quality Management District (SCAQMD) Rule 481(c)(2) prohibits persons from operating any spray painting or coating equipment unless coatings are applied with high-volume, low-pressure (HVLP) spray, electrostatic and/or equipment that has been certified by SCAQMD. As this comment also notes, since 1989, SCAQMD authorizes the manufactures or users of spray equipment that has not been certified by SCAQMD as compliant with Rule 481 to apply for such certification, which certification will be granted if the equipment has an efficiency rate that is equivalent to SCAQMD standards (i.e., 65 percent or greater).[307] The Project, however, does not propose to use spray equipment that has not already been certified by the air district as compliant with applicable air district regulations. Accordingly, this comment's proposed mitigation is unnecessary, as it would not offer substantial environmental benefits beyond those that will already occur with the Project's adherence to all applicable air district regulations.

Response to Comment F.2-5:

This comment summarizes that Draft EIR's determinations regarding certain Project effects related to VOC and NOx emissions and concerns related mitigation measures identified in the Draft EIR. The Project has committed to an extensive list of feasible air quality mitigation measures, as set forth Draft EIR pages 5.11-78 through 5.11-82. The mitigation measures will be incorporated into a Mitigation Monitoring and Reporting Program (MMRP) and meet the requirements of CEQA. All mitigation measures will be made conditions of approval of the Project and will be fully enforceable as required by CEQA section 21081.6(b).

MM 11-2 requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 4 final emission standards to the extent that equipment is available, and if Tier 4 equipment is not available the applicant must provide the County with documentation that demonstrates the reasons for non-availability. In cases of documented shortage of Tier 4 equipment, Tier 3 equipment may be used, but only in accordance with the County's Green Construction Policy

In regards to this comment's identification of certain selective catalytic reduction (SCR) retrofit devices that are purportedly available for use in conjunction with Tier 3 engines in the event an insufficient number of Tier 4 vehicles can be obtained to serve the Project, the Lead Agency notes that MM 11-2 provides that "all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB.)"[308] Accordingly, the Project would be required to use SCR devices on construction equipment, to the extent they have been certified by CARB. Moreover, MM 11-2 requires that any emissions-control device used by the contractor must achieve

307 SCAQMD 2017b
308 DRP 2017, p. 5.11-78

emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

To date, CARB has not certified any SCR devices for construction equipment for NOx reduction, however, some SCR devices for construction equipment have been certified by the Environmental Protection Agency for NOx reduction.[309] In response to this comment, the text following the first and second bullet points set forth in MM 11-2 is hereby revised as follows:

- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency (USEPA) Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). Any emissions-control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If Tier 4 Final equipment is not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability.
- Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach. These policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA).

In response to this comment, the following documents are added to the administrative record:

California Air Resources Board (CARB). 2017b (August 13, 2017, last accessed). Verification Procedure – Currently Verified Diesel Emission Control Strategies. Sacramento, CA: CARB. https://www.arb.ca.gov/diesel/verdev/vt/cvt.htm.

U.S. Environmental Protection Agency (USEPA). 2017b (August 13, 2017, last accessed). Verified Technologies List for Clean Diesel. Washington, D.C.: USEPA. https://www.epa.gov/verified-diesel-tech/verified-technologies-list-clean-diesel.

Response to Comment F.2-6:

As discussed in response to Comment F.2-5, MM-2 requires that all off-road diesel-powered construction equipment greater than 50 horsepower used at the Project site must meet U.S.

[309] CARB 2017b; USEPA 2017b

Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by the California Air Resources Board or the U.S. Environmental Protection Agency. The performance standard described in MM 11-2 already accommodates the Project's use electric and hybrid engine construction equipment of the type recommended by this comment. Accordingly, further revision is unwarranted. As confirmed by CARB's 2016 Mobile Source Strategy, technological innovation in the field of low-NOx and low-emission engines across multiple weight classes is rapidly evolving, spurred in large part by California regulatory policy that mandates steep emission reductions in all sectors of the economy, including construction.[310] In light of this fast changing field, and taking into account the Project's 20-year buildout horizon, MM 11-2 is designed to be agnostic with respect to any particular technology that must be used during Project construction in order to accommodate the use of new technologies as they may become available over the life of the Project's construction period. This comment's recommendations regarding the Project's use of electric powered, and electric hybrid, construction equipment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.2-7:

This comment requests that the proposed mitigation measures described in Comments F.2-1 through F.2-6 be added to the EIR. Please see responses to Comments F.2-1 through F.2-6. With respect to this comment's assertion that the Project demonstrate a commitment to implementation of the mitigation measures identified in the Draft EIR, all such mitigation measures will be made enforceable conditions of Project approval and will be included in the enforceable Mitigation Monitoring and Reporting Program adopted for the Project, as required by CEQA.

Response to Comment F.2-8:

The Project's annual PM10 and PM2.5 emissions were adjusted in the EIR to account for an error within the CalEEMod modeling. At the time the EIR was prepared, the CalEEMod model overestimated the annual emissions from fugitive dust proportional to the number of years of the construction period. While annual construction emissions for vehicle exhaust were calculated correctly, the calculation of fugitive dust emissions was flawed. This flaw is easily demonstrated with test runs using the same inputs for the quantity and types of equipment. The only variation to these test runs would be the duration of construction of phase. If sensitivity runs are conducted for a full year, 5-year and 10-year periods, the fugitive dust emissions provided within the CalEEMod output was erroneously calculated as a cumulative total of all analyzed years instead of emissions for a single year. For instance, the fugitive dust emissions for a 1-year period would be the same while emissions for a 5 and 10 years would be 5 and 10 times higher on an annual basis than that calculated for a 1-year period even for the same level of annual equipment activity. The AVAQMD emissions thresholds are based on annual emissions for a single year and not a cumulative total of all analyzed years. As such, the analysis of potential air quality impacts related to PM10 and PM2.5 for the

[310] CARB 2016

Project were not underestimated, as stated by the Commenter, but were appropriately adjusted to account for the error within the CalEEMod modeling. An email was sent by Psomas to Barbara Radlein of the SCAQMD on August 8, 2017 with a description of the identified error. On August 15, 2017, Sam Wang of the SCAQMD confirmed by telephone that there is an issue with the CalEEMod model related to error identified by Psomas. The SCAQMD has contacted the program developer Trinity Consultants to identify the cause of the issue. This error in the CalEEMod model has been corrected, as can be verified by reviewing the list of revisions and additions included in CalEEMod version 2016.3.2, which is available under the "FAQ" tab on the CalEEMod website[311] and includes the following entry: "Fixed miscalculation of the annual fugitive dust emissions for PM10 and PM2.5 (bug caused emissions to be overestimated for projects with multiple construction years)." Accordingly, this comment's claim that construction air quality impacts are underestimated in the EIR to avoid a finding of significance as stated by the Commenter is inaccurate.

In response to this comment, the following is hereby added to the administrative record:

South Coast Air Quality Management District (SCAQMD). California Emissions Estimator Model (CalEEMod) Frequently Asked Questions (FAQs). Diamond Bar, CA: CalEEMod. http://www.caleemod.com/.

311 South Coast Air Quality Management District (SCAQMD). California Emissions Estimator Model (CalEEMod) Frequently Asked Questions (FAQs). Diamond Bar, CA: CalEEMod. http://www.caleemod.com/.

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TriCounty Watchdogs PO Box 6407 Frazier Park, CA 93222

13 July 2017

Mr. Jodie Sackett
County of Los Angeles Department of Regional Planning Hall of Records, 13th Floor Room 1348
320 West Temple Street Los Angeles, California 90012
JSackett@planning.lacounty.gov

Re: Comments on the Centennial Project Draft Environmental Impact Report of May 2017
State Clearinghouse No. 2004031072

Dear Mr. Sackett,

The Tri-County Watchdogs, an organization that focuses on promoting responsible growth in the Mountain Communities where Kern, Los Angeles and Ventura Counties meet, thanks you for the opportunity to comment on the Centennial Draft Environment Impact Report. F.3-1

We must, however, begin by saying that it was extremely difficult to access the information in this large report since CDs were not sent out and internet access in our rural mountain area has low bandwidth. It was impossible for our group to thoroughly read through the 2000 pages of the report, not to speak of the thousands of pages of appendices. We asked in writing for an extension only to learn that you were out of your office until two days ago. It seems to us that perhaps Los Angeles County Planning Department did not truly desire informed community feedback. Otherwise, another month's extension would have been granted when it was orally requested on June 29. The meeting on June 29, which surprised everyone by being a hearing rather than an information session, would have been better noticed. Tejon Ranchcorp (TRC) would have been asked to pay for the sending of hundreds of CDs. F.3-2

Nevertheless, we shall persevere. We must, for we are alarmed by the huge size of a proposed development in an area where **water** is scarce, where healthy **air** is already threatened by a cement plant as well as pollution drifting over from **traffic** on the I-5 recent and recent developments in the Santa Clarita valley, and where many precious species of wildlife share an endangered **bioregion** of native California grassland. Furthermore, as experienced Californians living in an adjacent area whose geology we did not know when we bought homes here, we cannot forget the **earthquake** danger to new human residents living en masse in a fault-ridden zone. F.3-3

WATER

Creating a new city of nearly 60,000 residents is a bad idea in an arid area that is likely to suffer severe drought conditions for many years, if not permanently. We note that very many people and communities in our adjacent region (Frazier Park area) are suffering because of dry wells, and that sag ponds in Gorman were dry by June.

Over the past 14 years, Tejon Ranch Company/Tejon RanchCorp (TRC) has scrambled to cobble together enough sources of water to make it through the 20 year span required by Senate Bill 221 [ref page 5.18.11]. On paper it appears to have done so, assuming normal--that is, a repetition of the past 20 year history-- cycles of wet and dry years. However, as Climate Change wreaks havoc with weather patterns all over the world, our idea of normal is today highly contested. What if Southern California endures another ten-year (or longer) drought period on top of the one that has recently lowered groundwater levels all over the state? Where will the thirsty residents of the Antelope Valley get their water when there are 547,000 of them as opposed to the roughly 400,000 there now? F.3-4

In this worst-case scenario, even the DEIR expresses some doubt both within and after the 20-year period (which actually ends in 2035 since the preparation of the DEIR has taken two years).

1634 acre feet per year (afy), or roughly 25% of the potable water needed at buildout (6788 afy) is expected to come from groundwater from the eastern Antelope Valley Groundwater Basin, to which TRC is now entitled because of the Judgment and Physical Solution of December 2015. The DEIR presumes that this 1634 afy will be constant through wet and dry and multiple-year drought years. However, as the Peer Review of Kennedy Jenks Consultants points out, "It is not clear from the Judgment and Physical Solution whether this is a sound assumption even though the allocation is related to the safe yield determination for the Basin and should be confirmed by the Watermaster Engineer" [App 5.18.G. p.17]. F.3-5

As we noted in our comments on the Hauled Water Initiative last fall, the Antelope Valley Basin and the small Acton Basin are already pumped to capacity, and the Santa Clara River Basin, which might have surplus to pump, has been contaminated by perchlorate. There is a risk in all three basins that increased pumping will increase concentrations of dissolved solids as well as other dangerous elements (Hauled Water Initiative WSA pp.7-9). F.3-6

Extended droughts could affect not only the groundwater but also the SWP surface water that the DEIR counts on. What would ten years of a 5% allocation do to the Project's calculations? I would hope that the County will employ the services of a trained hydrologist to tell them. F.3-7

The Antelope Valley Regional Integrated Water Management Plan (AVIRWMP), which hopes to accomodate the updated Antelope Valley Area Plan, discusses *potential* (not actual) extra sources of water on 5.18 pp.36-7, but concludes that "The General Plan Update Final EIR determined that the lower residential and related development associated with the AVAP update would reduce future water demand, but that the plan's water supply impacts would F.3-8

nevertheless remain *significant and unavoidable* (DRP 2015c). In other words, there will not be enough water for a projected 405,410 population (General Plan) much less the 547,000 projected if the Centennial Project is approved.

F.3-8 cont.

If we assume that in worst case multiple-year drought conditions water will be purchased from well outside the area, for example, northern California (which has just emerged from drought), Washington State, or eastern Nevada, southern Idaho, or some part of the United States that is experiencing flood instead of drought, the cost will be prohibitive. If rates double, triple, quadruple over twenty or thirty years, middle class home owners will be left with unsellable property that they cannot afford to live in. The needs of current and future residents must come ahead of profits for out-of-state investors like the east-coast consortium that owns Tejon Ranchcorp.

F.3-9

In addition, the DEIR's Water Supply Analysis (WSA) does not take fully into account the amount of water that will be needed for fire suppression. According to DEIR 3.0 [p.3-14] and 5.3.3, The Los Angeles County Fire Department has designated the Antelope Valley area, including the Project site, as a VHFHSZ, that is "highly vulnerable to wildfire." Drought has extended the fire season by a couple of months, and so far this year wildfires havc consumed twice as much acreage as last year. Earlier this week, CNBC reported that 6000 firefighters were battling 14 wildfires in California, three major ones in southern California. Studies need to be done on the volume of water that would be needed for this purpose. (We also note that fire fighters are already stressed to their limits fighting fires, and a significant amount of tax money would need to be invested in new hires and equipment.)

F.3-10

BIOLOGICAL RESOURCES

Grasslands:

The Centennial City Project, which is not an expansion of nearby urban or suburban cities or towns but rather the intrusion of almost 20,000 homes and more industry and commerce into natural and rural lands, proposes to destroy over 9,000 acres of California grassland. Native perennial bunch grasses of several species are found throughout the grasslands, up to over 30% coverage, which is very high for present California grasslands. This grassland harbors many native grassland-dependent animals and plants: it is home to pronghorns, elk, badger, burrowing owls, grasshopper sparrow, California condor and many other native wildlife, several of them endangered already.

F.3-11

The DEIR indicates that depredation of these grasslands will be reduced to insignificant levels by on-site and off-site designations of mitigation lands. However, the lands mentioned include lands already marked as green belts within the projects and lands previously set aside in the Tejon Conservancy agreement. The reality is that this Project, when built-out, will result in the permanent loss of some of California's last and best grassland habitat, including major stands of native bunchgrass species.

F.3-12

Burrowing owl: Section 5.7 (Special Status Wildlife Species Observations with Impact boundary - after page 142):

The above-referenced map in the DEIR indicates one location within the Project footprint with evidence of burrowing owl presence. This is very difficult to believe.

One of the members of TCW worked as a biological monitor on Tejon Ranch property immediately north of the project representing DWR during the construction of the Tehachapi East Afterbay(TEA) in 2005. One of the pre-construction activities involved the location of burrowing owl activity, installation of one-way doors in active burrows outside the nesting season and construction of artificial burrows in nearby locations off the construction site.

During the field activity, many indications of burrowing owl activity were noted, including sightings of birds, and various evidences of recent activity at burrows. California ground squirrel activity was concentrated around wild cucumber vines. Burrowing owls were also found in these locations.

The majority of the Centennial City footprint consists of grasslands of the type found at the TEA site. We find that only one location for burrowing owl in the entire 12, 000+ acres of the Project site is incredible. We suggest that thorough field surveys be conducted for burrowing owl so that appropriate measures can be taken.

The paucity of burrowing owl records for the Project site suggests that field surveys for other wildlife species may also not have been adequate.

F.3-13

Tri-colored blackbird Section 5.7 [pages 149 -150]:

The DEIR acknowledges that this species is presently a Candidate State-listed species that receives the same legal protection afforded to an endangered or threatened species.

The DEIR acknowledges that Project's biological surveys determined that tri-colored blackbirds have been nesting at four nearby off and on-site locations whose foraging ranges would include the Project lands.

The DEIR acknowledges that tri-colored blackbirds are known to forage as much as five miles from the nesting colonies.

The DEIR states that analysis has produced a figure of 8% reduction in suitable foraging area for the above four potential nesting locations.

For the Quail Lake colony and the one on-Project-site colony, analysis given in the DEIR indicates a potential loss of 20% foraging for these two colonies.

The DEIR's claim that Mitigation Measure 7.7 (enhancement and preservation of existing wetlands) will reduce the Project's impact on the tri-colored blackbird to a "less than significant" level is untrue.

F.3-14

TCW has developed considerable knowledge of the Quail Lake tri-colored blackbird (TCBL) nesting colonies. Up to 1000 and possibly 2000 adults have nested at Quail Lake during 2015, 16 and 17. We have no information prior to 2015. Most of the colonies have been on the north side next to the Centennial City Project. Observations indicate that TCBL adults conduct

F.3-15

most of their foraging during nesting season northwards into Tejon Ranch within the Centennial City proposed project land. We have a collection of photographs to support these observations. F.3-15 cont.

Tri-colored blackbirds are intensely colonial. The females in each colony are known to ovulate simultaneously. The males who are feeding the females and young forage in tight flocks. The males at the Quail Lake colonies have been observed flying from the colonies on the north shore northwards through Tejon Ranch fields over the first ridge 1/3 mile north of the lake, then returning all together from an unknown destination in a few minutes with insects in their mouths. It is apparent from the time lapse that foraging was taking place within Village #9 location of Centennial City Plans. F.3-16

The DEIR indicates a percentage of foraging reduction based based on a five-mile hypothetical radius of 8% (20% for Quail Lake colonies). This figure is very dubious. Our impression is that the Quail Lake colonies probably do most of their foraging on the fields that are to be bulldozed by the Project. F.3-17

It is very likely that the build-out of Village #9 north of Quail Lake will permanently destroy the colonies of tri-colored blackbirds at Quail Lake. This is in direct violation of the California Fish & Wildlife requirement to protect existing breeding colonies of this species. F.3-18

Mitigation Measure 7.7 indicates that any disruption of nesting caused by the Project will be mitigated by the enhancement and preservation of existing wetlands. There is no assurance that this activity will create a replacement for the destroyed nesting colonies. Therefore, the DEIR proposes to destroy the colonies first, then hopefully the colonies will accept adjacent wetlands. This is not a reasonable plan for the protection of a listed species. F.3-19

Implementation of MM 7.7 would **not** reduce the negative impact on nesting of tri-colored blackbird immediately adjacent to the Project to a level considered less than significant. F.3-20

Furthermore, the Project's proposal to move the National Cement Plant road [DEIR 4-39] may also damage foraging areas of the breeding tri-colored population.Specifics and a map showing the proposed new route would be essential in order to evaluate the environmental affects, are missing. Our guess is that the new route would either traverse open space north and west of Village #1 or run south of Village #1 just north of Quail Lake. Either way, this realignment will increase the disturbance of natural grassland and tri-colored blackbird foraging area. F.3-21

Mitigation: Before moving the National Cement Plant road TRC needs to provide a map, and it needs to calculate the negative affects on the open space, the grasslands and and various flora and fauna. It then needs to submit its calculations for public input. F.3-22

Bioregion connectivity

Section 5.7 (See Exhibit 5.7-15 after page 172):

Significant Ecological Area 17 (SEA 17), as shown on Exhibit 5.7-15, would form a coherent polygon if not interrupted by the footprint of Centennial City Project Plan. Most of the area within the Centennial City footprint is consistent with the biotic communities of the adjacent SEA 17 lands. F.3-23

Centennial City Project will seriously disrupt the connectivity of major bioregions between Tehachapi Mountains and the San Gabriel mountains (Liebre Mountain) to the south. This location represents the intersection of more bioregions than any other location in California: San Joaquin Valley, Tehachapi Mountains(southern end of Sierra Nevada), Mojave Desert, Transverse Ranges, Coast Ranges, and the Southern California Coastal Plains.

The DEIR has not adequately considered this major disruption of California's natural bioregions.

F.3-23 cont.

In addition, although the Centennial City Project has been designed with open spaces, most of these open spares are narrow polygons that run east-to-west (see Exhibit 4-6, page 4-29). This allignment is exactly the opposite alignment needed to facilitate connectivity between the sections of SEA 17 north and south of the Project location. The placement of green belt open spaces should have been aligned in connection with existing natural conditions. This issue needs to be revisited.

F.3-24

The DEIR does describe an underpass at Highway 138 which is designed to accomodate some wildlife. However, this feature does not provide true connectivity in this region.

F.3-25

Bird Migration:

The DEIR fails to mention the possible affects of the Centennial City project on local bird migration.

F.3-26

Local observers and photographers have documented the regular seasonal passage of many species of native birds in the Quail Lake regions. These experienced observers, photographers and other chroniclers of birdlife have determined that there is a regular seasonal migration of landbirds and waterbirds through the location of the Centennial City Project. In the opinion of these observers, there is a migratory route that passes northward from Mexico past Salton Sea, through Antelope Valley, past Quail Lake, through the Grapevine Canyon into San Joaquin Valley and on northwards. This route is used both during the spring and fall migration periods.

F.3-27

The final EIR needs to address the affect of the build-out of the project, including the subsequent widening of Highway 138 and the proposed shifting of the National Cement Road, on migration movements of birdlife. This study needs to include the affects of lights, sounds, habitat destruction and alteration and other features.

F.3-28

AIR

Valley Fever:

The DEIR states that the risk of VALLEY FEVER (which is discussed in 5.3, pp. 14-15, and 5.11 pp 65-67) will be controlled by measures that include" watering exposed surfaces and haul roads three times daily; replacing ground cover in disturbed areas quickly; covering stock piles with tarps; and limiting speeds on unpaved roads to 15 miles per hour." In addition, near-by "residents would be provided with a notice disclosing this potential risk and describing strategies to avoid potential exposure to Valley Fever spores during construction or other earth-moving

F.3-29

activities prior to sale, lease, or rental of any property." This is not enough, for there is new evidence that spores can travel farther than the DEIR assumes.. F.3-29 cont.

We therefore suggest that in addition to the above **mitigation** measures, the following be adopted:
1. Tent construction areas with mesh of the kind TRC is currntly using to keep dust and winds off berries in Bakersfield area east of the 99.
2. Extend the radius of notification to include Gorman school and all schools in Lebec and Frazier Park F.3-30

Furthermore, measures to protect construction workers beyond "requiring that respirators or masks be worn" must be specified. We suggest the following **mitigations**:
1.provide workers with either on-site showers and laundry facilities so that they do not carry spores home on clothing or
2. provide hazmat suits F.3-31

Construction workers: MM 3-2 describes measures such as; and completing other means of reducing the spread and/or inhalation of Valley Fever spores, if present.
While construction workers would be at highest risk, on-site populations would also be at risk for exposure during interim phases of development, depending on the proximity to on-site construction activities. As described in PDF 3-1 and ensured by MM 3-3, all Therefore, with implementation of PDF 3-1 and MMs 3-1 through MM 3-3, the potential for exposure to Valley Fever spores from construction of the Project would be less than significant. [p.5.3-15] F.3-32

Air Quality

It is clear from the discussions in 5.11 [Air Resources] and 5.3-41-2 [Level of Significance after Mitigation] that during construction and after build-out of the proposed project, levels of air pollution would rise to unacceptable levels, causing illness, disability and premature death to the inhabitants of the Antelope Valley. As the DEIR states, no mitigation exists that can bring to levels required by the South Coast Air Quality Management District and the Antelope Valley Air Quality Management District the daily emissions of VOC [Volatile Organic Compounds that lead to the formation of ozone, which triggers chest pain, coughing, throat irritation, and congestion, worsens bronchitis, emphysema, and asthma, and can inflame the linings of the lungs and even, with repeated exposure permanently scar lung tissue], NOX [Nitrogen Oxides that cause airway inflammation and increase asthma], CO [Carbon Monoxide, which deprives tissues of oxygen], PM10 and PM2.5 [inhalable coarse and fine Particulate Matter that aggravate asthma, cause heart attacks and decreased lung function, cause premature death in people with weakened hearts or lungs]. F.3-33

Faced with this disaster, which will also accelerate Climate Change [see 5.21] we request an additional **mitigation**[to those in 5.11.8 pp, 78-82] :
1. require solar panels on all residential and commercial buildings F.3-34

We note that this is also a mitigation to 5.20 [Dry Utilities/ Electricity] F.3-34 cont.

Contra the statement on p. 5.3.21 that, " there is no evidence that either historic or regular operations at the NATIONAL CEMENT PLANT or on the realigned National Cement Plant Road have or would adversely impact the Project," we believe that Cement plant dust will harm new residents.
We therefore request another **mitigation**: TRC must reduce and control the blasting and particulate matter before large numbers of new homes are built only one or two miles away. F.3-35

Traffic:

1. Widening the 138 will be a disaster to biological resources. The northwestern part of the Antelope Valley has been designated a very Significant Ecological Area, and it would be difficult not to leave a major impact on these important lands even with the mitigations TRC has proposed. F.3-36

2. Moving the National Cement Plant road [DEIR 4-39] may also be a disaster to biological resources.

We cannot find a map of the proposed new route in the DEIR. which would be essential in order to evaluate the environmental affects. Our guess is that the new route would either traverse open space north and west of Village #1 or run south of Village #1 just north of Quail Lake. Either way, this realignment will increase the disturbance of natural grassland and tri-colored blackbird foraging area. F.3-37

TRC needs to provide a map, and it needs to calculate the negative affects on the open space, the grasslands and and various flora and fauna.

3.. As a **mitigation** of expected traffic in Antelope Valley and the I-5, we request the TRC contribute a fair share to repair the Ridge Route from Castaic to the 138 so that it becomes a viable alternative to the 5. F.3-38

Earthquake: We point out the obvious: it is unwise to build on top of so many faults.
If building must occur, we request the following **mitigation**:
1.Sellers of lots and home must be required to notify new owners of nearness to Garlock,San Andreas, and the two newly discovered unnamed faults. F.3-39

The proposed Centennial project would unleash significant and unavoidable impacts on F.3-40

aesthetics, air, biological resources, archeological and paleontological resources, greenhouse gases and the quality of water (which is likely to be degraded by dense septic tanks and pollutants in storm run-off). All of these impacts, which the DEIR describes so well, should be enough to make Supervisors think long and hard–about their neighbors, their non-corporate constituents, and their own grandchildren–before approving this project.

Given all of the above, we ask the Supervisors *not* to make *an irretrievable commitment of water and biological resources*. Do not approve a project of 19,333 housing units that will create a lasting need for water that must nearly all be imported, that will necessitate paving precious grasslands in asphalt and concrete, and endanger with pollutants all nearby human, animal, and plant life

F.3-40 cont.

For the Tri-County Watchdogs:

Terry Kelling, President (Frazier Park, CA)
Katherine King, Secretary (Venice and Frazier Park, CA)
Lynn Stafford, Board member (Pine Mountain Club)

*Tri-County Watchdogs is a local grassroots organization based in the Frazier park area, whose mission is to protect natural and cultural resources, to promote ecotourism, and foster responsible growth in the local Mountain Communities. We formed to respond to concerns about our water supply, air quality, our cultural and historical heritage, economic opportunities, and the neglect of our area by the counties and state.

Responses to Comment Letter F.3
Tri-County Watchdogs
July 13, 2017

Response to Comment F.3-1:

The comment is an introduction to the commenting organization. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment F.3-2:

In addition to the hard copy of the Notice of Availability sent via overnight mail to residents and agencies, which contained a link to access the Draft EIR on the County's website, a hard copy of the Draft EIR was also available for review at the following libraries.

Lancaster Regional Library
601 West Lancaster Boulevard
Lancaster, California 93534

Quartz Hill Library
5040 West Avenue M-2
Quartz Hill, California 93536

Castaic Library
27971 Sloan Canyon Road
Castaic, California 91384

Canyon Country JoAnne Darcy Library
18601 Soledad Canyon Road
Santa Clarita, California 91351

Valencia Public Library
23743 West Valencia Boulevard
Santa Clarita, California 91355

San Fernando Library
217 North Maclay Avenue
San Fernando, California 91340

Old Town Newhall Library
24500 Main Street
Santa Clarita, California 91321

Bakersfield Library, Southwest Branch
8301 Ming Avenue
Bakersfield, California 93311

Frazier Park Library
3732 Park Drive
Frazier Park, California 93225

Stevenson Ranch Library
25950 The Old Road
Stevenson Ranch, CA 91381

The Frazier Park Library (Kern County) and the Castaic Library (Los Angeles County) are located in the rural areas of the Tehachapi Mountains.

Additionally, the County extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. The notice of time extension

was posted online[312] and emailed to all persons and parties who specifically requested a time extension.

The Hearing Examiner Staff Summary for the public hearing on June 29, 2017 was posted online on June 15, 2017.[313] The June 29, 2017 public hearing was also advertised in the local newspapers (*The Signal* and *Antelope Valley Press*) on May 17, 2017, and a public notice was posted on the Project site on May 25, 2017. The Hearing Examiner public hearing meeting was duly noticed.

Response to Comment F.3-3:

The Commenter's opinions are noted. The Applicant has the water required to serve the Project. The source of the water is discussed in Section 5.18, Water Resources. Air quality is discussed in Section 5.11, Air Resources. Traffic on the I-5 and the surrounding region is discussed in Section 5.10, Traffic. Wildlife species and native grassland are discussed in Section 5.7, Biological Resources. Seismic issues are discussed in Section 5.1, Geology. Greater detailed comments on these issues are more specific further in this letter and are responded to in much greater detail below.

Please also see Sections 5.3 (Air Quality), 5.6 (Geology and Soils), 5.9 (Biology), 5.16 (Transportation and Traffic) and 5.17 (Utilities and Service Systems) of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Sections 3.3 (Air Quality), 3.4 (Biology), 3.7 (Geology and Soils), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3-4:

This comment expresses an opinion about regional future water supplies and potential climate change impacts to water supplies. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not address or question the content of the Draft EIR, and no further response is required. The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of

312 Los Angeles, County of. 2017 (July 13). Notice of Time Extension of Public Comment Period for the Centennial Project Draft Environmental Impact Report. Los Angeles, CA: County of. http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-hearing-time-extension.pdf.

313 Los Angeles, County of. 2017 (June 15). Hearing Examiner Staff Summary: "Centennial Specific Plan Project." Los Angeles, CA: County of. http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-staff-report.pdf.

Water Resources in the State Water Project Delivery Capability Report (see Draft EIR, Appendix 5.18-C). As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the environmental impact reports found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Frazier Park and Gorman area water supplies referenced in this comment. Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 Urban Water Management Plan adopted by the Antelope Valley-East Kern Water Agency, the State Water Project contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast with the base scenario in the Delivery Capability Report, the Early Long Term scenario incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year State Water Project delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base scenario rate. Consistent with the Antelope Valley-East Kern Water Agency methodology used in the Agency's 2015 Urban Water Management Plan, the Early Long Term scenario is further modified to incorporate a single dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The Urban Water Management Plan was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed

in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan.

Response to Comment F.3-5:

The Project's use of 1,634 acre-feet per year of Antelope Valley Basin groundwater is consistent with the Antelope Valley Basin Adjudication Judgment and Physical Solution, which allocates rights to Antelope Valley Basin groundwater to sustainably manage the Basin's groundwater resources over time. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts within the Basin's sustainable yield.[314] The Adjudication Judgment and Physical Solution provides that, after a 7-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the amount of the overlying production right of 1,634 acre feet per year allocated to Tejon Ranch Company in the adjudication. As discussed on page 5.18-20 of the Draft EIR, the 2013 Antelope Valley Integrated Regional Water Management Plan found that groundwater is considered to be a very reliable supply for the Antelope Valley region even in short-term and during multiple-year droughts. MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified. Consequently, if Project and other Basin groundwater use were to be reduced by the watermaster in the future, MM 18-2 ensures that the Project's potential long-term, cumulative impacts to the Antelope Valley Groundwater Basin groundwater supplies will be less than significant.

Response to Comment F.3-6:

The Project will not pump groundwater from, discharge to, or impact groundwater quality in the Acton or Santa Clara River Basins. The Project's use of 1,634 acre-feet per year of groundwater, production of imported water return flows from urban water use in the Antelope Valley Basin, and water banking operations in the Antelope Valley will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution, which was approved by the Superior Court in December 2015 to sustainably manage Antelope Valley

314 DRP 2017, Appendix 5.18-D

groundwater resources over time.[315] A watermaster will be appointed under the supervision of the Court to implement the Adjudication Judgment and Physical Solution. The Adjudication Judgment and Physical Solution prohibits water use that causes material injury, which is defined in Section 3.5.18 of the Judgment to mean impacts to the Basin caused by pumping or storage of groundwater that cause material physical harm to the Basin, any Basin subarea, or any producer, party or production right under the Adjudication Judgment and Physical Solution including degradation of water quality by introducing contaminants to the aquifer and/or transmission introduced contaminants through the aquifer. Section 18.5.8 requires that the Watermaster take all reasonable steps to assist and encourage appropriate regulatory agencies to enforce reasonable water quality regulations affecting the Basin. As a result, groundwater use, return flow production and banking/storage activities in the Antelope Basin, including by the Project will occur under the auspices of the Adjudication Judgment and Physical Solution and must protect groundwater quality as necessary to sustainably use and maintain the Basin. Project impacts to groundwater quality are discussed in Section 5.4, Water Quality, and would be less than significant with mitigation.

Response to Comment F.3-7:

This comment addresses the reliability of imported water supplies for the Project. The potential delivery reliability and variability of Project State Water Project supplies is discussed in Draft EIR Section 5.18, Water Resources.[316] The Draft EIR analysis of State Water Project supplies utilizes the 82-year model results for the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report.[317] The Early Long Term delivery reliability scenario is also utilized in the 2015 Urban Water Management Plan adopted by the Antelope Valley-East Kern Water Agency, the State Water Project contractor for Antelope Valley and for the Project. The Early Long Term scenario incorporates more significant assumptions regarding potential climate change impacts than the Delivery Capability Report base scenario, including 2025 emission levels and a 15-centimeter sea level rise. The average year State Water Project delivery rate in the Early Long Term scenario is lower than the Delivery Capability Report base scenario rate. Consistent with the Antelope Valley-East Kern Water Agency methodology, the Early Long Term scenario was further modified to more conservatively evaluate Project water supplies by using a lower single dry year delivery rate of 5 percent than identified in the Delivery Capability Report. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. The comment does not address or question the discussion of the potential delivery reliability and variability of State Water Project supplies for the Project in the Draft EIR. The comment does not cite to any available information suggesting that State Water Project delivery levels could average 5 percent over a 10-year period. Table 6.4 in the Delivery Capability Report summarizes the average State Water Project delivery rates during the worst 2-, 4-, and 6-year droughts

315 *Ibid*.
316 *Id.,* 5.18-20 to -28, -54 to -64
317 *Id.,* Appendix 5.18-C

within the 82-year historical record for California maintained by the California Department of Water Resources. Table 6.4 shows that annual deliveries during these worst-case conditions ranged from an average of 28 percent (2-year drought) to 33 percent (4- and 6-year droughts). Consequently, the most severe drought-period delivery levels identified by the Department of Water Resources in the Delivery Capability Report for periods up to 6 years are substantially higher the 5 percent annual average suggested in the comment. No drought has persisted for longer than six years in the California Department of Water Resources historical record. The analysis of Project imported water supplies using the Early Long Term scenario in the Delivery Capability Report incorporates the effects of the most severe droughts during the 82-year historical record, plus additional adjustments to account for potential climate change effects and the 5 percent single dry year delivery level used by the Antelope Valley-East Kern Water in the Agency's 2015 Urban Water Management Plan. Consequently, the Draft EIR includes a discussion of State Water Project delivery reliability that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan.

Response to Comment F.3-8:

This comment addresses long-term regional water supplies. Long term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[318] As discussed in Draft EIR Sections 5.18 and 7.0 the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs also concluded that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation,

318 *Ibid*.

including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable. Neither the Antelope Valley Area Plan and General Plan EIRs nor the Draft EIR found that there would not be enough water to serve future regional demand. The analyses found that impacts would be significant and unavoidable because of the lack of pertinent information and uncertainty regarding such supplies.

Response to Comment F.3-9:

This comment expresses an opinion regarding the possible costs of obtaining hypothetical water supplies, some of which include out of state sources that are not known to have provided significant municipal or other water supplies to California. The comment does not cite to any available information substantiating the feasibility and costs of obtaining these supplies, and further analysis of these issues would be speculative. The comment does not address or question the content of the Draft EIR and no further response is required. As discussed in Draft EIR Section 5.18, Water Resources, the Project's available water supplies would sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. None of the Project water supplies would be obtained from any of the sources included in the comment. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment F.3-10:

This comment discusses water supplies for fire suppression. Fire flows are considered to be intermittent water uses that are accounted for in a project's water system losses or non-revenue water. As shown in Draft EIR Table 5.18-7, the Project demand includes a potable water system loss of 327 acre-feet per year at buildout, or just under 105 million gallons per year. The volume of fire flows for the Project is discussed on pages 5.3-35 and 5.3-36 of Section 5.3, Hazards and Fire Safety, in the Draft EIR. The Project's water system will provide water supplies to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires. The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and the Los Angeles County Fire Department's fire-suppression standards for improved property and development. These requirements must be met prior to the approval of building permits by the County. The fire flow demand for the Project is conservatively assumed to be 4,000 gallons per minute for a duration of 4 hours (approximately 1.0 million gallons) in each of the four water system pressure zones within the site. The system losses shown in Draft EIR Table 5.18-7 are several times greater in magnitude than the required fire flow volumes for the Project. In addition, water reserves to ensure that supplies are available to meet fire suppression demand when needed will be maintained in the onsite water bank and the offsite existing, adjacent water

bank that will serve the Project.[319] The Draft EIR found that the Project's water supplies would sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet, or more than 25.6 billion gallons. This level of reserve water supplies significantly exceeds the maximum fire flow demands for the Project area. Consequently, potential fire suppression water demand is accounted for in the Draft EIR analysis of Project water supplies.

Response to Comment F.3-11:

The grasslands, and the plant and wildlife species that compose them, as well as their regional value, are described in the Draft EIR on pages 5.7-25 through 5.7-27, 5.7-40 through 5.7-47, 5.7-62, 5.7-67, 5.7-107, 5.7-111, 5.7-113 through 5.7-118, 5.7-121, 5.7-126 and 5.7-127. Mitigation has been included in the Draft EIR to reduce impacts to these biological resources to a less than significant level (MM 7-10).[320] Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR. Please see responses to Comments B.4-34, B.4-35, B.4-36, B.4-37, B.4-56, B.4-57, and B.4-60 for further information.

Response to Comment F.3-12:

The Commenter is correct that the mitigation lands are within Tejon Ranch, for which a proactive mitigation agreement – the Tejon Ranch Land Use and Conservation Agreement (Ranch-Wide Agreement or TRCRWA) – was voluntarily agreed to by the Ranch and the State's leading environmental advocacy groups, including the Sierra Club, Natural Resource Defense Council, Audubon Society California, Endangered Habitats League, and the Planning and Conservation League.[321] Representatives of the State's principal environmental agencies, including, but not limited to, those charged with the protection of Biological Resources within the Resources Agency and the California Department of Fish and Wildlife (CDFW), also expressly recognize the mitigation value of preserved lands on Tejon Ranch and endorsed use of these lands to mitigate the planned Ranch development projects, including the Centennial Project. Exhibit R to the TRCRWA was a letter executed contemporaneously by the leaders of six State environmental and resource agencies, including the California Department of Fish and Game (now Fish and Wildlife) and the Resources Agency. That letter recognizes the unique value of Tejon's voluntary and proactive preservation agreement, agrees that lands preserved pursuant to the Agreement are allowed to be mitigation lands of future permitting of Tejon Ranch development projects, including the Centennial Project, and recognizes that land for which conservation easements are acquired via public funds may also be used as mitigation under designated circumstances. The letter provides in pertinent part:

[319] *Id.,* Appendix 5.19-A, p. 8-2
[320] *Id.,* p. 5.7-180 to -182
[321] *Id.,* pp. 4-45 to -46, 5.7-16

> *[W]e understand that of the approximately 270,000 acres comprising the Ranch, the Ranchwide Agreement would provide for the permanent preservation of at least 18,000 acres and for the option to preserve an additional 62,000 acres through the purchase of conservation easements, or potentially fee title, for an anticipated total of approximately 240,000 acres, or approximately 90 percent of the total Ranch acreage. Because of the many unique factors noted above, including the sheer magnitude of this conservation effort and the significant resource values attributed to this property, and in viewing the 240,000 acres in the Conserved Areas in a holistic manner, we expect that TRC will be allowed to use those Conserved Areas and corresponding natural resource values associated with these Conserved Areas to meet the land conservation and corresponding natural resources mitigation requirements for and the planned development and other activities within the Developed Areas, including the designated planned development projects of Tejon Mountain Village, Centennial and Grapevine, subject to potential limitations for Conserved Areas acquired using public funds as described below.* (TRCRWA, Exhibit R, page 2, bullet 1)
>
> ****
>
> *For portions of the Conserved Areas that are permanently preserved by conservation easements, or potentially fee title, acquired using public funds, the use of these lands for mitigation purposes would not be allowed unless the potential mitigation use of these lands is taken into account in the price paid and unless mitigation uses are allowed by applicable laws including those governing the public finding source(s) used to fund the acquisition.* (TRCRWA, Exhibit R, page 2, bullet 3)

Other CEQA lead agencies, responsible agencies (including CDFW), and the USFWS, have all accepted Tejon Ranch lands designated for open space conservation in the TRCRWA as mitigation lands for Tejon development projects. (See, e.g., TMV EIR, MSHCP, and Grapevine EIR.) In the absence of an agency-imposed mitigation obligation to preserve such lands, the open space preservation for areas identified for conservation in the TRCRWA are enforceable only by private party agreement with the signatories to the TRCRWA, and are not legally enforceable by any other party including any public agency. The acquisition areas identified in the TRCRWA are subject to a Conservation Easement enforceable by the State Wildlife Conservation Board, but those easements likewise expressly allow for future mitigation use of these lands for enhancement above conditions existing as of the required implementation of any mitigation activities, which will be implemented pursuant to the Ranch-wide Management Plan (RWMP) described in the revised MM 7-10 and as further described in response to Comment F.8-173. MM 7-10 expressly requires the continued open space preservation of the lands designated in the Draft EIR for grasslands mitigation, including preservation of all identified mitigation lands as well as optional enhancement of WCB easement lands, and accordingly will create a new legal mitigation obligation imposed and enforceable by Los Angeles County, as part of the required MMs to be imposed as

conditions of approval for the Centennial Project.[322] Finally, the overall open space value of all conserved lands in the region, including public lands such as the Angeles National Forest and Tejon Ranch lands conserved under agency mitigation and permit requirements such as the Tejon Uplands Multi-Species Habitat Conservation Plan, is described and its Biological Values recognized in the Draft EIR as well as other certified EIRs completed for the Project vicinity such as the Antelope Valley Area Plan EIR and the SR-138 EIR/EIS. Also, please see response to Comment B.4-63.

It should also be noted that commenter CBD was initially among the environmental groups working toward completion of the TRCRWA but withdrew before the Agreement was executed and is not a signatory to the Agreement. CBD sued to block the Tejon Mountain Village Project, raising similar biological resource objections to development of even less than 10 percent of Tejon Ranch acreage that the other environmental groups agreed could be developed without compromising the biological value of Tejon Ranch and the surrounding ecosystems. As set forth in the Agreement, the State's leading environmental advocacy groups agreed with Tejon Ranch that:

> Tejon Ranch is the largest contiguous property under single, private ownership in the State of California. It has been owned by the Tejon Ranch Co. since its incorporation in 1936. The Tejon Ranchcorp is a wholly owned subsidiary of the Tejon Ranch Co. that holds title to the lands comprising Tejon Ranch except those owned by TIC Corp., which owned the lands comprising the Tejon Industrial Complex. TRC will continue its historic ranch uses including farming, grazing, wildlife management and filming under this Agreement together with oil drilling and sand and gravel mining within defined areas all consistent with a Ranch-wide Management Plan. TRC has formed Centennial LLC to pursue development in the Centennial Development Area and TMV LLC to pursue development in the Tejon Mountain Village Development Area. **This Agreement allows TRC to pursue development plans in defined development areas without opposition from the Resource Organizations while enabling a conservancy the preserve Tejon Ranch's natural resource values for future generations.**
>
> The long-term conservation of Tejon Ranch has been one of the highest priorities of the Resource Organizations. **This unique property lies at the confluence of four major ecological region – the Sierra Nevada, Mojave Desert, Coastal Range and San Joaquin Valley. This Agreement follows many years of scientific analysis of conservation values on Tejon Ranch by TRC and others, including the Resource Organizations. By comprehensively addressing the entire Tejon Ranch, this Agreement avoids fragmentation of many of the environmentally sensitive areas on Tejon Ranch. The conserved lands will be managed in accordance with a comprehensive Ranch-wide Management Plan[323] that will identify the**

322 *Id.,* p. 5.7-180

323 The approved Ranch-wide Management Plan is available on the Tejon Ranch Conservancy's website at http://www.tejonconservancy.org/rwmp.htm.

> **natural resources and conservation values of the conserved lands as well as opportunities to protect, enhance and restore identified resources and values and establish best management practices for continued use of the conserved lands for existing ranch uses.**
>
> (TRCRWA Recitals, subsections B and D, emphasis added.)

The Commenter's opinion that development should not be allowed on Tejon Ranch, including but not limited to the Project site, is noted for the record.

Response to Comment F.3-13:

Single pairs or individual burrowing owls have been observed on or in the vicinity of the Project site during multiple bird surveys performed between March 2000 and July 2015.[324] Focused burrowing owl surveys have also been conducted.[325,326] Specifically, qualified wildlife biologists conducted protocol-level focused surveys for the western burrowing owl in 2003 and 2006.[327] One pair was observed in the eastern portion of the site in 2001 and one pair was observed just off the site to the north in 2006 using an abandoned irrigation standpipe; this species was not detected on site since 2001.[328] Additionally, as part of a comprehensive grassland quality survey conducted on the Project site in April 2006, a search for evidence of burrowing owl presence on the site, as well as a habitat and occurrence record evaluation using geographic information system (GIS) databases and analytical tools, was conducted by Natural Resource Consultants (NRC). Through these methods, NRC determined that burrowing owls are likely to be present on the Project site but are locally distributed and uncommon. During at least 1,044 man-hours of fieldwork over three weeks, two individual burrowing owls were observed, both of which were slightly off-site to the east. NRC concluded that though grassland habitats preferred by burrowing owls are present on the site, burrowing owls are uncommon and/or locally distributed.[329] The Project site is at the edge of the known range of the species as shown by the CDFW's California Wildlife Habitat Relationships Database.[330] Although not focused protocol-level surveys for burrowing owl, the biologists conducting special status plant survey transects for the Project in 2015 and 2016 also searched for, but did not find, the burrowing owl or burrowing owl sign during the surveys. Suitable burrowing owl habitat consists of relatively short vegetation with only sparse shrubs and taller vegetation combined with the presence of burrows for roosting and nesting.[331] In California, burrowing owls are largely dependent on California ground squirrels (*Spermophilus beecheyi*) to dig their burrows[332], although burrows from less common burrowing wildlife such as kit fox may also be used. The surveys have found the California ground squirrel, as well as kit fox or other suitably sized burrows,

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324 DRP 2017, p. 5.7-19 to -23, Table 5.7-2
325 *Id.,* Appendix 5.7-B, Birds-4
326 *Id.,* Appendix 5.7-B, Gen-6
327 *Id.,* p. 5.7-22, Table 5.7-2
328 *Id.,* p. 5.7-115
329 *Id.,* Appendix 5.7-B, Birds-4
330 Zeiner, D.C., W.F. Laudenslayer Jr., K.E. Mayer, M. White (Eds). 1990a. *California's Wildlife Vol. 3: Mammals.* Sacramento, CA: CDFG, The Resources Agency.
331 Gervalis et al. 2008
332 *Ibid*.

to be largely absent from the Project site; as a result, the Project site's grasslands lack suitable burrows for the burrowing owl and is generally unsuitable for that species. The Draft EIR ultimately uses a conservative approach by requiring specific burrowing owl mitigation.

Response to Comment F.3-14:

The County notes that on April 19, 2018, the California Fish and Game Commission authorized the listing of tricolored blackbird as a "threatened" species.[333] However, it is noted that Candidate species are afforded the same legal protections as State-listed species. Therefore, consultation with CDFW will be required. The relevant analysis therefore remains the same under CEQA, and no mitigation measure updates are required. The Commenter's statements to reiterate points made in the Draft EIR are otherwise correct. However, these facts do not indicate potentially significant impacts to tricolored blackbird. The species is complex and its biology must be considered closely. For example, there has been no evidence that tricolored blackbird have bred in the same year at the on-site location (in the north end of the Project site) and Quail Lake sites. In addition, the on-site breeding area has not been used since the first time it was detected and the habitat has substantially diminished in recent years due to drought. However, in order to further clarify the Draft EIR text regarding the reduction of impacts to less than significant, additional language will be added to the impact assessment. In response to this comment, the following addition has been made to the first paragraph on page 5.7-113 of Section 5.7.3, Environmental Setting:

> The tricolored blackbird was observed nesting in large numbers along the north-central edge of the Project site and was also observed in Oso Creek (BonTerra Consulting 2008; Impact Sciences 2004a). These populations have not been incidentally detected during focused surveys since the original observations, possibly due to habitat degradation. Most recently, focused surveys for tricolored blackbird were conducted in 2015 and they were observed nesting off site along the northern shore of Quail Lake and at Holiday Lake, and these birds were observed foraging on the Project site (BonTerra Psomas 2015d).

Additionally, in response to this comment, the following addition has been made to the first paragraph on page 5.7-149 of Section 5.7.6, Environmental Impacts:

> The results of this focused survey documented relatively heavy use of the Project site for foraging purposes by tricolored blackbirds nesting off site at Quail Lake, and to a much lesser degree, Holiday Lake. No breeding was detected at Oso Creek or along the north-central edge of the Project site. Breeding has not been observed in either location since 2008, likely due to habitat degradation. In an effort to determine the Project's potential effect on tricolored blackbird nesting colony foraging lands of the region, an assessment of each of four known colonies was conducted (BonTerra Psomas 2015c).

[333] FGC 2018; Nossaman 2018

With respect to foraging habitat, the Draft EIR indicated that loss of foraging habitat could interrupt breeding if both Quail Lake and the north pond were used for breeding at the same time. As noted above, it has been nine years since any tricolored blackbird were found at the north pond, the habitat has become severely degraded, and the area is not likely to become suitable in the future. The species routinely shifts breeding locations, and there are also existing suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the existing foraging habitat for that season during construction, and the land use adjacent to Quail Lake up to approximately ½ mile is almost entirely open space recreation and, therefore, will be permeable and available for foraging. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance riparian areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this nomadic species to continue to persist in the region.

Therefore, the following edits are hereby made to the third full paragraph on page 5.7-149 of the Draft EIR:

> Due to the shifting of tricolored blackbird nesting locations from year to year, a subset of two or three of the available nesting locations may represent the entire regional breeding population. A substantial reduction of foraging lands surrounding this subset of nesting locations could result in considerable reduction of nesting success. A review of the Quail Lake and the on-site colony subset identified a potential post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In a given year, if these two areas were used for nesting, the reduced availability of suitable foraging land could result in substantial reduction in nesting success. <u>However, the north pond has become unsuitable habitat, so the likelihood of its future use by tricolored blackbird is very low. Additionally, the species shifts breeding locations between sites, and there are also existing potentially suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the breeding colony for that season during construction. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance wetland areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding</u>

> and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide forage ranging species to continue to persist in the region. Based on the revised MMs 7-7, 7-10, and 7-12, the impacts to foraging habitat are less than significant.

In response to this comment and others, the following edits are hereby made to MM 7-7 on pages 5.7-178 and 5.7-179:

> The Project shall incorporate avoidance and additional open space buffer features for each of the two ~~this~~ known tricolored blackbird nesting areas on and adjacent to the Project site ~~area~~. Permanent impacts will be restricted to a distance of 400 feet from the nesting area excluding small impact areas associated with infrastructure and utilities along SR-138 immediately south of Quail Lake. The nesting area will be delineated by a qualified Ornithologist based on all available data (three years of site-specific data shall be used). Temporary impacts (i.e., construction noise) within a ¼ mile ~~400 feet~~ of active nesting areas shall be restricted to the non-breeding season. The breeding season for this species shall be considered April 1 through July 1. The applicant shall consult with CDFW and may obtain an Incidental Take permit if determined appropriate.
>
> ~~The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat. Potentially suitable areas for enhancement and preservation include lower Oso Canyon proximate to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source.~~

See other applicable responses for more information, including responses to Comments B.4-18, B.4-19, F.3-15, F.3-16 F.3-17, F.3-18, F.3-19, F.3-20, F.3-21, F.8-156, and F.8-158.

Response to Comment F.3-15:

Comment noted. The Draft EIR also discussed that focused tricolored blackbird surveys conducted for the Project in 2015 found nesting colonies at Quail Lake and found that foraging occurred on the Project site as well as elsewhere. See response to Comment F.3-14.

Response to Comment F.3-16:

As noted in the response to Comment F.3-15, focused tricolored blackbird surveys conducted for the Project in 2015 produced the same results mentioned here (nesting colonies at Quail Lake were observed foraging on the Project site), which were then used to extrapolate Project impacts in the Draft EIR.

Response to Comment F.3-17:

The analysis of potential foraging grounds for the tricolored blackbird in the Project area was based on available potentially suitable habitat and the best available information on the ecology of this species. The tricolored blackbirds were observed foraging in scrub as well as grassland habitat.

Response to Comment F.3-18:

The Commenter's opinion regarding the Project's impacts on tricolored blackbird is noted. The Project will comply with the California Fish and Game Code requirements including consulting with CDFW. The Project would not directly impact the Quail Lake and Holiday Lake (the latter approximately 3.4 miles east of the site[334], which are both outside the Project site boundary, and sufficient foraging habitat is maintained. See response to Comment F.3-14. Please refer to response to Comment B.4-29 regarding applicable mitigation measures requiring pre-construction surveys, and to Applicant's independent legal obligation to secure all required permits (including where applicable ITP permits). Please also refer to responses to Comments B.4-18 and B.4-78 regarding the modified buffer distance, and further clarification regarding elevation change and Specific Plan development restrictions.

Response to Comment F.3-19:

Please refer to response to Comment F.3-18. The Project does not propose to destroy or disrupt any nesting colonies. All nesting colonies are avoided with the addition of a buffer as well as reduced activities within during the breeding season (MM 7-7). The mitigation measure also includes preservation of areas that have already been shown to be used by tricolored blackbirds within the mitigation lands. Therefore, the mitigation measure is expected to mitigate the potential impacts to this species to a less than significant level. Please refer to responses to Comments B.4-29 regarding applicable mitigation measures requiring pre-construction surveys, and to Applicant's independent legal obligation to secure all required permits (including where applicable ITP permits). Please also refer to responses to Comments B.4-18 and B.4-78 regarding the modified buffer distance, and further clarification regarding elevation change and Specific Plan development restrictions.

Response to Comment F.3-20:

The Commenter's opinion regarding the Project's impacts on tricolored blackbird is noted. As described in the Draft EIR[335] and in responses to Comments F.3-14 through F.3-19 above, the Draft EIR concludes that the Project's potential impacts on the tricolored blackbird are mitigated to a less than significant level. Please refer to response to Comment B.4-29 regarding applicable mitigation measures requiring pre-construction surveys, and to Applicant's independent legal obligation to secure all required permits (including where applicable ITP permits). Please also refer to responses to Comments B.4-18 and B.4-78

334 DRP 2017, p. 5.7-113
335 *Id.,* pp. 5.7-148 to -150

regarding the modified buffer distance, and further clarification regarding elevation change and Specific Plan development restrictions.

Response to Comment F.3-21:

The new alignment of Cement Plant Road will run to the west of Village #9, as shown on Exhibit 5.12-3, On-site Circulation System and as graphically depicted on each Draft EIR graphic that shows the proposed roadway network. This roadway alignment is fully within the impact footprint analyzed throughout the Draft EIR. As stated in Section 5.7.6, Environmental Impacts, "although the Project includes a new road along its western edge (Cement Plant Road), the road's use would be limited to infrequent daytime truck traffic to and from the Cement Plant, functioning the same as the existing Cement Plant Road to the east. Nighttime use will be prohibited except for emergency. This new Cement Plant Road would connect to SR-138 via a Gorman Post Road extension, and a new intersection in this area will be avoided."[336] The Draft EIR acknowledges impacts to foraging habitat, inclusive of the realignment of Cement Plant Road, and mitigation efforts are included to lessen those impacts. See responses to Comments B.4-18, B.4-19, F.3-15, F.3-16 F.3-17, F.3-18, F.3-19, F.3-20, F.8-156, and F.8-158, among other applicable responses, for further information.

Response to Comment F.3-22:

All required biological studies, as well as the Project's impact assessment, have included the National Cement Plant Road realignment; therefore, the road re-alignment is fully within the impact footprint analyzed throughout the Draft EIR. The realignment of the National Cement Plant Road is described fully in Section 4.0, Project Description, on page 4-39, and illustrated on Exhibit 4-7. As discussed on page 4-39, "A portion of the [National Cement Plant] roadway within the project boundaries is planned to be re-aligned through the Project site to access the SR-138 from the western side of Quail Lake rather than from the current connection on the east side of Quail Lake." "Intersection improvements (e.g., deceleration lane, an acceleration lane, turn pocket) would be constructed within the Caltrans right-of-way to allow for safe ingress/egress to the re-aligned National Cement Plant Road from SR-138, as discussed in Section 4.8, Off-Site Project Features." As a Project component described in Section 4.0, both the on-site and off-site features associated with the National Cement Plant Road realignment are addressed in all topical analyses in the Draft EIR, including biological resources. As such, the calculation of impacts associated with this Project component has been submitted for public input via the Draft EIR.

Response to Comment F.3-23:

The Project does not encroach on SEA 17, and would, therefore, not disrupt the footprint of the SEA. Further, State CEQA Guidelines require the Draft EIR to assess potential impacts to wildlife movement. In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains, from a biological perspective, was considered in detail.[337] The assessment, which used various scientific studies, including site-

[336] *Id.,* p. 5.7-165
[337] *Id.,* pp. 5.7-50 to -64, -164 to -170

specific studies listed in Table 5.7-2[338], concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions.[339] Although direct impacts on regional and local wildlife movement would be considered less than significant, and no mitigation is required, in order to lessen Project impacts on wildlife movement, MMs 7-13 through 7-19[340] are proposed, which incorporate planning and construction methods to reduce potential indirect impacts to wildlife movement. Please also refer to responses to Comments F.3-24, F.3-25, F.3A-32, F.3A-33, F.3A-34, B.4-34, B.4-35, B.4-36, B.4-37, F.8-165, F.8-165A, F.8-166, F.8-167, B.4-56, B.4-57, F.5-2, F.8-168, and F.7-22 for a more detailed discussion of responses on wildlife movement within the Project site.

A discussion of regional wildlife movement, beginning on page 5.7-6, is provided in the Draft EIR. The section acknowledges the importance of movement in the region where several major bio regions come together stating that various recent reports that discuss the biotic resources in the vicinity of the Tehachapi Mountains (including the Project region) describe the importance of these mountains as a landscape linkage between the Sierra Nevada and the Coast Ranges.[341] Typically, landscape linkages facilitate wildlife movement between large areas of similar terrain, vegetation types, or habitats. Because of the unique adaptations required of wildlife species that inhabit the low elevations of the San Joaquin Valley to the north of the Tehachapi Mountains and the Antelope Valley and adjacent Mojave Desert to the south of the mountain range, most species that occupy these geographically separate and distinct ecosystems do not venture south or north, into or over, the Tehachapi Mountains. As noted above, wildlife species within the mountains surrounding the Project site are expected to move freely within the mountains to satisfy their life history requirements. Accordingly, most wildlife movement in the mountains probably occurs within large landscape areas in upland portions of the Tehachapi range, and to the south of the Centennial property within the western extent of the San Gabriel Mountains much more than between these areas. The same can be expected of movement on the valley floor and surrounding low foothills, where the proposed Project is located.

The Draft EIR goes on to discuss the long-term sustainability of regional linkages beginning on page 5.7-62. The section describes two regional conservation plans, which although not providing mitigation for Centennial, would act in concert with the Centennial mitigation preserves to help sustain the functionality of the regional landscape linkage for future wildlife populations. These plans offer elements for long-term sustainability and management of a Tehachapi Mountains landscape linkage: the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement [TRCRWA]) and the Tehachapi Upland Multiple Species Habitat Conservation Plan (TUMSHCP).

Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement

338 *Id.,* p. 5.7-23
339 *Id.,* p. 5.7-166
340 *Id.,* pp. 5.7-190 to -193
341 *Id.,* Exhibit 5.7-6

measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch. The TRCRWA also provides that the Conservancy, or an alternate conservation entity as identified in the TRCRWA, will manage long-term mitigation obligations for open space lands used for mitigation to comply with federal and state agency permit requirements imposed in relation to the development activities allowed in the TRCRWA, including development of the Project. While the TRCRWA is not itself an agency-imposed mitigation measure for Centennial or other Ranch activities, the TRCRWA does provide the overarching legal, management, and funding framework for the open space lands used as mitigation lands in local, state, and federal land use entitlements and permits. It also voluntarily conserves 170,000 contiguous acres of open space Ranch lands, even if preservation of such lands is not required by agency mitigation measures. Resource agency support of the TRCRWA is included in an appendix to the TRCRWA. Maintenance of the open space or conserved lands will be the responsibility of the Conservancy, funded in large part by a fee based on a portion of the purchase price for each residential parcel on Tejon Ranch. Since Centennial constitutes over 75 percent of the currently planned residential units on the Ranch, it will bear the substantial costs of funding the Conservancy and maintaining wildlife movement corridor areas through the Ranch. As mentioned in Section 5.7.2, Relevant Plans, Policies and Regulations, of the Draft EIR, no public agency is a party to the TRCRWA, although the federal and State agencies responsible for administering biological protection laws and regulations confirmed that lands under the RWMP continue to be eligible mitigation lands.

In addition, the TUMSHCP ensures the persistence of covered species, including sustaining viable populations of those species, providing for (within property dispersal) and protecting current opportunities for wildlife movement beyond the Ranch by preserving existing landscape linkages. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and mitigation measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages in the Project region.

The TUMSHCP will be a major contributor to ensuring the viability of the Tehachapi Landscape linkage into the future. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species occur in the foothills and lowland areas as well, including the Centennial site. These species will benefit from the TUMSHCP in addition to the Centennial Mitigation Preserve program described in this document.

The wildlife movement impact analysis beginning on page 5.7-164 of the Draft EIR concludes that development of the Project site will result in some losses of areas that may be used for

foraging and/or breeding for these species. Pathways to or from foraging or breeding grounds on the Project site, such as along ridge-lines or canyon bottoms, may become "dead ends" to through dispersal. However, these sorts of impacts are not expected to destabilize the regional population dynamics of these species, especially given the substantial amount of similar terrain in the northwestern Antelope Valley area. Multi-generational gene flow among wildlife populations in the region is expected to be sustained in the open spaces on and off the site that will remain following Project implementation. The direct impacts of Project development, therefore, are considered less than significant.

Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP) inclusive of open space designations, SEA protection, and preservation of habitat linkages. The AVAP is a community-based plan that is a subset of the County of Los Angeles General Plan, which includes the Project area. The AVAP EIR provides an analysis of all potential, reasonably foreseeable environmental impacts related to the implementation of the AVAP "to indicate possible ways to reduce or avoid environmental damage and to identify alternatives" to the AVAP.[342] Additionally, the AVAP EIR discloses "significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present and reasonably foreseeable future projects."[343]

Response to Comment F.3-24:

Please see response to Comment F.3-23. The open space areas within the Project impact footprint are consistent with existing drainage patterns (east-west), which currently facilitate local wildlife movement through the area. As stated in Section 5.7.6, Environmental Impacts, these open space areas "facilitate the local movement of wildlife and dispersal and gene flow between populations of small organisms (particularly insects, amphibians, reptiles, small mammals)".[344] The purpose of these areas is not to facilitate movement through the Project down to SEA 17. However, implementation of MM 7-14, which designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) where the current intersection with National Cement Plant Road exists, is intended to allow for local wildlife movement to pass through the Project area down to SEA 17.

Response to Comment F.3-25:

The size of the proposed undercrossing is expected to support movement of many wildlife species potentially moving through the area. Most of these animals, such as raccoon, opossum, and skunks, have been identified using much smaller crossings than the proposed crossing's dimensions; therefore, there is no reason to believe that the large crossing proposed would not support crossing of many species. In addition, current crossings either do not exist in the area or consist of much smaller drainage culverts. The proposed crossing is expected to improve crossing conditions for most wildlife in the region compared to the existing condition. The exiting condition is inclusive of SR-138, which does not represent a

342 DRP 2014a, p. 2-1
343 *Ibid*.
344 DRP 2017, p. 5.7-166

barrier for all species but is problematic due to vehicular traffic and lack of vegetative cover. The Project proposal improves the crossing by allowing at least some individuals of some species to utilize a more protected pathway to access habitat on either side of the highway. In addition, the crossings included in the Project design are consistent with the Antelope Valley Area Plan (AVAP). The AVAP EIR provided an analysis of the regional habitat linkages to be retained, inclusive of development of other areas including the Project development area. The County's AVAP EIR analysis concludes that such impacts are less than significant. The Project Draft EIR supports this AVAP EIR conclusion, and the wildlife movement impact analysis beginning on page 5.7-164 of the Draft EIR provides evidence indicating these local connections may support local movement but are not required to sustain regional wildlife populations in the area, which primarily occur in the foothill areas north of the Project site. The Project undercrossing at SR-138 is expected to facilitate more localized wildlife movement but is not critical to regional wildlife linkages. For additional discussion, please see response to Comment F.3-23, the wildlife movement sections of the AVAP EIR,[345] and the Caltrans SR-138 EIR.[346]

Response to Comment F.3-26:

The Commenter is correct in that a separate discussion on local bird migration is not included in the Draft EIR; instead, migration was discussed on a species-specific level: southwestern willow flycatcher,[347] California condor,[348] yellow-breasted chat,[349] and yellow warbler.[350] The use of some on-site vegetation types by a variety of bird species is disclosed on page 5.7-49 of the Draft EIR: "During spring and fall migration, a variety of migratory birds are expected to use these vegetation types on the site. Some migrants include the pacific-slope flycatcher (*Empidonax difficilis*), warbling vireo (*Vireo gilvus*), Cassin's vireo (*Vireo cassinii*), yellow warbler, black-throated gray warbler (*Setophaga nigrescens*), Townsend's warbler (*Setophaga townsendi*), MacGillivray's warbler (*Geothlypis tolmiei*), and Wilson's warbler (*Cardellina pusilla*)."

As stated in Section 5.7.3, Environmental Setting, the Biological Assessment of SEA 17 prepared by PCR et al. (2000) "suggest[s] that lands within SEA 17 may be an important topographic reference for migrating birds, with essential high elevation foraging grounds along the route".[351] Project implementation would not impact these important migrating lands which occur in SEA 17. Also, the Project area, specifically, has not been shown to be a major thoroughfare for bird migration.

345 DRP 2014a, pp. 5.4-67, -70, -85

346 California Department of Transportation (Caltrans). 2017b (June). Final Environmental Impact Report/Environmental Impact Statement and Section 4(F) Evaluation: Northwest State Route 138 Corridor Improvement Project (pp. 73-76, 100-101). Los Angeles, CA: Caltrans. http://media.metro.net/projects_studies/nw138/images/feir-feis/nw138_feir-feis.pdf.

347 DRP 2017, p. 5.7-118

348 *Ibid*.

349 *Id.,* p. 5.7-121

350 *Id.,* p. 5.7-122

351 *Id.,* p. 5.7-57

Response to Comment F.3-27:

The Commenter's report regarding seasonal use of Quail Lake by migrating birds is noted. The Project does not modify Quail Lake. Use of Quail Lake by water birds would continue with Project implementation. As the Commenter notes, landbirds also use the region during migration, particularly Grapevine Canyon, which lies to the west of the Project. As demonstrated by the avian species observed and documented in the Plant and Wildlife Compendium in Appendix 5.7-A of the Draft EIR, landbirds do use the Project site during migration. Project surveys identified specific parts of the Project site as particularly valuable to migrant landbirds. As a result, PDF 7-3 was designed to protect these Project features and minimize potential impacts on migratory landbirds. Approximately 5,624 acres of the Project site would be included in the Open Space land use designation. Of the 5,624 acres of designated Open Space, approximately 5,116 acres (42 percent of the total Project site) are intended to (1) remain in their original natural condition; (2) be restored; and/or (3) be enhanced by weed abatement, fencing, and native species planting, among other means. Of this amount, approximately 3,866 acres are designated as SEA 17 to be preserved in perpetuity within the site boundaries.[352] The on-site open space areas would provide continued foraging habitat in addition to the approximately 39,213 acres of off-site open space acres that would be set aside for preservation to mitigation impacts to biological resources.[353] Also, although birds do stop to forage on the Project site, it is reasonable to assume that the majority of birds migrating through this area are attracted to the habitats surrounding the Project (SEA 17) that provide greater shelter and food and water sources. These areas will remain open to migrating birds that pass through the vicinity of the Project. Finally, Quail Lake and the Project site is not located at a bottleneck or choke point for aerial migration, such as due to topography or resources (i.e., food, water, shelter), and therefore, Project implementation would not block or otherwise be an obstacle to bird migration through the western Antelope Valley area.

Response to Comment F.3-28:

The SR-138 widening project is an existing Caltrans project, approved in 2017 following completion of an Environmental Impact Report/Environmental Impact Statement by Caltrans. The new alignment of Cement Plant Road will run to the west of Village #9, as shown on Exhibit 5.12-3, On-site Circulation System, and as graphically depicted on each Draft EIR graphic that shows the proposed roadway network. This roadway alignment is fully within the impact footprint analyzed throughout the Draft EIR. As stated in Section 5.7.6, Environmental Impacts, "although the Project includes a new road along its western edge (Cement Plant Road), the road's use would be limited to infrequent daytime truck traffic to and from the Cement Plant, functioning the same as the existing Cement Plant Road to the east. Nighttime use will be prohibited except for emergency. This new Cement Plant Road would connect to SR-138 via a Gorman Post Road extension, and a new intersection in this area will be avoided."[354] Because the Cement Plant Road realignment is

352 *Id.,* p. 4-44
353 *Ibid*.
354 *Id.,* p. 5.7-165

part of the Project, as defined in Section 4.0, Project Description,[355] this component is fully within the impact footprint analyzed throughout the Draft EIR and was considered when assessing potential direct (e.g., habitat modification) and indirect (e.g., light, noise, dust) impacts to biological resources. All focused biological surveys included the impact area for the realignment of Cement Plant Road. The proposed location of the Cement Plant Road would not be a barrier to bird migration any more than the existing road alignment, as there are no tall structures, upward-facing light sources, transmission lines, or other design features that can be a deterrent to bird flight paths, and the roadway would continue "to be limited to infrequent daytime truck traffic to and from the Cement Plant".[356]

Response to Comment F.3-29:

To clarify, the Draft EIR does not specify an assumed distance that the spores would be limited to; however, it is expected that the majority of fugitive dust and associated spores (if present) would settle out of the wind before leaving the Project site due to both the physical properties of entrained sediment and the large size of the site.[357] Evidence that these statements are in error is not provided. Regardless, to ensure concerned parties can be aware of earth-moving activities on the Project site during the construction period, MM 3-11 is hereby added to the Draft EIR in response to this comment:

> **MM 3-11** The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable interested parties both on- and off-site to easily access information relevant to potential Valley Fever risk. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebel, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.

Please also see Section 5.3 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3-30:

Regarding the first suggested mitigation measure, the use of mesh or netting such as used on stationary objects like fruit trees and bushes to protect against dust and/or birds is not

355 *Id.,* p. 4-39
356 *Id.,* p. 5.7-165
357 *Id.,* p. 5.3-18

practical for use on construction sites. This is due both to the scale of the Project site and the associated construction area(s) and because the construction activity would be regularly moving. Consistent with Rule 403 requirements, the suppression of dust before it reaches a project's boundaries is both feasible and more effective in reducing the risk of Valley Fever spores being spread due to ground-disturbing activity. In addition to fully implementing Rule 403 (per MM 3-1), the Project Applicant/Developer has committed to several actions for prevention of Valley Fever exposure for construction workers consistent with the recommendations of the California Department of Public Health (CDPH), cited as CDPH 2013b (English language) and CDPH 2013c (Spanish language) in MM 3-2.[358] The encapsulation or other dust barrier to limit the spread of Valley Fever is not suggested by the CDPH. Regarding the second suggested mitigation measure, it is assumed that "notification" refers to the notification described in Draft EIR MM 3-3, wherein each purchaser or tenant reads and signs a notice regarding the Valley Fever risk during the construction period. Please refer to response to Comment F.3-29 discussing new MM 3-11 requiring creation of a website with regularly updated information on ground-disturbing activities and the notification of off-site persons to the presence of this website to seek out information, if desired.

Please also see Section 5.3 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3-31:

As discussed in response to Comment F.3-30, in addition to fully implementing Rule 403 (per MM 3-1), the Project Applicant/Developer has committed to several actions for prevention of Valley Fever exposure for construction workers consistent with the recommendations of the California Department of Public Health (CDPH), cited as CDPH 2013b (English language) and CDPH 2013c (Spanish language) in MM 3-2.[359] In addition to preventing direct exposure, the CDPH includes action to prevent transport of the spores, if present. These actions include the provision of Tyvek™ coveralls/suits daily. Therefore, the following MM 3-2 in the Draft EIR is hereby augmented in response to this comment:

MM 3-2 To aid in the prevention of Valley Fever among construction crews on the Project site, the following measures shall be implemented by the Construction Contractor during all construction activities:

- Have Tyvek™ coveralls/suits available in a range of sizes for construction worker use upon request. If used, require the worker to remove the Tyvek™ suit at the work site at the end of the day.

358 *Id.,* p. 5.3-26
359 *Ibid.*

Please also see Section 5.3 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3-32:

This comment includes segments of sentences, or full sentences, from the first three paragraphs on page 5.3-18 of the Draft EIR. As such, it is unclear the intent of this comment. Please refer to responses to Comments F.3-29 through F.3-31 related to Valley Fever.

Please also see Section 5.3 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3-33:

This comment misstates the Draft EIR's determinations regarding the Project's potential air quality impacts. As explained at Draft EIR page 5.11-1, the northern 91 percent of the Project site lies within the boundaries of the Antelope Valley Air Quality Management District (AVAQMD), while the remaining 9 percent lies within the South Coast Air Quality Management District (SCAQMD). As an initial matter, under *existing* pre-Project conditions, the AVAQMD and SCAQMD are both in federal and state nonattainment for ozone (O_3), the SCAQMD is in federal and state nonattainment for particulate matter (PM10 and PM2.5), and the AVAQMD is in state nonattainment for PM10.[360] Thus, these pollutants already exceed applicable air quality standards irrespective of whether the Project is approved and constructed.

Moreover, as explained on Draft EIR pages 5.11-9 and 5.11-10, toxic air contaminants (TACs) are those air pollutants that are known or suspected to cause cancer or other serious health effects (e.g., reproductive effects or birth defects). With respect to the Project's potential to expose sensitive receptors (e.g., residences, schools, day care facilities, hospitals) to substantial pollution concentrations, the Draft EIR determined that this impact would be less than significant with implementation of MM 11-2. With respect to TAC emissions associated with the Project's proposed on-site stationary sources, the Draft EIR determined that impacts from these sources would be less than the incremental cancer risk of and non-cancer health index thresholds with implementation of MMs 11-1, 11-7, 11-8, and 11-9 and, therefore, this impact would be less than significant.[361] With respect to TAC emissions from existing off-site stationary sources (i.e., the National Cement Plan), the Draft EIR determines that TAC risks from such sources would be less than the applicable AVAQMD and SCAQMD thresholds and, therefore, this impact would be less than significant.[362] Finally, with respect to TAC emissions from vehicles on State Route 138, the Draft EIR determined that impacts from these sources would be less than the incremental cancer risk of and non-cancer health

360 *Id.,* pp, 5.11-22 to -28
361 *Id.,* p. 5.11-71
362 *Id.,* p. 5.11-72

index thresholds with implementation of MMs 11-10 and 11-11 and, therefore, this impact would be less than significant.[363]

The air quality analyses in Section 5.11, Air Resources, of the Draft EIR was conducted based on the methods recommended by the SCAQMD for criteria pollutants and TACs, as discussed on pages 5.11-18 through 5.11-22. Descriptions of health effects for each of the analyzed air pollutants were provided to inform the public of potential health effects as required by the disclosure requirements under the CEQA.[364] Project related air pollutant emissions were evaluated both in terms of contributions to regional air quality and localized impacts to uses proximate to the Project site.[365] The Draft EIR disclosed that there would be significant and unavoidable air quality impacts related to construction emissions in the jurisdiction of the AVAQMD as well as the SCAQMD.[366] Long-term operational emissions were also found to exceed the AVAQMD and SCAQMD thresholds of significance for regional emissions.[367] On Draft EIR pages 5.11-58 through 5.11-63, localized impacts to existing residential uses were also evaluated and found to result in exceedance of the ambient air quality standards developed by the State of California and the federal government to determine air pollutant concentrations that would affect human health.

In terms of air pollutant emissions from construction of Project components that may affect the health risk to residents of the Project, this issue was evaluated on pages 5.11-63 and 5.11-64 of the Draft EIR. This discussion explains that, "although construction of the Project would occur over a period of many years, use of diesel-powered construction equipment in any single area would likely occur for no more than a few months and would cease when construction completed in that area. Further, there will be limited periods when construction would be near adjacent residences." The Draft EIR concludes that, "[b]ased on the relatively short exposure time, diesel PM generated by Project construction would not create conditions where the probability for the MEI (Maximum Exposed Individual) to contract cancer is greater than ten in one million, which is the threshold the AVAQMD and SCAQMD uses for cancer risk. Likewise, the probability of construction or operations to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the MEI is very low. Additionally, with ongoing implementation of federal and State requirements for cleaner-burning fuels, diesel engine retrofits, and new low-emission diesel engine types, the diesel PM emissions of individual equipment would be substantially reduced over future years as Project construction is implemented. This impact would be less than significant; no mitigation is required."

Draft EIR Appendix 5.11-B, Air Quality Analysis for Stationary Sources, further evaluates Project air quality impacts of stationary sources of emissions that are permitted to be located on the Project in accordance with the Centennial Specific Plan. This analysis addressed

363 *Id.,* p. 5.11-74
364 *Id.,* pp. 5.11-3 to -10
365 *Id.,* pp. 5.11-40 to -74; *Id.,* Appendices 5.11-B and 5.11-C
366 *Id.,* p. 5.11-40 to -58
367 *Ibid*.

health risks associated with TACs and characterizes the sources of criteria pollutants to quantify their emissions.[368]

This study included the following components:

- An evaluation of the Project's TAC emissions to ensure that the health risks posed to sensitive receptors by stationary sources located in the Project's Business Park area are not in excess of applicable significance thresholds;
- An evaluation of the Project's TAC emissions to ensure that the health risks posed to sensitive receptors by discrete stationary sources that may located in the Project's Commercial and Institutional areas are not in excess of applicable significance thresholds;
- An evaluation of the TAC emissions that would be generated by the Project's two wastewater reclamation facilities (WRF) to ensure that the health risks posed to adjacent stationary sources are not in excess of applicable thresholds; and
- An evaluation of stationary sources that emit criteria pollutants having ambient air quality standards to assess the potential of violating these standards.

As explained in the Draft EIR[369], modeling described in Appendix 5.11-B confirms that none of the sensitive receptors located adjacent to the Project's Business Park areas would be exposed to TAC emissions that exceed a cancer of risk of 10 in 1 million or have a chronic non-cancer hazard index of 1.0, provided there is minimum buffer area between the sensitive receptor and the Business Park area. In order to ensure that the Project's future tract maps incorporate this required buffer area, MM 11-7 requires the establishment of buffer areas in the Project equivalent to those used for the TAC modeling. Moreover, per MM 11-8, no sensitive use (e.g., school, hospital, day care center) may be located within a Business Park area unless the Project Applicant/Developer provides written evidence to the County that sensitive use would not be exposed to TAC with pollutant concentrations resulting in a cancer risk greater than or equal to 10 in 1 million for health risks and 1.0 for non-cancer chronic and acute hazard indices.

There are several discrete types of equipment with TAC emissions levels less than those described previously for stationary sources that would be permitted in the Commercial and Institutional areas on the Project site, including natural gas-fired boilers, emergency generators, gas stations, spray booths, storage tanks, dry cleaners, and small-source particulate matter (PM) generators.[370] The Appendix 5.11-B modeling analysis confirms that the aggregate risk from these TAC-emitting sources would be below significance thresholds with implementation of MM 11-1, which requires all such stationary sources to comply with the parameters stated in the Stationary Source Types, Size Limits, and Quantity Estimates set forth on Draft EIR Table 5.11-5 and which is included as Attachment A to the Project's Mitigation Monitoring and Reporting Program.[371] Should there be a need or request for a

368 *Id.,* Appendix 5.11-B, p. 4
369 *Id.,* p. 5.11-69
370 *Id.,* p. 5.11-70
371 *Ibid*.

stationary source exceeding the prescribed limits, MM 11-1 requires the Project Applicant/Developer to apply for a source-specific permit from the AVAQMD or the SCAQMD, as applicable.

Appendix 5.11-B also includes a screening health risk assessment conducted to evaluate the air concentration at the nearest sensitive receptors to the WRFs. The results of the screening analysis demonstrate that the estimated incremental cancer risk, chronic and acute health indexes from all WRFs would be less than the significance thresholds at the maximally exposed sensitive receptor location and thus impacts from TAC emissions generated by the WRFs would be less than significant.[372]

In addition, Draft EIR Appendix 5.11-C, Centennial Supplemental Air Quality Analysis, further evaluates in detail potential localized air quality impacts related to both criteria and toxic emissions generated by the Project, with a focus on how sensitive residential land uses would be affected by mobile emissions and stationary sources proximate to the Project site.

This study included the following components:

- An evaluation of the potential health risks resulting from mobile emissions generated by increased traffic due to the project for new and existing residences located near California State Route 138;
- An evaluation of ambient air quality impacts resulting from construction and comparison to the South Coast Air Quality Management District (SCAQMD) Localized Source Thresholds;
- A review of a health risk assessment for the National Cement facility located north of the Project site; and
- A review of consistency with air district plans and California Air Resources Board (CARB) land use guidelines.

Specifically, Appendix 5.11-C and the Draft EIR[373] evaluates the potential adverse impacts of toxic air contaminants (TACs) and diesel particulate matter exposure generated by traffic traveling along SR-138 and the offsite National Cement factory.

To assess the health risks associated with SR-138 mobile emissions, Appendix 5.11-C used the Centennial Specific Plan's land use plan to determine the Project-site location of all future sensitive receptors that would be located within 500 feet of SR-138, and evaluated cancer risk from diesel exhaust using a receptor grid with 40-meter spacing.[374] The 500-foot buffer was selected on the basis of the California Air Resources Board's (CARB) 2005 guidance manual on land use development, *Air Quality and Land Use: A Community Perspective*.[375] The CARB guidance manual recommends a 500-foot buffer between freeways and sensitive receptors, indicating that further analysis may be in order if the proposed sensitive receptor

372 *Ibid.*; *Id.,* Appendix 5.11-B, pp. 19-22
373 *Id.,* pp. 5.11-71 to -74
374 *Id.,* Appendix 5.11-C, pp. 2, 3
375 *Id.*, Appendix 5.11-C, p. 1

is located within this buffer.[376] The Appendix 5.11-C modeling confirms that incremental cancer risks for the 70-year exposure duration are below 10 in 1 million at locations greater than 150 feet from the travel lanes and thus would not exceed applicable thresholds of significance.[377] The estimated hazard index for all proposed sensitive receptors would be significantly less than one at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.[378] This determination is consistent with the Antelope Valley Area Plan EIR, which concluded that potential adverse effects to sensitive receptors located in proximity to SR-138 would be less than significant with mitigation.[379] Moreover, as more stringent vehicular greenhouse gas emission and criteria air pollution standards take effect, and as transportation fuels and vehicles become cleaner over time, the number of diesel powered vehicles on roadways as well as emissions from remaining newer diesel engines are expected to further reduce diesel-related health risks at the Project site.[380]

To address the potential impact to sensitive receptors located within 150 feet of the SR-138 travel lanes, MM 11-10 imposes a 150-foot buffer from such travel lanes within which the Project will be prohibited from siting new sensitive receptor uses. As an added layer of protection, MM 11-11 further requires that prior to future tract map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138, an additional dispersion modeling study must be conducted to estimate diesel PM air concentrations. If the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then effective TAC reduction measures must be implemented to mitigate for interior air quality, such as filtration technologies or equivalent protections against TACs from mobile emissions.

In addition, MM 11-11 has been revised in this Final EIR to further insure that sensitive receptors are protected at the Project site from emissions generated by high-volume roadways. Specifically, MM 11-11 has been revised to, among other things, require preparation of a dispersion analysis to calculate the health risks from mobile emissions whenever the Project proposes a tentative map that would locate sensitive receptors within 500 feet of a "high-volume" roadway (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), in addition to SR-138.

Although not required by CEQA, as confirmed by the Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Appendix 5.11-C also evaluates the estimated cancer risks and chronic and acute non-cancer hazard indices at the future Project residences and other sensitive uses (after Centennial Buildout) caused by emissions generated by offsite National Cement Lebec Plant and determined that any related health risk are below the AVAQMD's and SCAQMD's thresholds if significance (i.e., 10 in 1 million for cancer risk and 1.0 for HI). The cancer risk at the northernmost portion of the Project site was estimated to be 0.15 in 1 million; the chronic

376 *Ibid*.
377 *Id.*, p. 5.11-73; *Id.*, Appendix 5.11-C, p. 3
378 *Ibid*.
379 DRP 2014a, p. 5.3-43
380 DRP 2017, pp. 5.21-7, -8, -23

and acute non-cancer hazard indices estimated for this location were 0.01 and 0.12, respectively. Based on the results presented in the Appendix 5.11-C, the Draft EIR determined that the cement plant is not expected to cause unacceptable risks to future residents at Centennial.[381]

As demonstrated by the EIR analysis summarized above, this comment's claim that the Project's potential TAC emissions would "rise to unacceptable levels, causing illness, disability and premature death" is not supported by the facts.

Response to Comment F.3-34:

The Commenter made a substantively identical comment in Letter F.3A, which comment as been designated as Comment F.3A-46 in this Final EIR. Please see response to Comment F.3A-46 for a response to this comment.

Response to Comment F.3-35:

Particulate matter is considered in the Draft EIR as PM10 and PM2.5 – particulate matter with a diameter of 10 and 2.5 microns or less, respectively.

The analysis and conclusion of Threshold 3-4 in Section 5.3, Hazards and Fire Safety, including the quoted sentence in this comment, pertains to hazardous materials/wastes at the Cement Plant that have resulted in soil and groundwater contamination, and potential conflicts between Project-related vehicular and alternative traffic introduced by the Project and existing traffic on the realigned National Cement Plant Road.

Air emissions from operations at the National Cement Plant are discussed in Section 5.11, Air Resources. The existing air quality, which is the baseline for the proposed Project's air quality analysis, is presented beginning on page 5.11-25 under the header "Monitored Air Quality". As shown in Table 5.11-4 beginning on page 5.11-26, PM10 and PM2.5 are monitored at the applicable monitoring stations.

As discussed in Section 5.11, "Particulate matter in the AVAQMD tends to be primarily fugitive dust. This dust appears to be generated by both local sources and by region-wide dust during moderate to high wind episodes. These regional episodes tend to be multi-district and sometimes interstate in scope. The AVAQMD has identified the local sources of fugitive dust to be primarily unpaved road travel; construction and local disturbed areas of soil concentrated in the urban populated areas in the district; and seasonal agricultural operations";[382] and "Particulate levels in the area are due to natural sources (such as wind), grading operations, and motor vehicles".[383] As such, the contribution of National Cement Plant operations to the particulate matter in the Mojave Desert Air Basin is not as dominant as dust (from wind and grading) and vehicles, and these emissions are represented in the existing monitored air quality data.

381 *Id.,* p. 5.11-71; *Id.*, Appendix 5.11-C, p. 9
382 *Id.*, p. 5.11-6
383 *Id.,* p. 5.11-26

In Section 5.11, Threshold 11-2 – Would the proposed project expose sensitive receptors to substantial pollutant concentrations – the National Cement Plant is acknowledged as a source of toxic air contaminants (TACs) in the area.[384] Accordingly, a health risk analysis (HRA) was completed to evaluate the human health impacts; the HRA concluded the risks at the future Project residences and other sensitive uses are below the applicable thresholds.[385] Based on the analysis of the technical report, the Draft EIR concludes that the TAC risks [which include risks from particulate matter] from the National Cement Plant at Lebec to the Project site would be less than the applicable AVAQMD and SCAQMD [Southern California Air Quality Management District] CEQA significance thresholds," and that, "The impact would be less than significant".[386]

Further, CEQA does not require an analysis of the environment on the project but rather whether a project "may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."[387] According to the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) (62 Cal.4th 369), "CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents."[388] Thus, CEQA does not require the Project to mitigate for emissions generated by current operations of the National Cement Plant.

Please also see Section 5.3 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3-36:

Please see response to Comment F.3-28.

Response to Comment F.3-37:

Please see responses to Comments F.3-21 and F.3-22.

Response to Comment F.3-38:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment appears to refer to the segments of the Ridge Route roadway constructed prior to, and located generally to the east of, Interstate (I) 5 extending from the community of Castaic north to State Route (SR) 138. As recently discussed in published reports,[389] portions of the Ridge Route have been closed for several years due to storm damage; easements for portions of the route have been vacated and are currently held by

384 *Id.,* p. 5.11-29
385 *Id.,* pp. 5.11-71 and -72
386 *Id.,* p. 5.11-72
387 Public Resources Code (PRC) § 21065
388 CBIA v. BAAQMD at 369, 378
389 See, e.g., http://www.latimes.com/business/autos/la-fi-hy-old-ridge-route-20160502-story.html.

private landowners; portions of the route were listed on the National Register of Historic Places in 1997; and much of the route traverses through the Angeles National Forest and is subject to the planning and conservation oversight of the U.S. Forest Service. Due to these factors, the use of the Ridge Route to mitigate impacts on I-5 would be infeasible.

Potential Project impacts to I-5 are discussed in Section 5.10, Traffic, Access, and Circulation, of the Draft EIR, including the text and tables on pages 5.10-56 to 5.10-119. The analysis compares the applicable Level of Service (LOS) standards for I-5 freeway segments and on-ramps and off-ramps located north and south of the Project site using well-established analysis methodologies under existing conditions, existing conditions with the Project, and under future (cumulative) with Project conditions based on future I-5 traffic projections prepared by applicable transportation and transit planning agencies for Los Angeles and Kern Counties. The Draft EIR determined that no significant impacts to freeway segments or interchange ramps would occur under existing plus Project conditions, and that the Project could contribute to an exceedance of capacity on the westbound SR-138 to southbound I-5 ramp. The Draft EIR determined that, under cumulative plus Project conditions, the Project could contribute to impacts at six mainline segments along I-5 and to the interchange connector ramps from westbound SR-138 to southbound I-5 and from I-5 to eastbound SR-138. The Draft EIR found that all potentially affected I-5 segments and ramps under existing plus Project and cumulative plus Project conditions would operate within acceptable performance criteria with the implementation of mitigation measures and found that compliance with these mitigation measures and the fair share contributions towards the improvements described above would reduce potential Project impacts to I-5 freeway segments and ramps to less than significant levels.

The Draft EIR also discusses the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"), including SR-138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7.0, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Draft EIR was filed by the County on May 15, 2017 and the 60-day comment period began on May 17, 2017. As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

The STS compares the Project's potential impacts identified in the Draft EIR for I-5, SR-14, and SR-99 facilities using the volume-to-capacity methodology specified by the Congestion

Management Plan for Los Angeles County and the Project's potential impacts using the Caltrans' recommended HCM methodology. HCM calculations were prepared for 62 locations within the Draft EIR study area consisting of freeway segments in advance of and after major system interchanges as well as representative locations between major system interchanges. The analyzed locations provide a comprehensive coverage of the Draft EIR study area because they include the freeway facilities with the greatest potential to be affected by congestion. Under existing plus Project conditions, the Draft EIR and the STS show that all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[390] Under cumulative plus Project conditions with mitigation, the Draft EIR and the STS show that almost all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[391] The STS indicates that certain study locations, such as the Grapevine grade segment of I-5, would not meet HCM-based LOS standards because topographic conditions, lane and speed controls and other localized conditions would result in higher traffic densities. As shown in STS Table A-5, however, LOS conditions would be worse under cumulative without Project conditions, and LOS conditions improve under cumulative with Project conditions with the implementation of the Project MMs.[392] Consequently, the STS demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Please also see Section 5.16 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3-39:

The presence of on-site, nearby, and regional faults is clearly disclosed in Section 5.1, Geotechnical. As discussed on pages 5.1-16 and 5.1-17, consistent with State regulations, there would no building on or within the required setback of the Alquist-Priolo Earthquake Fault Zone for the San Andreas Fault. The setback zone for the San Andreas Fault is incorporated into the Geologic Safety Zone, which also establishes building setbacks for the two unnamed on-site faults. Building setbacks are related to the risk of adverse effects of surface rupture on a fault during an earthquake. The Project would not expose people or structures to potential adverse effects from surface rupture of a known fault with implementation of PDF 1-1 (i.e., the Geologic Safety Zone). However, the risks from surface rupture of a fault are a different issue than the risks from strong seismic ground shaking during an earthquake. As stated on page 5.1-15 of the Draft EIR, "…the overall seismic risk at the Project site is the same as Southern California in its entirety." In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area. In any case, for properties located in a seismic hazard zone, California *Public Resources Code* § 2694 requires that the seller's agent, or the seller if acting without an agent, but disclose that the property is located in a seismic hazard zone.

390 DRP 2017, Appendix 5.10-C, Table 4-1
391 *Id.,* Appendix 5.10-C, Table 4-2
392 *Id.,* Appendix 5.10-C, Section 5

Therefore, the notification requirement proposed by this comment is already a requirement of existing law. Since the Project is required to comply with existing law, and since the proposed notification requirement would not mitigate a physical impact on the environment, it is not an appropriate mitigation measure under CEQA.

Please also see Section 5.6 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.7 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3-40:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The significant unavoidable issues are listed in the comment are not those noted in the Draft EIR, which are the following, as stated in Table 1-1, Centennial Specific Plan Impact Summary, on page 1-36:

> The following environmental factors would result in cumulatively significant and unavoidable impacts:
>
> - Land Resources (loss of Prime Farmland)
> - Biological Resources (regional wildlife movement, loss of native grasslands)
> - Population, Housing, and Employment (substantial relative to existing conditions)
> - Traffic, Access, and Circulation (without pending improvements by Caltrans)
> - Air Resources (construction and operational emissions in the AVAQMD and the SCAQMD)
> - Noise (traffic noise along segments of SR-138)
> - Visual Resources (change to long range views from public land and nighttime light and glare)
> - Solid Waste (contribution to municipal solid waste disposal)
> - Water Resources (water supplies)
> - Climate Change (greenhouse gas emissions)

More specifically, septic tanks will not be a part of the Project which will include a new sewer treatment plant as part of the Project development.

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From: King, Katherine <king@humnet.ucla.edu>
Sent: Thursday, August 17, 2017 3:43 PM
To: Jodie Sackett
Cc: Terry _ Cliff Kelling
Subject: - CENTENNIAL DEIR PUBLIC COMMENT PERIOD
Attachments: Centennial DEIR response Aug 2017.pdf

Dear Mr Sackett,

Attached please find the revised Centennial DEIR comment letter that is to replace the one submitted by the Tri-County Watchdogs before the deadline was extended.

We look forward to reading the responses to our questions and requests in the FEIR.

F.3A-1

Best wishes,

Katherine King,
Secretary, Tri-County Watchdogs

TriCounty Watchdogs PO Box 6407 Frazier Park, CA 93222

17 August 2017

Mr. Jodie Sackett
County of Los Angeles Department of Regional Planning Hall of Records, 13th Floor Room 1348
320 West Temple Street Los Angeles, California 90012
JSackett@planning.lacounty.gov

Re: Comments on the **Centennial Project Draft Environmental Impact Report of May 2017**
State Clearinghouse No. 2004031072

Dear Mr. Sackett,

The Tri-County Watchdogs, an organization that focuses on promoting responsible growth in the Mountain Communities where Kern, Los Angeles and Ventura Counties meet, thanks you for the opportunity to comment on the Centennial Draft Environment Impact Report. F.3A-2

We must, however, begin by saying that until July 13 it was extremely difficult to access the information in this large report since CDs were not sent out and internet access in our rural mountain area has low bandwidth. It was impossible for our group to thoroughly read through the 2000 pages of the report, not to speak of the thousands of pages of appendices before the original deadline of July 17. We asked in writing for an extension only to learn that you were out of your office until July 11. It seemed to us that perhaps Los Angeles County Planning Department did not truly desire informed community feedback. Otherwise, another month's extension would have been granted when it was orally requested on June 29. The meeting on June 29, which surprised everyone by being a hearing rather than an information session, would have been better noticed. Tejon Ranchcorp (TRC) would have been asked to pay for the sending of hundreds of CDs. F.3A-3

Nevertheless, we submitted a comment letter on July 13, just before the extension was granted and the document was made more accessible. This letter replaces that earlier one. F.3A-4

We are deeply alarmed by the huge size of a proposed development in an area where **water** is scarce, where **Valley Fever** is rampant, where healthy **air** is already threatened by a cement plant as well as pollution drifting over from **traffic** on the I-5 recent, and where many precious species of wildlife share an endangered **bioregion** of native California grassland. Furthermore, as experienced Californians living in an adjacent area whose geology we did not know when we F.3A-5

bought homes here, we cannot forget the **earthquake** danger to new human residents living en masse in a fault-ridden zone. F.3A-5 cont.

WATER RESOURCES

Creating a new city of nearly 60,000 residents is a bad idea in an arid area that is likely to suffer severe drought conditions for many years, if not permanently. We note that very many people and communities in our adjacent Frazier Park region are suffering because of dry wells, and that sag ponds in Gorman were dry by June. F.3A-6

Over the past 14 years, Tejon Ranch Company/Tejon RanchCorp (TRC) has scrambled to cobble together enough sources of water to make it through the 20 year span required by Senate Bill 221 [ref page 5.18.11]. On paper TRCappears to have done so, but only if one assumes "normal" cycles--that is, a repetition of the past 20 year history-- of wet and dry years. However, as Climate Change wreaks havoc with weather patterns all over the world, teh very idea of "normal" has become highly contested. What if Southern California endures another ten-year (or longer) drought period on top of the one that has recently lowered groundwater levels all over the state? Where will the thirsty residents of the Antelope Valley get their water when there are 547,000 of them as opposed to the roughly 400,000 there now? F.3A-7

In this worst-case scenario, even the DEIR expresses some doubt both within and after the 20-year period (which ends in 2035 since the preparation of the DEIR has taken two years). F.3A-8

1634 acre feet per year (afy), or roughly 25% of the potable water needed at buildout (6788 afy), is expected to come from groundwater from the eastern Antelope Valley Groundwater Basin, to which TRC is now entitled because of the Judgment and Physical Solution of December 2015. The DEIR presumes that this 1634 afy will be constant through wet and dry and multiple-year (3) drought years. Howevcr, as the Peer Review of Kennedy Jenks Consultants points out, "It is not clear from the Judgment and Physical Solution whether this is a sound assumption even though the allocation is related to the safe yield determination for the Basin and should be confirmed by the Watermaster Engineer" [App 5.18.G. p.17]. What if another decade of drought changes the "safe yield determination"? **Please supply a more realistic assessment that takes climate change and a repetition of the past ten years as the new "normal."** F.3A-9

As we noted in our comments on the Hauled Water Initiative last fall, the Antelope Valley Basin and the small Acton Basin are already pumped to capacity, and the Santa Clara River Basin, which might have surplus to pump, has been contaminated by perchlorate. There is a risk in all three basins that increased pumping will increase concentrations of dissolved solids as well as other dangerous elements (Hauled Water Initiative WSA pp.7-9). F.3A-10

Extended droughts could affect not only the groundwater but also the SWP surface water that the DEIR counts on. What would ten years of a 5% allocation do to the Project's calculations? We F.3A-11

request that before taking action on this Project the County employ the services of a trained hydrologist to tell them and us. F.3A-11 cont.

It is ominous that 26,627 acre feet (AF) of CEntennial's reserve supply of water is due to amounts owed to TRC by AVEK precisely because of previous droughts: namely, 13,595 AF that TRC loaned to AVEK in 2008 and 2009 "to help alleviate the critical water shortage that was emerging in the Antelope Valley;" and 13,032 AF that AVEK is required to supply "in future wetter years in exchange for TRC... foregoing SWP deliveries in prior dry years" [5.18-61]. Again, **we ask for a realistic plan that includes a decade of *future* "dry years," *future* "critical water shortage."** F.3A-12

Indeed, the Antelope Valley Regional Integrated Water Management Plan (AVIRWMP), which hopes to accomodate the updated Antelope Valley Area Plan, discusses *potential* (not actual) extra sources of water on 5.18 pp.36-7, but concludes that "The General Plan Update Final EIR determined that the lower residential and related development associated with the AVAP update would reduce future water demand, but that the plan's water supply impacts would nevertheless remain *significant and unavoidable* (DRP 2015c). In other words, there will not be enough water for a projected 405,410 population (General Plan) much less the 547,000 projected if the Centennial Project is approved. F.3A-13

If we assume that in worst case multiple-year drought conditions water will be purchased from well outside the area, for example, northern California (which has just emerged from drought), Washington State, or eastern Nevada, southern Idaho, or some part of the United States that is experiencing flood instead of drought, the cost will be prohibitive. If rates double, triple, quadruple over twenty or thirty years, middle class home owners will be left with unsellable property that they cannot afford to live in. *The needs of current and future residents must come ahead of profits for out-of-state investors* like the east-coast consortium that owns Tejon Ranchcorp. F.3A-14

In addition, the DEIR's Water Supply Analysis (WSA) does not take fully into account the amount of water that will be needed for fire suppression. According to DEIR 3.0 [p.3-14] and 5.3.3, The Los Angeles County Fire Department has designated the Antelope Valley area, including the Project site, as a VHFHSZ, that is "highly vulnerable to wildfire." Drought has extended the fire season by a couple of months, and so far this year wildfires havc consumed three times as much acreage as last year. Last month, CNBC reported that 6000 firefighters were battling 14 wildfires in California at the same time, including three major ones in southern California. **Before the county approves any part of this project, studies need to be done on the volume of water that would be needed for fire suppression in this era of climate change.** F.3A-15

We note that Kern CopuntyPlanning Department Director Oviatt responded to the 2015 revised NOP with a similar request for a more realistic water study that takes into account already permitted development in Kern County as well as growing Los Angeles County areas served by AVEK [Revised NOP: Agency Comments pp. 151-2]. In addition, we would now add, Los F.3A-16

Angeles County supervisors must take into account the recently approved housing developments in Santa Clarita. F.3A-16 cont.

Mitigation: Do new, more realistic water studies that take into account climate change that has happened and will continue to happen despite the greenhouse gases measures that are featured in later sections of the DEIR. Issue permits for a limited number of new houses and buildings only in accordance with these new studies. Issue no permits until these new studies show how much water will be available for current as well as new residents of the Antelope Valley. F.3A-17

BIOLOGICAL RESOURCES

Grasslands:

The Centennial City Project, which is not an expansion of nearby urban or suburban cities or towns but rather the intrusion of almost 20,000 homes and more industry and commerce into natural and rural lands, proposes to destroy over 9,000 acres of California grassland. Native perennial bunch grasses of several species are found throughout the grasslands, up to over 30% coverage, which is very high for present California grasslands. This grassland harbors many native grassland-dependent animals and plants: it is home to pronghorns, elk, badger, burrowing owls, grasshopper sparrow, California condor and many other native wildlife, several of them endangered already. F.3A-18

The DEIR indicates that depredation of these grasslands will be reduced to insignificant levels by on-site and off-site designations of mitigation lands. The reality is that this Project, when built-out, will result in the permanent loss of some of California's last and best grassland habitat, including major stands of native bunchgrass species. F.3A-19

We note that the off-set mitigation preserves mentioned include lands already marked as green belts within the projects and lands previously set aside in the "Tejon Ranch Conservation and Land Use Agreement" (both "dedicated" and "acquisition" areas). We further note that the Tejon Conservancy is now struggling to secure the monetary support that TRC will cease supplying after 2021. This support, currently $800,000 per year, is needed in order to pay the salaries of the "experienced staff with expertise in land trust administration, conservation biology, environmental education, outdoor recreation and open space land management" that is promised in the "Agreement." Therefore, although we greatly respect the staff of the Conservancy, we have little confidence in the promise that Tejon Ranchcorp will voluntarily fulfill its responsibility to mitigate through preserved lands the significant and unavoidable depredations that its development plans entail. F.3A-20

We therefore ask that as a further **mitigation, TRC must commit to continuing its current support of $800,000 per annum for the Conservancy through 2031**. F.3A-21

Burrowing owl: Section 5.7 (Special Status Wildlife Species Observations with Impact boundary - after page 142):

The above-referenced map in the DEIR indicates one location within the Project footprint with evidence of burrowing owl presence. This is very difficult to believe.

One of the members of TCW worked as a biological monitor on Tejon Ranch property immediately north of the project representing DWR during the construction of the Tehachapi East Afterbay(TEA) in 2005. One of the pre-construction activities involved the location of burrowing owl activity, installation of one-way doors in active burrows outside the nesting season and construction of artificial burrows in nearby locations off the construction site.

During the field activity, many indications of burrowing owl activity were noted, including sightings of birds, and various evidences of recent activity at burrows. California ground squirrel activity was concentrated around wild cucumber vines. Burrowing owls were also found in these locations.

The majority of the Centennial City footprint consists of grasslands of the type found at the TEA site. We find that only one location for burrowing owl in the entire 12, 000+ acres of the Project site is incredible. We suggest that thorough field surveys be conducted for burrowing owl so that appropriate measures can be taken.

The paucity of burrowing owl records for the Project site suggests that field surveys for other wildlife species may also not have been adequate.

F.3A-22

Tri-colored blackbird Section 5.7 [pages 149 -150]:

The DEIR acknowledges that this species is presently a Candidate State-listed species that receives the same legal protection afforded to an endangered or threatened species.

The DEIR acknowledges that Project's biological surveys determined that tri-colored blackbirds have been nesting at four nearby off and on-site locations whose foraging ranges would include the Project lands.

The DEIR acknowledges that tri-colored blackbirds are known to forage as much as five miles from the nesting colonies.

The DEIR states that analysis has produced a figure of 8% reduction in suitable foraging area for the above four potential nesting locations.

For the Quail Lake colony and the one on-Project-site colony, analysis given in the DEIR indicates a potential loss of 20% foraging for these two colonies.

The DEIR's claim that Mitigation Measure 7.7 (enhancement and preservation of existing wetlands) will reduce the Project's impact on the tri-colored blackbird to a "less than significant" level is untrue.

F.3A-23

TCW has developed considerable knowledge of the Quail Lake tri-colored blackbird (TCBL) nesting colonies. Up to 1000 and possibly 2000 adults have nested at Quail Lake during 2015, 16 and 17. We have no information prior to 2015. Most of the colonies have been on the north side next to the Centennial City Project. Observations indicate that TCBL adults conduct

F.3A-24

most of their foraging during nesting season northwards into Tejon Ranch within the Centennial City proposed project land. We have a collection of photographs to support these observations. F.3A-24 cont.

Tri-colored blackbirds are intensely colonial. The females in each colony are known to ovulate simultaneously. The males who are feeding the females and young forage in tight flocks. The males at the Quail Lake colonies have been observed flying from the colonies on the north shore northwards through Tejon Ranch fields over the first ridge 1/3 mile north of the lake, then returning all together from an unknown destination in a few minutes with insects in their mouths. It is apparent from the time lapse that foraging was taking place within Village #9 location of the Centennial project. F.3A-25

The DEIR indicates a percentage of foraging reduction based on a five-mile hypothetical radius of 8% (20% for Quail Lake colonies). This figure is very dubious. Our impression is that the Quail Lake colonies probably do most of their foraging on the fields that are to be bulldozed by the Project. F.3A-26

It is very likely that the build-out of Village #9 north of Quail Lake will permanently destroy the colonies of tri-colored blackbirds at Quail Lake. This is in direct violation of the California Fish & Wildlife requirement to protect existing breeding colonies of this species. F.3A-27

Mitigation Measure 7.7 indicates that any disruption of nesting caused by the Project will be mitigated by the enhancement and preservation of existing wetlands. There is no assurance that this activity will create a replacement for the destroyed nesting colonies. Therefore, the DEIR proposes to destroy the colonies first, then hopefully the colonies will accept adjacent wetlands. This is not a reasonable plan for the protection of a listed species. F.3A-28

Implementation of MM 7.7 would **not** reduce the negative impact on nesting of tri-colored blackbird immediately adjacent to the Project to a level considered less than significant. F.3A-29

Furthermore, the Project's proposal to move the **National Cement Plant road** [DEIR 4-39] may also damage foraging areas of the breeding tri-colored population.Specifics and a map showing the proposed new route, which would be essential in order to evaluate the environmental affects, are missing. Our guess is that the new route would either traverse open space north and west of Village #1 or run south of Village #1 just north of Quail Lake. Either way, this realignment will increase the disturbance of natural grassland and tri-colored blackbird foraging area. F.3A-30

Mitigation: Before moving the National Cement Plant road **TRC needs to provide a map, and it needs to calculate the negative affects on the open space, the grasslands and and various flora and fauna**. It then needs to submit its calculations for public input. F.3A-31

Bioregion connectivity

Section 5.7 (See Exhibit 5.7-15 after page 172):

Significant Ecological Area 17 (SEA 17), as shown on Exhibit 5.7-15, would form a coherent polygon if not interrupted by the footprint of Centennial Project Plan. Most of the area within the Centennial footprint is consistent with the biotic communities of the adjacent SEA 17 lands. F.3A-32

The Centennial Project will seriously disrupt the connectivity of major bioregions between Tehachapi Mountains and the San Gabriel mountains (Liebre Mountain) to the south. This location represents the intersection of more bioregions than any other location in California: San Joaquin Valley, Tehachapi Mountains(southern end of Sierra Nevada), Mojave Desert, Transverse Ranges, Coast Ranges, and the Southern California Coastal Plains. F.3A-32 cont.

The DEIR has not adequately considered this major disruption of California's natural bioregions.

In addition, although the Centennial Project has been designed with open spaces, most of these open spares are narrow polygons that run east-to-west (see Exhibit 4-6, page 4-29). This allignment is exactly the opposite alignment needed to facilitate connectivity between the sections of SEA 17 north and south of the Project location. The placement of green belt open spaces should have been aligned in connection with existing natural conditions. This issue needs to be revisited. F.3A-33

The DEIR does describe an underpass at Highway 138 which is designed to accomodate some wildlife. However, this feature does not provide true connectivity in this region. F.3A-34

Bird Migration:

The DEIR fails to mention the possible affects of the Centennial project on local bird migration. F.3A-35

Local observers and photographers have documented the regular seasonal passage of many species of native birds in the Quail Lake regions. These experienced observers, photographers and other chroniclers of birdlife have determined that there is a regular seasonal migration of landbirds and waterbirds through the location of the Centennial Project. In the opinion of these observers, there is a migratory route that passes northward from Mexico past Salton Sea, through Antelope Valley, past Quail Lake, through the Grapevine Canyon into San Joaquin Valley and on northwards. This route is used both during the spring and fall migration periods. F.3A-36

The final EIR needs to **address the effect of the build-out of the project, including the subsequent widening of Highway 138 and the proposed shifting of the National Cement Road, on migration movements of birdlife.** This study needs to include **the effects of lights, sounds, habitat destruction and alteration** and other features. F.3A-37

AIR

Valley Fever:
Los Angeles County Dept of Public Health reported on July 21, 2017 that Valley Fever is on the rise in the county and in the Antelope Valley in particular. It warns that "people who live in the Antelope Valley are almost 9-times as likely to be diagnosed with Valley Fever compared with persons who live elsewhere in the county." It boggles the mind that Tejon RanchCorp is asking approval to bring 55,000 more people into this area, many of them to endure multiple years of ground upheaval. F.3A-38

The DEIR states that the risk of VALLEY FEVER (which is discussed in 5.3.2, pp. 13-14, and 5.11.7 pp 65-67) will be controlled by measures that include "watering exposed surfaces and haul roads three times daily; replacing ground cover in disturbed areas quickly; covering stock piles with tarps; and limiting speeds on unpaved roads to 15 miles per hour." In addition, near-by "residents would be provided with a notice disclosing this potential risk and describing strategies to avoid potential exposure to Valley Fever spores during construction or other earth-moving activities prior to sale, lease, or rental of any property." F.3A-39

These measures are not enough, for there is evidence (1) that watering increases the number of spores in the following season and (2) that spores can travel much farther than the DEIR assumes. For example, in 1977, a dust storm in Bakersfield carried dust and spores all the way to Sacramento. D. Pappagianis and H. Einstein wrote a scientific article about the result: "Tempest From Tehachapi Takes Toll or Coccidioides Conveyed Aloft and Afar."Western Journal of Medicine. 129, 6 (1978): 527–530. F.3A-40

A *New Yorker* article by Dana Goodyear, "Death Dust," described what happened as follows:

> "The Tempest from Tehachapi, as one researcher called it, spread dirt over an area the size of Maine. Twenty hours afterward, the dust reached Sacramento, four hundred miles north of Bakersfield, in the form of a murky haze that hung in the air for another day, stinging the eyes and noses of the residents. On the twenty-first, it started raining in Sacramento, which turned the dust to mud, coating the cars and sidewalks, and marked the end of the drought.
> Over the next several weeks, Sacramento County recorded more than a hundred cases of coccidioidomycosis, otherwise known as valley fever, or cocci, a disease caused by inhaling the microscopic spores of Coccidioides immitis, a soil-dwelling fungus found in Bakersfield. (In the previous twenty years, there had never been more than half a dozen cases a year.) Six of the victims died."
> [http://www.newyorker.com/magazine/2014/01/20/death-dust] F.3A-41

In addition, the Center for Disease Control website states that up to 40% of Valley Fever patients require hospitalization, and it posts an average cost of almost $50,000 per hospitalized patient. F.3A-42

We therefore suggest that in addition to the **mitigation** measures listed in the DEIR, the following be adopted:

1. **Tent construction areas** with mesh of the kind TRC is currently using to keep dust and winds off berries in Bakersfield area east of the 99.
2. **Extend the radius of notification** to include Gorman school and all schools in Lebec and Frazier Park
3. Mandate **soil-testing of every property** with the results to be provided **to every prospective buyer or renter** before a contract or lease may be signed.
4. **Post signs** on all roads within and adjacent to the project stating "CLOSE WINDOWS: VALLEY FEVER AREA"
4. Create an **endowment in advance to cover medical costs** of those people caught in the inevitable upsurge in Valley Fever cases. F.3A-43

5. The County should prepare for lawsuits and factor in that cost as they weigh the costs and benefits of this Project.

F.3A-43 cont.

Furthermore, construction workers, who, as the DEIR states, "would be at highest risk," need protective measures beyond education and "requiring that respirators or masks be worn" [5.11-66]. We think that their families and neighbors also need more protection, since there is evidence that a car originating in a Valley Fever area passed spores on to its new owner in Michigan after some one drove it there (*op cit*). We therefore suggest that the following **mitigations** be specified **for construction workers**:

1. Require workers to wear **respirators** without the secondary option of masks.
1. Provide workers with **either on-site showers and laundry facilities** so that they do not carry spores home on clothing or
2. Provide **hazmat suits**

F.3A-44

Air Quality

It is clear from the discussions in 5.11 [Air Resources] and 5.3-41-2 [Level of Significance after Mitigation] that during construction and after build-out of the proposed project, levels of air pollution would rise to unacceptable levels, causing illness, disability and premature death to the inhabitants of the Antelope Valley. As the DEIR states, no mitigation exists that can bring to levels required by the South Coast Air Quality Management District and the Antelope Valley Air Quality Management District the daily emissions of VOC [Volatile Organic Compounds that lead to the formation of ozone, which triggers chest pain, coughing, throat irritation, and congestion, worsens bronchitis, emphysema, and asthma, and can inflame the linings of the lungs and even, with repeated exposure permanently scar lung tissue], NOX [Nitrogen Oxides that cause airway inflammation and increase asthma], CO [Carbon Monoxide, which deprives tissues of oxygen], PM10 and PM2.5 [inhalable coarse and fine Particulate Matter that aggravate asthma, cause heart attacks and decreased lung function, cause premature death in people with weakened hearts or lungs].

F.3A-45

Faced with this disaster, which will also accelerate Climate Change [see 5.21], we request additional **mitigations** to those in 5.11.8 pp, 78-82 (which mysteriously do not include solar) and in Climate Action Plan Table 5.21.11 p.5.21.75 (which does include solar)] :

1) Require rooftop solar collection on *all* residential and commercial buildings

We note with approval that rooftop solar is planned for 100% of single-family detached residential units, but would like to see the 30% requirement for multi-family units and 60% requirement for commercial buildings be increased to 100%. Air quality and climate change demand it!

2) Double the number of required electric vehicle charging stations in multi-family residential projects and commercial buildings to 1 per 10 residential units and 1 per 25,000 sf of commercial space.

We note with approval the requirement to build electric charging stations in every single-family garage.

F.3A-46

Contra the statement on p. 5.3.21 that, " there is no evidence that either historic or regular operations at the **National Cement Plant** or on the realigned National Cement Plant Road have or would adversely impact the Project," we believe that Cement plant dust will harm new residents.
We therefore request another **mitigation**: **TRC must reduce and control the blasting** and particulate matter before large numbers of new homes are built only one or two miles away. F.3A-47

Traffic:

Widening the 138 to six lanes will be a disaster to biological resources. The northwestern part of the Antelope Valley has been designated a very Significant Ecological Area, and it would be difficult not to leave a major impact on these important lands even with the mitigations TRC has proposed. F.3A-48

As a **mitigation** of expected traffic in Antelope Valley and the I-5, we request the TRC contribute a fair share to **repair the Ridge Route from Castaic to the 138** so that it becomes a viable alternative to the 5 for local residents. F.3A-49

PUBLIC SERVICES [1.6.15-1.6.17; 5.15-5.17]

Library Services

There is no time line as to when the library services promised by the developer will be functional. Please give us start and completion dates. Please posts agreements, whatever stage they are at, with the Los Angeles County Public Library system as to provision of books, electronic facilities, and staffing. F.3A-50

Solid Waste Disposal

We question where precisely solid wastes will be disposed of. The document is murky, appearing to give a lot of information but saying little. The time horizon given is 15 years. What happens then? After 2030, seven strategies compared, agree on the underlying fact that no new landfills willl be permitted. We are drowning in garbage and available landfills are reaching capacity. Proposed solutions do not inspire confidence, much less credibility. F.3A-51

What are the assurances that these options comply with federal, state, and local statues and regulations related to solid waste? F.3A-52

How is TRC going to dispose of the 25% of operational waste that doesn't go to landfill F.3A-53

disposal? As usual, the expense and effort involving this disposal falls on property owners. Developers leave a mess and expect homeowners to pay the cost! With additional unavoidable impacts on the County. Caveat emptor.

F.3A-53 cont.

Hazardous Materials

As the DEIR acknowlwdges, transportation of hazardous materials is dangerously precarious. Kettleman City is not without its own problems and it is 105 miles NWof the project. McKittrick is 60 miles away. Please show agreements that these locations are willing and able to accept Centennial's hazardous materials until 2035 at least. Since 2035 is not that many years away, what long-term alternatives are there to these limited dump sites?

F.3A-54

PARKS, Road Maintenance, Flood-control.

Although the planned villages appear to be private communities (HOAs or POAs), the developer appears to be relying on county services for parks, facility maintenance, county-owned road maintenance, public right of way maintenance, flood control infrastructure maintenance and maintenance of other facilities. These services will be paid for not only by fees and taxes by the buyers into this development, but by current residents. This is quite a giveaway on the part of the county.

F.3A-55

The developer benefits and walks away with the profits while the tax burden falls upon the county and property owners. How do you justify this? For example, the Golden Valley water district, a small water company with 20 subscribers and one small building is being asked to create a huge infrastructure for 1500 new homes in the start up phase. Who will pay for this? Not the 20 subscribers. Luckily, Golden Valley can say no, but what then?

F.3A-56

Mitigations: 1) **clarify** what designated **open spaces** will be **parks** and make sure that all parks are available to the general public.

F.3A-57

2) **clarify costs and payers for the initial water services**

F.3A-58

Fire and Law Enforcement [5.16]

The early phases of creating infrastructure and the building of a new city will invite theft of building materials and equipment and create the need for security and fire protection. Who is paying for this security? The prison in Lancaster releases inmates into the community. A less than secure job site with expensive equipment and supplies might prove tempting to newly released prisoners. (We would, of course, not be writing this sentence if a major goal of California prisons was actually rehabilitation.)

F.3A-59

Yet not until Phase III is the construction of a store front new LASD station planned. In the meantime law enforcement will be provided by a LASD station 28 miles distant. CHP comes

F.3A-60

from more than 10 miles distant. An 8 minute response time for "emergency" issues appears wildly optimistic. In the middle of the night when there is no other vehicle on the road perhaps. F.3A-60 cont.

We draw your attention to the worried responses of law enforcement to the NOP of 2004. Captain Conley, Commander of the Newhall area Highway Patrol, wrote that increased traffic on the I-5 and 138 would cause "delays in emergency response time." The Los Angeles Sherif's Department anticipates that response times from the nearest station (Valencia) would be 1 hour (non-emergency), 50 minutes (priority), and 45 minutes (emergency) [2.0b NOP and Comment letters pp.77, 125-6]. F.3A-61

We also are aware of a recent incident in the Tri-corners area (adjacent to the Project area) in which the emergency response time --in summer with decent traffic conditions-- was 20 minutes. F.3A-62

Instead of giving estimated response time in terms of minutes and miles, we as residents ask you to **provide a more realistic assessment of how long it actually takes to get there**, allowing for winter weather and frequent road closures in the area of the development. Wildfires routinely create massive, miles long traffic jams on the I-5 and roads within or leading to the project area. F.3A-63

Please cite mitigation measures for these frequent occurrences. The statement that the Project will have impact on fire and law enforcement at a less than significant level is laughable. Please restate how levels of significance have been determined. Is this term in the sense of statistical significance? F.3A-64

Fire fighters are already stressed to their limits fighting fires. If current services are siphoned off to this new development, how will this affect residents who already feel that our fire and law enforcement services are inadequate? F.3A-65

Medical services:

Kern CountyPlanning Department Director Oviatt's response to the 2015 revised NOP included concern over the lack of medical facilities in proximity to the proposed Centennial development. She writes that there is "no major hospital within immediate transport of the Project site," and that "Accidents on Interstate 5, as well as icy roads on State Highway 138, could make access to off-site hospital facilities difficult or impossible." She and we would like to know how increased need for emergency and medical services will impact current residents. F.3A-66

The area needs a Level 1 Trauma Hospital We could tell you one terrible story after another of people who desperately need major and immediate medical care. For major medical events we have a choice of Henry Mayo in Valencia or any number of subpar hospitals in Bakersfield. What ambulance service will go that far to service this community? Please justify how there is no medical facility, no urgent care, no small clinics proposed when a new city is created. F.3A-67

The area also needs a Valley Fever specialty clinic like the ones in Arizona, e.g. the Valley Fever Center for Excellence and the Mayo Clinic Cocci Clinic. F.3A-68

Mitigations: 1) specify firm time line for building a **trauma center**.

2) Commit to building a **Valley Fever medical center** in Los Angeles County immediately.

F.3A-69

Earthquake: We point out the obvious: it is unwise to build a city on top of so many faults. If building must occur, we request the following

Mitigations: 1) Sellers of lots and home must be required to **notify new owners of nearness to Garlock,San Andreas, and the two newly discovered unnamed faults**.

2) In addition to the strictest building codes to withstand a 7 point earthquake, we would like to see additional measures to deal with **the effect of a breach of the aqueduct** on a much greater population than now exists in the area.

F.3A-70

CLIMATE CHANGE [5.21]

We applaud the commitment to install rooftop solar on 100% of single-family detached homes and the banning of utility scale solar plants within the project. We regret, however, that only 30% of multi-family residential units and 60% of commercial buildings are required to have rooftop solar. We are dismayed, too, that only 10% of single-family homes must have energy efficient water heater. We request the following **mitigations**:

1) **100% of multi-family residential units and commercial buildings must have rooftop solar.** 2) **100% of residential units and commercial building must have energy efficient water heaters** (including solar and tankless).

F.3A-71

ALTERNATIVES

The proposed Centennial project would unleash significant and unavoidable impacts on aesthetics, air, biological resources, archeological and paleontological resources, greenhouse gases and the quantity and quality of water (which is likely to be degraded by dense septic tanks and pollutants in storm run-off). All of these impacts, which the DEIR describes so well, should be enough to make Supervisors think long and hard–about the well-being of their neighbors, their non-corporate constituents, and their own grandchildren–before approving this project.

F.3A-72

Given all of the above, we ask the Supervisors *not* to make *an irretrievable commitment of water and biological resources*. Do not approve a project of 19,333 housing units (or even of 19,241, which is the reduced figure of Alternative C) that will create a lasting need for water that must nearly all be imported, that will necessitate paving precious grasslands in asphalt and concrete, and endanger with pollutants all nearby human, animal, and plant life.

F.3A-73

Until Tejon Ranchcorp comes up with a more reasonable alternative project, we ask that you choose Alternative A: No Project.

F.3A-74

For the Tri-County Watchdogs:

Terry Kelling, President (Frazier Park, CA)

Katherine King, Secretary (Venice and Frazier Park, CA)

*Tri-County Watchdogs is a local grassroots organization based in the Frazier park area, whose mission is to protect natural and cultural resources, to promote ecotourism, and foster responsible growth in the local Mountain Communities. We formed to respond to concerns about our water supply, air quality, our cultural and historical heritage, economic opportunities, and the neglect of our area by the counties and state.

F.3A-75

Responses to Comment Letter F.3A
Tri-County Watchdogs
August 17, 2017

Response to Comment F.3A-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.3A-2:

The comment is an introduction to the commenting organization. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.3A-3:

In addition to the hard copy of the Notice of Availability sent via overnight mail to residents and agencies, which contained a link to access the Draft EIR on the County's website, a hard copy of the Draft EIR was also available for review at the following libraries.

Lancaster Regional Library
601 West Lancaster Boulevard
Lancaster, California 93534

Quartz Hill Library
5040 West Avenue M-2
Quartz Hill, California 93536

Castaic Library
27971 Sloan Canyon Road
Castaic, California 91384

Canyon Country JoAnne Darcy Library
18601 Soledad Canyon Road
Santa Clarita, California 91351

Valencia Public Library
23743 West Valencia Boulevard
Santa Clarita, California 91355

San Fernando Library
217 North Maclay Avenue
San Fernando, California 91340

Old Town Newhall Library
24500 Main Street
Santa Clarita, California 91321

Bakersfield Library, Southwest Branch
8301 Ming Avenue
Bakersfield, California 93311

Frazier Park Library
3732 Park Drive
Frazier Park, California 93225

Stevenson Ranch Library
25950 The Old Road
Stevenson Ranch, CA 91381

Additionally, the County extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. The notice of time extension

was posted online[393] and emailed to all persons and parties who specifically requested a time extension.

A summary of the Hearing Examiner public hearing on June 29, 2017 was posted online on June 15, 2017.[394] Upon request, at the June 29, 2017 Hearing Examiner public hearing, the Lead Agency distributed several CD copies of the Draft EIR to meeting attendees. Prior to the June 29, 2017 meeting, the Lead Agency also uploaded the Draft EIR to its public website, and, after the meeting, upon request, further arranged the online materials to be more accessible by breaking the Draft EIR into its individual sections for faster downloading and review.

Response to Comment F.3A-4:

The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.3A-5:

The Commenter's opinions are noted. The Applicant has the water required to serve the Project. The source of the water is discussed in Section 5.18, Water Resources. Air quality is discussed in Section 5.11, Air Resources. Traffic on the I-5 and the surrounding region is discussed in Section 5.10, Traffic. Wildlife species and native grassland are discussed in Section 5.7, Biological Resources. Seismic issues are discussed in Section 5.1, Geology. The Commenter provides more detailed comments on these issues further in this letter. As such, please see responses to Comments F.3A-6 through F.3A-17 with regard to water supply, F.3A-38 through F.3A-44 with regard to valley fever, F.3A-45 through F.3A-47 with regard to air quality, F.3A-48 and F.3A-49 with regard to traffic, F.3A-18 through F.3A-21 with regard to native grassland and F.3A-22 through F.3A-37 with regard to other special-status species, and F.3A-70 with regard to earthquakes.

Please also see Section 5.17 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.18 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3A-6:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not address or question the content of the Draft EIR, and no further response is required. The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long term,

393 Los Angeles, County of. 2017 (July 13). Notice of Time Extension of Public Comment Period for the Centennial Project Draft Environmental Impact Report. Los Angeles, CA: County of. http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-hearing-time-extension.pdf.

394 *Id.* 2017 (June 15). Hearing Examiner Staff Summary: "Centennial Specific Plan Project." Los Angeles, CA: County of. http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-staff-report.pdf.

cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[395] As discussed in Draft EIR Section 5.18 and 7.0 the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Frazier Park and Gorman area water supplies referenced in this comment. Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 Urban Water Management Plan adopted by the Antelope Valley-East Kern Water Agency, the State Water Project contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast with the base scenario in the Delivery Capability Report, the Early Long Term scenario incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year State Water Project delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base

[395] DRP 2017, Appendix 5.18-C

scenario rate. Consistent with the Antelope Valley-East Kern Water Agency methodology used in the Agency's 2015 Urban Water Management Plan, the Early Long Term scenario is further modified to incorporate a single dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The Urban Water Management Plan was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan.

Response to Comment F.3A-7:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors to a final decision on the proposed Project. The comment does not address or question the content of the Draft EIR, and no further response is required. The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[396] As discussed in Draft EIR Sections 5.18 and 7.0 the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation

396 *Ibid.*

installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

The Project's water supplies are discussed in Section 5.18, Water Resources. Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 Urban Water Management Plan adopted by the Antelope Valley-East Kern Water Agency, the State Water Project contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast with the base scenario in the Delivery Capability Report, the Early Long Term scenario incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year State Water Project delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base scenario rate. Consistent with the Antelope Valley-East Kern Water Agency methodology used in the Agency's 2015 Urban Water Management Plan, the Early Long Term scenario is further modified to incorporate a single dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The Urban Water Management Plan was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan.

MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified for the Project.

Response to Comment F.3A-8:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed

Project. The comment does not address or question the content of the Draft EIR, and no further response is required. The following information summarizes the analysis of regional water supplies discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report[397] and using the same methodology adopted by the Antelope Valley-East Kern Water Agency in the agency's current Urban Water Management Plan, which includes the project. The analysis also incorporates the lower single dry year delivery rate of 5 percent used by AVEK to provide a more conservative analysis of State Water Project supplies and to reflect the lowest delivery level during the most recent drought. MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified for the Project.

Response to Comment F.3A-9:

The Project's use of 1,634 acre-feet per year of Antelope Valley Basin groundwater is consistent with the Antelope Valley Basin Adjudication Judgment and Physical Solution, which allocates rights to Antelope Valley Basin groundwater to sustainably manage the Basin's groundwater resources over time. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts within the Basin's sustainable yield.[398] The Adjudication Judgment and Physical Solution provides that, after a seven-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the amount of the overlying production right of 1,634 acre feet per year allocated to Tejon Ranch Company in the adjudication. As discussed on page 5.18-20 of the Draft EIR, the 2013 Antelope Valley Integrated Regional

397 DRP 2017, Appendix 5.18-C
398 *Id.,* Appendix 5.18-D

Water Management Plan found that groundwater is considered to be a very reliable supply for the Antelope Valley region even in short-term and during multiple-year droughts.

All Project groundwater use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[399] The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution also takes account of and avoids potential long-term, cumulative impacts to the Antelope Valley Basin. Section 1.5 of the Adjudication Judgment and Physical Solution states that after the Phase 3 trial of the proceedings, the Court determined that the safe yield of the Antelope Valley Basin is 110,000 acre-feet per year. Section 3.5.43 of the Adjudication Judgment and Physical Solution defines safe yield to mean the amount of annual extractions of water from the Basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Section 3.4 of the Adjudication Judgment and Physical Solution states that the physical solution governs groundwater, imported water and Antelope Valley Basin storage space to ensure that the Antelope Valley Basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield and provides that, after a seven-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the amount of the overlying production right of 1,634 acre feet per year allocated to Tejon Ranch Company in the adjudication. The fact that the Adjudication Judgment and Physical Solution, including the annual groundwater allocation to the Tejon Ranch Company, takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids long term, cumulative groundwater impacts and ensures that cumulative groundwater use will be sustainable over time.

MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential

399 *Ibid*.

sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified. Consequently, if Project and other Basin groundwater use were to be reduced by the Watermaster in the future, MM 18-2 ensures that the Project's potential long-term, cumulative impacts to the Antelope Valley Groundwater Basin groundwater supplies will be less than significant.

Response to Comment F.3A-10:

The Project will not pump groundwater from, discharge to or impact groundwater quality in the Acton or Santa Clara River basins. The Project's use of 1,634 acre-feet per year of groundwater, production of imported water return flows from urban water use in the Antelope Valley Basin, and water banking operations in the Antelope Valley will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution, which was approved by the Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time.[400] A watermaster will be appointed under the supervision of the Court to implement the Adjudication Judgment and Physical Solution. The Adjudication Judgment and Physical Solution prohibits water use that causes material injury, which is defined in Section 3.5.18 of the Judgment to mean impacts to the Basin caused by pumping or storage of groundwater that cause material physical harm to the Basin, any Basin subarea, or any producer, party or production right under the Adjudication Judgment and Physical Solution including degradation of water quality by introducing contaminants to the aquifer and/or transmission introduced contaminants through the aquifer. Section 18.5.8 requires that the Watermaster take all reasonable steps to assist and encourage appropriate regulatory agencies to enforce reasonable water quality regulations affecting the Basin. As a result, groundwater use, return flow production and banking/storage activities in the Antelope Basin, including by the Project will occur under the auspices of the Adjudication Judgment and Physical Solution and must protect groundwater quality as necessary to sustainably use and maintain the Basin. Project impacts to groundwater quality are discussed in Section 5.4, Water Quality, and would be less than significant with mitigation.

Response to Comment F.3A-11:

The potential delivery reliability and variability of Project State Water Project supplies is discussed in Draft EIR Section 5.18, Water Resources.[401] The Draft EIR analysis of State Water Project supplies utilizes the 82-year model results for the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report.[402] The Early Long Term delivery reliability scenario is also utilized in the 2015 Urban Water Management Plan adopted by the Antelope Valley-East Kern Water Agency, the State Water Project contractor for Antelope Valley and for the Project. The Early Long Term scenario incorporates more significant assumptions

400 *Ibid*.
401 *Id.,* pp. 5.18-20 to -28, -54 to -64
402 *Id.,* Appendix 5.18-C

regarding potential climate change impacts than the Delivery Capability Report base scenario, including 2025 emission levels and a 15-centimeter sea level rise. The average year State Water Project delivery rate in the Early Long Term scenario is lower than the Delivery Capability Report base scenario rate. Consistent with the Antelope Valley-East Kern Water Agency methodology, the Early Long Term scenario was further modified to more conservatively evaluate Project water supplies by using a lower single dry year delivery rate of 5 percent than identified in the Delivery Capability Report. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. The comment does not address or question the discussion of the potential delivery reliability and variability of State Water Project supplies for the Project in the Draft EIR. The comment does not cite to any available information suggesting that State Water Project delivery levels could average 5 percent over a 10-year period. Table 6.4 in the Delivery Capability Report summarizes the average State Water Project delivery rates during the worst 2-, 4-, and 6-year droughts within the 82-year historical record for California maintained by the California Department of Water Resources. Table 6.4 shows that annual deliveries during these worst-case conditions ranged from an average of 28 percent (2-year drought) to 33 percent (4- and 6-year droughts). Consequently, the most severe drought-period delivery levels identified by the Department of Water Resources in the Delivery Capability Report for periods up to 6 years are substantially higher the 5 percent annual average suggested in the comment. No drought has persisted for longer than six years in the California Department of Water Resources historical record. The analysis of Project imported water supplies using the Early Long Term scenario in the Delivery Capability Report incorporates the effects of the most severe droughts during the 82-year historical record, plus additional adjustments to account for potential climate change effects and the 5 percent single dry year delivery level used by the Antelope Valley-East Kern Water in the Agency's 2015 Urban Water Management Plan. Consequently, the Draft EIR includes a discussion of State Water Project delivery reliability that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan.

Response to Comment F.3A-12:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not address or question the content of the Draft EIR, and no further response is required. The following information summarizes the discussion of Antelope Valley-East Kern (AVEK) water supplies that are available to the project under specific single-year loan and in-lieu use agreements between the Tejon Ranch Company (TRC) and AVEK, including the discussions on Draft EIR pages 3-7, 5.18-61, and 5.18-62. These water supplies, collectively referred to a "AVEK Call Water" in the Draft EIR, are derived from transactions in 2008 and 2009 under which TRC purchased certain available water supplies from a third-party seller, and provided these supplies to AVEK in exchange for an agreement to repay the supplied water at 1.5 times the volumes transferred to AVEK.

The total remaining volume of water that AVEK is required to supply TRC as repayment under the 2008 and 2009 agreements, is 13,595 acre-feet. TRC has also participated in an in-lieu program administered by AVEK under which AVEK provides surface supplies in future wetter years in exchange for TRC using groundwater and foregoing SWP deliveries in prior dry years. The amount of water that AVEK is required to supply to TRC under the in-lieu program is 13,032 acre-feet. Finally, in 2007 and 2008, TRC purchased 2,362 acre-feet of water from AVEK for future delivery in wetter years. The total amount of AVEK Call Water the AVEK is contractually obligated to supply to TRC, all of which will be made available by TRC for Project use is 28,989 acre-feet. As shown in Draft EIR Table 5.18-10, the AVEK Call Water is used as part of the Project's reserve supply, and delivery is assumed to occur on a pro-rata basis over 20 average water years. The actual delivery timing can be flexibly arranged with AVEK to reflect the agency's available supplies from year to year. The water supply and demand projections assume that no AVEK Call Water would be supplied in either a single-dry year or during multiple-dry year droughts.[403] Documentation concerning the AVEK Call Water is included in Appendices J, O, and P of Draft EIR Appendix 5.18-A. The fact that TRC voluntarily entered into agreements with AVEK to supply water to the agency during relatively dry years, from 2007 to 2009, in exchange for future repayment in of water in wetter years does not affect the analysis of Project water supplies or the conclusion of the Draft EIR.

AVEK has developed significant new water banking and groundwater production rights since the last of the AVEK Call Water agreements with TRC was executed in 2009. As discussed on Draft EIR page 5.18-29, under the Antelope Valley Basin Adjudication Judgment and Physical Solution, AVEK has an overlying pre-rampdown production right of 4,000 acre-feet per year (afy) and an overlying production right of 3,550 afy at the end of the 7-year production rampdown period. The Adjudication Judgment and Physical Solution also provides AVEK with the right to produce an amount of imported water return flows in any year equal to 34 percent of agricultural imported water use and 39 percent of municipal and industrial imported water use multiplied by the average amount of imported water used by AVEK in the preceding 5-year period. AVEK has also developed groundwater banking programs to increase the reliability of the Antelope Valley region's water supplies by storing excess water available from the SWP during wet periods and recovering these supplies for delivery to customers during dry and high demand periods or in the event the SWP system is disrupted. AVEK's Water Supply Stabilization Project No. 2 (Westside Water Bank) started operations in 2010, and currently includes approximately 400 acres of groundwater recharge basins and 9 groundwater recovery wells. Up to 20 new wells may be constructed as a part of the Westside Water Bank project. Five irrigation wells existing on the property at the time of development may also be used in the program. AVEK meters the water delivery and recovery amounts for the banking program and will not recover more than 90 percent of the amount recharged to account for evapotranspiration, other losses during recharge and conveyance, and metering accuracy. The Eastside Water Banking and Blending Project started operations in 2016 and includes three 2-acre recharge basins and three groundwater wells. This project allows for recharge of raw water that is later recovered and blended for delivery to the Eastside Water Treatment Plant. The maximum recharge and recovery

[403] DRP 2017, Tables 5.18-11 and 5.18-12

volumes for the Westside Water Bank are estimated to be approximately 36,000 afy. AVEK can also recover groundwater from the Eastside Water Bank (5,700 afy total estimated capacity) and from 3 potable groundwater wells in the Bench Ranch Well Field (total capacity of about 3,700 afy). The current AVEK Urban Water Management Plan projects that AVEK will recover up to 36,000 afy from groundwater banking facilities during single-dry and multiple-dry years.

Response to Comment F.3A-13:

Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[404] As discussed in Draft EIR Sections 5.18 and 7.0 the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs also concluded that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable. Neither the Antelope Valley Area Plan and General Plan EIRs nor the Draft EIR found that there would not be enough water to serve future regional demand. The analyses found that impacts would be significant and unavoidable because of the lack of pertinent information and uncertainty regarding such supplies.

404 *Id.,* Appendix 5.18-C

Response to Comment F.3A-14:

This comment expresses an opinion regarding the possible costs of obtaining hypothetical water supplies, some of which include out of state sources that are not known to have provided significant municipal or other water supplies to California. The comment does not cite to any available information substantiating the feasibility and costs of obtaining these supplies, and further analysis of these issues would be speculative. The comment does not address or question the content of the Draft EIR and no further response is required. As discussed in Draft EIR Section 5.18, Water Resources, the Project's available water supplies would sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. None of the Project water supplies would be obtained from any of the sources included in the comment. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment F.3A-15:

Fire flows are considered to be intermittent water uses that are accounted for in a project's water system losses or non-revenue water. As shown in Draft EIR Table 5.18-7, the Project demand includes a potable water system loss of 327 acre-feet per year at buildout, or just under 105 million gallons per year. The volume of fire flows for the Project is discussed on pages 5.3-35 and 5.3-36 of Section 5.3, Hazards and Fire Safety, in the Draft EIR. The Project's water system will provide water supplies to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires. The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and the Los Angeles County Fire Department's fire-suppression standards for improved property and development. These requirements must be met prior to the approval of building permits by the County. The fire flow demand for the Project is conservatively assumed to be 4,000 gallons per minute for a duration of 4 hours (approximately 1.0 million gallons) in each of the four water system pressure zones within the site. The system losses shown in Draft EIR Table 5.18-7 are several times greater in magnitude than the required fire flow volumes for the Project. In addition, water reserves to ensure that supplies are available to meet fire suppression demand when needed will be maintained in the onsite water bank and the offsite existing, adjacent water bank that will serve the Project.[405] The Draft EIR found that the Project's water supplies would sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet, or more than 25.6 billion gallons. This level of reserve water supplies significantly exceeds the maximum fire flow demands for the Project area. Consequently, potential fire suppression water demand is accounted for in the Draft EIR analysis of Project water supplies.

[405] *Id.,* Appendix 5.19-A, p. 8-2

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not address or question the content of the Draft EIR, and no further response is required. The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[406] As discussed in Draft EIR Sections 5.18 and 7.0 the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry- and multiple-dry year demand by 2035. The EIRs found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

The Project's water supplies are discussed in Section 5.18, Water Resources. Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 Urban Water Management Plan adopted by the Antelope Valley-East Kern Water Agency, the State Water Project contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast with the base scenario in the Delivery Capability Report, the Early Long Term scenario

406 *Id.,* Appendix 5.18-C

incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year State Water Project delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base scenario rate. Consistent with the Antelope Valley-East Kern Water Agency methodology used in the Agency's 2015 Urban Water Management Plan, the Early Long Term scenario is further modified to incorporate a single dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The Urban Water Management Plan was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. The project water supplies are sufficient to meet fire flow requirements under these analytical conditions, including climate change.

MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified for the Project.

Response to Comment F.3A-16:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not address or question the content of the Draft EIR, relevant comments received during the Notice of Preparation period were incorporated into the Draft EIR, and no further response is required. The following information summarizes the analysis of regional and Antelope Valley-East Kern (AVEK) water agency supplies in the Draft EIR. Consistent with applicable law, the referenced agency statement in the comment requested that an "analysis of the realistic availability of water over the next 20 years on cumulative basis should be included in the EIR." The Draft EIR includes this analysis. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This

surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[407] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley, including AVEK supplies, would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not be sufficient to meet dry and multiple-dry year demand by 2035. The EIRs also concluded that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable. Neither the Antelope Valley Area Plan and General Plan EIRs nor the Draft EIR found that there would not be enough water to serve future regional demand. The analyses found that impacts would be significant and unavoidable because of the lack of pertinent information and uncertainty regarding such supplies.

In 2016, after the agency comment referenced above was submitted to the County, AVEK adopted its current Urban Water Management Plan (UWMP) in accordance with state law.[408] The Urban Water Management Plan was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consistent with the County's findings in the EIRs for the Antelope Valley Area Plan and General Plan, the AVEK UWMP found that normal year supplies would be sufficient to meet demand, but that shortfalls could occur in dry and multiple dry years. Section 7.4 of the UWMP states that AVEK "AVEK is committed to maintaining the reliability of the region's water supplies and will continue to explore options to maximize available water supplies for the benefit of the region" and to achieve the goal of providing "a level of regional water reliability that supports customers' water needs." The further development of local groundwater banking water conservation to reduce local demand is identified as an element of the AVEK reliability objective. Consistent with this goal, the Project includes a substantial

407 *Ibid.*
408 *Id.,* Appendix 5.18-F

water banking program and will result in water use levels that are substantially lower than current demand for comparable uses in the region.

Response to Comment F.3A-17:

The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[409] As discussed in Draft EIR Sections 5.18 and 7.0 the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 Urban Water Management Plan adopted by the Antelope Valley-East Kern Water Agency, the State Water Project contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast

409 *Id.,* Appendix 5.18-C

with the base scenario in the Delivery Capability Report, the Early Long Term scenario incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year State Water Project delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base scenario rate. Consistent with the Antelope Valley-East Kern Water Agency methodology used in the Agency's 2015 Urban Water Management Plan, the Early Long Term scenario is further modified to incorporate a single dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The Urban Water Management Plan was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. The project water supplies are sufficient to meet fire flow requirements under these analytical conditions, including climate change.

MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified for the Project.

Response to Comment F.3A-18:

The grasslands, and the plant and wildlife species that compose them, as well as their regional value, are described in the Draft EIR on pages 5.7-25 through 5.7-27, 5.7-40 through 5.7-47, 5.7-62, 5.7-67, 5.7-107, 5.7-111, 5.7-113 through 5.7-118, 5.7-121, 5.7-126 and 5.7-127. Mitigation has been included in the Draft EIR to reduce impacts to these biological resources to a less than significant level (MM 7-10).[410] Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative impacts of the Draft EIR. Also, please see responses to Comments F.3-11, F.3-12, F.3-19, B.4-22, B.4-25, B.4-60, B.4-17, B.4-63, and B.4-81 for additional information on this topic.

[410] *Id.,* p. 5.7-180 to -182

Response to Comment F.3A-19:

Please see responses to Comments F.3-12 and F.3A-18. As stated in MM 7-10 in the Draft EIR in Section 5.7, Biological Resources, mitigation ratios of at least 2:1 are required for grasslands.[411] The ratio of 2:1 was developed over multiple years of discussion and grassland studies, as listed in Table 5.7-2 on page 5.7-19 of the Draft EIR. The grassland studies conducted on the site and in portions of the mitigation lands provide a detailed understanding of the botanical composition of grasslands within these areas as summarized on pages 5.7-25 to 5.7-27, 5.7-42 to 5.7-47, and 5.7-158 to 5.7-160. These studies indicate roughly 26 percent of the grasslands on site would be considered native grasslands and 74 percent would be considered non-native grasslands based on the most common definitions. The 2:1 ratio was applied to all 6,415 acres of impacted grasslands, rather than to the smaller native grassland acreages scattered on the Project site and surrounded by non-native grassland, as a way to provide for a greater total grassland mitigation obligation as well as a more like-for-like mitigation scenario by avoiding preservation of many small patches of widely distributed native grasslands, as discussed in the first paragraph on page 5.7-160. Furthermore, sampling studies and assessments of the 14,908 acres of preserved grasslands indicate a high degree of similarity to that of the impacted grasslands.[412]

Grassland and wildflower studies of mitigation areas (including on-site mitigation lands, the offsite mitigation lands included in the Draft EIR, and the additional offsite mitigation lands included in this Final EIR (see response to Comment B.4-63), indicate an acceptable degree of similarity in vegetation species composition at varying degrees consistent with Project impact areas.[413] Furthermore, the 14,375 acres are preserved as part of a contiguous open space area inclusive of 28,171 additional acres of other vegetation types in a mosaic of regional biological resources. Impacts to non-native grasslands have traditionally been considered less than significant and have not required any mitigation. The Centennial Project approach to grassland mitigation is progressive, conservative and results in more meaningful mitigation for grasslands as well as regional biological values as a whole than would result from a more traditional and less conservative approach. In addition, the 14,375 of preserved grasslands is actually greater than the 12,832 acres of grasslands which would be required with the 2:1 resulting in 2,076 additional acres of grassland preservation. The additional acreage provides still greater assurance of full mitigation for the Project's grassland impacts.

Response to Comment F.3A-20:

Please see response to Comment F.3-12. The Conservancy's funding sources from Tejon Ranch are described in the TRCRWA[414]. The Conservancy's initial years of operations were funded by Tejon Ranch, and pursuant to the TRCRWA finding will be provided in perpetuity through the payment of transfer fees on designated property transactions within the planned development projects of Centennial, Tejon Mountain Village, and Grapevine.

411 *Id.,* p. 5.7-180
412 *Id.,* pp. 5.7-135 to -138, PDFs 7.1 and 7.2
413 *Id.,* Appendix 5.7-B, Plant-8
414 Final EIR Appendix 5.7-E

Lawsuits by commenter CBD have caused some development project delays, which will in turn delay the Conservancy's access to transfer fees from these future development projects. Commenters cannot cause a consequence (project delay from lawsuit challenges that in turn delay Conservancy funding from development area transfer fees) and then convert their conduct into an alleged deficiency in CEQA compliance.[415]

Response to Comment F.3A-21:

Please see response to Comment F.3-12. The Conservancy's funding sources from Tejon Ranch are described in the Ranch-Wide Agreement (TRCRWA).[416] The Conservancy's initial years of operation were funded by Tejon Ranch, and, pursuant to the TRCRWA finding, will be provided in perpetuity through the payment of transfer fees on designated property transactions within the planned development projects of Centennial, Tejon Mountain Village, and Grapevine. Lawsuits by commenter CBD have caused some development project delays, which will in turn delay the Conservancy's access to transfer fees from these future development projects. Commenters cannot cause a consequence (project delay from lawsuit challenges that in turn delay Conservancy funding from development area transfer fees) and then convert their conduct into an alleged deficiency in CEQA compliance.[417] The Commenter's request that Tejon Ranch continue to fund the Conservancy under terms that deviate from the TRCRWA falls outside the scope of CEQA. The TRCRWA includes specific requirements regarding the funding of project-related mitigation activities, which are not triggered until or unless such projects are fully approved and the need for mitigation is triggered.

Response to Comment F.3A-22:

Single pairs or individual burrowing owls have been observed on or in the vicinity of the Project site during multiple bird surveys performed between March 2000 and July 2015.[418] Focused burrowing owl surveys have also been conducted.[419] Specifically, qualified wildlife biologists conducted protocol-level focused surveys for the western burrowing owl in 2003 and 2006.[420] One pair was observed in the eastern portion of the site in 2001 and one pair was observed just off the site to the north in 2006 using an abandoned irrigation standpipe; this species was not detected on site since 2001.[421] Additionally, as part of a comprehensive grassland quality survey conducted on the Project site in April 2006, a search for evidence of burrowing owl presence on the site, as well as a habitat and occurrence record evaluation using geographic information system (GIS) databases and analytical tools, was conducted by Natural Resource Consultants (NRC). Through these methods, NRC determined that burrowing owls are likely to be present on the Project site but are locally distributed and uncommon. During at least 1,044 man-hours of fieldwork over three weeks, two individual

415 *Respect Life v. City of South San Francisco 2017 at* http://www/courts/ca/gov/opinions/documents/A145992.PDF
416 Final EIR Appendix 5.7-E
417 See *Respect Life v. City of South San Francisco 2017* at http://www/courts/ca/gov/opinions/documents/A145992.PDF.
418 DRP 2017, p. 5.7-19 to -23, Table 5.7-2
419 *Id.,* Appendix 5.7-B, Birds-4; *Id.,* Appendix 5.7-B, Gen-6
420 *Id.,* p. 5.7-22, Table 5.7-2
421 *Id.,* p. 5.7-115

burrowing owls were observed, both of which were slightly off-site to the east. NRC concluded that though grassland habitats preferred by burrowing owls are present on the site, burrowing owls are uncommon and/or locally distributed.[422] The Project site is at the edge of the known range of the species as shown by the CDFW's California Wildlife Habitat Relationships Database.[423] Although not focused protocol-level surveys for burrowing owl, the biologists conducting special status plant survey transects for the Project in 2015 and 2016 also searched for, but did not find, the burrowing owl or burrowing owl sign during the surveys. Suitable burrowing owl habitat consists of relatively short vegetation with only sparse shrubs and taller vegetation combined with the presence of burrows for roosting and nesting.[424] In California, burrowing owls are largely dependent on California ground squirrels (*Spermophilus beecheyi*) to dig their burrows,[425] although burrows from less common burrowing wildlife such as kit fox may also be used. The surveys have found the California ground squirrel, as well as kit fox or other suitably sized burrows, to be largely absent from the Project site; as a result, the Project site's grasslands lack suitable burrows for the burrowing owl and is generally unsuitable for that species. The Draft EIR ultimately uses a conservative approach by requiring specific burrowing owl mitigation. Also see response to Comment F.3-13.

Response to Comment F.3A-23:

The County notes that on April 19, 2018, the California Fish and Game Commission authorized the listing of tricolored blackbird as a "threatened" species.[426] However, it is noted that Candidate species are afforded the same legal protections as State-listed species. Therefore, consultation with CDFW will be required. The relevant analysis therefore remains the same under CEQA, and no mitigation measure updates are required. The Commenter's statements to reiterate points made in the Draft EIR are otherwise correct. However, these facts do not indicate potentially significant impacts to tricolored blackbird. The species is complex and its biology must be considered closely. For example, there has been no evidence that tricolored blackbird have bred in the same year at the on-site location (on the north end of the Project site) and Quail Lake sites. In addition, the on-site breeding area has not been used since the first time it was detected and the habitat has substantially diminished in recent years due to drought. However, in order to further clarify the Draft EIR text regarding the reduction of impacts to less than significant, additional language will be added to the impact assessment. In response to this comment, the following addition has been made to the first partial paragraph, beginning with the first full sentence, on page 5.7-113 of Section 5.7.3, Environmental Setting:

> The tricolored blackbird was observed nesting in large numbers along the north-central edge of the Project site and was also observed in Oso Creek (BonTerra Consulting 2008; Impact Sciences 2004a). These populations have not been incidentally detected during focused surveys since the original

422 *Id.,* Appendix 5.7-B, Birds-4
423 Zeiner, et al. 1990
424 Gervalis et al. 2008
425 *Ibid.*
426 FGC 2018; Nossaman 2018

> observations, possibly due to habitat degradation. Most recently, focused surveys for tricolored blackbird were conducted in 2015 and they were observed nesting off site along the northern shore of Quail Lake and at Holiday Lake, and these birds were observed foraging on the Project site (BonTerra Psomas 2015d).

Additionally, in response to this comment, the following addition has been made to the second full paragraph, beginning with the third sentence, on page 5.7-149 of Section 5.7.6, Environmental Impacts:

> The results of this focused survey documented relatively heavy use of the Project site for foraging purposes by tricolored blackbirds nesting off site at Quail Lake, and to a much lesser degree, Holiday Lake. No breeding was detected at Oso Creek or along the north-central edge of the Project site. Breeding has not been observed in either location since 2008, likely due to habitat degradation. In an effort to determine the Project's potential effect on tricolored blackbird nesting colony foraging lands of the region, an assessment of each of four known colonies was conducted (BonTerra Psomas 2015c).

With respect to foraging habitat, the Draft EIR indicated that loss of foraging habitat could interrupt breeding if both Quail Lake and the north pond were used for breeding at the same time. As noted above, it has been nine years since any tricolored blackbird were found at the north pond, the habitat has become severely degraded, and the area is not likely to become suitable in the future. The species routinely shifts breeding locations, and there are also existing suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the existing foraging habitat for that season during construction, and the land use adjacent to Quail Lake up to approximately ½ mile is almost entirely open space recreational parkland as depicted in the Specific Plan and, therefore, will be permeable and available for foraging. Finally, there is a significant increase in elevation between Quail Lake and the higher ground within the Specific Plan park area which also adds to the effectiveness of the buffer distance. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance riparian areas, including wetlands, which will preserve and enhance breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this nomadic species to continue to persist in the region.

Therefore, the following edits are hereby made to the third full paragraph on page 5.7-149 of the Draft EIR:

Due to the shifting of tricolored blackbird nesting locations from year to year, a subset of two or three of the available nesting locations may represent the entire regional breeding population. A substantial reduction of foraging lands surrounding this subset of nesting locations could result in considerable reduction of nesting success. A review of the Quail Lake and the on-site colony subset identified a potential post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In a given year, if these two areas were used for nesting, the reduced availability of suitable foraging land could result in substantial reduction in nesting success. However, the north pond has become unsuitable habitat, so the likelihood of its future use by tricolored blackbird is very low. Additionally, the species shifts breeding locations between sites, and there are also existing potentially suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the breeding colony for that season during construction. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance wetland areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide forage ranging species to continue to persist in the region. Based on the revised MMs 7-7, 7-10, and 7-12, the impacts to foraging habitat are less than significant.

In response to this comment and others, the following edits are hereby made to MM 7-7 on pages 5.7-178 and 5.7-179:

MM 7-7 The Project shall incorporate avoidance and additional open space buffer features for each of the two ~~this~~ known tricolored blackbird nesting areas on and adjacent to the Project site ~~area~~. Permanent impacts will be restricted to a distance of 400 feet from the nesting area excluding small impact areas associated with infrastructure and utilities along SR-138 immediately south of Quail Lake. The nesting area will be delineated by a qualified Ornithologist based on all available data (three years of site-specific data shall be used). Temporary impacts (i.e., construction noise) within a ¼ mile ~~400 feet~~ of active nesting areas shall be restricted to the non-breeding season. The breeding season for this species shall be considered April 1 through July 1. The applicant shall consult with CDFW and may obtain an Incidental Take permit if determined appropriate.

~~The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat.~~ ~~Potentially suitable areas for enhancement and preservation include lower Oso Canyon proximate to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source.~~

Response to Comment F.3A-24:

Comment noted. The Draft EIR also discussed that focused tricolored blackbird surveys conducted for the Project in 2015 found nesting colonies at Quail Lake and found that foraging occurred on the Project site as well as elsewhere. See response to Comment F.3-14.

Response to Comment F.3A-25:

As noted in the response to Comment F.3-15, focused tricolored blackbird surveys conducted for the Project in 2015 produced the same results mentioned here (nesting colonies at Quail Lake were observed foraging on the Project site), which were then used to extrapolate Project impacts in the Draft EIR.

Response to Comment F.3A-26:

The analysis of potential foraging grounds for the tricolored blackbird in the Project area was based on available potentially suitable habitat and the best available information on the ecology of this species. The tricolored blackbirds were observed foraging in scrub as well as grassland habitat.

Response to Comment F.3A-27:

The Commenter's opinion regarding the Project's impacts on tricolored blackbird is noted. The Project will comply with the California Fish and Game Code requirements including consulting with CDFW. The Project would not directly impact the Quail Lake and Holiday Lake (the latter approximately 3.4 miles east of the site[427], which are both outside the Project site boundary, and sufficient foraging habitat is maintained. See response to Comment F.3-14.

Response to Comment F.3A-28:

Please refer to response to Comment F.3-18. The Project does not propose to destroy or disrupt any nesting colonies. All nesting colonies are avoided with the addition of a buffer as

[427] DRP 2017, p. 5.7-113

well as reduced activities within during the breeding season (MM 7-7). The MM also includes preservation of areas that have already been shown to be used by tricolored blackbirds within the mitigation lands. Therefore, MM 7-7 is expected to mitigate the potential impacts to this species to a less than significant level.

Response to Comment F.3A-29:

The Commenter's opinion regarding the Project's impacts on tricolored blackbird is noted. As described in the Draft EIR[428] and in responses to Comments F.3-14 through F.3-19 above, the Draft EIR concludes that the Project's potential impacts on the tricolored blackbird are mitigated to a less than significant level.

Response to Comment F.3A-30:

The new alignment of Cement Plant Road will run to the west of Village #9, as shown on Exhibit 5.12-3, On-site Circulation System, and as graphically depicted on each Draft EIR graphic that shows the proposed roadway network. This roadway alignment is fully within the impact footprint analyzed throughout the Draft EIR. As stated in Section 5.7.6, Environmental Impacts, "although the Project includes a new road along its western edge (Cement Plant Road), the road's use would be limited to infrequent daytime truck traffic to and from the Cement Plant, functioning the same as the existing Cement Plant Road to the east. Nighttime use will be prohibited except for emergency. This new Cement Plant Road would connect to SR-138 via a Gorman Post Road extension, and a new intersection in this area will be avoided."[429] The Draft EIR acknowledges impacts to foraging habitat, inclusive of the realignment of Cement Plant Road, and mitigation efforts are included to lessen those impacts.

Response to Comment F.3A-31:

The new alignment of Cement Plant Road will run to the west of Village #9, as shown on Exhibit 5.12-3, On-site Circulation System, and as graphically depicted on each Draft EIR graphic that shows the proposed roadway network. This roadway alignment is fully within the impact footprint analyzed throughout the Draft EIR. As stated in Draft EIR Section 5.7.6, Environmental Impacts, "although the Project includes a new road along its western edge (Cement Plant Road), the road's use would be limited to infrequent daytime truck traffic to and from the Cement Plant, functioning the same as the existing Cement Plant Road to the east. Nighttime use will be prohibited except for emergency. This new Cement Plant Road would connect to SR-138 via a Gorman Post Road extension, and a new intersection in this area will be avoided."[430] The Draft EIR acknowledges impacts to foraging habitat, inclusive of the realignment of Cement Plant Road, and mitigation efforts are included to lessen those impacts.

428 *Id.,* pp. 5.7-148 to -150
429 *Id.,* p. 5.7-165
430 *Id.,* p. 5.7-165

Response to Comment F.3A-32:

The Project does not encroach on SEA 17, and would, therefore, not disrupt the footprint of the SEA. Further, State CEQA Guidelines require the Draft EIR to assess potential impacts to wildlife movement. In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains, from a biological perspective, was considered in detail.[431] The assessment, which used various scientific studies, including site-specific studies listed in Table 5.7-2,[432] concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions.[433] Although direct impacts on regional and local wildlife movement would be considered less than significant, and no mitigation is required, in order to lessen Project impacts on wildlife movement, MMs 7-13 through 7-19 are proposed, which incorporate planning and construction methods to reduce potential indirect impacts to wildlife movement. Please also see responses to Comments F.3-24, F.3-25, F.3A-32, F.3A-33, F.3A-34, B.4-56, B.4-57, F.5-2, F.8-168, and F.7-22.

A discussion of regional wildlife movement, beginning on page 5.7-6, is provided in the Draft EIR. The section acknowledges the importance of movement in the region where several major bio regions come together stating that various recent reports that discuss the biotic resources in the vicinity of the Tehachapi Mountains (including the Project region) describe the importance of these mountains as a landscape linkage between the Sierra Nevada and the Coast Ranges.[434] Typically, landscape linkages facilitate wildlife movement between large areas of similar terrain, vegetation types, or habitats. Because of the unique adaptations required of wildlife species that inhabit the low elevations of the San Joaquin Valley to the north of the Tehachapi Mountains and the Antelope Valley and adjacent Mojave Desert to the south of the mountain range, most species that occupy these geographically separate and distinct ecosystems do not venture south or north, into or over, the Tehachapi Mountains. As noted above, wildlife species within the mountains surrounding the Project site are expected to move freely within the mountains to satisfy their life history requirements. Accordingly, most wildlife movement in the mountains probably occurs within large landscape areas in upland portions of the Tehachapi range, and to the south of the Centennial property within the western extent of the San Gabriel Mountains much more than between these areas. The same can be expected of movement on the valley floor and surrounding low foothills, where the proposed Project is located.

The Draft EIR goes on to discuss the long-term sustainability of regional linkages beginning on page 5.7-62. The section describes how two regional conservation plans will assist in sustaining the functionality of the regional landscape linkage for future wildlife populations. These plans offer elements for long-term sustainability and management of a Tehachapi Mountains landscape linkage: the Tejon Ranch Conservation and Land Use Agreement

431 *Id.,* pp. 5.7-50 to -64, -164 to -170
432 *Id.,* p. 5.7-23
433 *Id.,* p. 5.7-166
434 *Id.,* Exhibit 5.7-6

(Ranch-Wide Agreement [TRCRWA]) and the Tehachapi Upland Multiple Species Habitat Conservation Plan (TUMSHCP).

Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch. The TRCRWA also provides that the Conservancy, or an alternate conservation entity as identified in the TRCRWA, will manage long-term mitigation obligations for open space lands used for mitigation to comply with federal and state agency permit requirements imposed in relation to the development activities allowed in the TRCRWA, including development of the Project. While the TRCRWA is not itself an agency-imposed Mitigation Measure for Centennial or other Ranch activities, the TRCRWA does provide the overarching legal, management, and funding framework for the open space lands used as mitigation lands in local, state, and federal land use entitlements and permits. It also voluntarily conserves 170,000 contiguous acres of open space Ranch lands even if preservation of such lands is not required by agency Mitigation Measures. Resource agency support of the TRCRWA is included in an appendix to the TRCRWA. Maintenance of the open space or conserved lands will be the responsibility of the Conservancy, funded in large part by a fee based on a portion of the purchase price for each residential parcel on Tejon Ranch. Since Centennial constitutes over 75 percent of the currently planned residential units on the Ranch, it will bear the substantial costs of funding the Conservancy and maintaining wildlife movement corridor areas through the Ranch. As mentioned in Section 5.7.2, Relevant Plans, Policies and Regulations, of the Draft EIR, no public agency is a party to the TRCRWA, although the federal and State agencies responsible for administering biological protection laws and regulations confirmed that lands under the RWMP continue to be eligible mitigation lands.

In addition, the TUMSHCP ensures the persistence of covered species, including sustaining viable populations of those species, providing for (within property dispersal) and protecting current opportunities for wildlife movement beyond the Ranch by preserving existing landscape linkages. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and mitigation measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages across cismontane Southern California.

The TUMSHCP will be a major contributor to ensuring the viability of the Tehachapi Landscape linkage into the future. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species

occur in the foothills and lowland areas as well, including the Centennial site. These species will benefit from the TUMSHCP in addition to the Centennial Mitigation Preserve program described in this document.

The wildlife movement impact analysis beginning on page 5.7-164 of the Draft EIR concludes that development of the Project site will result in some losses of areas that may be used for foraging and/or breeding for these species. Pathways to or from foraging or breeding grounds on the Project site, such as along ridge-lines or canyon bottoms, may become "dead ends" to through dispersal. However, these sorts of impacts are not expected to destabilize the regional population dynamics of these species, especially given the substantial amount of similar terrain in the northwestern Antelope Valley area. Multi-generational gene flow among wildlife populations in the region is expected to be sustained in the open spaces on and off the site that will remain following Project implementation. The direct impacts of Project development, therefore, are considered less than significant.

Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP) inclusive of open space designations, SEA protection, and preservation of habitat linkages. The AVAP is a community-based plan that is a subset of the County of Los Angeles General Plan, which includes the Project area. The AVAP EIR provides an analysis of all potential, reasonably foreseeable environmental impacts related to the implementation of the AVAP "to indicate possible ways to reduce or avoid environmental damage and to identify alternatives" to the AVAP.[435] Additionally, the AVAP EIR discloses "significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present and reasonably foreseeable future projects."[436]

Response to Comment F.3A-33:

Please see response to Comment F.3-23. The open space areas within the Project impact footprint are consistent with existing drainage patterns (east-west), which currently facilitate local wildlife movement through the area. As stated in Section 5.7.6, Environmental Impacts, these open space areas "facilitate the local movement of wildlife and dispersal and gene flow between populations of small organisms (particularly insects, amphibians, reptiles, small mammals)".[437] The purpose of these areas is not to facilitate movement through the Project down to SEA 17. However, implementation of MM 7-14, which designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) where the current intersection with National Cement Plant Road exists, is intended to allow for local wildlife movement to pass through the Project area down to SEA 17.

Response to Comment F.3A-34:

The size of the proposed undercrossing is expected to support movement of many wildlife species potentially moving through the area. Most of these animals, such as raccoon,

435 DRP 2014a, p. 2-1
436 *Ibid.*
437 DRP 2017, p. 5.7-166

opossum, and skunks, have been identified using much smaller crossings than the proposed crossing's dimensions; therefore, there is no reason to believe that the large crossing proposed would not support crossing of many species. In addition, current crossings either do not exist in the area or consist of much smaller drainage culverts. The proposed crossing is expected to improve crossing conditions for most wildlife in the region compared to the existing condition. The exiting condition is inclusive of SR-138, which does not represent a barrier for all species but is problematic due to vehicular traffic and lack of vegetative cover. The Project proposal improves the crossing by allowing at least some individuals of some species to utilize a more protected pathway to access habitat on either side of the highway. In addition, the crossings included in the Project design are consistent with the Antelope Valley Area Plan (AVAP). The AVAP EIR provided an analysis of the regional habitat linkages to be retained, inclusive of development of other areas including the Project development area. The County's AVAP EIR analysis concludes that such impacts are less than significant. The Project Draft EIR supports this AVAP EIR conclusion, and the wildlife movement impact analysis beginning on page 5.7-164 of the Draft EIR provides evidence indicating these local connections may support local movement but are not required to sustain regional wildlife populations in the area, which primarily occur in the foothill areas north of the Project site. The Project undercrossing at SR-138 is expected to facilitate more localized wildlife movement but is not critical to regional wildlife linkages. For additional discussion, please see response to Comment F.3A-32, the wildlife movement sections of the AVAP EIR,[438] and the Caltrans SR-138 EIR.[439]

Response to Comment F.3A-35:

Please refer to response to Comment F.3-26. The Commenter is correct in that a separate discussion on bird migration specifically is not included in the Draft EIR, instead migration was discussed on a species-specific level: southwestern willow flycatcher[440], California condor[441], yellow-breasted chat[442], and yellow warbler[443]. The use of some on-site vegetation types by a variety of bird species is disclosed on page 5.7-49: "During spring and fall migration, a variety of migratory birds are expected to use these vegetation types on the site. Some migrants include the pacific-slope flycatcher (*Empidonax difficilis*), warbling vireo (*Vireo gilvus*), Cassin's vireo (*Vireo cassinii*), yellow warbler, black-throated gray warbler (*Setophaga nigrescens*), Townsend's warbler (*Setophaga townsendi*), MacGillivray's warbler (*Geothlypis tolmiei*), and Wilson's warbler (*Cardellina pusilla*)."

As stated in Section 5.7.3, Environmental Setting, the Biological Assessment of SEA 17 prepared by PCR et al. (2000) "suggest[s] that lands within SEA 17 may be an important topographic reference for migrating birds, with essential high elevation foraging grounds along the route".[444] Project implementation would not impact these important migrating

438 DRP 2014a, pp. 5.4-67, -70, -85
439 Caltrans 2017b, pp. 73-76, 100-101
440 DRP 2017, p. 5.7-118
441 *Ibid.*
442 *Id.,* p. 5.7-121
443 *Id.,* p. 5.7-122
444 *Id.,* p. 5.7-57

lands which occur in SEA 17. Also, the Project area, specifically, has not been shown to be a major thoroughfare for bird migration.

Response to Comment F.3A-36:

Please refer to response to Comment F.3-27. The Commenter's report regarding seasonal use of Quail Lake by migrating birds is noted. The Project does not modify Quail Lake. Continued foraging habitat would be available on large portions of the site with Project implementation, as approximately 5,624 acres of the Project site would be included in the Open Space land use designation.[445] Also, the Project lands are not located at a bottleneck or chokepoint, and Project implementation would not block or stop bird migration. Although birds do stop to forage on the Project site, it is reasonable to assume that the majority of birds migrating through this area are attracted to the habitats surrounding the Project that provide greater shelter and food and water sources (SEA 17). These areas will remain open to migrating birds that pass through the vicinity of the Project.

Response to Comment F.3A-37:

Please refer to response to Comment F.3-28. The SR-138 widening project is an existing Caltrans project, approved in 2017 following completion of an Environmental Impact Report/Environmental Impact Statement by Caltrans. The new alignment of Cement Plant Road will run to the west of Village #9, as shown on Exhibit 5.12-3, On-site Circulation System and as graphically depicted on each Draft EIR graphic that shows the proposed roadway network. This roadway alignment is fully within the impact footprint analyzed throughout the Draft EIR. As stated in Section 5.7.6, Environmental Impacts, "although the Project includes a new road along its western edge (Cement Plant Road), the road's use would be limited to infrequent daytime truck traffic to and from the Cement Plant, functioning the same as the existing Cement Plant Road to the east. Nighttime use will be prohibited except for emergency. This new Cement Plant Road would connect to SR-138 via a Gorman Post Road extension, and a new intersection in this area will be avoided."[446] Because the Cement Plant Road realignment is part of the Project defined in Section 4.0, Project Description, this component is fully within the impact footprint analyzed throughout the Draft EIR and was considered when assessing potential direct (e.g., habitat modification) and indirect (e.g., light, noise, dust) impacts to biological resources. All focused biological surveys included the impact area for the realignment of Cement Plant Road. The proposed location of the Cement Plant Road would not be a barrier to bird migration any more than the existing road alignment, as there are no tall structures, upward-facing light sources, or other design features that can be a deterrent to bird flight paths, and the roadway would continue "to be limited to infrequent daytime truck traffic to and from the Cement Plant".[447]

445 *Id.,* p. 4-24
446 *Id.,* p. 5.7-165
447 *Ibid.*

Response to Comment F.3A-38:

The potential for Valley Fever spores to be found in soils of the Antelope Valley, and the effects of contracting Valley Fever, is fully disclosed in the Draft EIR. The risks from possible exposure of both construction workers and the Project-related population to Valley Fever spores is comprehensively analyzed in Section 5.3, Hazards and Fire Safety, and Section 5.11, Air Resources, of the Draft EIR. The Draft EIR concludes there would be less than significant impacts associated with Valley Fever with implementation of mitigation measures. In responses to Comments F.3-29 through F.3-31, the Draft EIR has been augmented with revised MM 3-2 and additional MM 3-11:

MM 3-2 To aid in the prevention of Valley Fever among construction crews on the Project site, the following measures shall be implemented by the Construction Contractor during all construction activities:

- Have Tyvek™ coveralls/suits available in a range of sizes for construction worker use upon request. If used, require the worker to remove the Tyvek™ suit at the work site at the end of the day.

MM 3-11 The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable interested parties both on- and off-site to easily access information relevant to potential Valley Fever risk. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebec, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.

Response to Comment F.3A-39:

These are accurate statements derived from the Draft EIR. The dust control measures quoted in the comment[448] are examples of typical Antelope Valley Air Quality Management District (AVAQMD) and South Coast Air Quality Management District (SCAQMD) Rule 403 practices. The following sentence states "The rules [403] include comprehensive sets of best available control measures that reduce fugitive dust generation and are required for all projects within the AVAQMD's and SCAQMD's jurisdictions".[449] Therefore, the example practices identified

[448] *Id.,* p. 5.11-65
[449] *Ibid.*

are not all of the available control measures that would be among those utilized to effectively control dust emissions, which "is the key to preventing exposure to Valley Fever spores during ground-disturbing construction activities."[450] The on-site risk of Valley Fever exposure during earth-moving activities is fully disclosed in the Draft EIR and this risk is the purpose behind Project Design Feature (PDF) 3-1, quoted in this comment. In response to Comment F.3-30, the Draft EIR has been augmented with MM 3-11 to ensure concerned parties can be aware of earth-moving activities on the Project site during the construction period.

Response to Comment F.3A-40:

To clarify, the Draft EIR does not specify an assumed distance that the spores would be limited to; however, it is expected that the majority of fugitive dust and associated spores (if present) would settle out of the wind before leaving the Project site due to both the physical properties of entrained sediment and the large size of the site.[451] As noted in response to Comment F.3A-39, "The control of fugitive dust is the key to preventing exposure to Valley Fever spores during ground-disturbing construction activities."[452] In the existing condition, dust from the Project site can become airborne due to wind and be carried off the site. However, this occurs in the absence of dust control measures. Although there would be greater earth disturbance during Project implementation than in the existing condition, as discussed in the Draft EIR, there would also be a suite of dust control measures enacted to ensure that fugitive dust does not leave the Project site boundaries, consistent with Rule 403 requirements. As such, the results of a 1977 Bakersfield dust storm without control measures is not equivalent to earth-disturbing construction activity with dust control. Regardless, to ensure concerned parties can be aware of earth-moving activities on the Project site during the construction period, MM 3-11 has been added to the Draft EIR (refer to response to Comment F.3A-38).

Response to Comment F.3A-41:

Please refer to response to Comment F.3A-40. The potential for Valley Fever spores to be found in soils of the Antelope Valley, and the effects of contracting Valley Fever, is fully disclosed in the EIR.

Response to Comment F.3A-42:

Research into this data cited from the Centers for Disease Control (CDC) located the CDC documentation[453] with this information as well as the source cited in the CDC documentation.[454] The figure for the percent of persons hospitalized was based on interviews by the authors of "every tenth case-patient with coccidioidomycosis reported

450 *Ibid.*
451 *Id.,* p. 5.3-18
452 *Id.,* p. 5.11-65
453 Centers for Disease Control (CDC). 2012 (December). *Fungal Pneumonia: A Silent Epidemic, Coccidioidomycosis (valley fever)*. Atlanta, GA: CDC. https://www.cdc.gov/fungal/pdf/cocci-fact-sheet-sw-us-508c.pdf.
454 U.S. National Library of Medicine, National Institutes of Health (NIH). 2010 (November). *Enhanced Surveillance of Coccidioidomycosis, Arizona, USA, 2007–2008.* Emerging Infectious Diseases.2010 November; Volume 16(11): 1738–1744: PubMed Central® 3294516. Bethesda, MD: NIH. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3294516/.

during January 2007-February 2008."[455] As such, the number of people reporting hospitalization in this particular survey represent a portion of the subset (approximately 40 percent per CDPH 2013 cited in the Draft EIR on page 5.3-13) of those exposed to Valley Fever spores that develop any symptoms. As such, this literature does not support the indication that 40 percent of persons exposed to Valley Fever spores will require hospitalization.

The Draft EIR makes no attempt to minimize or otherwise obscure the presence of Valley Fever in the Antelope Valley, its potential effects, and the rate of the disease in the region. As previously stated, the on-site risk of Valley Fever exposure during earth-moving activities is fully disclosed in the Draft EIR. It is assumed to be present in the soils on the Project site, although it may not be, for purposes of the Draft EIR analysis and to analyze the associated precautions for construction workers and residents that should be taken.

In response to this comment, the following documents are added to the administrative record:

Centers for Disease Control (CDC). 2012 (December). *Fungal Pneumonia: A Silent Epidemic, Coccidioidomycosis (valley fever)*. Atlanta, GA: CDC. https://www.cdc.gov/fungal/pdf/cocci-fact-sheet-sw-us-508c.pdf.

U.S. National Library of Medicine, National Institutes of Health (NIH). 2010 (November). *Enhanced Surveillance of Coccidioidomycosis, Arizona, USA, 2007–2008.* Emerging Infectious Diseases.2010 November; Volume 16(11): 1738–1744: PubMed Central® 3294516. Bethesda, MD: NIH. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3294516/.

Response to Comment F.3A-43:

Regarding the first suggested measure, the use of mesh or netting such as used on stationary objects like fruit trees and bushes to protect against dust and/or birds in not practical for use on construction sites. This is due both to the scale of the Project site and the associated construction area(s) and because the construction activity would be regularly moving. This would be potentially feasible for a small, discrete site and/or a stationary construction setting such as single home. The suppression of dust, consistent with Rule 403 requirements, before it reaches a project's boundaries is both feasible and more effective in reducing the risk of Valley Fever spores being spread due to ground-disturbing activity. In addition to fully implementing Rule 403 (per MM 3-1), the Project Applicant/Developer has committed to several actions for prevention of Valley Fever exposure for construction workers consistent with the recommendations of the California Department of Public Health (CDPH), cited as CDPH 2013b (English language) and CDPH 2013c (Spanish language) in MM 3-2.[456] The encapsulation or other dust barrier to limit the spread of Valley Fever is not suggested by the CDPH.

455 NIH 2010
456 DRP 2017, p. 5.3-26

Regarding the second suggested measure, it is assumed that "notification" refers to the notification described in Draft EIR MM 3-3, wherein each purchaser or tenant reads and signs a notice regarding the Valley Fever risk during the construction period. Please refer to responses to Comments F.3-29 and F.3A-38 discussing new MM 3-11 requiring creation of a website with regularly updated information on ground-disturbing activities and the notification of off-site persons to the presence of this website to seek out information, if desired.

Regarding the third suggested measure, the CDPW states there is no reliable way to test the soil for spores before working in a particular place.[457]

Regarding the fourth suggested measure, as discussed in response to Comment F.3-31 and F.3A-38, the Draft EIR has been augmented with MM 3-11 to ensure concerned parties can be aware of earth-moving activities on the Project site during the construction period. Further, because much of the land throughout the Antelope Valley is undeveloped, these areas are also potential sources of Valley Fever spores through spread by wind. Placing warning signs along the Project site during construction would elicit fear without reasonable basis, as the Project's construction activities would involve dust control measures, and as such is considered arbitrary and unwarranted.

Regarding the fifth suggested measure (also labeled "4"), as discussed in responses to Comments F.3A-40 through F.3A-42, the presence of Valley Fever spores in the soils of the Antelope Valley does not directly lead to an increase in cases of the disease because of ground-disturbing construction activity on any one site. Further, there is no feasible way to determine whether any given case of Valley Fever is based on exposure to spores from a specific location, particularly given the wide prevalence of the fungus in Southern California. As such, tying payment of medical costs to implementation of the proposed Project is considered unreasonable.

Regarding the sixth suggested measure (labeled "5"), this comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.3A-44:

As discussed in responses to Comments F.3-30 and F.3A-43, in addition to fully implementing Rule 403 (per MM 3-1), the Project Applicant/Developer has committed to several actions for prevention of Valley Fever exposure for construction workers consistent with the recommendations of the California Department of Public Health (CDPH), cited as CDPH 2013b (English language) and CDPH 2013c (Spanish language) in MM 3-2.[458] In addition to preventing direct exposure, the CDPH includes action to prevent transport of the spores, if present. These actions include the provision of Tyvek™ coveralls/suits daily. Therefore, the Draft EIR has been augmented with MM 3-2 (refer to response to Comment F.3A-38). Regarding the suggested measure to require workers to wear respirators only,

457 (CDPH 2013 as cited in Draft EIR)
458 *Ibid.*

construction workers would be notified of Valley Fever risk and respirators would be among the safety equipment provided daily to the workers. However, it would be up to each individual to make the decision whether or not to wear a respirator instead of a mask.

Response to Comment F.3A-45:

The Commenter made an identical comment in Letter F.3, which comment has been designated as Comment F.3-33 in this Final EIR. Please see response to Comment F.3-33 for a response to this comment.

Response to Comment F.3A-46:

The Project's potential climate change impacts related to greenhouse gas (GHG) emissions were fully disclosed and analyzed in Section 5.21 of the Draft EIR. As discussed in Section 5.21, Climate Change, the Project takes a very aggressive approach to reducing GHG emissions arising from the Project. Among other things, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainability accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (*see* Comment D4-2). See also response to Comment F.8-20 for further discussion.

Consistent with Smart Growth principles, Medium- to Very High-Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center.[459] The Town Center of the Project is located in Village 3, and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center.[460] An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[461] Moreover, to reduce vehicle miles traveled, the Project includes an integrated network of roadways, walking and biking trails to reduce automobile use and facilitate safe and efficient travel. An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas.[462] One hundred percent (100 percent) of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other

459 *Id.,* p. 4-16
460 *Ibid.*
461 *Id.,* p. 4-16, -17
462 *Id.,* p. 4-6

public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[463]

Moreover, the EIR includes mitigation measures which require compliance with a non-exclusive list of laws and regulations requiring GHG reductions in equipment, activities, facilities and services associated with the Project (MM 21-20). The EIR also includes 45 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, 21-1 through 21-19). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in response to Comment 4.8-204, and mitigation measures have been revised in response to comments on the Draft EIR to further reduce the Project's GHG emissions.

As described in *Center for Biological Diversity v. California Department of Fish and Wildlife* ("*Newhall*") (2015) 62 Cal.4th 204, 229-30, compliance with laws and regulations, along with compliance with Sustainable Communities Strategies adopted by regional transportation agencies such as the Southern California Council of Governments (SCAG) pursuant to SB 375 plan, are both appropriate pathways for assessing the significance of project-related GHG emissions. As described in the EIR, the Project must comply with regulatory requirements and complies with the Los Angeles County Community Climate Action and the CARB-approved SCAG RTP/SCS.[464] However, because the jurisdiction and control for continuing to implement many of these laws and regulations falls to agencies other than Los Angeles County (including other state and federal agencies), and because climate change is a global challenge that requires action by the international community as a whole, the County is unable to conclude that County-enforced mitigation requirements are sufficient to reduce GHG emissions to less than significant levels for CEQA purposes, as discussed on Draft EIR pages 5.21-86 and 5.21-94.

In *Newhall*, the California Supreme Court (Court) considered how GHG emissions should be addressed in an EIR for a large-scale development project in Los Angeles County. The Court identified "potential pathways to compliance" pursuant to which such an analysis could be adequate.[465] "[A] lead agency might assess consistency with A.B. 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities."[466] An agency may also make use of adopted "metropolitan regional 'sustainable communities strategies'" authorized by SB 375 to streamline analysis.[467] Jurisdictions may "develop 'climate action plans' . . . for their geographic areas . . . as tools for CEQA streamlining."[468] Finally, "a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions."[469]

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463 *Id.,* p. 4-16, -17
464 *Id.,* pp. 5.21-48 to -86
465 *Newhall* at page 229
466 *Ibid.*
467 *Id.*, at page 230
468 *Ibid.*
469 *Ibid.*

The "compliance with laws and regulations" CEQA compliance pathway was generally addressed in the EIR under Threshold 1 of the State CEQA Guidelines for GHG (whether the project "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment."), which is designated as Threshold 21-1 by the EIR. In addition to laws and regulations already approved, California is a global leader in adopting laws and regulations that have substantially reduced per capita GHG and, as the CARB has concluded in its most recent approved Scoping Plan under AB 32 (California Air Resources Board, First Update to the Climate Change Scoping Plan: Building On the Framework ("CARB Scoping Plan"), approved by CARB in May, 2014), place us on a trajectory of ongoing substantial reductions in GHG including achievement of Executive Order goals of reducing GHG from the transportation sectors and the overall economy (CARB Scoping Plan at page ES1). California's global leadership role in mandating GHG reductions with prescriptive new legal mandates was again confirmed in 2016, when the state enacted SB 32 (established a GHG reduction mandate to be achieved by 2030) and AB 197 (directing that priority in GHG reduction efforts be directed to industrial facilities and vehicles). This new SB 32 2030 GHG reduction mandate is the same as the GHG reduction target included in Executive Order B-30-15 of 40 percent below 1990 levels by 2030. The current CARB Scoping Plan included a framework for setting the 2030 target,[470] which is now being used by CARB in establishing the GHG reduction measures to be included in a second update to the Scoping Plan.[471]

The "compliance with SB 375 plan" CEQA compliance pathway was generally addressed in the Draft EIR and accompanying Appendix E.1 technical report under Threshold 2 of the State CEQA Guidelines for GHG (whether the project would "conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gas"). Although there is no legal mandate that cities or counties prepare local climate action plans, Los Angeles County has nevertheless adopted such a plan, the Los Angeles County Community Climate Action Plan (CCAP). The Project consistency with the CCAP was therefore also addressed in the EIR under Threshold 2.

As with BAAQMD thresholds cited favorably by the Court, in this case the expert air agencies for this project area has recommended use of a GHG significance threshold and analytical methodology for land use projects that is based on AB 32 compliance. Thus, for informational purposes, the EIR evaluates the Project's estimated GHG emissions as compared to the Antelope Valley Air Quality Management District (AVAQMD) significance thresholds for impacts related to the GHG emissions, as well as certain significance thresholds for impacts related to GHG emissions proposed by staff of the South Coast Air Quality Management District (SCAQMD), but not adopted by the SCAQMD board.

Information and analysis included in the Draft EIR and accompanying Draft EIR Appendix E.1 has been organized into each of these three compliance pathways to help clarify how the EIR analysis complies with the Court's *Newhall* decision.

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470 California Air Resources Board (CARB). 2017 (November). California's 2017 Climate Change Scoping Plan (pp. ES5, 34, 44). Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

471 See CARB's Scoping Plan website, available at: https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm.

Compliance with GHG Reduction Laws and Regulations Threshold

This first pathway is based on describing how various components of the project are required to reduce GHG emissions based on adopted laws and regulations designed to achieve emissions reductions required under AB 32 and under other greenhouse gas reduction laws and regulations.

As the *Newhall* Court noted:

> "[A] lead agency might assess consistency with A.B. 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities…To the extent a project's design features comply with or exceed the regulations outlined in the Scoping Plan and adopted by the Air Board or other state agencies, a lead agency could appropriately rely on their use as showing compliance with "performance based standards" adopted to fulfill "a statewide…plan for reduction or mitigation of greenhouse gas emissions."
>
> (*Newhall*, 62 Cal. 4th, at pages 264-265.)

The following table summarizes laws and regulations requiring GHG reductions that affect project greenhouse gas emissions at the construction or operational phases. Legal mandates to reduce greenhouse gas emissions from vehicles, for example, reduce project-related vehicular emissions. Legal mandates to reduce greenhouse gas emissions from the energy production sector that will serve the project likewise reduce project-related GHG emissions from electricity consumption. Legal mandates to reduce per capita and per household water consumption, improve household and appliance energy efficiency, and impose waste management standards to reduce methane and other greenhouse gases from solid wastes, are all examples of greenhouse gas reduction mandates that reduce greenhouse gas emissions below what would have been required under the laws and regulations in effect as of 2008 ("business as usual"). The following table identifies laws and regulation currently in effect that reduce GHG emissions from project-related GHG emissions:

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Building Components/Facility Operations		
Roofs/Ceilings/Insulation	CALGreen Building Code (Title 24, Part 11, "CALGreen") Building Energy Efficiency Standards (Title 24, Part 6)	The Project must comply with efficiency standards regarding roofing, ceilings, and insulation. For example: Roofs/Ceilings: New construction must reduce roof heat island effects per CALGreen Building Code section 106.11.2, which requires use of roofing materials having a minimum aged solar reflectance, thermal emittance complying with section A5.106.11.2.2 and A5.106.11.2.3 or a minimum aged Solar Reflectance Index (SRI) as specified in Tables A5.106.11.2.2, or A5.106.11.2.3. Roofing materials must also meet solar reflectance and thermal emittance standards contained in Title 20 Standards. Roof/Ceiling Insulation: There are also requirements for the installation of roofing and ceiling insulation. (See Title 24, Part 6 Compliance Manual at Section 3.2.2.)
Flooring	CALGreen	The Project must comply with efficiency standards regarding flooring materials. For example, for 80 percent of floor area receiving "resilient flooring," the flooring must meet applicable installation and material requirements contained in CALGreen section 5.504.4.6.
Window and Doors (Fenestration)	Title 24, Part 6	The Project must comply with fenestration efficiency requirements. For example, the choice of windows, glazed doors, and any skylights for the Project must conform to energy consumption requirements affecting size, orientation, and types of fenestration products used. (See Title 24, Part 6 Compliance Manual, Section 3.3.)
Building Walls/Insulation	CALGreen California Energy Code Title 24, Part 6	The Project must comply with efficiency requirements for building walls and insulation. Exterior Walls: Must meet requirements in current edition of California Energy Code, and comply with sections A5.106.7.1 or A5.106.7.2 of CALGreen Building code for wall surfaces, as well as section 5.407.1, which required weather-resistant exterior wall and foundation envelope as required by California Building Code section 1403.2. Construction must also meet requirements contained in Title 24, Part 6, which vary by material of the exterior walls. (See Title 24, Part 6 Compliance Manual, Part 3.2.3.) Demising (Interior) Walls: Mandatory insulation requirements for demising walls (which separate

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		conditioned from non-conditions space) differ by the type of wall material used. (*Id.,* at 3.2.4.) Door Insulation: There are mandatory requirements for air infiltration rates to improve insulation efficiency; they differ according to the type of door. (*Id.,* at 3.2.5.) Flooring Insulation: There are mandatory requirements for insulation that depend on the material and location of the flooring. (*Id.,* at 3.2.6.)
Finish Materials	CALGreen	The Project must comply with pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen section 5.504.4.)
Wet Appliances (Toilets/Faucets/Urinals, Dishwasher/Clothes Washer, Spa and Pool/Water Heater)	CALGreen California Energy Code Title 24, Part 6 Appliance Efficiency Regulations ("Title 20 Standards")	Wet appliances associated with the Project must meet various efficiency requirements. For example: Spa and Pool: Use associated with the Project is subject to appliance efficiency requirements for service water heating systems and equipment, spa and pool heating systems and equipment. (Title 24, Part 6, Sections 110.3, 110.4, 110.5; Title 20 Standards, Sections 1605.1(g), 1605.3(g); see also California Energy Code.) Toilets/Faucets/Urinals: Use associated with the Project is subject to new maximum rates for toilets, urinals, and faucets effective January 1, 2016: • Showerheads maximum flow rate 2.5 gpm at 80 psi • Wash fountains 2.2 x (rim space in inches/20) gpm at 60 psi • Metering faucets 0.25 gallons/cycle • Lavatory faucets and aerators 1.2 gpm at 60 psi • Kitchen faucets and aerators 1.8 gpm with optional temporary flow of 2.2 gpm at 60 psi • Public lavatory faucets 0.5 gpm at 60 psi • Trough-type urinals 16 inches length • Wall mounted urinals 0.125 gallons per flush • Other urinals 0.5 gallons per flush (Title 20 Standards, Sections 1605.1(h),(i) 1065.3(h),(i).) Water Heaters: Use associated with the Project is subject to appliance efficiency requirements for

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		water heaters. (Title 20 Standards, Sections 1605.1(f), 1605.3(f).) Dishwasher/Clothes Washer: Use associated with the Project is subject to appliance efficiency requirements for dishwashers and clothes washers. (Title 20 Standards, Sections 1605.1(o), (p), (q), 1605.3(o), (p), (q).)
Dry Appliances (Refrigerator/Freezer, Heater/Air Conditioner, Clothes Dryer)	Title 20 Standards CALGreen	Dry appliances associated with the Project must meet various efficiency requirements. For example: Refrigerator/Freezer: Use associated with the Project is subject to appliance efficiency requirements for refrigerators and freezers. (Title 20 Standards, Sections 1605.1(a), 1605.3(a).) Heater/Air Conditioner: Use associated with the Project is subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) Clothes Dryer: Use associated with the Project is subject to appliance efficiency requirements for clothes dryers. (Title 20 Standards, Section 1605.1(q).)
	CALGreen	Installations of HVAC, refrigeration and fire suppression equipment must comply with CALGreen Sections 5.508.1.1 and 508.1.2, which prohibits CFCs, halons, and certain hydrochlorofluorocarbons and hydrofluorocarbons.
Lighting	Title 20 Standards	Lighting associated with the Project will be subject to energy efficiency requirements contained in Title 20 Standards. General Lighting: Indoor and outdoor lighting associated with the Project must comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) Emergency lighting and self-contained lighting associated with the Project must also comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(l), 1605.3(l).) Traffic Signal Lighting: For any necessary Project improvements involving traffic lighting, traffic signal modules and traffic signal lamps will need to comply with applicable appliance efficiency

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		regulations (Title 20 Standards, Sections 1605.1(m), 1605.3(m).)
	Title 24, Part 6	Lighting associated with the Project will also be subject to energy efficiency requirements contained in Title 24, Part 6, which contains energy standards for non-residential indoor lighting and outdoor lighting. (See Title 24 Part 6 Compliance Manual, at Sections 5, 6.) Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation. (*Id.,* at Section 5.) Regulations for outdoor lighting include, for example, creation of lighting zones, lighting power requirements, a hardscape lighting power allowance, requirements for outdoor incandescent and luminaire lighting, and lighting control functionality. (*Id.,* at Section 6.)
	Assembly Bill 1109	Lighting associated with the Project will be subject to energy efficiency requirements adopted pursuant to AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting.
Bicycle and Vehicle Parking	CALGreen	The Project will be required to provide compliant bicycle parking, fuel-efficient vehicle parking, and electric vehicle charging spaces (CALGreen Sections 5.106.4, 5.106.5.1, 5.106.5.3)
	Title 24, Part 6	The Project is also subject to parking requirements contained in Title 24, Party 6. For example, parking capacity is to meet but not exceed minimum local zoning requirements, and the Project should employ approved strategies to reduce parking capacity (Title 24, Part 6, Section 106.6.)
Landscaping	CALGreen	The CALGreen Building Code requires and has further voluntary provisions for: • A water budget for landscape irrigation use; • For new water service, separate meters or submeters must be installed for indoor and outdoor potable water use for landscaped areas of 1,000- 5,000 square feet; • In, non-residential projects with 1,000-2,000 square feet of landscaped areas, install

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		irrigation controllers and sensors that follow specified criteria; • Provide water-efficient landscape design that reduces use of potable water beyond initial requirements for plant installation and establishment.
	Executive Order B-29-15	The Project is also subject to emissions reduction requirements to be achieved by implementation of Executive Order B-29-15. This emergency executive order directs the Department of Water Resources to lead a statewide initiative to replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes. The order also directed the departments to update the Model Water Efficient Landscaping Ordinance, which they did in 2015.
	Model Water Efficient Landscaping Ordinance	The model ordinance promotes efficient landscaping in new developments and establishes an outdoor water budget for new and renovated landscaped areas that are 500 square feet or larger. (California Code of Regulations, Title 23, Division 2, Chapter 2.7.)
	Cap-and-Trade Program	Transportation fuels used in landscape maintenance equipment (e.g., gasoline) would be subject to the Cap-and-Trade program. (See "Energy Use," below.)
Refrigerants	CARB Management of High Global Warming Potential Refrigerants for Stationary Sources	Any refrigerants associated with the Project will be subject to CARB standards. CARB's Regulation for the Management of High Global Warming Potential Refrigerants for Stationary Sources 1) reduces emissions of high-Global Warming Potential refrigerants from leaky stationary, non-residential refrigeration equipment; 2) reduces emissions resulting from the installation and servicing of stationary refrigeration and air conditioning (R/AC) appliances using high-GWP refrigerants; and 3) requires verification of greenhouse gas (GHG) emission reductions. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.)

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Consumer Products	CARB High-Global Warming Potential Greenhouse Gases in Consumer Products	All consumer products associated with the project will be subject to CARB standards. CARB's consumer products regulations set volatile organic compound (VOC) limits for numerous categories of consumer products, and limits the reactivity of the ingredients used in numerous categories of aerosol coating products (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 8.5.)
Construction		
Use of Off-Road Diesel Engines, Vehicles, and Equipment	CARB In-Use Off-Road Diesel Vehicle Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits). The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.
	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in equipment operation would be subject to the Cap-and-Trade Program. (See "Energy Use," below.)
Pollutant Control	CALGreen	If an HVAC system is used during construction, the Project must use return air filters with a MERV of 8, based on ASHRAE 52.2-1999, or an average efficiency of 30 percent based on ASHRAE 5.2.1-1992. All filters must be replaced immediately prior to occupancy. (CALGreen Section A5.504.1.3.)
Greening New Construction	CALGreen	All new construction, including the Project, must comply with the California Green Building Code, or "CALGreen", as discussed in more detail throughout this table. Adoption of the mandatory CALGreen standards for commercial construction has been essential for improving the overall environmental performance of new commercial buildings; it also sets voluntary targets for builders to exceed the mandatory requirements.

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Construction Waste	CALGreen	The Project will be subject to CALGreen requirements for construction waste reduction, disposal, and recycling, such as a requirement to recycle and/or salvage for reuse a minimum of 50 percent of the non-hazardous construction waste in accordance with Section 5.408.1.1, 5.408.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
Worker, vendor and truck vehicle trips (on-road vehicles)	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in worker, vendor and truck vehicle trips would be subject to the Cap-and-Trade Program. (See "Energy Use," below.)
Solid Waste		
Solid Waste Management	Landfill Methane Control Measure	Waste associated with the Project will be disposed per state requirements for landfills, material recovery facilities, and transfer stations. Per the statewide GHG emissions inventory, the largest emissions from waste management sectors come from landfills, and are in the form of methane. In 2010, CARB adopted a regulation that reduces emissions from methane in landfills, primarily by requiring owners and operators of certain uncontrolled municipal solid waste landfills to install gas collection and control systems, and requires existing and newly installed gas and control systems to operate in an optimal manner. The regulation allows local air districts to voluntarily enter into a memorandum of understanding with CARB to implement and enforce the regulation and to assess fees to cover costs of implementation.
	Mandatory Commercial Recycling (AB 341)	AB 341 will require the Project, if it generates four cubic yards or more of commercial solid waste per week, to arrange for recycling services, using one of the following: self-haul; subscribe to a hauler(s); arranging for pickup of recyclable materials; subscribing to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation. The Project will also be subject to local commercial solid waste recycling program required to be implemented by each jurisdiction under AB 341.
	CALGreen	The Project will be subject to CALGreen requirement to provide areas that serve the entire building and are identified for the depositing, storage and collection of nonhazardous materials for recycling (CALGreen Section 5.410.1.)

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Energy Use		
Electricity/Natural Gas Generation	Cap-and-Trade Program	Electricity and natural gas usage associated with the Project will be subject to the Cap-and-Trade Program. The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO2e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.
Energy Efficiency	Zero Net Energy Buildings (Title 24, Part 6)	The Project will be subject to net energy construction requirements contained in Title 24, Part 6. California revised building energy efficiency requirements contained in Title 24 in 2014 to require that all residential buildings be Zero Net Energy by 2020, and all commercial buildings must follow suit by 2030. MMs 21-2 and 21-3 further obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent.
Renewable Energy	California Renewable Portfolio Standards (RPS) (Senate Bill X1-2 and 350)	Energy providers associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350. SB X1-2 requires IOUs, POUs, and ESPs to increase purchases of renewable energy such that at least 33 percent of retail sales are procured from renewable energy resources by December 31, 2020. In the interim each entity was required to procure an average of 20 percent of renewable

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		energy for the period of January 1, 2011 through December 31, 2013; and will be required to procure an average of 25 percent by December 31, 2016, and 33 percent by 2020. Senate Bill 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030.
	Million Solar Roofs Program (Senate Bill 1)	The Project will participate in California's energy market, which is affected by implementation of the Million Solar Roofs Program. As part of Governor Arnold Schwarzenegger's Million Solar Roofs Program, California has set a goal to install 3,000 megawatts of new, solar capacity by 201. The Million Solar Roofs Program is a ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time.
	California Solar Initiative - Thermal Program	The Project will participate in California's energy market, which is affected by implementation of the California Solar Initiative -Thermal Program. The program offers cash rebates of up to $4,366 on solar water heating systems for single-family residential customers. Multifamily and Commercial properties qualify for rebates of up to $800,000 on solar water heating systems and eligible solar pool heating systems qualify for rebates of up to $500,000. Funding for the CSI-Thermal program comes from ratepayers of PG&E, SCE, SoCalGas, and SDG&E. The rebate program is overseen by the California Public Utilities Commission as part of the California Solar Initiative.
	Waste Heat and Carbon Emissions Reduction Act (AB 1613, AB 2791)	The Project will participate in California's energy market, which is affected by implementation of the Waste Heat and Carbon Emissions Reduction Act. Originally enacted in 2007 and amended in 2008, this act directed the CEC, PUC, and CARB to implement a program that would encourage the development of new combined heat and power systems in California with a generating capacity of not more than 20 megawatts, to increase combined heat and power use by 30,000 GWh. The CPUC publicly owned electric utilities, and CEC duly established policies and procedures for the purchase of electricity from eligible combined heat and power systems. CEC guidelines require combined heat and power systems to be designed to reduce waste energy;

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		have a minimum efficiency of 60 percent; have NOx emissions of no more than 0.07 pounds per megawatt-hour; be sized to meet eligible customer generation thermal load; operate continuously in a manner that meets expected thermal load and optimizes efficient use of waste heat; and be cost effective, technologically and feasible, environmentally beneficial.
Vehicular/Mobile Sources		
General	SB 375 and SCAG RTP/SCS	The Project complies with, and is subject to, the SCAG adopted RTP/SCS, which CARB approved as meeting its regional GHG targets in 2016.
Fuel	Low Carbon Fuel Standard (LCFS)/ Executive Order S-01-07	Auto trips associated with the Project will be subject to LCFS (Executive Order S-01-07), which requires a 10 percent or greater reduction in the average fuel carbon intensity by 2020 with a 2010 baseline for transportation fuels in California regulated by CARB. The program establishes a strong framework to promote the low carbon fuel adoption necessary to achieve the Governor's 2030 and 2050 greenhouse gas goals.
	Cap-and-Trade Program	Use of gasoline associated with the Project will be subject to the Cap-and- Trade Program. The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO2e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.
Automotive Refrigerants	CARB Regulation for Small Containers of Automotive Refrigerant	Vehicles associated with the project will be subject to CARB's Regulation for Small Containers of Automotive Refrigerant. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		95360 et seq.) The regulation applies to the sale, use, and disposal of small containers of automotive refrigerant with a GWP greater than 150. The regulation achieves emission reductions through implementation of four requirements: 1) use of a self-sealing valve on the container, 2) improved labeling instructions, 3) a deposit and recycling program for small containers, and 4) an education program that emphasizes best practices for vehicle recharging. This regulation went into effect on January 1, 2010 with a one-year sell-through period for containers manufactured before January 1, 2010. The target recycle rate is initially set at 90 percent, and rises to 95 percent beginning January 1, 2012.
Light-Duty Vehicles	Assembly Bill 1493 (or the Pavley Standard)	Cars that drive to and from the Project will be subject to AB 1493, which directed the Air Resources Board (CARB) to adopt a regulation requiring the maximum feasible and cost-effective reduction of greenhouse gas (GHG) emissions from new passenger vehicles. Pursuant to AB 1493, CARB adopted regulations that establish a declining fleet average standard for carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), and hydrofluorocarbons (air conditioner refrigerants) in new passenger vehicles and light-duty trucks beginning with the 2009 model year and phased-in through the 2016 model year. These standards are divided into those applicable to lighter and those applicable to heavier portions of the passenger vehicle fleet. The regulations will reduce "upstream" smog-forming emissions from refining, marketing, and distribution of fuel.
	Advanced Clean Car and Zero Emissions Vehicle (ZEV) Programs	Cars that drive to and from the Project will be subject to the Advanced Clean Car and Zero Emissions Vehicle Programs. In January 2012, the Air Resources Board approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards called Advanced Clean Cars. By 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. The ZEV program will act as the focused technology of the Advanced Clean Cars program by requiring

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018-2025 model years.
	Tire Inflation Regulation	Cars that drive to and from the Project will be subject to the CARB Tire Inflation Regulation, which took effect on September 1, 2010, and applies to vehicles with a gross vehicle weight rating (GVWR) of 10,000 pounds or less. Under this regulation, automotive service providers must, inter alia, check and inflate each vehicle's tires to the recommended tire pressure rating, with air or nitrogen, as appropriate, at the time of performing any automotive maintenance or repair service, and to keep a copy of the service invoice for a minimum of three years, and make the vehicle service invoice available to the CARB, or its authorized representative upon request.
	EPA and NHTSA GHG and CAFE standards.	Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles. (75 FR 25324–25728 and 77 FR 62624–63200.)
Medium- and Heavy-Duty Vehicles	CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation (Truck and Bus Regulation)	Any heavy-duty trucks associated with the Project will be subject to CARB standards. The regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet PM filter requirements. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. The regulation applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds.
	CARB In-Use Off-Road Diesel Vehicle Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits). The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.
	Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation applies to heavy-duty tractors that pull 53-foot or longer box- type trailers. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.) Fuel efficiency is improved through improvements in tractor and trailer aerodynamics and the use of low rolling resistance tires.
	EPA and NHTSA GHG and CAFE standards.	Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for medium- and heavy-duty vehicles. (76 FR 57106–57513.)
Water Use		
Water Use Efficiency	Emergency State Water Board Regulations	Water use associated with the Project will be subject to recent emergency regulations. On May 18, 2016, partially in response to Executive Order B-27-16, the State Water Board adopted emergency water use regulations (California Code of Regulations, title 23, section 864.5 and amended and re-adopted sections 863, 864, 865, and 866). The regulation directs the State Water Board, Department of Water Resources, and Public Utilities Commission to implement rates and pricing structures to incentivize water conservation, and calls upon water suppliers, homeowners' associations, California businesses, landlords and tenants, and wholesale water agencies to take stronger conservation measures.
	Executive Order B-37-16	Water use associated with the Project will be subject to Emergency Executive Order B-37-16, issued May 9, 2016, which directs the State Water Resources Control Board to adjust emergency water conservation regulations through the end of January 2017 to reflect differing water supply conditions across the state.

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		The Water Board must also develop a proposal to achieve a mandatory reduction of potable urban water usage that builds off the mandatory 25 percent reduction called for in Executive Order B-29-15. The Water Board and Department of Water Resources will develop new, permanent water use targets to which the Project will be subject. The Water Board will permanently prohibit water-wasting practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non- recirculated water in a fountain or other decorative water feature; watering lawns in a manner that causes runoff, or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians.
	Executive Order B-40-17	Executive Order B-40-17 lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. It also rescinds Executive Order B-29-15, but expressly states that Executive Order B-37-16 remains in effect and directs that State Water Resources Control Board to continue development of permanent prohibitions on wasteful water use to which the Project will be subject.
	Senate Bill X7-7	Water provided to the Project will be affected by Senate Bill X7-7's requirements for water suppliers. Senate Bill X7-7, or the Water Conservation Act of 2009, requires all water suppliers to increase water use efficiency. It also requires, among other things, that the Department of Water Resources, in consultation with other state agencies, develop a single standardized water use reporting form, which would be used by both urban and agricultural water agencies.
	CALGreen	The Project is subject to CALGreen's water efficiency standards, including a required 20 percent mandatory reduction in indoor water use. (CALGreen, Division 4.3.)
	California Water Code, Division 6, Part 2.10, Sections 10910–10915.	Development and approval of the project requires the development of a project-specific Water Supply Assessment.
	Kern County Landscaping	The project would be subject to Kern County's Landscaping Requirements and Water Efficient

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	Requirements and Water Efficient Landscaping.	Landscaping ordinances. (Kern County Code of Ordinances, Title 19, Chapter 19.86, Sections 19.86.050 and 19.86.060.)
	Cap-and-Trade Program	Electricity usage associated with water and wastewater supply, treatment and distribution would be subject to the cap-and-trade program.
	California Renewable Portfolio Standards (RPS) (Senate Bill X1-2 and 350)	Electricity usage associated with water and wastewater supply, treatment and distribution associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350.
Water Recycling	Water Reclamation Requirements for Recycled Water Use. SWRCB Order WQ 2016-0068- DDW	These requirements replace 2014-0090-DWQ General Waste Discharge Requirements for Recycled Water Use, and establish standard conditions for recycled water use and conditionally delegates authority to an Administrator to manage a Water Recycling Program and issue Water Recycling Permits to recycled water users. Only treated municipal wastewater for non-potable uses can be permitted, such as landscape irrigation, crop irrigation, dust control, industrial/commercial cooling, decorative fountains, etc. Potable reuse is not covered.
	Regulations for Groundwater Replenishment Using Recycled Water	This emergency rulemaking by the California Department of Public Health (California Title of Regulations, Title 22, Sections 60301.050 et seq.), effective June 18, 2014, applied to Groundwater Replenishment Reuse Projects (GRRPs) utilizing surface application, which received initial permits from the Regional Board. The regulations address permitting and plan approval, sampling requirements, operation requirements, and ongoing reporting requirements.
	Policy for Water Quality Control for Recycled Water. SWRCB Resolution No. 2009-, as amended by Resolution No. 2013-0003	The project would be subject to the State Water Resources Control Board statewide mandate to increase recycled water usage by 0.2 million acre-feet per year by 2020.

As described above, the project's GHG emissions (both on and off-site) are regulated by scores of GHG emission reduction mandates. Compliance with these GHG reduction legal requirements is appropriately assumed to occur under CEQA. *Oakland Heritage Alliance v.*

City of Oakland (2011) 195 Cal. App. 4th 884, 906; *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 244-45. Under this threshold, project-level GHG emissions are considered in the EIR to be less than significant impacts under CEQA; however, because implementation of many of these measures falls largely outside of the jurisdiction and control of Kern County, the EIR also concludes that this impact remains significant and unavoidable at both a project and cumulative level.

Compliance with Plan Threshold

The *Newhall* Court also recommended evaluating a project's compliance with GHG reduction plans and acknowledged that global climate change caused by greenhouse gas emissions was ultimately a cumulative impact.[472] As the Governor's Office of Planning and Research has noted:

> Although climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment. CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impacts of a project.
>
> (Office of Planning and Research, June 19, 2008[473])

This EIR considers the project's compliance with the applicable GHG reduction plan for the region, the RTP/SCS adopted pursuant to SB 375, Stats. 2008, ch. 728, by SCAG and approved by CARB in 2016. SB 375 was enacted after AB 32, and includes regional targets established by CARB for greenhouse gas reductions from the transportation and land use sectors that are not constrained by the GHG reduction mandates set forth in AB 32, and are estimated by CARB to result in additional GHG reductions from the land use and transportation sectors.[474] The approved RTP/SCS designates the Project site for future urbanized development, and the EIR describes the project's consistency with the RTP/SCS in Section 5.8, Land Use,[475] Section 5.9, Population, Housing and Employment,[476] Section 5.11, Air Resources,[477] and Section 5.21, Climate Change.[478]

This EIR also considers the Project's compliance with the applicable climate action plan, the Los Angeles County Community Climate Action Plan (Los Angeles CCAP). The Los Angeles CCAP is designed to support the State's overall GHG reduction goals for 2020 under AB 32. The Project's consistency with the CCAP is shown in Table 5.21.11.[479] Since the Project is

472 *Newhall* 62 Cal. 4th, at page 219

473 Office of Planning and Research (OPR). 2008 (June 19). Technical Advisory, CEQA AND CLIMATE CHANGE: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review (p. 6). Sacramento, CA: OPR. https://www.opr.ca.gov/docs/june08-ceqa.pdf.

474 California Government Code § 65080(b)(2)

475 DRP 2017, p. 5.8-73

476 *Id.,* pp. 5.9-23 to -32

477 *Id.,* pp. 5.11-74 to -75

478 *Id.,* pp. 5.21-85 to -86

479 *Id.,* pp. 5.21-73 to -83

consistent with the Los Angeles CCAP, it would not have significant GHG emissions relative to the CCAP's 2020 planning horizon and the AB 32 reduction target. Since the Project has a phased implementation schedule with full buildout beyond the CCAP's 2020 planning horizon, consistency with the CCAP is only one Newhall compliance pathway used to assess the Project's GHG impacts in Section 5-21, Climate Change.

Since the Project would be consistent with the Los Angeles CCAP, which meets the requirements for a programmatic climate action plan specified in Section 15183.5 of the State CEQA Guidelines, as well as the SCAG 2016 RTP/SCS, the Project's GHG emissions could be considered less than significant under the "compliance with SB 375" and "compliance with a climate action plan" pathways identified by the *Newhall* court, as discussed in Section 5.21 under Threshold 21-2.

The Project has been specifically designed to significantly reduce its reliance on fossil fuel and to promote energy efficiency and the use of renewable energy sources, as discussed in response to Comment F.8-204. Specifically, regarding renewable energy production, MM 21-1 requires the Project Applicant/Developer to provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation.

With respect to this comment's recommended mitigation measures regarding renewable energy production, the EIR includes functionally equivalent measures. Specifically, MM 21-1 requires the Project Applicant/Developer to provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation, which may include, but is not limited to, solar, geothermal, biofuel and hydroelectric systems in a manner consistent with the Specific Plan. In addition, MM 21-5 requires the Project to equip a minimum of 70 percent of public and community pools and spas with active solar water heating systems where heating is necessary or desired, and MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, mitigation measure 21-2 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent.

In addition, the Specific Plan's Green Development Program requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations.

This comment's assertion that the electric vehicle (EV) charger should be more widely available is noted for the record and will be provided the Regional Planning Commission and

Board of Supervisors for consideration. The EIR includes several mitigation measures to ensure an appropriate amount of EV charging stations will be available to Project residents and visitors. In response to this comment, the relevant mitigation measures have been revised to clarify their application, as follows:

MM 11-4 The Project's plans and specifications for non-residential buildings shall demonstrate that the following features have been incorporated into the building designs. Proof of compliance shall be provided to the County prior to the issuance of occupancy permits.

- For buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupant.
- Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to ~~1~~25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces.
- ~~Facilities~~ Electric Vehicle Charging Spaces (EV Space), as defined by CALGreen Code Section 202, shall be installed to support future installation of ~~e~~Electric ~~v~~Vehicle Supply Equipment (EVSE), as defined by CALGreen Code Section 202, ~~charging~~ at each non-residential building with ~~3~~10 or more parking spaces. Installation of each EV Space shall be consistent with Sections A5.106.5.3 and A5.106.5.3.1, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code. The EV Space facilities shall meet Section 406.9 (Electric Vehicle) of the *California Building Code* and as follows:

Total Number of Actual Parking Spaces	Tier 1 Number of Required EV Spaces
0-9	0
10-25	2
26-50	3
51-75	5
76-100	7
101-150	10
151-200	14
≥200	8 percent of total spaces rounded up to nearest whole number

~~**Single charging space requirements.** When only a single charging space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1. The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.~~

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles (EV) at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Provide raceways from the electrical service panel to the designated parking areas which are required to be installed at the time of construction.

MM 11-6 The Project's plans and specifications for parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, shall demonstrate that the following features have been incorporated into the parking facility.

- The parking facility shall include a minimum of five percent preferentially located parking spaces for

alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.

- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations when a demand is demonstrated~~. Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV Space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:

  Single charging space requirements. When only a single EV ~~charging s~~Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

  Multiple charging spaces required. When multiple EV ~~charging s~~Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as

required by County Code Section 22.52.1225B, whichever is more stringent.

MM 21-15 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction.

MM 21-16 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that "alternative energy fueling stations" shall be installed as follows. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel. An electric charging station shall allow for simultaneous charging of two electric vehicles.

- Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter.
- Multi-family residential buildings of at least seventeen ~~20~~ (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first ~~twenty~~ seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty~~ seventeen (~~20~~ 17) residential units thereafter.
- The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station.
- Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station.

MM 21-19 For parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and

parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 ~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated.~~ Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:

  Single charging space requirements. When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

  Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electrical vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground

raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent.

The above mitigation measures go well beyond the mandatory regulatory requirements with respect to the provision of EV charging infrastructure. For example, MM 11-4 requires all Project nonresidential building with 10 or more parking spaces to install Electric Vehicle Charging Spaces (EV Spaces) in accordance with CALGreen Code Section A.5.106.5.3, Nonresidential Voluntary Measures (Tier 1). This normally voluntary commitment is made a requirement of the Project by MM 11-4, thus ensuring that the Project will substantially exceed the CALGreen Code's mandatory requirements for the provision EV Spaces at nonresidential buildings, as shown by the following chart:

Nonresidential Building Parking Space Total	Legally Required Number of EV Spaces (CALGreen § 5.106.5.3)	MM 11-4 Required Number of EV Spaces (CALGreen § A5.106.5.3)
0-9	0	0
10-25	1	2
26-50	2	3
51-75	4	5
76-100	5	7
101-150	7	10
151-200	10	14
>200	6% of total	8% of total

MM 11-4 also requires the Project to exceed mandatory regulatory requirements with respect to the Project's provision of preferential parking for low-emitting, fuel efficient, and carpool vehicles at nonresidential, and with respect to the provision of onsite showers and lockers at nonresidential buildings to encourage workforce occupants to walk and bike to their jobs.

Under existing law, three percent, but in no case less than one, of the parking spaces provided for multifamily residential buildings with 17 units or more must be constructed as EV Spaces. MMs 11-6 and 21-19 expands on this requirement by requiring the Project to ensure that five percent of such spaces are constructed EV Spaces in accordance with the CALGreen Code Tier 1 Residential Voluntary Measures. Indeed, MMs 11-6 and 21-19 go even farther that the CALGreen Code Tier 1 voluntary measures by requiring the Project to also ensure that five percent of the total number of parking spaces in parking structures and parking lots that serve uses other than residential or nonresidential buildings, such as parks or trailheads, and which have 20 or more total spaces, are constructed as EV Spaces. Finally, MMs 11-6 and 21-19 go beyond applicable law by also requiring that bike parking be provided in residential

parking facilities consistent with the requirements of CALGreen Code Residential Voluntary Measure A4.106.9.

In addition, MM 21-15 goes beyond the requirements of applicable law by requiring the Project to install a EV charging receptacle in ever detached and attached single-residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A.4.106.4.1. Existing law – i.e., CALGreen Code Section 4.106.4.1 - merely requires that detached and attached single-family residences be wired to accommodate a EV charging receptacle to be install by the homeowner, if installed at all. Finally, existing law does not require any residential or nonresidential projects to provide electric vehicle charging stations or other form of alternative energy fueling station for low-emission or alternative fueled vehicles. The Project, however, will be required to go beyond the requirements of existing law by requiring the installation of alternative energy vehicle fueling stations (EVFS) (i.e., an electrical vehicle charging station or a station providing another new or improved technology) in the amounts set forth in MM 21-16, as revised above. In response to this comment, MM 21-16 has been revised to (i) lower the threshold size of multi-family residential buildings that will qualify for at least one EVFS from 20 units to 17 units, and (ii) increasing the number EVFS that must be installed in a qualifying multi-family residential building by requiring one EVFS per every 17 units, rather than one EVFS per every 20 units. The combination of these measures, all of which go well beyond the requirements of existing law will ensure that EVFS will be widely available to residents of multi-family residential units and people traveling to the Project site.

It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[480, 481] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage

480 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

481 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf

technologies.[482,483] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[484] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy.

Although the Draft EIR adequately addresses the Project's potential impacts related GHG emissions, this comment's recommendations are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.3A-47:

The analysis and conclusion of Threshold 3-4 in Draft EIR Section 5.3, Hazards and Fire Safety, including the quoted sentence in this comment, pertains to hazardous materials/wastes at the National Cement Plant that have resulted in soil and groundwater contamination, and potential conflicts between Project-related vehicular and alternative traffic introduced by the Project and existing traffic on the realigned National Cement Plant Road.

Air emissions from operations at the National Cement Plant are discussed in Draft EIR Section 5.11, Air Resources. The existing air quality, which is the baseline for the proposed Project's air quality analysis, is presented beginning on Draft EIR page 5.11-25 under the header "Monitored Air Quality". As shown in Table 5.11-4 beginning on Draft EIR page 5.11-26, PM10 and PM2.5 are monitored at the applicable monitoring stations. Particulate matter is considered in the Draft EIR as PM10 and PM2.5 – particulate matter with a diameter of 10 and 2.5 microns or less, respectively.

As discussed in Section 5.11, "Particulate matter in the AVAQMD tends to be primarily fugitive dust. This dust appears to be generated by both local sources and by region-wide dust during moderate to high wind episodes. These regional episodes tend to be multi-district and sometimes interstate in scope. The AVAQMD has identified the local sources of fugitive dust to be primarily unpaved road travel; construction and local disturbed areas of soil concentrated in the urban populated areas in the district; and seasonal agricultural operations"[485]; and "Particulate levels in the area are due to natural sources (such as wind), grading operations, and motor vehicles"[486]. As such, the contribution of National Cement Plant operations to the particulate matter in the Mojave Desert Air Basin is not as dominant

482 *Ibid*.

483 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf

484 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

485 DRP 2017, p. 5.11-6

486 *Id.,* p. 5.11-26

as dust (from wind and grading) and vehicles, and these emissions are represented in the existing monitored air quality data.

In Section 5.11, the analysis under Threshold 11-2, which asks whether the proposed project would expose sensitive receptors to substantial pollutant concentrations, acknowledges that the National Cement Plant is a source of toxic air contaminants (TACs) in the area.[487] Accordingly, a health risk analysis (HRA) was completed to evaluate the human health impacts; the HRA concluded the risks at the future Project residences and other sensitive uses are below the applicable thresholds.[488] Based on the analysis of the technical report, the Draft EIR concludes that the TAC risks (which include risks from particulate matter) from the National Cement Plant at Lebec to the Project site would be less than the applicable AVAQMD and SCAQMD [Southern California Air Quality Management District] CEQA significance thresholds, and that, "The impact would be less than significant."[489]

Further, CEQA does not require an analysis of the environment's impacts on the project but rather whether a project "may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." [490]According to the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 378, "CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents." Thus, CEQA does not require the Project to mitigate for emissions generated by current operations of the National Cement Plant.

Response to Comment F.3A-48:

The comment states that the SR-138 widening project will have impacts to biological resources. As stated in the response to Comment F.3-28, the SR-138 widening project is not associated with the Centennial Specific Plan. The Commenter's opinion will be noted for the record and provided to the Planning Commission and Board of Supervisors. Because this comment does not question the content of the Draft EIR, no further response is required.

Response to Comment F.3A-49:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment appears to refer to the segments of the Ridge Route roadway constructed prior to, and located generally to the east of, Interstate (I) 5 extending from the community of Castaic north to State Route (SR) 138. As recently discussed in published reports,[491] portions of the Ridge Route have been closed for several years due to storm damage; easements for portions of the route have been vacated and are currently held by private landowners; portions of the route were listed on the National Register of Historic Places in 1997; and much of the route traverses through the Angeles National Forest and is

487 *Id.,* p. 5.11-29
488 *Id.,* pp. 5.11-71 and -72
489 *Id.,* p. 5.11-72
490 PRC § 21065
491 See, e.g., http://www.latimes.com/business/autos/la-fi-hy-old-ridge-route-20160502-story.html.

subject to the planning and conservation oversight of the U.S. Forest Service. Due to these factors, the use of the Ridge Route to mitigate impacts on I-5 would be infeasible.

Potential Project impacts to I-5 are discussed in Section 5.10, Traffic, Access, and Circulation, including the text and tables on pages 5.10-56 to 5.10-119. The analysis compares the applicable Level of Service (LOS) standards for I-5 freeway segments and on-ramps and off-ramps located north and south of the Project site using well-established analysis methodologies under existing conditions, existing conditions with the Project, and under future (cumulative) with Project conditions based on future I-5 traffic projections prepared by applicable transportation and transit planning agencies for Los Angeles and Kern Counties. The Draft EIR determined that no significant impacts to freeway segments or interchange ramps would occur under existing plus Project conditions, and that the Project could contribute to an exceedance of capacity on the westbound SR-138 to southbound I-5 ramp. The Draft EIR determined that, under cumulative plus Project conditions, the Project could contribute to impacts at six mainline segments along I-5 and to the interchange connector ramps from westbound SR-138 to southbound I-5 and from I-5 to eastbound SR-138. The Draft EIR found that all potentially affected I-5 segments and ramps under existing plus Project and cumulative plus Project conditions would operate within acceptable performance criteria with the implementation of mitigation measures and found that compliance with these mitigation measures and the fair share contributions towards the improvements described above would reduce potential Project impacts to I-5 freeway segments and ramps to less than significant levels.

The Draft EIR also discusses the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"), including SR-138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7.0, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Draft EIR was filed by the County on May 15, 2017 and the 60-day comment period began on May 17, 2017. As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

The STS compares the Project's potential impacts identified in the Draft EIR for I-5, SR-14, and SR-99 facilities using the volume-to-capacity methodology specified by the Congestion Management Plan for Los Angeles County and the Project's potential impacts using the Caltrans' recommended HCM methodology. HCM calculations were prepared for 62 locations

within the Draft EIR study area consisting of freeway segments in advance of and after major system interchanges as well as representative locations between major system interchanges. The analyzed locations provide a comprehensive coverage of the Draft EIR study area because they include the freeway facilities with the greatest potential to be affected by congestion. Under existing plus Project conditions, the Draft EIR and the STS show that all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[492] Under cumulative plus Project conditions with mitigation, the Draft EIR and the STS show that almost all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[493] The STS indicates that certain study locations, such as the Grapevine grade segment of I-5, would not meet HCM-based LOS standards because topographic conditions, lane and speed controls and other localized conditions would result in higher traffic densities. As shown in STS Table A-5, however, LOS conditions would be worse under cumulative without Project conditions, and LOS conditions improve under cumulative with Project conditions with the implementation of the Project MMs.[494] Consequently, the STS demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Please also see Section 5.16 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.3 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.3A-50:

No specific timeline has been set for the construction and operation of the on-site library. Rather, page 5.17-9 of the Draft EIR states that the Project proposes a public library that would be on an approximate 2.5-acre site at the Town Core. The library would be completed and operational on a date mutually agreed to between the County Librarian and the Applicant, taking into account the demands on library services within and adjacent to the Project site.

MMs 17-1 through 17-8 on Draft EIR pages 5.17-10 through 5.17-14 were developed in consultation with the County Library and includes the location and size of the land to be dedicated for construction of the library. Draft EIR page 5.17-8 states that the County Library's current service level planning guidelines are 2.75 items (including books, magazines, movies, etc.) per capita for the collection and 1.0 computer per 1,000 people served. The current planning guideline for library facility space is a minimum of 0.5 square foot per capita and 2.0 square feet of land per capita. Draft EIR page 5.17-9 states that based on the County Library service level planning guideline of 0.5 square foot per capita and an anticipated Centennial population of approximately 57,150 people, the Project could generate a demand for up to a 28,575 gross square foot library. Based on the 2.0 square feet of land per capita standard, an 114,300-square-foot site (2.62 acres) would be needed to serve the Project. MM 17-4 requires that the sizing, design and programming of the

492 Final EIR Appendix 5.10-C, Table 4-1
493 *Id.,* Appendix 5.10-C, Table 4-2
494 *Id.,* Appendix 5.10-C, Section 5

Permanent Library Facility, including the influence of technology on library services, would be agreed upon by representatives from County Library and the Project Applicant/Developer.

Response to Comment F.3A-51:

With regard to the planning timeline for solid waste disposal, analysis in the Draft EIR is based on available County information. The Los Angeles County Department of Public Works (LACDPW) has evaluated and planned the County's solid waste disposal needs over a 15-year time frame and included strategies for maintaining adequate disposal capacity from 2015 to 2030. While the County updates this report annually, at this time, they have only evaluated solid waste disposal to 2030 and determine adequacy of existing landfills. However, as annual updates are completed, it is expected that updated waste projections, facility capacities, diversion rates, and alternative technologies would be developed to meet the future waste disposal needs of the County. As stated on Draft EIR page 5.17-18, the Los Angeles County Countywide Siting Element establishes goals and policies for the siting of solid waste transformation and land disposal facilities to serve the solid waste generation and disposal needs of the County for the next 15 years. The County is in the process of updating the Countywide Siting Element, which will include goals and strategies through which current and future solid waste management infrastructure needs can be met; potential landfill expansion sites; and out-of-County disposal opportunities. Thus, evaluation and planning by the LACDPW is expected to be updated continuously to identify strategies for maintaining adequate disposal capacity into the future.

However, permitted Class III landfill capacity cannot be guaranteed at the time of Project buildout and through the life of the Project, which are beyond the LACDPW's 15-year planning horizon for disposal. Therefore, while the County is committed to handling all solid wastes generated within the County now and into the future, to be conservative, the Draft EIR concludes that the Project buildout would result in a significant impact on the County's anticipated Class III landfill capacity.[495] PDFs 17-2 and 17-3, and MMs 17-9 and 17-10, reflect all feasible measures to reduce and divert the Project's municipal solid waste generation. Therefore, the Draft EIR concludes that the Project would conservatively result in significant and unavoidable impacts related to municipal solid wastes during long-term operation of the Project.[496]

With regard to the selection of landfills to serve the Project, Table 5.17-3 on Draft EIR page 5.17-23 lists the major landfills that serve the Project area. However, solid waste haulers and landfills operate in a free enterprise system in the Antelope Valley area that allows the use of any waste hauler and any landfill. Draft EIR page 5.17-29 states that construction wastes are likely to be disposed at the nearest landfills, the Antelope Valley Public Landfill and the Lancaster Landfill and Recycling Center, but may be disposed at any of the available facilities, as selected by the individual contractors. Draft EIR page 5.17-31 also states that long-term

495 DRP 2017, p. 5.17-2
496 *Ibid.*

solid wastes from the Project after diversion may ultimately be disposed of at any in-County facility and out-of-County facilities.

Response to Comment F.3A-52:

With regard to Project compliance, as disclosed in the Draft EIR, solid waste disposal is subject to State plans, policies, and regulations including the California Integrated Waste Management Act (AB 939), California Health and Safety Code, Section 25218, California Solid Waste Reuse and Recycling Access Act of 1991, Solid Waste Disposal Measurement Act of 2008 (SB 1016), Governor Brown's 75 Percent Initiative (AB 341), and the Mandatory Commercial Organics Recycling Bill (AB 1826).[497] At the County level, solid waste disposal is subject to the requirements of the Los Angeles County Roadmap for a Sustainable Waste Management Future, the Countywide Integrated Waste Management Plan (CIWMP), the County of Los Angeles Solid Waste Ordinance, the Construction and Demolition Debris Recycling and Reuse Ordinance, the County Green Building Standards Code, and the County of Los Angeles General Plan and Antelope Valley Area Plan requirements.[498] The Project is required to and shall comply with the requirements of the above-identified plans, policies, and regulations.

With regard to County planning, the LACDPW planning endeavors related to the update of the County Siting Element discussed in response to Comment F.3A-51 and the annual update of the County of Los Angeles Countywide Integrated Waste Management Plan are being conducted in compliance with the California Integrated Waste Management Act, the CIWMP, and other State and County regulations, as discussed on Draft EIR pages 5.17-14 through 5.17-20.

Response to Comment F.3A-53:

With regard to the diversion of operational wastes from landfills, the Project has committed to diverting 75 percent of such waste, not 25 percent.[499] The method of such diversion can be found in PDF 17-3, as follows:

> The Project includes a Solid Waste Management Plan to achieve the goal of diverting 75 percent of operational solid waste generated from Project requiring landfill disposal. Property Owners shall process on-site, contract with a waste management company and/or recyclers, and/or self-haul to waste and recycling facilities to properly recycle, divert, and dispose of solid wastes generated on-site, such as metals, paper, household plastics, glass, cardboard, food waste, and green waste. Throughout the Project's operation, the waste hauler shall be required by contract to maintain records showing the diversion of not less than 75 percent of the operational waste generated

497 *Id.,* pp. 5.17-14 to -17
498 *Id.,* pp. 5.17-17 to -20
499 *Id.,* p. 5.17-26

by the Project. The Solid Waste Management Plan has many interrelated components, including, but not limited to:

- Implementation of a "three bin system" for waste collection and recycling for both residential (both single-family and multi-family uses) and commercial businesses. The three-bin system for residential areas will require separate receptacles for yard, such as leaves and tree trimmings (and possibly food waste, per property's hauler) into the green bin, recyclables into the blue bin, and permitted, non-recyclable and non-compostable solid waste into the third bin. The mandatory recycling for businesses will require that businesses divert from landfill disposal the recyclables that they generate, including food and green waste. Each non-residential building owner shall implement a recycling program including food and green waste recycling, where applicable. Businesses will provide appropriate number and placement of trash and recycling receptacles for visitor use in public areas and provide an easily accessible area that serves the entire building and is dedicated to the collection and storage of nonhazardous materials for recycling, including but not limited to: paper, food waste, green waste, corrugated cardboard, glass, plastic, and metals. Each owner of a commercial property, including multi-family residence, school, and place of worship, shall submit to the County a site plan of the property that depicts how solid wastes would be collected and stored for on-site processing, curbside collection, and/or self-hauling. Prior to sale, lease, or rental of commercial property, including portions of a multi-family residential structure, each owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and stores recyclables, compostables, universal waste, hazardous waste, and electronic waste for on-site processing, curbside collection, and/or self-hauling.
- The waste management contract will establish dedicated cans for green waste and a Green Waste Recycling Plan that must be adhered to by landscape maintenance companies as part of the Covenants, Conditions, and Restriction (CC&Rs). The CC&Rs will require the use of mulching mowers or mowers with mulching blades for common lawn areas and placing three to five inches of mulch in common areas' planting beds each year as part of the Landscape Maintenance Plan for all non-residential and multi-family buildings.
- All landscaping companies shall utilize California Air Resources Board-(CARB) approved or electric mowing equipment (e.g., mowers, string trimmers, leaf blowers) and shall divert organic wastes to a mulching and composting facility or anaerobic digestion facility. The CC&Rs shall describe the residential recycling program to facilitate recycling and reuse and to educate residents and consecutive buyers (i.e., buyers

after the initial home buyer) regarding the availability of and requirements for using the recycling program.

- Household hazardous wastes and less commonly disposed materials (such as electronics and appliances) would have seasonal pickup (at least two times a year) and residents would be notified of upcoming events.
- Semi-annual "exchange days" would be organized, publicized, and paid for by the Master Homeowners Association (HOA). Community members would be able to exchange with their neighbors items they no longer want. Homeowners would then be encouraged to do spring cleaning and major yard trimming and deliver usable items to a central location where they could be displayed for the weekend and picked up by others who are interested. As part of the event, large dumpsters, including green waste dumpsters, could also be brought for trash and green waste that cannot be reused. Neighborhood volunteers would monitor the dumpsters to make sure they are used efficiently and that only authorized waste is discarded in them.
- The Project Applicant/Master Developer shall set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station (MRF/TS) that includes a household hazardous waste permanent collection and reuse center and allows for mulching/composting operations. The site shall be located in a suitable location with the capacity to manage the nonhazardous solid waste and household hazardous waste generated by the Centennial Development Project at buildout. The Project Applicant/Master Developer shall prepare and grade the site, and install basic mainline infrastructure fronting the property prior to the issuance of any occupancy permits associated with the first phase of project implementation. The Master Developer shall continually encourage a waste management company to build these facilities on this build ready site. The CC&R for the future MRF/TS site shall require the land to be set aside for the MRF/TS in perpetuity.
- A seasonal collection and/or a mulching and composting facility could be included in the MRF/TS to allow for most green waste to be diverted from landfill disposal with the goal of a 100 percent green waste diversion from landfills. The landscape concept and turf limits are, in part, designed to reduce the amount of green wastes generated by the Project and to reduce the demand for irrigation water.
- A MRF/TS can include organics processing equipment to allow for the recycling of food and green waste.

(DRP 2017, pp. 5.17-25 to -28)

Response to Comment F.3A-54:

The disposal of hazardous materials is addressed in Draft EIR Section 5.17, Other Public Services. While the Draft EIR does analyze both the on-site handling of hazardous materials (including transport)[500] and the risk of an accident involving a hazardous materials transporter due to increased traffic on State Route (SR) 138 and Interstate (I) 5[501], the Draft EIR does not state that transport of hazardous materials is "dangerously precarious".

As indicated on page 5.17-24 of the Draft EIR, in the same description with the approximate distance and direction of the Kettleman Hills Landfill and McKittrick Waste Treatment Site identified in this comment, these facilities have a combined daily permitted capacity of 11,500 tons per day (tpd) and a combined remaining capacity of approximately 6.8 million cubic yards (cy). Based on the range of proposed land uses, which would not include industrial uses handling acutely hazardous materials, the amount of hazardous materials generated by the Project would be a small proportion of the total waste stream requiring landfill disposal (approximately 13,849 tons per year, or 44.4 tpd)[502] and this would largely involve common hazardous wastes such as household cleaners, paints and thinners, batteries, electronic equipment, and motor oil.[503] The small proportion, less than one percent by weight, as applied for the construction phase[504] of the total waste stream that would be considered hazardous would equate to approximately 0.44 tpd. This would represent approximately 0.004 percent[505] of the daily permitted capacity of these two facilities. Common sense indicates that a volume of waste equal to less than one one-thousandth of a percent would not result in a significant impact to the capacity of hazardous waste disposal locations. In summary, there is no nexus between the impacts of the proposed Project and the need for mitigation such as a written agreement to demonstrate available capacity for the nominal hazardous waste stream that would require disposal (i.e., would not be reused or recycled).

Response to Comment F.3A-55:

As stated under PDF 14-3 on Draft EIR page 5.14-16, the Project includes 163 acres of public Park Overlay, which includes acreage to meet the County's Parkland Dedication Ordinance requirement. In addition, the Applicant would fund the cost of constructing and equipping the public parks on the Project site, pursuant to a park development agreement; statutory development agreement pursuant to Section 65864 et seq. of the California Government Code; or other condition of approval. Private recreational facilities would be maintained by Property Owners Association (POAs) or Homeowners Association (HOAs).

Roadways and other infrastructure and public facilities would be built by the Project and dedicated to the County for long-term maintenance. Section 4.6.2 on Draft EIR page 4-92 states that the most likely method of financing the construction of infrastructure would be

500 DRP 2017, pp. 5.3-15 and -16
501 *Id.,* p. 5.3-38
502 *Id.,* p. 5.17-31
503 *Id.,* p. 5.17-32
504 *Id.,* p. 5.17-30
505 Calculated as [0.44 / 11,500] * 100 = 0.00382

through the establishment of a Community Facilities District (CFD). As required under the provisions of the Mello-Roos Communities Facilities Act, the CFD would only include properties that receive the services defined in the CFD. The Commenter's opinion with regard to the funding of maintenance is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.3A-56:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not address or question the content of the Draft EIR, and no further response is required.

With respect to the costs for the initial water and wastewater services, the second to last sentence of the first paragraph on page 5.18-52 of the Draft EIR states, "All of the projects water supplies and the design, permitting, financing and construction of all treatment, collection and distribution infrastructure will be provided by the Project Applicant/Developer". Draft EIR MM 19-2 requires that the Project Applicant/Developer demonstrate that the Project has either been annexed into an existing qualified public utility district (e.g. Golden Valley Municipal Water District) or that a new public utility district (e.g. Project Water Purveyor) has been created to serve the Project. The final form of entity that will provide and manage water resources for the project will be determined at the time MM 19-2 is satisfied. MM 19-1 requires that the Project Applicant/Developer provide documentation to the County that it has completed all required procedures and has paid all applicable fees associated with establishing the Project Water Purveyor, or an alternate qualified public utility district. MM 19-4 requires the Project Applicant/Developer to provide the County with plans and specifications that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utilities district requirements and standards to demonstrate that water reclamation facility (WRF) West will serve the Project site west of the west branch of the California Aqueduct. MM 19-5 requires the Project Applicant/Developer to provide the County with plans and specifications that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utilities district requirements and standards to demonstrate that the WRF East will serve the Project site east of the west branch of the California Aqueduct.

MM 18-1 requires that the Project Applicant/Developer implement several measures, including installing, maintaining and monitoring all non-construction potable and non-potable water use using appropriate metering equipment throughout the site, and installing, maintaining and operating on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater. Additionally, MM 18-1 requires that the Water Purveyor must implement water budget-based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District). The water budget-based rates shall incorporate and be designed to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or

Los Angeles County. As discussed on Draft EIR page 5.18-41, water budget-based rates for indoor and outdoor residential, commercial, industrial, and other uses have be used throughout California, including the Irvine Ranch Water District, the Rancho California Water District, the Eastern Municipal Water District, and the Western Municipal Water District. The rates are based on the costs associated with water consumption for specific uses, such as residential indoor; outdoor residential yard; and commercial, industrial, and institutional indoor and outdoor use. The costs of supplying water increase with the volume of use because a supplier must utilize more expensive supplies to meet progressively higher marginal water demands. As a result, water-budget based rates incorporate lower rates for use below the applicable indoor and outdoor budgets, and higher rates for use above the budgeted levels to reflect the marginal costs of supplying additional water. As in numerous other California districts, this rate structure will allow for the financing of required water supplies and infrastructure by the Project Water Purveyor in manner that also encourages significant water conservation and reduces demand.

As discussed on Draft EIR page 5.2-32, the Project Water Purveyor could also operate and maintain non-construction hydromodification best management practices (BMPs) on the site, and would be responsible for BMP inspections, monitoring, maintenance and enforcement. Until the Project Water Purveyor or similar BMP management agency is established, the Project Applicant/Developer will be responsible for all hydromodification BMPs, including design, permitting, construction, operations, and maintenance.

As discussed on Draft EIR page 4-92, several other methods are available to fund the construction and ongoing maintenance of infrastructure needed to serve the Project, including the establishment of a Community Facilities District under the provisions of the Mello-Roos Communities Facilities Act of 1982. Such a district is formed to finance designated public services and capital facilities by levying special taxes in a project area. In this case, the special tax lien recorded on each individual property on the Project site could be used to fund capital costs. Other sources of Project-generated revenue include but are not limited to property taxes, sales tax, gasoline taxes, other district assessments, and business license fees. Consequently, Project water and other infrastructure will be funded and maintained by water budget-based rates and other funding mechanisms commonly used throughout the state to successfully support new and established communities.

Response to Comment F.3A-57:

The proposed Project includes approximately 163 acres of Park Overlay, which includes parks that would be dedicated to the County of Los Angeles in a developed condition. Parks dedicated to the County are public parks and would be maintained by the County. Private parks and other recreation amenities would be maintained by the Homeowner's Association or other private entity. Based on the types and amounts of recreation amenities proposed, and providing the public parks in a developed condition, the proposed Project would meet and exceed both the County of Los Angeles Parkland Dedicated Ordinance/Quimby Act requirement and the County's General Plan parkland standard.[506] Regarding making all parks available to the public, as noted, this is not necessary because the Project would meet

[506] DRP 2017, p. 5.14-1

and exceed County standards for provision of public parkland/recreation features. Including private parks and other amenities, such as commercial recreation facilities, community recreation facilities (e.g., in multi-family complexes), and pocket parks, is a routine characteristic of development projects, provided adequate public parkland has also been provided.

Response to Comment F.3A-58:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not address or question the content of the Draft EIR, and no further response is required.

With respect to the costs for the initial water and wastewater services, the second to last sentence of the first paragraph on page 5.18-52 of the Draft EIR states, "All of the projects water supplies and the design, permitting, financing and construction of all treatment, collection and distribution infrastructure will be provided by the Project Applicant/Developer". Draft EIR MM 19-2 requires that the Project Applicant/Developer demonstrate that the Project has either been annexed into an existing qualified public utility district (e.g. Golden Valley Municipal Water District) or that a new public utility district (e.g. Project Water Purveyor) has been created to serve the Project. The final form of entity that will provide and manage water resources for the project will be determined at the time MM 19-2 is satisfied. MM 19-1 requires that the Project Applicant/Developer provide documentation to the County that it has completed all required procedures and has paid all applicable fees associated with establishing the Project Water Purveyor, or an alternate qualified public utility district. MM 19-4 requires the project applicant/developer to provide the County with plans and specifications that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utilities district requirements and standards to demonstrate that the water reclamation facility (WRF) West will serve the Project site west of the west branch of the California Aqueduct. MM 19-5 requires the Project Applicant/Developer to provide the County with plans and specifications that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utilities district requirements and standards to demonstrate that the WRF East will serve the Project site east of the west branch of the California Aqueduct.

MM 18-1 requires that the Project Applicant/Developer implement several measures, including installing, maintaining and monitoring all non-construction potable and non-potable water use using appropriate metering equipment throughout the site, and installing, maintaining and operating on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater. Additionally, MM 18-1 requires that the Project Water Purveyor must implement water budget-based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District). The water budget-based rates shall incorporate and be designed to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by

the State or Los Angeles County. As discussed on Draft EIR page 5.18-41, water budget-based rates for indoor and outdoor residential, commercial, industrial, and other uses have be used throughout California, including the Irvine Ranch Water District, the Rancho California Water District, the Eastern Municipal Water District, and the Western Municipal Water District. The rates are based on the costs associated with water consumption for specific uses, such as residential indoor; outdoor residential yard; and commercial, industrial, and institutional indoor and outdoor use. The costs of supplying water increase with the volume of use because a supplier must utilize more expensive supplies to meet progressively higher marginal water demands. As a result, water-budget based rates incorporate lower rates for use below the applicable indoor and outdoor budgets, and higher rates for use above the budgeted levels to reflect the marginal costs of supplying additional water. As in numerous other California districts, this rate structure will allow for the financing of required water supplies and infrastructure by the Project Water Purveyor in manner that also encourages significant water conservation and reduces demand.

As discussed on Draft EIR page 5.2-32, the Project Water Purveyor could also operate and maintain non-construction hydromodification best management practices (BMPs) on the site, and would be responsible for BMP inspections, monitoring, maintenance and enforcement. Until the Project Water Purveyor or similar BMP management agency is established, the Project Applicant/Developer will be responsible for all hydromodification BMPs, including design, permitting, construction, operations, and maintenance.

As discussed on Draft EIR page 4-92, several other methods are available to fund the construction and ongoing maintenance of infrastructure needed to serve the Project, including the establishment of a Community Facilities District under the provisions of the Mello-Roos Communities Facilities Act of 1982. Such a district is formed to finance designated public services and capital facilities by levying special taxes in a project area. The formation of a district would be subject to further action by the County and by the Local Agency Formation Commission. In this case, the special tax lien recorded on each individual property on the Project site could be used to fund capital costs. Other sources of Project-generated revenue include but are not limited to property taxes, sales tax, gasoline taxes, other district assessments, and business license fees. Consequently, Project water and other infrastructure will be funded and maintained by water budget-based rates and other funding mechanisms commonly used throughout the state to successfully support new and established communities.

Response to Comment F.3A-59:

As stated on Draft EIR page 5.16-21, security fencing and private security would be provided and paid for by the Applicant at construction sites and would reduce the need for police protection services. The Los Angeles Sheriff's Department (LASD) would be responsible for providing general law enforcement services to the Project site during construction, including response to calls for service in the cases of trespassing, theft, and vandalism. With security fencing and private security at construction sites, the Project's short term, construction related impacts would be less than significant.

The comments regarding the prison in Lancaster and California prisons are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.3A-60:

The location for the permanent LASD Station is in the Business Park area along SR-138, which is anticipated to be developed during Phase 3. However, as stated on Draft EIR page 5.16-21, prior to the development of the permanent Los Angeles Sheriff's Department (LASD) Station, the LASD could operate out of a "store front" substation at the first development area – Village 1 (MM 16-4). This temporary substation would become operational before the first certificate of occupancy for the Project is issued.

MM 16-1 on Draft EIR page 5.16-16 sets the response times to the site for the Los Angeles County Fire Department (LACFD) at 5 minutes for fire service responses and 8 minutes for advanced life support. These response times do not apply to the LASD. Draft EIR page 5.16-19 states that the generally accepted response times for law enforcement agencies are 10 minutes or less for emergency situations; 20 minutes or less for priority incidents; and 60 minutes or less for routine or non-emergency situations. With the addition of the "store front" LASD substation during the first phase of development and the permanent LASD Station on the Project site by buildout, response times to the Project site for emergency and non-emergency calls would improve over existing response times due to the decreased distance from the site to the station.[507]

Response to Comment F.3A-61:

Section 5.10, Traffic, Access and Circulation, of the Draft EIR discusses increases in traffic volumes on SR-138 and I-5. The discussion under Threshold 10-5 addresses emergency access[508] and concludes that impacts to emergency access would be less than significant with implementation of the proposed roadway improvements at intersections with SR-138 and compliance with existing regulations and implementation of mitigation measures. In Section 5.3, Hazards and Fire Safety, the discussion under Threshold 3-7 addresses emergency response and evacuation[509] and states that traffic generation by the Project would not adversely affect emergency access or evacuation routes, with the Project Applicant/Developer continually updating the Emergency Response Plan prepared for the Project (MM 3-7) and the Project Applicant/Developer preparing a California MUTCD-compliant Traffic Control Plan for County and Caltrans approval for emergency access and circulation during activities in the roadways (MM 3-8). Page 5.3-25 states that impacts on emergency response or evacuation activities would be less than significant after mitigation.

With the addition of the store front LASD substation during the first phase of development and the permanent LASD station on the Project site by buildout, response times to the Project

507 DRP 2017, p. 5.16-22
508 *Id.,* pp. 5.10-140 and -141
509 *Id.,* pp. 5.3-23 to -25

site for emergency and non-emergency calls would improve over existing response times due to the decreased distance from the site to the station.[510]

Response to Comment F.3A-62:

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see responses to Comments F.3A-63 and F.3A-64 for more information about response times.

Response to Comment F.3A-63:

The Draft EIR has appropriately considered response times. Draft EIR page 5.16-19 states that the Santa Clarita Valley LASD Station's anticipated response times to the Project site for emergency, priority, and routine incidents are 1 to 10 minutes; 1 to 20 minutes; and 1 to 60 minutes, respectively. The response times are variable because the responding patrol units may be deployed elsewhere within the Station's service area and not necessarily dispatched from the Station itself.

Draft EIR page 5.16-22 states that the addition of the store front LASD substation during the first phase of development and the permanent LASD Station on the Project site by buildout would improve existing response times for emergency and non-emergency calls due to the decreased distance from the site to the station. The LASD has indicated that optimal response times to the site can be met with the proposed temporary store front substation and permanent on-site LASD Station and that that the proposed on-site facilities would adequately serve the Project. Under circumstances when winter weather, road closures, wildfires, and traffic jams affect traffic flows on the I-5 and SR-138, response to the Project from the on-site temporary store front and permanent LASD station would not be affected.

Response to Comment F.3A-64:

Traffic jams on the I-5 would not affect Sheriff's services to the Project since the Sheriff's officers would be stationed at the on-site storefront substation or permanent LASD Station. Traffic jams on SR-138 would also not affect Sheriff's services to the area north of the SR-138 since the temporary substation and permanent LASD station would be located north of SR-138 and need not use SR-138 to reach the majority of development on the site. Areas south of the SR-138 would be accessible from the temporary substation and permanent LASD station through two underpasses and one overpass bridge crossing over SR-138 would be constructed as part of the Project. Prior to the construction of these crossings, at grade intersections at SR-138 would provide emergency access to the area south of the SR-138.

Draft EIR Section 5.16, Fire and Law Enforcement Services, acknowledges that the Project would create demands for fire protection and law enforcement services. The analysis in Section 5.16 discusses the existing regulations and environmental conditions at the site, along with the thresholds of significance used to determine the impacts of the Project. The Project would include the construction of up to four on-site fire stations (MMs 16-1 through

[510] *Id.,* p. 5.16-22

16-3). These fire stations would provide the necessary fire protection services to the Project and thus, impacts on fire protection services would be less than significant after mitigation. Similarly, the Project includes the construction of an on-site temporary store front substation prior to the first certificate of occupancy and a permanent LASD station by buildout (MM 16-4). The on-site station would provide the necessary law enforcement services to the Project. Thus, impacts on law enforcement services would be less than significant after mitigation.

Because there are various factors that determine the potential for fire incidents and criminal activity at the Project site and these cannot be readily quantified, the analysis is not based on statistical measures but, instead, was based on direct consultations with the LACFD and the LASD. The LACFD has indicated that up to four fire stations would be required to serve the Project and four fire station locations have been proposed in the Land Use Plan for the Project. The LASD has indicated that optimal response times to the site can be met with the proposed temporary store front substation and permanent on-site LASD station and that the proposed on-site facilities would adequately serve the Project. These were the main bases for the conclusions that impacts on fire and law enforcement services would be less than significant.

Response to Comment F.3A-65:

There is no intention to siphon off fire fighters to serve this new development. As stated on Draft EIR page 5.16-5, the County's Developer Fee Program was adopted specifically to fund the purchase of fire station sites; the construction of new stations and facility improvements; and the purchase of equipment. Prior to the construction of the first on-site fire station, the Project would pay developer fees, which may be used for the construction of facility improvements and the purchase of equipment needed at Fire Station 77. MM 16-2 on page Draft EIR page 5.16-16 allows the Applicant to enter into a program where the Applicant provides the land and constructs and equips the fire stations in exchange for credit towards the fee payments. MM 16-3 states that the Applicant would provide the land for, and construct and equip, up to four new fire stations to serve the Project. The fire station operating and staffing costs would be funded by property tax revenues from the Project. Impacts on fire protection services would be less than significant after mitigation.

This comment on the use of existing firefighting personnel versus the hiring of additional firefighters and the perception that fire and law enforcement services in the area are inadequate are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.3A-66:

The LACFD provides advanced life support (paramedic) services and MM 16-1 requires that response times to the Project site shall be 5 minutes or less for fire service responses and 8 minutes or less for the advanced life support (paramedic) unit responses.

Medical service demand would depend on the insurance coverage of individual persons, individual medical needs, and the site of medical emergencies. Also, personal preference on

the use of facilities for medical services and physicians would affect demand for medical services from future residents, employees, and visitors of the Project. Therefore, the demand for medical services could not be readily quantified or determined with any degree of certainty.

However, the demand for emergency medical services is more location-dependent and would likely be served by nearby facilities, including the Antelope Valley Hospital in Lancaster; Palmdale Regional Medical Center in Palmdale; Henry Mayo Newhall Hospital in Valencia; Northridge Hospital Medical Center in Northridge; Olive View UCLA Medical Center in Sylmar; and the Providence Holy Cross Medical Center in Mission Hills. These hospitals and medical centers are private facilities and service provision or expansion would be in response to demand. As such, increased demand for medical services at any one facility would likely lead to expanded services and facilities. The Institutional/Civic land use designation of the Project allows for the future development of a hospital and other public and institutional uses on 110 acres of the site. Project and area demands may make this hospital a viable investment.

Prior to the on-site hospital development or if no hospital is built on the site, medical or other incidents at the Project site that require emergency services may cause ambulances or paramedic units to utilize SR-138 and I-5 to reach the nearest emergency room. Section 5.10, Traffic, Access and Circulation, of the Draft EIR discusses increases in traffic volumes on SR-138 and I-5. The discussion under Threshold 10-5 addresses emergency access[511] and concludes that impacts to emergency access would be less than significant with implementation of the proposed roadway improvements at intersections with SR-138 and compliance with existing regulations and implementation of mitigation measures. The roadway improvements would maintain acceptable levels of service and facilitate both emergency access and egress. In Section 5.3, Hazards and Fire Safety, the discussion under Threshold 3-7 addresses emergency response and evacuation[512] and states that traffic generation by the Project would not adversely affect emergency access or evacuation routes, with the Project Applicant/Developer continually updating the Emergency Response Plan prepared for the Project (MM 3-7) and the Project Applicant/Developer preparing a California MUTCD-compliant Traffic Control Plan for activities in the roadway (MM 3-8). Draft EIR page 5.3-25 states that impacts on emergency response or evacuation activities would be less than significant after mitigation. Under extreme circumstances where accidents on the I-5 or icy roads on SR-138 prevent emergency vehicles to reach the site and/or travel to the nearest hospital, helicopter transport services may be utilized as an alternative.

Response to Comment F.3A-67:

The need for a Level I Trauma hospital would be dependent on the number and types of emergency service needs of the area. The comments regarding stories of people needing immediate medical care, nearby hospitals, and ambulance services to these hospitals are

511 DRP 2017, pp. 5.10-140 and -141
512 *Id.,* pp. 5.3-23 to -25

noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

The Institutional/Civic land use designation of the Project allows for the future development of a hospital/medical center and other public and institutional uses on 110 acres of the site. The decision to build a hospital or that the hospital be a Level I Trauma hospital would be dependent on the organization or entity that proposes to build the facility, with consideration of the emergency medical needs of the Project area.

Health services (doctor, dentist, and clinics), medical facilities and centers, and medical/dental offices are permitted in areas designated as Commercial, Business Park, Mixed Use, and Institutional/Civic. Urgent care centers are conditionally permitted in these same land use designations.

Response to Comment F.3A-68:

Valley Fever is discussed on Draft EIR pages 5.11-28 through 5.11-29 and 5.11-64 through 5.11-67 in Section 5.11, Air Resources, and on pages 5.3-13 through 5.3-14 and 5.3-17 through 5.3-19 in Section 5.3, Hazards and Fire Safety. Implementation of fugitive dust control measures required by AVAQMD and SCAQMD and MMs 3-2 and 3-3 on Draft EIR pages 5.3-26 through 5.3-27 would mitigate impacts related to Valley Fever to be less than significant. Please also see responses to Comments F.3A-38 through F.3A-44 regarding Valley Fever and Project mitigation for its potential impacts.

The comment regarding the need for a Valley Fever specialty clinic is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.3A-69:

The Project would comply with pertinent public health and safety regulations and would not create hazardous conditions or medical emergencies that would generate a need for a trauma center in the area. However, the Institutional/Civic land use designation of the Project allows for the future development of a hospital/medical center and other public and institutional uses on 110 acres of the site. The time frame for construction of a hospital or other public and institutional use would be dependent on the organization or entity that proposes to build the facility, with consideration of the medical service demand and needs of the Project area.

As discussed above in response to Comment F.3A-68, Section 5.11, Air Resources, and Section 5.3, Hazards and Fire Safety, of the Draft EIR discuss potential impacts related to Valley Fever and conclude that compliance with existing regulations and implementation of MMs 3-2 and 3-3 would mitigate impacts related to Valley Fever to be less than significant. Please also see responses to Comments F.3A-38 through F.3A-44 with regard to Valley Fever and Project mitigation for its potential impacts. Thus, the Project does not create a need for a Valley Fever medical center. However, medical facilities and centers are permitted in areas designated as Commercial, Business Park, Mixed Use, and Institutional/Civic on the site. The

decision to build a Valley Fever medical center on the site would be dependent on the organization or entity that proposes to build the facility, with consideration of the Valley Fever medical needs of the Project area.

Response to Comment F.3A-70:

The presence of on-site, nearby, and regional faults is clearly disclosed in Draft EIR Section 5.1, Geotechnical. As discussed on Draft EIR pages 5.1-16 through 5.1-17, consistent with State regulations, there would no building on or within the required setback of the Alquist-Priolo Earthquake Fault Zone for the San Andreas Fault. The setback zone for the San Andreas Fault is incorporated into the Geologic Safety Zone, which also establishes building setbacks for the two unnamed on-site faults. Building setbacks are related to the risk of adverse effects of surface rupture on a fault during an earthquake. The Project would not expose people or structures to potential adverse effects from surface rupture of a known fault with implementation of PDF 1-1 (i.e., the Geologic Safety Zone). However, the risks from surface rupture of a fault are a different issue than the risks from strong seismic ground shaking during an earthquake. As stated on page 5.1-15 of this Draft EIR, "…the overall seismic risk at the Project site is the same as Southern California in its entirety." In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area. Therefore, the notification of the future population on the Project site about fault proximity would unnecessarily raise fears that are not based on accurate information. Because there is not a scientific basis for this notification, the Commenter's suggested mitigation measure will not be included in the Mitigation Monitoring and Reporting Program for the Project.

In 2008, BonTerra Consulting (now Psomas) conferred with the California Department of Water Resources (DWR) regarding seismic safety of the West Branch of the California Aqueduct. In summary, DWR reported that based on both construction design combined with engineering features and processes to respond to any event that affects the flow of water, the proposed Project's location adjacent to a portion of the California Aqueduct does not represent a substantial risk. Specifically, staff at DWR indicated that pumping plants along the Aqueduct, like the Oso Pumping Plant, shut off automatically from any source of vibration. This can include vibration from a seismic event, motor vibration, or low oil. Additionally, check structures in the canals limit pools and are managed remotely to control flow. These check structures can be "stair stepped" to control flow without use of pumps. If something occurs to alter the flow, such as pooling, sensors on the check stations and other canal features send a signal to the area control center to which an attendant responds. The DWR facilities, except storage reservoirs, maintain an Emergency Action Plan under FERC Guidelines and reservoirs maintain plans in non-FERC formats called OES to be implemented in an emergency, such as a seismic event. Regarding seismic risk, DWR reported that based on seismic design criteria used at the time of construction and any subsequent improvements, catastrophic failure is not anticipated for any portion of the California Aqueduct. It was acknowledged that some portions would be expected to experience distress more than other portions, such as where the Aqueduct crosses over a fault line. However, it was reiterated that for the West Branch that bifurcates the Project site, in a seismic event the

Oso Pumping Plant would automatically shut down flows and emergency plans would be enacted.[513] Accordingly, because there would not be a significant risk involving breach of the California Aqueduct during a seismic event, the impact would be less than significant, and no mitigation is required.

In response to this comment, the following document is added to the administrative record:

Royer, J. 2008 (May 1). Personal communication. Telephone conversation between J. Royer (California Department of Water Resources, Division of Engineering, Geotechnical and Structures Branch, Dams and Canals Section) and J. Neary (BonTerra Consulting [now Psomas]) regarding seismic safety at West Branch of California Aqueduct.

Response to Comment F.3A-71:

This comment's recommendations regarding rooftop solar and energy efficient water heaters are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see response to Comment F.3A-46 which discusses the various mitigation measures and project design features incorporated into the Project to reduce the Project's overall GHG emissions as well as the Project's consistency with the regional RTP/SCS and the County's Community Climate Action Plan, as well as the Project's compliance with applicable regulatory programs for the reduction of greenhouse gas (GHG) emissions.

Although this comment correctly notes that the Project does not propose development of utility-scale solar plants within the Project site, it should be noted that the Project does not propose to install rooftop solar on 100 percent of single-family detached homes. As explained in this response, MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs that can accommodate solar collection systems. However, the Specific Plan's Green Development Program requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations.

In addition, MM 21-5 requires the Project to equip a minimum of 70 percent of public and community pools and spas with active solar water heating systems where heating is necessary or desired, and MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus

[513] Royer, J. 2008 (May 1). Personal communication. Telephone conversation between J. Royer (California Department of Water Resources, Division of Engineering, Geotechnical and Structures Branch, Dams and Canals Section) and J. Neary (BonTerra Consulting [now Psomas]) regarding seismic safety at West Branch of California Aqueduct.

ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent.

It is noted that Draft EIR Table 5.21-11 inaccurately states that a minimum of 100 percent of all single-family detached residential units will be constructed with solar energy collection equipment. This statement is a typographical error. To correct this and other typographical errors, Draft EIR Table 5.21-11 is hereby revised as follows:

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 1: GREEN BUILDING AND ENERGY	
Existing County Initiatives	
Energy Upgrades to Existing Structures provides rebates and incentives for energy retrofit efficiency projects.	Because Centennial will be a new community, energy efficiency is required for buildings, infrastructure (e.g., outdoor irrigation), and appliances. The Project does not include any existing structures, and thus this CCAP action is not applicable.
Los Angeles County Code (Title 31) requires implementation of sustainable policies for new building design.	The Project is consistent with Title 31 of the County Code ~~applies to the Project,~~ and ~~is~~ implement~~ed through~~ a variety of measures including, for example (1) landscape design restrictions related to minimizing turf grass and the use of non-invasive and drought tolerant plants and tree species; (2) recycling and/or salvaging a minimum of 75% of the non-hazardous construction and demolition debris, and 100% of soils during grading; and (3) compliance with a water budget for landscape irrigation use conforms to the California Department of Water Resources Model Water Efficient Landscape Ordinance.
Commercial Building Performance Partnership provides financial mechanisms for energy conservation upgrades to existing buildings.	Energy conservation is required for new structures, and no retrofits of existing structures are included in the Project and thus this CCAP action is not applicable.
Renewable Energy and Clean Fuels Program implements projects to accelerate the use of compressed natural gas as an alternative fuel.	Renewable energy produced within the Project will be primarily rooftop solar, and at minimum 50% of the Project's anticipated electricity demand will be satisfied from on-site renewable energy generation. It is anticipated that the dominant alternative transportation fuel will be electricity (e.g., electric and hybrid-electric vehicles); however, compressed natural gas (CNG) will also be made available as a transportation fuel to the extent consistent with then-applicable recommendations and/or requirements from the California Air Resources Board (CARB) and County.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
New CCAP Actions	
BE-1: Green Building Development encourages energy reductions in new development through voluntary reductions that exceed the minimum standards set forth in the State's CALGreen Building Code (Title 24).	The Project exceeds the CALGreen Building Code minimum requirements in several ways, including: 1. Compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings, resulting in buildings that would exceed 2016 Title 24 requirements by 15% (PDF 21-1). 2. Compliance with CALGreen voluntary measure A5.203.1.2.1 for nonresidential buildings and residential buildings taller than 4 stories, resulting in buildings that would exceed 2016 Title 24 requirements by 10%. 3. Owners of all single-family units and multi-family residential structures are required, upon resale, to present to the buyer a written energy audit checklist at the time the seller provides the buyer with the Real Estate Transfer Disclosure Statement required by Section 1102 et seq. of the *California Civil Code.* The energy audit checklist shall certify that all heating, ventilation, and air conditioning (HVAC) systems, thermostats, appliances, windows, and swimming pools are either the same as originally installed or otherwise comply with the Green Development Program. 4. For nonresidential buildings, within 90 days after the end of the first full calendar year following the issuance of the certificate of occupancy, and within 90 days after each 5-year period thereafter, the owner or tenant in possession thereof shall submit to the master commercial owners association or other applicable association a report prepared by the owner or a qualified, independent third party that evaluates whether all major building systems such as a heat furnace, air conditioner, and other energy-consuming mechanical fixtures are working within the design standards established by the manufacturer of such equipment. 5. Residential appliances offered by builders shall consist ~~exclusively~~ of low-energy and/or low-water consuming appliances that are Energy-Star compliant for each appliance that is rated by

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	Energy Star (e.g., refrigerator, clothes washer, dishwasher, and room air conditioner). These project design features meet and exceed the requirements of ~~Section 22.52.2130~~ Title 31 of the County Code (Green Building).
BE-2: Energy Efficiency retrofits will be further encouraged for existing buildings and structures.	The Project does not include any existing buildings, so this measure is not applicable.
BE-3: Solar Installations are encouraged for new and existing buildings	Renewable energy produced within the Project would ~~be generated~~ provide ~~at~~ a minimum of 50% of the Project's anticipated electricity demand ~~would be satisfied from on-site renewable energy generation~~. Specific metrics to achieve this goal include: 1. A minimum of 100% of all single-family detached residential units at buildout shall ~~have~~ be pre-wired to support solar energy collection equipment and a minimum of 30% of all single-family detached residential units at buildout shall have solar energy collection equipment installed on roof areas or on top of other structures on the site (e.g., patio covers or pergolas). 2. Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. 3. A minimum of 10% of all single-family detached residential units at buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. 4. A minimum of 30% of all multi-family residential units at buildout shall have solar energy collection equipment, which shall be installed on roof areas facing within 30 degrees of true south. 5. A~~ll~~ minimum of 70% of public and community swimming ~~s~~pools constructed within the Project shall be heated by a solar water heating system or renewable power system that provides electricity for water heating.

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CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	6. A minimum of 60% of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south.
BE-4: Alternative Renewable Energy Programs are designed to encourage the use of non-solar renewable energy technology such as wind, hydropower, and geothermal resources, as feasible.	The Project site does not have hydropower or geothermal resources. Utility-scale wind plants present a potential hazard to sensitive biological resources such as the California Condor, and utility-scale solar plants are not an authorized use on the Project site or vicinity under the Antelope Valley Area Plan. However, the Specific Plan states that renewable energy systems shall be installed in connection with the development of one or more of the following: residential units, non-residential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity.
BE-5: Wastewater Treatment Plant Biogas recovery and reuse	The Project's wastewater reclamation facilities (WRF) will include equipment to capture and reuse biogas for energy production.
BE-6: Energy Efficiency Retrofits of Wastewater Equipment promotes efficient treatment equipment	There is no existing wastewater treatment facility at the Project site, so this measure is not applicable.
BE-7 Landfill Biogas encourages renewable biogas projects at regional landfills.	There is no existing or proposed landfill at the Project site, so this measure is not applicable.
CATEGORY 2: LAND USE AND TRANSPORTATION	
Existing County Initiatives	
Healthy Design Ordinance (Ordinance 2013-001, amending Title 21 (Subdivisions) and Title 22 (Planning and Zoning)) is designed to require projects to have better walking environments (e.g., with wider sidewalks and more shade trees), encourage more bicycling (e.g., by requiring bike parking), improve access to healthy foods (e.g., with weekly farmer's markets and permissible community gardens), and enhance project review requirements to provide an opportunity to review healthy design features such as landscaping, lighting, street furniture and bike parking spots.	The Project design ~~complies~~ is consistent with all of the substantive standards of the Healthy Design Ordinance, including but not limited to requirements for right-of-way widths; pedestrian crossings; tree plantings in lot frontages; and bicycle parking facilities. The Project allows community gardens as legally permitted uses in residential, ~~and~~ mixed-use, park, recreation/entertainment, and institutional/civic areas of the Project. The Project Transportation Demand Management (TDM) Program includes bicycle program metrics, discussed below.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
Bicycle Master Plan promotes bicycle ridership and bike-friendly designs throughout the County.	The Project includes a safe and aesthetically pleasing dedicated bicycle network and pedestrian system into all development designs, and distributes community uses such as neighborhood parks, elementary schools, and neighborhood-scale retail in key locations throughout the Project to reduce single-occupancy automobile travel for these neighborhood-scale destinations. The Mobility Plan of the Specific Plan ~~Project TDM Program~~ includes bicycle program metrics, discussed below.
Sustainable Transportation Programs to increase the efficiency of the transportation network.	The Project includes the following measures to reduce single-occupancy commuter travel to and from the Project site: 1. Land use planning principles that create a balanced master-planned community that includes: A. Mixed-use neighborhoods where residential, commercial, and other employment-generating uses and institutional/public uses are proximate to each other and connected by a network of walkable streets, bikeways and trails to reduce reliance on automobile use within the Project site. B. A diverse range of residential product types, including dedication of a minimum of 10 percent of residential units as affordable housing, to compliment the diverse range of employment opportunities within the Project and help minimize the off-site employment commuter trips. 2. Establishment of a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is also to coordinate and facilitate transit and rideshare usage to serve as many riders as possible, and to reduce the volume of automobile trips within and from the Project site, as described in more detail in the ~~Project TDM Program~~ Mobility Plan below.
New CCAP Actions	
LUT-1: Bicycle Programs and Supporting Facility improvements to expand the County's existing bicycle network.	As a new community, the Project includes a network of bikeways and multi-purpose trails, as well as community trails, in addition to the greenways and paseos. The Project trail system will

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	connect to the Pacific Crest Trail (PCT), which is designated as a National Scenic Trail that traverses approximately 2,650 miles through 3 states (California, Oregon, and Washington) will be relocated to the west side of 300th Street West, which travels through the Project site. This realignment is not a part of the Project, but is assumed to be the future alignment for evaluation purposes in this EIR. The Project requires bicycle parking facilities for 5% of the minimum required vehicle parking spaces for nonresidential land uses or as required by County Code Section 22.52.1225B, whichever is more stringent, to encourage and support bicycle use.
LUT-2: Pedestrian Network improvements to expand the County's existing pedestrian network.	As a new community, the Project implements a Complete Streets design approach that includes sidewalks and dedicated bicycle network and pedestrian system incorporated into all development designs and throughout the community to reduce single-occupancy automobile travel for neighborhood-scale destinations.
LUT-3: Transit Expansion to create priority bus lanes and improve the existing efficiency of the transportation network.	As a new community, the Project implements a ~~TDM Program~~ Mobility Plan that includes strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. The Project also includes a transit easement running North-South through the center of the development, connecting its most housing-dense areas with the business park, accommodating future internal commuting within the Project site.
LUT-4: Travel Demand Management to encourage ride-sharing and employer-sponsored vanpools to reduce peak-period vehicle trips.	The Project ~~TDM Program~~ Mobility Plan encourages ride-sharing and employer-sponsored vanpools, as well as other measures to reduce automobile trips within and from the Project site. The TDM will be managed by the TMA.
LUT-5: Car-Sharing Program promotes the shared use of private and employer-owned vehicles.	The Project ~~TDM Program~~ Mobility Plan includes formation of strategic partnerships with car sharing services (e.g., Uber or Lyft) and other innovation/technology approaches to increase transportation efficiency, as described in more detail below.

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CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
LUT-6: Land Use Design and Density targets land use patterns to support mobility, and improve the diversity of urban and suburban developments	The Project includes a balanced mix of housing, employment, and community uses including schools, retail, and public services, to minimize off-site trips. The Project design also encourages pedestrian and bicycle use through the use of walkable communities planning and design techniques, and includes a diverse range of housing types.
LUT-7: Transportation Signal Synchronization Program Improve the network of traffic signals on the major streets throughout Los Angeles (LA) County.	The Project site does not include any existing traffic signals, but the Project will use synchronized traffic signals to ensure the efficient use of future Project roadways.
LUT-8: Electric Vehicle Infrastructure. Install EV charging facilities at County-owned public venues and ensure that at least one-third of these charging stations will be available for visitor use.	The Project requires electric vehicle infrastructure, specifically: 1. Builders will be required to install one 240 volt of alternating current (VAC) outlet available for use to charge electric vehicles in the garage or other suitable location for each single-family home. 2. For business park and institutional land uses, a minimum of 1 electric vehicle charging station (consisting of a 208/240 VAC or alternative electric charging technology approved by the County, serving 2 adjacent parking spaces) will be installed for the first 50,000 square feet (sf) of building space, and an additional fueling station will be installed for each subsequent 50,000 sf of building space. 3. For multi-family residential projects that include at least ~~20~~ 17 units, a minimum of 1 alternative energy ~~electric~~ vehicle fueling ~~charging~~ station be installed for the first 17~~20~~ units and an additional ~~charging~~ alternative energy vehicle fueling station will be installed for each subsequent ~~20~~ 17 units. 4. Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided for nonresidential structures ~~larger than 20,000 sf and made available for employees and visitors~~ as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200

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CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	spaces; and at least 10% of total for 201 and more spaces. 5. For parking facilities and parking lots with more than 20 spaces, the parking facility or lot must include: A. A minimum of 5% preferentially located parking spaces for alternative-fueled vehicles. B. Electrical lines designed and sized to provide electric vehicle charging stations for up to 3% of parking space when demand is demonstrated.
LUT-9: Idling Reduction Goal. Encourage idling limits of 3 minutes for heavy-duty construction equipment as feasible within manufacturer's specifications.	The Project includes as a mandatory contract specification for all construction contractors a restriction to limit unnecessary construction equipment idling to 3 minutes, and include methods to encourage equipment operators to achieve the 3-minute goal.
LUT-10: Efficient Goods Movement is designed to improve cargo transport on existing roadways and transportation infrastructure.	The Project includes contributions to California Department of Transportation (Caltrans) to avoid any adverse Project-related impact to goods movement on Interstate (I) 5 and State Route (SR) 138. Contributions are described in mitigation measures in Section 5.10, Traffic, Access and Circulation.
LUT-11: Sustainable Pavements Program is designed to improve the resiliency of, and reduce the GHG emissions associated with, existing paved roadways.	The Project will use durable roadway paving materials that will be determined upon consideration of aggregates, asphalt materials, cementitious materials, recycled materials, and other roadway materials that are commonly used in pavement construction in order to assess from a life-cycle perspective the role they play in contributing to the sustainability of the Project's pavement system. "Cool" pavements will be used to reduce heat island effects.
LUT-12: Electrify Construction and Landscaping Equipment. Utilize electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment.	All landscape maintenance equipment at Centennial will be CARB-approved or electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment.

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CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 3: WATER CONSERVATION AND WASTEWATER	
Existing County Initiatives	
Conservation rebates, smart gardening workshops and stormwater controls provide water and wastewater improvements in existing communities	This measure does not apply to new communities. The Project includes compliance with drought-response State measures including the Model Water Efficient Landscape Ordinance (MWELO), which are more stringent than required by CALGreen (DWR 2015). The Project includes 2 WRFs that will provide a reliable supply of recycled water for landscaping, to reduce reliance on potable water supplies.
New CCAP Actions	
WAW-1: Per Capita Water Use Reduction Goal. Meet the State established per capita water use reduction goal as identified by Senate Bill (SB) X7-7 for 2020. The State goal is a 20 percent reduction in per capita water use compared to baseline levels.	The final EIR for the Antelope Valley Area Plan (AVAP) update utilized the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) average Antelope Valley estimate of per capita water use (199 gallons per capita per day [gpcd]) to evaluate the water demand growth that could occur from the implementation of the AVAP. At full buildout, the Project's total per capita water use would be approximately 177.5 gpcd. The Project would reduce water demand by approximately 10% below the per capita average consumption in the Antelope Valley. The analysis compared the Project to the baseline per capita consumption in the Project vicinity since the Project site is undeveloped there is not an established baseline of water consumption on the Project site.
WAW-2: Recycled Water, Water Supply Improvement Programs, and Stormwater Runoff. Promote the use of wastewater and gray water to be used for agricultural, industrial, and irrigation purposes. Manage stormwater, reduce potential treatment, and protect local groundwater supplies.	The Project includes a comprehensive water resources management program, including: 1. *Recycled Water.* The Project includes water recycling facility to recycle, and reuse, wastewater piped to the Project WRF. All nonresidential and multi-family development must install recycled water infrastructure to irrigate common areas for these facilities (except where prohibited by law), and all available recycled water shall be used for such irrigation uses. 2. *Potable Water Conservation.* The Project includes numerous potable water conservation measures, including: A. Establishing maximum available water allocations for each residential and commercial parcel, and monitoring and enforcing such allocations through a

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	metering system and rate structure and/or penalty structure for those exceeding their water allocations. B. Restricting outdoor landscaping planting in private yards to a designated low-water plant pallets to minimize use of potable water for private landscaping, ~~prohibiting~~ mandating that only recycled water be used to irrigate turf in commercial areas ~~projects~~, and restricting turf to 25% of landscaped areas on private residential projects. C. Requiring the ~~exclusive~~ use of Energy Star or equivalent major appliances, as described above, that use less water (as well as less energy). D. Requiring the exclusive use of kitchen and bathroom faucets that comply with 2013 CALGreen code residential voluntary measures specified in Sections A4.303.1 and A4.303.3 of the Code. 3. *Storm Water Management.* The Project's integrated water resources management approach will comply with County requirements related to hydrology and flood control considerations through compliance with Low Impact Development (LID) standards and best management practices (BMPs) for sediment management through hydromodification techniques. The Project includes 2 WRFs that will provide a reliable supply of recycled water for landscaping, to reduce reliance on potable water supplies. The Project provides a reliable water supply through use of an integrated water resources management approach that incorporates water conservation measures; uses recycled water for non-potable uses; uses multiple sources of water supply to ensure that the Project's water needs are met without the need to solely rely on the annual delivery of a fixed amount of imported water; provides a high degree of water supply reliability for each stage of Project buildout; and minimizes the impacts of additional water demand on the state's water supply.

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Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 4: WASTE REDUCTION, REUSE AND RECYCLING	
Existing Initiatives	
Community waste diversion programs to redirect 50 percent of solid wastes to recycling or re-use instead of landfills	The Project will exceed this existing measure by implementing a 100 percent diversion of soil during grading activities, and at least ~~70~~ 75 percent of non-hazardous construction and demolition waste. The Project will also divert 75 percent of operational solid waste.
New CCAP Action	
SW-1: Waste Diversion Goal. For the County's unincorporated areas, adopt a waste diversion goal to comply with all State mandates to divert at least 75 percent of waste from landfill disposal by 2020.	The Project includes both a construction and operational waste reduction measures. 1. The Project must implement a plan and monitoring program to ensure recycle or reuse of a minimum of 75% by weight of construction and demolition debris, exclusive of soil, rock, and gravel. This quantity exceeds the 50% requirement of Section 20.87.040 of the County Code and the 75% target proposed in the CCAP. 2. The Developer must provide the County with a contract establishing an on-site waste recycling and composting program, including the collection of metals, paper, household plastics, glass, cardboard, green waste and food waste. The waste hauler should be required by contract to maintain records showing the diversion of not less than 75% of the operational waste generated by the Project. The Project will include a minimum of five acres for a Materials Recovery Facility/Transfer Station (MRF/TS), which may include mulching and composting operations and a Household Hazardous Waste Permanent Collection Center. An MRF/TS could be privately or publicly operated. The MRF/TS would allow for all materials that are recyclable to be sorted and compacted for shipment to an off-site recycling processing facility. The Developer shall encourage a waste management company to build these facilities within the Project site by grading, improving, and providing utility hookups by the end of the first phase of construction. The CC&R for the MRF/TS will require that the lot provided within the site remain as a Non-Disposal Solid Waste Processing Facility.

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CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 5: LAND CONSERVATION AND TREE PLANTING	
Existing Initiatives	
Implementation of the urban forestry plan and oak woodlands conservation management plan.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimizes disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. Open spaces will be provided within the Business Park that allow for wildlife movement between the southern portion of the Project site through to the drainage located on the northern side of SR 138.
New CCAP Actions	
LC-1: Develop Urban Forests. Support and expand urban forest programs within the unincorporated areas.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent ($MTCO_2e$). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
LC-2: Create New Vegetated Open Space. Restore and revegetate previously disturbed land and/or unused urban and suburban areas.	This action is not directly applicable to new development projects. However, the Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. Additionally, the Project would plant an estimated 35,123 new trees, as required by the County Tree Planting Ordinance. This would result in an estimated long-term sequestration of 24,867 $MTCO_2e$. This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance
LC-3: Promote the Sale of Locally Grown Foods and/or Products. Establish local farmers markets and support locally grown food.	The Project will include a weekly Farmer's Market sponsored by the homeowners association (HOA) or other entity selected by the Master Applicant/Developer, and will allow for community gardens as a permitted use in ~~commercial and~~ residential, mixed use, park, recreation/entertainment, and institutional/civic areas. The Project also accommodates a total of 50-acres for on-site food-growing and agriculture-related uses in places such as community gardens, orchards, groves, and greenhouses.
LC-4: Protect Conservation Areas. Encourage the protection of existing land conservation areas.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat.

Response to Comment F.3A-72:

This comment's general opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Lead Agency concurs with this comment's assertion that the Draft EIR comprehensively and adequately discloses the Project's potentially significant and unavoidable impacts to visual resources, air resources, biological resources, cultural resources, climate change, air quality, and water quality. Though the Draft EIR identifies all feasible mitigation to reduce the Project's significant impacts, a project the size of the Centennial Specific Plan cannot completely avoid all of its potentially significant impacts through mitigation. This comment's recommendation that County decision makers consider all of the Project's significant and unavoidable impacts prior to Project approval is also noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.3A-73:

This comment's general opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.3A-74:

This comment's stated preference that the County adopt Alternative A, the required "No Project" alternative, is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.3A-75:

The comment is a summary of the responsibilities of the commenting organization. The comment is noted for the record and will provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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July 13, 2017

Mr. Jodie Sackett
County of Los Angeles Dept. of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012

Re: Comments regarding Draft Environmental Impact Report (DEIR) for the Centennial Project, State Clearinghouse No. 2004031072

Dear Mr. Sackett:

We are submitting this response regarding the Draft Environmental Impact Report for the Centennial Project, on behalf of the 12,300 member Pacific Crest Trail Association (PCTA). The Pacific Crest Trail Association is the primary private partner in the management of the Pacific Crest National Scenic Trail (PCT). PCTA is part of a long-standing partnership with the USDA Forest Service, California State Parks, the National Park Service, and the Bureau of Land Management that is formalized in a Memorandum of Understanding (15-MU-11132424-003). With the main office in Sacramento, California, and five regional offices along the length of the trail, PCTA works alongside agency partners at the national, regional, and local levels to ensure the PCT is protected, preserved, and promoted as one of America's premier long-distance trails. In 2016 PCTA organized more than 98,000 hours of volunteer work and raised $2,400,000 to support these efforts. F.4-1

Background:

When the PCT was designated by Congress as a National Scenic Trail through the National Trails System Act of 1968, there was a requirement for publication of a route for the PCT in the Federal Register. This process was completed in 1973. At that time, a route approximately matching the route currently being discussed today by Tejon Ranch Company (TRC), the Tejon Ranch Conservancy (Conservancy), the U.S. Forest Service (USFS) and PCTA was selected as the route for the PCT. The USFS approached TRC about a purchase of this route, but at that time the TRC was not interested in a public route through their holdings in that location. So, in the late 1980s and early 1990s, USFS acquired rights for public passage around the eastern edge of the Ranch as an Interim Location in order to complete the PCT as a continuous route for public use. F.4-2

PCTA and USFS were approach by TRC in 2004 regarding their potential willingness to donate a right of way for public use and a conservation easement meant to protect the PCT experience in an agreed upon location on the ridgelines and Antelope Valley contained within the Ranch. Since that time, PCTA and our agency partners have been involved in discussions and fieldwork regarding a trail route, improved overnight use sites and management of the surrounding lands

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and public use on the PCT. The route through the Ranch would be approximately 38 miles in length including the Centennial project along 300th Street West.
Those discussions have resulted in a grant of a conservation viewshed easement on 10,000 acres of TRC lands in 2014 primarily to the Conservancy with third party enforcement rights held by USFS. PCTA and the USFS continue to work with TRC and the Conservancy to complete the last step – a public use easement held directly and managed by the USFS. It is hoped that we might be able to complete the next step in that process by the end of 2017.

The completion of the easement is complicated in that the USFS cannot expend funds for NEPA compliance without having rights in hand, and at the same time the NEPA analysis might result in changes in the route covered. The result is a plan for TRC to sign with USFS an agreement to transfer a public use easement once the analysis work is completed. This is that next step to which we refer. It is PCTA's determination that TRC has been negotiating with all parties in good faith and that we all share this goal of a substantially improved PCT experience for the public in the Tejon Ranch area.

F.4-2 cont.

Comments:
The PCTA provides the following comments to be considered and reviewed in the Projects Final Environmental Impact Report (FEIR).

- DEIR 5.13 Visual Resources page 5.13-10 (2nd to last paragraph) states that Exhibit 5.14-2 depicts the existing (interim) PCT alignment which it does not. The Exhibit only depicts the new proposed PCT alignment along 300th Street West in a straight line north and south. An Exhibit map in the FEIR should depict the existing interim PCT location approximately 1.75 miles east of the project along 270th Street West and its current connections to the Angles Forest southward and Tehachapi Mts. to the northeast.

F.4-3

- DEIR 5.14 Parks & Recreation page 5.14-13 (2nd to last paragraph) also states Exhibit 5.14-2 depicts the existing PCT alignment, which it does not. FEIR should include a corrected map.

F.4-4

- In conjunction with the above "Bullet points", the DEIR in several places only describes the existing interim PCT route east of the Project. Including an Exhibit Map of the interim PCT located approximately 1.75 miles east of the Project along 270th Street West and its current northeastern route around Tejon Ranch would improve depictions of existing conditions. And then for comparison purposes, include another Exhibit map (back to back) depicting the new proposed 38 mile PCT Trail Alignment and/or 10,000 acre conservation viewshed easement connecting Tejon Ranch's other conserved lands north and south to the Centennial Project. This would help FEIR reviewers to analyze/understand the significance of the PCT as a regional trail connection, plus convey the potential improvement of the PCT experience by moving it from its existing location on the floor of Antelope Valley to the crest of the Tehachapi Mountains.

F.4-5

The DEIR tries to explain the relocation of the PCT along 300th Street West and the potential impacts of the Centennial development on that location, including mitigating measures to be taken. We agree with the Mitigation Measure MM13-4 which states a block wall shall be installed along the rear of structures abutting the trail and a 34 ft. landscaped setback along 300th

F.4-6

Street West. However, we would also like to clarify PCTA's view of the visual analysis of proposed adjacent developments from south to the north along proposed PCT route along 300th Street West. F.4-6 cont.

- The PCT will come out of the cover of the hills between Pine Canyon Road and Hwy 138 and will be in view of the residential development across 138. Also visible as you get closer to Hwy 138 is a light industrial park adjacent to and west of the PCT, on the south side of Hwy 138 with intersection of 300th Street West (see simulation exhibit 5.13-4 is an example, but is located further southwest along Hwy 138). This is also the general location of a proposed public trail parking lot on the south side of Hwy 138 outside of the Centennial Project. F.4-7
- Exhibit 5.14-2 map indicates an underpass under Hwy 138 west of the intersection with 300th Street West. However, there is not a discussion/description of this underpass as it may or may not relate to the PCT. The FEIR should clarify and expand this potential feature. For instance Figure 3-40 of the Centennial Specific Plan depicts a conceptual 10 ft. wide x 12 ft. high Trail Underpass, but is not included in this section of the DEIR. The USFS minimum standard for an underpass with equestrian use is 10 ft. wide x 12 ft. high. We support the idea of the PCT alignment passing through such an underpass to safely navigate crossing Hwy 138. If practical, we would encourage expanding the width and height especially if the alignment is shared with the county trail system and bicyclists. The PCT prohibits bicycle use directly on the trail, therefore some type of separation between user groups would need to be established. F.4-8
- A commercial site is located on the north west corner of Hwy138/300th Street West with the PCT between the business and 300th Street (see exhibit 5.13-5). The PCT would then proceed north along the west side of 300th Street West in a set back from the street that would include a wall screening structure/residential development, the PCT, a paved bike path and vegetation plantings. To the east of the commercial site are a community park and a school site. Providing a Figure in the FEIR depicting a typical cross section of the PCT along 300th Street West with set-back measurements, screening wall, vegetation plantings and separate bike path would help to analyze visual impacts. For instance Figure 3-39 of Centennial Specific Plan depicts a typical cross section of the PCT, but is not included in this section of the DEIR. F.4-9
- The PCT and 300th Street West then passes through an inholding within Centennial and then enters a second area of residential development, which extends to the east side of 300th Street West. Before you reach the aqueduct on the west side of the PCT is another school and beyond that a community park. On the east side of 300th Street, across from the school is another small commercial site.
- Before you cross the aqueduct there is the waste water treatment plant to serve the majority of the entire community. At this point there is no information that details the impact of this utility on the PCT in terms of sight, smell and noise. We would imagine those same impacts would be a concern for the school, park and commercial site. The FEIR should clarify these potential impacts from the waste water treatment plant. F.4-10

- The DEIR states an area will be reserved for the PCT along the west side of 300th Street West through the Centennial project. As previously stated, USFS will need to hold easement rights prior to funds being expended for NEPA compliance and trail construction. The FEIR should discuss the mechanism and or dedication of an easement to USFS for the PCT to be realigned and completed in this location. F.4-11

To further clarify our view of this situation, it is necessary to look at the entire proposed PCT route across the Ranch which provides an experience for public users that is greatly superior to the current trail route. Sections of this relocation are of superlative quality with outstanding scenic and natural qualities. To be able to take advantage of this potential, we are rightfully willing to deal with the impacts of adjacent development in proximity to Hwy 138, which is already compromised by the road crossing and currently under planning for expansion. Make no mistake, the impacts of this development proposal are substantial, however the mitigation being offered is important and the resulting rural transition zone along the PCT is substantially outweighed by the improvement in the public value of the overall trail route proposed within the existing 10,000 acre conservation viewshed easement north and south of the Centennial project The location of schools in proximity to the PCT as well as trail system connections to the PCT from other schools, public facilities and the residential neighborhoods, gives us an opportunity to use the PCT as a public health and education resource at a scale not often reached by a trail as remote as the PCT. It gives us the opportunity to draw the public into the spectacular backcountry settings of the Ranch and spurs an appreciation for nature and scenery. We look forward to a long and robust relationship with this community. F.4-12

Comments continued:

- The 10,000 acre conservation viewshed easement TRC dedicated in 2014 appears to overlap onto Area 1 of the proposed Off-Site Mitigation Preserves south of Hwy 138. Where the rest of the 10,000 acre conservation easement to the north of the project appears to be outside of the proposed Preserves (Areas 2-6). The FEIR should clarify/discuss the compatibility of the Trail easement inside Preserve Area #1. We believe the off-site mitigation preserves found in exhibit 4-12 are critical to the quality of key areas of the PCT relocation, with substantial public value. F.4-13
- Where 300th Street West and the potential PCT alignment traverse through the inholding we have concerns as to whether the trail will be included or accommodated somehow (even temporarily) possibly within the street right-of-way. The FEIR should discuss what street improvements will be made to 300th Street West through this inholding area connecting back to the Centennial Project to the north. We hope that information addressing the PCT and its connection to the north would also be included. F.4-14
- We do have concerns regarding the impact of the waste water treatment facility proposed, and are surprised by the location, adjacent to a National Scenic Trail, as well as water transmission and management facilities such as the aqueduct, as well as a school and park. We hope that utilization of the alternative utility location in Alternative D would be considered closely and that the impact on the PCT experience would be further analyzed and given weight in the FEIR. F.4-15

Lastly, and possibly in conjunction with the county or community trail system, the FEIR should consider some type of rest stop with shade and water available somewhere along the 300th St. West PCT alignment. F.4-16

We look forward to working with TRC, the Conservancy, our agency partners and LA County in using this process and other related efforts to provide a world class experience to the public along the Pacific Crest Trail. F.4-17

Respectively Submitted,

Liz Bergeron
Executive Director and CEO

Responses to Comment Letter F.4
Pacific Crest Trail Association
July 13, 2017

Response to Comment F.4-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.4-2:

The Draft EIR includes a complete description of the Pacific Crest National Scenic Trail (PCT), its existing alignment, proposed alignment, and its federal designation as a National Scenic Trail.[514] Consistent with this comment, the Draft EIR further explains that the Forest Service, the Pacific Coast Trail Association (PCTA), the Tejon Ranch Conservancy (Conservancy), and the Tejon Ranch Company (TRC) are in ongoing discussions regarding an alternative realignment for the PCT. Specifically, the Forest Service, the PCTA, the Conservancy, and the Tejon Ranch Company are discussing the relocation of the existing segment of the PCT that currently crosses Lancaster Road at 270th Street West approximately two miles east-southeast of the Project site so that it is generally aligned along 300th Street West between SR-138 and the northeastern corner of the Project site, as shown on Draft EIR Exhibit 5.14-2.[515] A portion of the western right-of-way of 300th Street West has been reserved for the conceptual PCT realignment where this conceptual realignment is contiguous with a portion the Project site and where it bisects the northeastern corner of the site.[516] An appropriate buffer would be a buffer between the easement and Project development in the easternmost areas of the site.[517]

To facilitate the PCT realignment described in the Draft EIR, TRC has granted to the Conservancy two conservation easements that would preserve in perpetuity the conservation values of those portions of Tejon Ranch land located outside of the Project boundary and through which the proposed PCT alignment would extend.[518] Both conservation easements expressly acknowledge that the Forest Service, the Conservancy, and TRC are in ongoing discussions regarding an alternative realignment for the PCT, and that TRC intends to convey to the Forest Service a perpetual trail easement for the construction, maintenance, and use of the PCT on the property covered by the conservation easements.[519] This comment confirms the Commenter's impression that TRC has been participating in these discussion in good faith.

514 DRP 2017, pp. 5.14-13, -14
515 *Id.,* p. 5.14-14
516 *Ibid.*
517 *Id.,* Exhibit 4-10a
518 See Kern County Official Records Document Nos. 214047995, 20140445960 ("Conservation Easements")
519 Conservation Easements, Recital G

As explained in the Draft EIR, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project, as it is not being proposed by the Project Applicant/Developer.[520] Indeed, the PCT realignment will be subject to a separate permitting and environmental review process prior to its implementation. However, construction of the trail within the 300th Street West right of way is considered a component of the Project development for purposes of this EIR.[521] Thus, the proposed PCT realignment, as depicted on Draft EIR Exhibit 4-10a, is assumed to be the future alignment through the Project site for evaluation purposes in the Draft EIR and is depicted on the Project's Recreation and Trails Plan.[522] Moreover, the Draft EIR analysis includes consideration of the Project's potential impacts on the PCT and its users.[523] The Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043) (AVAP EIR) also considered the environmental effects on the PCT associated with buildout of the Project site in accordance with the Antelope Valley Area Plan.[524]

As discussed in Section 4.0 of the proposed Specific Plan, tentative subdivision maps and tentative map process will be used to establish the precise location of land use designations and street locations, and all map applications must include a detailed site plan depicting the use, location, and size of all improvements included in the mapped area, including streets and trails.[525] It is anticipated that the full 300th Street West right-of-way, inclusive of the PCT and Project multi-purpose path alignments, will be offered for dedication to the County as part of future tentative map applications, subject to a PCT trail easement, license or comparable property interest in favor of the Forest Service and/or PCTA encumbering the PCT alignment depicted on such tentative maps.

This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.4-3:

Exhibit 5.14-1 shows the current alignment of the PCT. In response to this comment, the following text change has been made to the Draft EIR:

The third sentence in the fourth paragraph on page 5.14-13 of Section 5.14, Parks and Recreation, has been revised to state:

> Exhibit 5.14-1~~2~~ depicts the existing alignment of the PCT.

Any other references in the Draft EIR to the PCT being illustrated on Exhibit 5.14-2 are similarly revised to refer to Exhibit 5.14-1.

520 DRP 2017, p. 4-39
521 *Ibid.; Id.,* Exhibit 5.7-11b
522 *Id.,* Exhibit 4-10a
523 *Id.,* pp. 5.7-138; 5.8-73; 5.12-20; 5.13-1, -8, -10 to -30; 5.14-3, -8, -10 to -22; 5.21-77
524 DRP 2014a, pp. 3-2; 4-15; 5.15-6, -11 to -16; 5.16-5; *Id.,* Figure 5.15-1
525 DRP 2017. Appendix 4.0-A, pp. 4-7, -12

Response to Comment F.4-4:

Exhibit 5.14-1 shows the existing location of the PCT, and references to Exhibit 5.14-2 were in error. The following revision has been made to the third sentence in the third full paragraph on page 5.14-12:

> Exhibit 5.14-~~2~~1 depicts the existing alignment of the PCT.

Any other references in the Draft EIR to the PCT being illustrated on Exhibit 5.14-2 are similarly revised to refer to Exhibit 5.14-1.

Response to Comment F.4-5:

As discussed in response to Comment F.4-2, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project, as it is not being proposed by the Project Applicant/Developer.[526] Indeed, the PCT realignment will be subject to a separate permitting and environmental review process prior to its implementation. However, construction of the trail within the 300th Street West right of way is considered a component of the Project development for purposes of this EIR.[527] Thus, the proposed PCT realignment, as depicted on Draft EIR Exhibit 4-10a, is assumed to be the future alignment through the Project site for evaluation purposes in the Draft EIR and is depicted on the Project's Recreation and Trails Plan in order to help the public and County Decision makers understand the relationship between the proposed Project and the proposed PCT trail alignment through the Project site.[528] Exhibit 4.10a also depicts the PCT trail alignment as it extends north and south of the Project site to provide additional locational context. Since the PCT trail realignment project is a separate project that will be subject to a separate environmental review and permitting process, and since the trail realignment is not being proposed by the Project Applicant/Developer, the EIR is not required to depict the entire 38-mile trail realignment, the vast majority of which will occur outside of the Project site boundary.

The proposed PCT trail realignment is also discussed in Section 5.15 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.16 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035). Please see those documents for further information on this topic.

Response to Comment F.4-6:

This comment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. See responses to Comments F.4-4 through F.4-11. Thus, no further response is required. Please see response to Comment F.4-2.

526 *Id.,* p. 4-39
527 *Ibid.*; *Id.,* Exhibit 5.7--116
528 *Id.,* Exhibit 4-10a

Response to Comment F.4-7:

In response to this comment, the following text, which would not alter the visual impacts discussion or conclusion in the Draft EIR, has been added after the fourth sentence of the third paragraph on page 5.13-21 to read as follows:

> The conceptual realignment of this segment of the PCT has broad views of flat-lying areas developed with rural/agricultural and older suburban land uses. As the PCT comes out of the cover of the hills between Pine Canyon Road and SR 138, trail users will have views of the proposed residential development across SR 138. Closer to SR 138 and at the proposed public trail parking lot just outside the Project site, trail users will see the Business Park adjacent to and west of the PCT on the south side of SR 138 at the intersection of 300th Street West. The visual simulation in Exhibit 5.13-4 provides an example of the views of the Business Park located south of the SR-138.

Please see response to Comment F.4-2.

Response to Comment F.4-8:

This comment confirms that the conceptual trail underpass depicted on Figure 3-40 of the Appendix 4.0-A complies with the USFS minimum standard for an underpass with equestrian use. The request regarding the scale of the underpass is acknowledged and will be taken into consideration in the future design process. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

The PCT trail alignment is also discussed in Section 5.15 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and in Section 3.16 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035). Please consult those documents for additional information germane to this topic.

Response to Comment F.4-9:

The comment provides a summary of anticipated views on the PCT on 300th Street West and requests that Figure 3-39 in the Specific Plan be included as a typical cross section of the Pacific Crest Trail along 300th Street West. Figure 3.39 of the Specific Plan has been inserted into Section 5.13, Visual Resources, of the Draft EIR as Exhibit 5.13-6. New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR.

The suggested text, which would not alter the visual impacts discussion or conclusion in the Draft EIR, has been added after the fifth sentence of the third paragraph on page 5.13-21 to read as follows:

> Development on the eastern section of the site would present trail users with views of residential, commercial, and business park structures along 300th

> Street West for a distance of approximately 1½ miles. A proposed commercial site will be located on the northwest corner of SR 138 and 300th Street West, with the PCT running between the commercial use and 300th Street West. The PCT would proceed north in a setback area along the street that would include a wall between the trail and residential development, a paved bike path and landscaped area. Visible to the east of the future commercial site would be a community park and a school site. A typical cross section of the PCT is provided in Exhibit 5.13-6.

Response to Comment F.4-10:

In response to this comment, the following text, which would not alter the visual impacts discussion or conclusion in the Draft EIR, has been added prior to the fourth paragraph on page 5.13-21 to read as follows:

> The PCT and 300th Street West then pass through a privately-owned inholding within Centennial and then enter a second area of residential development, which extends to the east side of 300th Street West. Before the PCT reaches the SWP Aqueduct, on the west side of the PCT is another school and beyond that, a community park. As shown on Exhibit 4-14, the property for the WRF East is adjacent to 300th Street West, just south of the SWP Aqueduct. On the east side of 300th Street West, across from the school, is another small commercial site.

The potential odor impacts associated with the WRFE are analyzed in Draft EIR Section 5.11, *Air Quality*, page 5.11-76, which discloses that the most likely potential nuisance odors would be from industrial or utility sources, including the WRFE. The Draft EIR further discloses anaerobic microbial decomposition of material in the wastewater and solid waste stream could generate emissions of hydrogen sulfide, ammonia, and other odorous compounds. The Draft EIR concludes that the WRFE's potential to emit objectionable odors would be less than significant because, prior to construction and operation, the WRFE would be required to obtain construction and operation permits from the Antelope Valley Air Quality Management District (AVAQMD), including its regulations that prohibit off-site nuisance odors generated by any source. As explained on Draft EIR page 5.11-76, to mitigate odors from the WRFE, state-of-the art design and odor-control measures would be implemented where necessary to comply with AVAQMD permitting requirements. Examples of such technology include covering and/or enclosing odorous processes, applying negative air pressure with blowers, and installing odor-control devices such as biofilters, chemical scrubbers, or activated carbon filters. MM 19-5 requires the Project to provide the County with plans and specifications for the WRFE that have been prepared in compliance with Title 22 and WDR requirements and be confirmed in documentation submitted to the County prior to the issuance of building permits for Project development.

Regarding views of the WRFE, pages 4-59 through 4-61 of the Draft EIR discusses the Wastewater Service Plant, which states that the WRFs would be constructed of concrete and steel materials that would generally be at or below grade, with a few structures (e.g.,

administrative/lab facilities, secondary treatment digesters, sludge centrifuges, and filtration facilities) having maximum heights of approximately 30 to 40 feet. Security fencing, night lighting, and landscape screening, if needed, would be provided along the perimeter of the WRF East site. The WRF East site would consist of open ponds, equipment, sheds, and small buildings (as shown in the Conceptual layout in Figure 5 of Appendix 5.19-B), which would be similar to typical industrial and utility facilities. However, the fencing and screening around the WRF would obscure views of the facilities from trail users and other adjacent uses into the WRF.

In addition, noise from the WRFs would have to comply with the County's Noise Ordinance as required under MM 12-2 in Section 512, Noise, which would require the completion of an acoustical analysis for each proposed business park use, school, community use area, park and recreation area, transportation center, animal control facility, utility, commercial development, and manufacturing/industrial development to verify the facility has been properly designed to comply with the noise ordinance. The design features required to achieve the noise standard include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the sensitive receptors; noise barriers; building orientation relative to the sensitive receptor; sound-rated windows; and upgraded exterior wall and/or roof construction.

Response to Comment F.4-11:

This comment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see response to Comment F.4-2 regarding the Project Applicant's proposed dedication of an easement or similar mechanism to the Forest Service to accommodate PCT realignment on the Project site.

Please also see Section 5.15 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.16 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment F.4-12:

It is noted the Centennial Project accommodates a request from the PCTA made after Centennial Specific Plan preparation began, and as such it is assumed the PCTA was aware that a large master-planned community was proposed along a section of 300th Street West at the time the request to include space for the realigned PCT was made. Your comments are acknowledged, and as this comment does not address or question the content of the Draft EIR no further response is required. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment F.4-13:

The comment correctly states that a portion of the proposed Pacific Crest Trail (PCT) realignment overlaps Area 1 of the Mitigation Preserve. The proposed realignment will shift the PCT from its current location along the eastern boundary of Area 1 to a more southerly

position running from 300th street southward through the Mitigation Preserve then continuing southward. The Draft EIR shall be modified to include specific language indicating that the goals of the Mitigation Preserve and the Pacific Crest Trail are compatible, and that applicable mitigation measure minimizing impacts of trails shall specifically identify the PCT.

In response to this comment, the following text is hereby added immediately following the last full paragraph on Draft EIR page 5.7-136:

> The resources preserved in the reserve area, when supplemented by individual programs for special-status resources, would mitigate all significant impacts to biological resources on the Project site.
>
> The Mitigation Preserve contains existing uses such as trails and access roads, as well as the proposed realignment of the Pacific Crest Trail. The uses mentioned here are consistent with the goals of the mitigation preserve. MM 7-17 includes a public awareness program which includes signage denoting sensitive areas. These project requirements are expected to minimize disturbances associated with trail usage and human activity within and adjacent to the Mitigation Preserve.

Additionally, the following text is hereby added to MM 7-17 on Draft EIR page 5.7-193:

> This program shall include signs that identify the boundaries of ecologically sensitive areas (including the avoided special status plant populations described in MM 7-1); the use of temporary, wildlife-friendly fencing around sensitive areas that appear to be receiving a high level of disturbance until the disturbance is reversed; and promotion of public education and awareness of such areas. In addition to signage being located along the boundaries of the Mitigation Preserve, signage denoting the boundaries of ecologically sensitive areas and other pertinent information shall be included along the Pacific Crest Trail where it overlaps the Mitigation Preserve.

The proposed PCT trail realignment is also discussed in Section 5.15 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.16 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035). Please see those documents for further information on this topic.

Response to Comment F.4-14:

As this comment correctly notes, the 300th Street West alignment through the Project site is bisected by inholding property that is not a part of the Project site and is owned by a third party (Inholding Property), as shown on Draft EIR Exhibit 4-7, Centennial Project – Circulation Plan. As discussed in response to Comment F.4-2, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project,

as it is not being proposed by the Project Applicant/Developer.[529] However, construction of the trail within the site's 300th Street West right of way is considered a component of the Project development for purposes of this EIR and the 300th Street West alignment through the Project site was included in the Project impact area assumed by the EIR.[530]

In February 2007, the owner of the "inholding area" described in this comment granted to the Project Applicant/Developer an easement encumbering a portion of inholding area adjacent to 300th Street West for the purpose of constructing, repairing, maintaining a pedestrian and equestrian trail for the use and enjoyment of the general public, which easement was recorded in the Official Records of Recorder's Office of Los Angeles County as document number 20070330445 (Inholding Trail Easement). The Inholding Trail Easement expressly provides that it may be conveyed by the Project Applicant/Developer to the Forest Service and shall become part of the PCT. It is anticipated that the Project Applicant will convey the Inholding Trail Easement to the Forest Service in conjunction with its conveyance of the PCT trail easement within the Project site in accordance with the ongoing discussions between the Project Applicant/Developer and the Forest Service discussed in response to Comment F.4-2.

As discussed in response to Comment F.4-2, tentative subdivision maps and tentative map process will be used to establish the precise location of land use designations and street locations, and all map applications must include a detailed site plan depicting the use, location, and size of all improvements included in the mapped area, including streets and trails.[531] A typical cross-section of the PCT along 300th Street West showing proposed improvements is depicted on Figure 3-39 of the proposed Specific Plan.[532] As shown on Specific Plan Figure 3-39, the PCT alignment along 300th Street West would be separated from the street by a landscaped Project multi-purpose path that would accommodate pedestrians and bicyclists in order to avoid conflicts with hiking and equestrian uses on the PCT alignment.

Response to Comment F.4-15:

This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Although this comment does not raise any specific concerns regarding the eastern water reclamation facility's (WRFE's) proposed on-site location in relation to the location of the off-site California Aqueduct, as explained on Draft EIR page 5.19-12, the WRFE and related conveyance pipelines, pump stations, and seasonal storage ponds would be located entirely within the Project site. No wastewater discharges, including recycled water use, will occur off-site and, therefore, operation of the WRFE would not involve any off-site impacts. Moreover, as explained on Draft EIR page 5.19-4, the planning, design, construction and operation of all wastewater reclamation facilities are regulated under the provisions of Title 22 of the California Code of Regulations to ensure that applicable water quality objectives and standards are not exceeded. The Lahontan Regional

529 DRP 2017, p. 4-19
530 *Id.,* Exhibit 5.7-11b
531 *Id.,* Appendix 4.0-A, pp. 4-7, -12
532 *Id.,* Appendix 4.0-A, pp. 3-90, -91

Water Quality Control board would issue Waste Discharge Requirements to the WRFE prior to commencing operations.

Response to Comment F.4-16:

As shown on Draft EIR Exhibit 4-10a, Centennial Project – Centennial Recreation and Trails Plan, the PCT alignment through the Project site will connect with the Project's network of Community Trails and Regional Trails, which will be accessible by the public. As shown on the Trails Plan, the Project's trail system will link to regional, community and neighborhood parks that will be developed by the Project. As shown on Exhibit 4-10a, there are multiple Project parks proposed within close proximity to the PCT and they will be improved potable water facilities, shade structures and other amenities, as depicted on Draft EIR Appendix 4.0-A, Figures 3-34 through 3-36. Accordingly, it is anticipated that PCT users will have meaningful access to water and shade when traversing the Project site, as recommended by this comment.

Response to Comment F.4-17:

This concluding comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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STATE OF CALIFORNIA–THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., Governor

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July 17, 2017

Centennial Project Draft Environmental Impact Report Comments
County Project No. 02-232 --- SCH No. 2004031072

Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, California 90012

Dear Mr. Sackett:

The Santa Monica Mountains Conservancy commented on the subject project in 2004 (attached) and incorporates those comments by reference in this letter. Since those 2004 comments, the project has not been demonstrably modified to avoid or minimize direct regionally significant impacts to the ecological sustainability of Southern California ecosystems located south of Highway 138 and east of Interstate 5. F.5-1

Failure to Analyze North-South Habitat Linkage Across Highway 138

In fact, the proposed project, and all of its Draft Environmental Impact Report (DEIR) development alternatives, would sever the most optimal five-mile-wide habitat linkage across Highway 138 between I5 and State Route 14. The DEIR is massively flawed for totally failing to analyze the project's potential impacts on habitat connectivity from the Tehachapi Mountains south (across Highway 138) into the portion of the Angeles National Forest located just east of I5. Habitat connectivity into this portion of the National Forest is vital for wildlife to connect to the Castaic Creek and Soledad Canyon areas that cross into the Rim of the Valley Trail Corridor Zone. F.5-2

The DEIR is deficient for not comparing how Metro and Caltrans have or have not provided Highway 138 under or over-crossings in the Northwest 138 Corridor Improvement Project EIS/EIR where the proposed project straddles the highway. The DEIR is further deficient for not analyzing how the proposed project, and all of its DEIR alternative projects, would eliminate virtually all wildlife movement across Highway 138 within the project boundary. Not even the slightest contiguous band of habitat or open land is proposed from the northern project area to Highway 138 or the proposed project open space south of Highway 138. Even DEIR Alternative E: Density Clustering/East of F.5-3

Aqueduct totally eliminates any wildlife movement potential across Highway 138 because west of the Aqueduct there is no north-south movement permeability. F.5-3 cont.

The approximately five-mile-wide section of Highway 138 overlapped by the project has prime wildlife crossing conditions compared to any section of the highway between I5 and the State Route 14. In all cases wildlife must find a way over the aqueduct. The attached figure shows how wildlife can cross the aqueduct on multiple, wide earth-covered bridges from the core habitat of the Tehachapi Mountains into the multi-thousand-acre portion of the project area located east of the west branch of the aqueduct that serves Quail Lake. These overcrossings are in remote areas free from traffic particularly at night. The aqueduct overcrossings between the project area and State Route 14 are generally narrow (less wildlife friendly) two-lane roads that are part of the public road network. The DEIR analysis fails to address the constraints of the California aqueduct components on north-south habitat connectivity between I5 and State Route 14. F.5-4

Other than the project area, there is no location along Highway 138 between I5 and State Route 14 where wildlife can cross from core habitat to core habitat without having to cross an additional paved road or encounter existing development. The DEIR is inadequate for not addressing the uniqueness of the project site for unimpeded wildlife movement across Highway 138. It is further deficient for not addressing the long term biological implications of permanently eliminating the only Tehachapi Mountains core habitat to core habitat connection for the soon to be created habitat island bound by Highway 138, State Route 14, and I5. The proposed project and all of its DEIR alternatives would sever this connection regardless of whether or not the Northwest 138 Corridor Improvement Project is constructed all or in part. The EIS/EIR for that said project is clearly inadequate for addressing and mitigating new wildlife movement barriers across Highway 138. The subject DEIR cannot hide behind the EIS/EIR process because the draft EIS/EIR was circulated many months ago and the Final EIS/EIR is now in circulation. F.5-5

The other factors that make the subject project section of Highway 138 prime for a north-south wildlife crossing zone is that development and road density increase dramatically from that section eastward to State Route 14. There are additional paved roads and small ranches at a minimum in every area. The odds of those areas facing increased development (creating more animal movement barriers) are higher over time than in the project area. F.5-6

The DEIR makes no attempt and flatly refuses to consider impact avoidance to maintain habitat connectivity from the Tehachapi Mountains through the project site and across F.5-7

Highway 138 to the Angeles National Forest. To maintain that connectivity it is imperative to have wide contiguous strip of open land in the main project area (but wholly east of the west aqueduct branch) that connects to at least two of the earth-covered aqueduct overcrossings and to Highway 138. The attached figure shows a conceptual permanent habitat linkage that could mitigate the above-described impact which must be considered an unmitigated significant impact for the proposed project and all of the development alternatives. Ideally such a north-south habitat linkage would tie in with a planned under or overcrossing on the proposed six-lane section of Highway 138. Even if it does not tie in, such a habitat linkage must be required in the project design and future efforts can lead to the construction of a dedicated animal over pass over Highway 138. Good and responsible planning efforts would have Los Angeles County, Metro, and Caltrans devising a solution for this issue starting today. F.5-7 cont.

The core project area is littered with USGS blueline streams and USGS distinct springs. The DEIR states that American badger and Pronghorn antelope have been identified in the project area east of the aqueduct. Surely black bears, mule deer, foxes, bobcats, long-tailed weasels, and mountain lions commonly use the main development area. F.5-8

The DEIR concludes that there is no need to consider any less ecologically damaging development alternative than Alternative E: Density Clustering/East of Aqueduct because any less of a project scale would be in conflict with Antelope Valley Area Plan (AVAP). The premise of that conclusion is that Alternative E (as well as C and D) would not achieve enough housing and employment levels anticipated in the AVAP and growth projections. The County is not required to max out the AVAP limits and "growth projections" are vague. F.5-9

The DEIR is deficient for rigidly using a flexible planning document to dictate that no substantial biological impact avoidance should even be attempted. Alternatives C and D provide window dressing at best as far as meaningful habitat impact avoidance. The proposed project all of its development alternatives do not benefit the public of Los Angeles County and in many ways would cause permanent irreparable environmental harm. F.5-10

The Conservancy questions how the County Board of Supervisors can consider a Statement of Overriding Considerations to approve a project so detrimental to the greater public and the County's environment. The DEIR is deficient for not including the least damaging alternative that it can conclude achieves enough housing and employment levels anticipated in the AVAP and growth projections. That threshold otherwise remains arbitrary. The same argument can be made for the DEIR dismissal of all less damaging alternatives that are "not consistent with the goals and policies of the F.5-11

AVAP within the West EOA or are supportive of the project objectives. The dismissal is arbitrary without addressing a quantitative threshold of what minimum size and shape project would be consistent. The DEIR is further deficient and arbitrary for not providing any quantitative or government regulation back-up in its conclusion that in regards to the Public Input Alternative (develops 4,990 acres), that the project area does not include enough acres to include both the land uses and onsite natural open space areas. What is that based on? F.5-11 cont.

The DEIR is deficient for categorically dismissing the avoidance or substantially lessening of biological (and visual) impacts because of need for housing and employment for 57,000 people on the San Andreas fault, in core habitat, with no public transit connection, along a scenic highway miles from any services. The project turns SMART growth on its head. F.5-12

The DEIR must be re-circulated with at least one alternative that maintains a contiguous habitat linkage from project-adjacent aqueduct overcrossings to Highway 138 and to open space south of the highway, or it shall be deficient in presenting an adequate range of alternatives to decision makers. Such an alternative can meet every Project Objective hands down. F.5-13

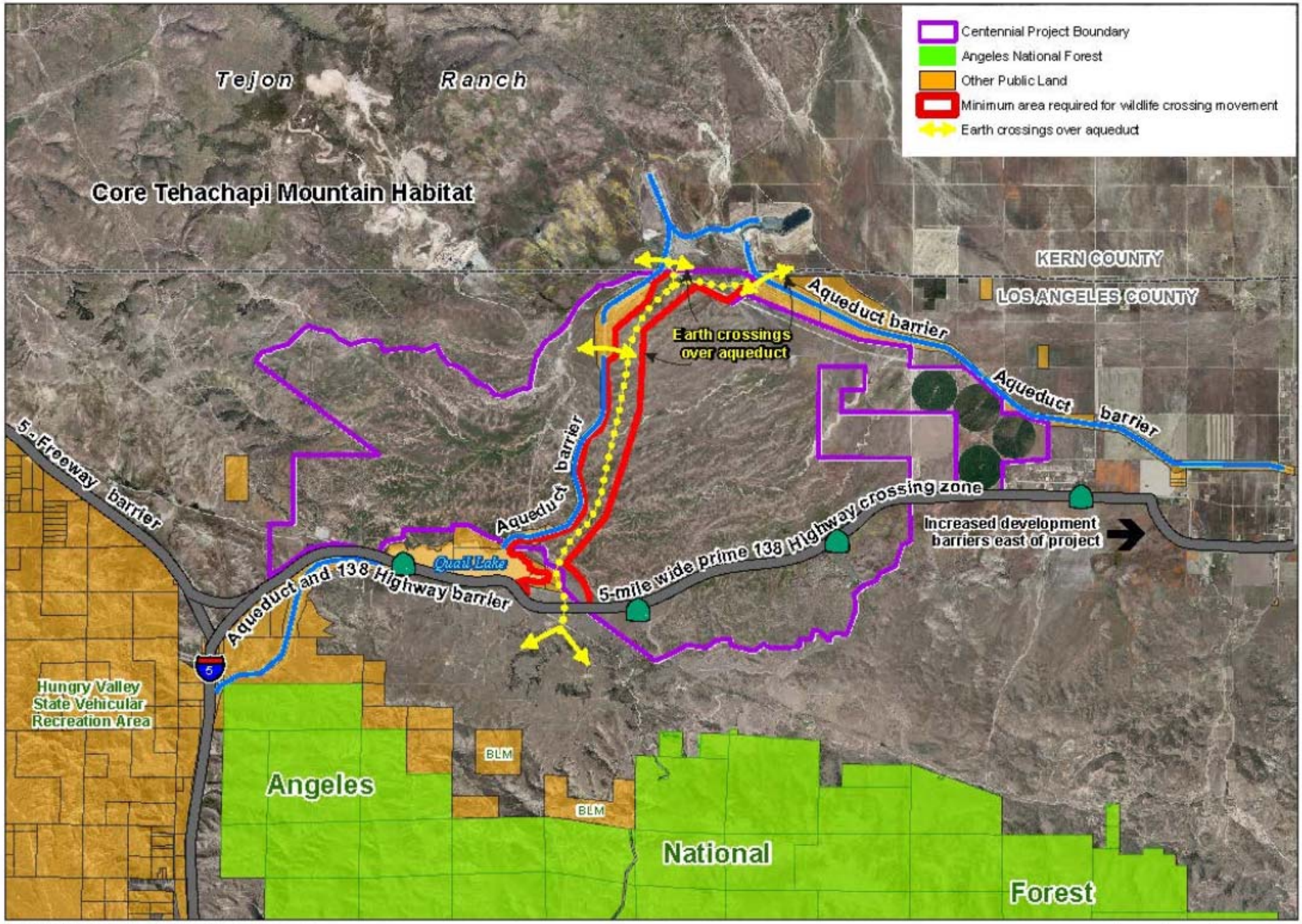
The proposed project would cause irreparable public and environmental harm in Los Angeles County but the project makes no provision for public access to thousands of acres of proposed open space that is greatly found in Kern County. The DEIR is deficient for not including mechanisms for public access to land proposed to be protected to specifically mitigate dozens of permanent significant impacts to numerous public resources. In the case of the hunt club at the southern end of the project, the DEIR calls for the protection of private land for exclusive private use to mitigate irreparable permanent impacts to public resources. F.5-14

Please feel free to contact me with any questions at 310-589-3200, ext. 128, or by e-mail at edelman@smmc.ca.gov. You may also send correspondence to me at the above letterhead address. Thank you for your consideration. F.5-15

Sincerely,



PAUL EDELMAN
Deputy Director
Natural Resources and Planning



Santa Monica Mountains Conservancy
Centennial Project Draft Environmental Impact Report Comments
County Project No. 02-232 -- SCH No. 2004031072

July 18th, 2017

STATE OF CALIFORNIA–THE RESOURCES AGENCY ARNOLD SCHWARZENEGGER, *Governor*

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April 26, 2004

Dr. Daryl Koutnik
County of Los Angeles
Department of Regional Planning
Impact Analysis Section, Room 1348
320 West Temple Street
Los Angeles, California 90012

Notice of Preparation Centennial Specific Plan
Project No. 02-232, SCH No: 2004031072

Dear Dr. Koutnik:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Centennial Specific Plan. The Conservancy is concerned with the direct relationship of the project site to the ecological sustainability of the major Southern California bioregion including the maintenance of regional habitat linkages. As part of the Conservancy's mission, the Conservancy strives to preserve, protect, and restore an interlinking system of wildlife habitats in Southern California through direct action, alliances, partnerships, and joint powers authorities. The Conservancy is actively involved in protecting key habitat linkages in and between such areas as the San Gabriel Mountains, Los Padres National Forest, Angeles National Forest, Santa Susana Mountains, Simi Hills, Verdugo Mountains, and Santa Monica Mountains. The Conservancy emphasizes that if major habitat linkages and wildlife hubs, such as those found on and in the vicinity of the project site, are not adequately preserved, then the functionality of the other key habitat linkages will be lost.

F.5-16

Adverse environmental impacts of Statewide significance, specifically to biological resources, would result from implementation of the proposed project. The DEIR must include a comprehensive and regional analysis of impacts to environmental resources, specifically biological resources, and an adequate analysis of less damaging project alternatives. A major fee simple dedication of open space land must be a requirement of any approved project.

The proposed project includes a Specific Plan with a maximum of 23,000 dwelling units and 14 million total square feet of non-residential development to be built over 20 years. This

includes subdivision entitlements, including General Plan and zoning amendments, tract maps, and conditional use permits. The NOP states that of the approximately 12,000-acre project site, about 4,961 acres of the project would be open space, and of that, 3,829 acres would remain as Natural Open Space. The NOP states that it is assumed that the project will develop generally from the west to east. The California Aqueduct runs through roughly the center of the site. The NOP states that portions of two Significant Ecological Areas (SEAs) occur on the project site. Based on a preliminary staff analysis, it appears that almost the entire project lies within the San Andreas Rift Zone SEA, proposed as part of the County's General Plan Update. The project overlays, or is in close vicinity to, several Missing Linkages, as identified by the South Coast Wildlands Project (SCWP 2000, 2003).

The proposed development would adversely impact habitat linkages as identified by the South Coast Wildlands Project. To avoid such impacts, substantially more acres of open space must be preserved by this project, and they must be situated in an ecologically sustainable configuration. Also, Figure 4 shows that the development would surround, and thus smother, many of the existing streams onsite. While this may facilitate the permitting process for the project proponent, this approach will severely compromise the ecological viability of these drainages as a result of direct and indirect impacts (e.g., fuel modification, lighting, change in quality and quantity of runoff, substantially increased human access). (Also, as animals often travel along drainages, this approach can funnel them into the developed areas , rendering them more vulnerable to additional risks.) Although the NOP (p. 20) states that about 33 percent of the total site would remain as Natural Open Space, the proposed configuration (as shown on Figure 4), would severely diminish the ecological values of that proposed remnant open space.

F.5-16 cont.

Regional and comprehensive approach to analysis of impacts, including cumulative impacts

There are several areas on the larger approximately 270,000 Tejon Ranch either already developed or anticipated to be developed. These include, but are not limited to, the Tejon Industrial Project and the Mountain Village Project. The only appropriate approach for planning would be a comprehensive approach for the entire ranch. This means that all of the development projects for Tejon Ranch must be addressed in one California Environmental Quality Act (CEQA) document. A comprehensive approach would lead to a more effective design of areas to protect as natural open space. Obtaining permits and environmental approvals for each project separately results in piece-mealing of the analysis of environmental impacts and this makes it more difficult for the public to comprehend the overall impacts from all of these developments. The Conservancy underscores the

importance of including future, planned projects for Tejon Ranch in a single CEQA document. If the Tejon Ranch representatives withhold information regarding proposed projects for the ranch, this is clearly contrary to the spirit and intent of CEQA.

If the project applicant and County decide not to take a comprehensive approach to planning for the ranch, the DEIR must address the rationale for not analyzing all these developments on Tejon Ranch in one CEQA document. If this approach is taken, at the very least, the CEQA document for the Centennial Specific Plan must include these other projects on Tejon Ranch (both on Los Angeles County and Kern County) in the cumulative impacts section. This analysis must include future, planned projects for Tejon Ranch.[1] The Conservancy emphasizes that this comprehensive cumulative impacts analysis must specifically address impacts to biological resources, including wildlife movement.

The NOP (p. 7) states that the project will include construction of excess infrastructure capacity (i.e., to meet needs for existing unmet demands or to provide excess capacity for future demands beyond those demands of the project itself). These utilities clearly meet the definition of growth-inducing. These additional projects are expected and their impacts must be analyzed thoroughly in the subject DEIR. The DEIR must include figures showing expected project footprints of these future projects. The DEIR will be inadequate if it only addresses the direct impacts of installing the subject utilities without addressing the environmental impacts from expected future development associated with those utilities.[2]

F.5-16 cont.

Any analysis of environmental impacts, specifically impacts to biological resources, must include a regional perspective. The approximately 270,000-acre Tejon Ranch plays a significant role in connecting the Los Padres National Forest, Angeles National Forest, and

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[1]The CEQA guidelines (Section 15355) state that the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects [underlining added for emphasis).

[2]Section 15126.2(d) of the CEQA guidelines state that evaluating impacts includes discussing the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Also included in this discussion is the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

the Sequoia National Forest. The analysis of impacts to biological resources, including to wildlife movement, must not only address impacts to wildlife movement on the project site, but how this project will affect wildlife movement from both Statewide and regional perspectives.

Other impacts to biological resources

The DEIR should address impacts to habitat linkages as discussed in the South Coast Wildlands Project reports (SCWP 2000, 2003). The DEIR must include a color aerial showing the project footprint, proposed open space, and adjacent protected open space, and it must address how these habitat linkages will be sustained. The document must also clearly show which adjacent parcels are also owned by Tejon Ranch, or any related business subsidiaries. This analysis should address the full suite of species utilizing those linkages, their life history requirements, and how the project will protect those species. The impact analysis must address impacts including, but limited to, lighting, increased domestic pets, and increased roadkill (of mammals, reptiles, amphibians, and birds). Project modifications and mitigation measures must effectively reduce any significant adverse biological impacts to a less than significant level.

The DEIR should analyze impacts to biological resources in the context of the Conservation Assessment of Tejon Ranch (Conservation Biology Institute, 2003). That study assessed conservation values of the larger Tejon Ranch (including the Centennial Specific Plan project site) with respect to habitat connectivity; listed and endemic species; watershed integrity; unique, diverse, and under-conserved vegetation communities, and roadless areas. The DEIR should address impacts to these biological values.

The DEIR must address how the project will preserve the ecological values of the existing SEAs and proposed SEAs over which the project overlaps.

The DEIR must include at least one figure depicting vegetation communities overlain on the proposed project. The "proposed project" on this figure must include all project elements with measurable biological impacts, including project footprint, roads, fuel modification areas, utilities, etc.

The DEIR must include tables with acres for all vegetation communities to be impacted and preserved. Open space to be preserved must have a separate classification for "Natural, Contiguous Open Space." The classification of Natural Open Space in the NOP is deficient because the approximately 3,829 acres of "Natural Open Space" includes "open space"

F.5-16 cont.

which is almost entirely surrounded by development. These isolated open space areas will significantly diminish in ecological value and should be considered in a separate category separate from "Natural, Contiguous Open Space." The following should not be included in the "Natural, Contiguous Open Space" category: isolated open space, lawns, manicured greenways, fuel modification zones, roads, lakes, and aqueduct. It is critical, particularly because of the project size and the presence of valuable biological resources on the site, that the acres of natural open space be accurately presented in the DEIR.

Environmentally superior project alternatives

Given the magnitude and complexity of the subject property, the DEIR must include several alternatives that substantially reduce the level of impacts to environmental resources, particularly to biological resources. The Conservancy emphasizes that for this alternatives analysis to be meaningful, at least four alternatives must result in substantially fewer environmental impacts, including fewer impacts to biological resources. This means that for at least four alternatives, the impact footprint must be substantially less.

The DEIR should include one project alternative that is consistent with the existing zoning, General Plan (including the Antelope Valley Areawide General Plan designation and the Hazards and Resources Map), and Highway Master Plan. The alternative should include only one golf course (compared to two golf courses in the proposed project), and the acres designated for the one golf course that are deleted should be counted towards undisturbed open space. (The Conservancy is concerned with adverse environmental impacts associated with golf courses [e.g., extent of land needed, water needs, changes in quality of runoff, etc.], and there appears no adequate justification to support two golf courses.)

Another alternative should be presented in the DEIR that mimics the following proposed footprint. If significant biological resources are present within this proposed development footprint (which have not yet been disclosed in the NOP), then a slightly different alternative should be analyzed in the DEIR that results in no greater environmental impacts than those resulting from this proposed alternative. This alternative would limit the development footprint to the northeast portion of the project site, east of the California Aqueduct, and north of State Route (SR)-138. The development footprint of this alternative would be limited to the following Planning Areas, as identified in Figure 4: 23-28, 30-32, and 35. The aqueduct is an appropriate demarcation for the project development footprint (i.e., by limiting the project to the east of the aqueduct).

F.5-16 cont.

This above-described alternative would result in significantly fewer biological and aesthetic impacts. This alternative would avoid many direct impacts to existing SEAs (on the south side of SR-138, and western portion of the project site). It would provide a greater likelihood of protecting the "Tehachapi Connection linkage" (identified by the South Coast Wildlands Project) on the west side of the project site. It would protect the integrity of substantially more streams. The rich biological resources and blue line streams east of the aqueduct would be protected. The rich biological resources south of SR-138 would be retained, and many blue line streams located north and south of SR-138 would be preserved. The key viewshed as seen to the north and south of SR-138 would be better preserved. It appears that this proposed development footprint would be located primarily within annual grasslands.

All alternatives must include the construction or funding of underpasses beneath SR-138.

Dedication and management of open space

The DEIR must include for the proposed project, and every alternative, the requirement of a major fee simple dedication of ungraded open space to an appropriate public entity capable of managing open space for resource protection and recreational use, to guarantee that the biological resources in the dedication areas are not adversely affected in the future. The Mountains Recreation and Conservation Authority (MRCA) is one appropriate agency to accept this dedication. In all cases, a CEQA mitigation measure must require that every acre of the open space dedication remain as natural open space in perpetuity, to prevent future land use changes for active park uses. To ensure adequate protection of any fee title dedication, a mitigation measure must specify that fee title shall be legally transferred to such agency prior to vegetation clearing or grading on the site. Figures in the DEIR must clearly depict the location of this dedication of open space.

F.5-16 cont.

The DEIR must include for the proposed project, and all alternatives, a requirement for a Community Facilities District (CFD), Landscape Maintenance District, or sufficient funds from the developer (e.g., in the form of a non-wasting endowment), to permanently fund maintenance of the open space. Open space dedications are a form of mitigation. For such mitigation to stand the test of time, it must be protected and in some cases actively managed. A complete open space mitigation package must include maintenance funding. The proposed project and every CEQA alternative must require that the funding mechanism be established prior to grading or vegetation removal.

If the project is phased, it may be appropriate to require portions of the fee simple dedication and the establishment of a proportional amount of the endowment, for example, prior to grading or vegetation removal for each respective phases. Likewise, a series of CFDs may be required. The DEIR must present the phasing plan for these mitigation measures. If later phases of project are delayed, at least the initial dedication must be able to stand-alone as an ecologically-viable sub-unit that is adjacent to other open space.

F.5-16 cont.

Thank you for your serious consideration of these comments. Please direct any questions or future correspondence to Paul Edelman of our staff at (310) 589-3200 ext. 128 or Judi Tamasi at (310) 589-3200 ext. 121, or to the address listed on the letterhead.

Sincerely,

Jerome C. Daniel

JEROME C. DANIEL
Chairperson

Literature cited

Conservation Biology Institute. 2003. Conservation Assessment of Tejon Ranch.

South Coast Wildlands Project (SCWP). 2000. Proceedings from Missing Linkages: Restoring Connectivity to the California Landscape conference in San Diego, California. November 2.

South Coast Wildlands Project (SCWP). 2003. South Coast Missing Linkages Project-A Linkage Design for the Tehachapi Connection. September.

Responses to Comment Letter F.5
Santa Monica Mountains Conservancy
July 17, 2017

Response to Comment F.5-1:

Thank you for your comment and for your participation in this public process. The comments on the NOP are addressed in response to Comment F.5-16.

Response to Comment F.5-2:

Numerous studies on wildlife movement[533] have been conducted on the Project site as well as throughout the Project region, and were used to inform the wildlife movement discussions in Sections 5.7.3, Environmental Setting, and Section 5.7.6, Environmental Impacts.[534] Studies on wildlife movement in the Project region have generally shown the Project area as a whole to be largely outside the critical regional corridor linking the Sierra Nevada-Cascade Cordillera with the Sierra Madre-Transverse-Peninsular Range Cordillera. Although the Tehachapi Linkage area, which represents the connection between these two mountain systems, occurs just to the west of the Project, the Project lands have generally not been included as part of this regional corridor. The primary resources in SEA 17, which surrounds the Project to the west and south and will remain unimpacted by the Project, are wildlife movement and the mosaic of associated habitats.[535] Additionally, as described on Draft EIR pages 5.7-62 and 5.7-63, two regional conservation plans will assist in sustaining the functionality of the regional landscape linkage for future wildlife populations. These plans offer elements for long-term sustainability and management of a Tehachapi Mountains landscape linkage: the Tejon Ranch Conservation and Land Use Agreement and the Tehachapi Upland Multiple Species Habitat Conservation Plan. Please see Linkage Analysis for the Southernmost Portion of the Linkage from Sierra Madre to Sierra Nevada and Draft Interim Wildlife Movement Corridor Assessment, Centennial Project Site, Tejon Ranch in Draft EIR Appendix 5.7-B for more details and graphics. Also see the following responses to Comments for additional discussion of wildlife movement: F.3-24, F.3-25, F.3A-32, F.3A-33, F.3A-34, B.4-56, B.4-57, F.5-2, F.8-168, F.7-22, F.3A-34, F.3A-32, and F.3A-33.

Response to Comment F.5-3:

Please see response to Comment F.5-2.

There is no requirement or standard of practice under CEQA for comparison of components amongst EIRs and/or EISs prepared by either the same, or, as in this case, different lead agencies. It would be permissible for the County of Los Angeles to have provided comment on Caltrans' EIR/EIS for the Northwest 138 Corridor Improvement Project during its public

533 DRP 2017, Table 5.7-2
534 *Id.,* Table 5.7-2; Beier 2003; Penrod et al. 2003, 2004, and 2005; Pioneer Environmental Services 2004; Trust for Public Lands 2004
535 DRP 2017, p. 5.7-8

review period. As such, the assertion that the Draft EIR is deficient for not including this comparison is erroneous.

Regardless, the Draft EIR addresses wildlife movement extensively in Section 5.7, Biological Resources, and Section 8.0, Alternatives, where wildlife movement is a relevant comparative issue for an alternative. It is noted that the majority of the Project site only abuts SR-138, with solely the southeastern portion of the site including areas both to the north and south of the roadway. State CEQA Guidelines require the Project Draft EIR to assess potential impacts to wildlife movement. Consistent with this requirement, in the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains, from a biological perspective, was considered. The assessment, which used various scientific studies, concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions.

However, in order to lessen Project impacts on wildlife movement, mitigation measures are proposed. Specifically, MM 7-14, described on pages 5.7-190 and 5.7-191, designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) at the current intersection of the California Aqueduct and Cement Plant Road. The width of the underpass shall be 100 feet and shall flare out on both sides of the highway to a 150-foot width in the Project open space adjacent to the highway. These specifications are expected to allow some local wildlife to safely pass between open space areas on opposite sides of the highway. The passage is intended for local wildlife usage within the area and infrequent regional movement that may traverse from areas northwest of the Project site to areas south of the Project site. In addition, the additional underpass to be constructed under SR-138 further to the east is expected to provide some local movement for animals within the Project area. This undercrossing is consistent with the Antelope Valley Area Plan, and both undercrossings provide for connectivity for local wildlife movement across SR-138. As such, the assertion that the Project, and its alternatives, eliminates any wildlife movement potential across SR-138 is erroneous.

Response to Comment F.5-4:

Although the earthen crossings depicted in the comment letter may be used by wildlife to some degree, it is expected that because most wildlife species prefer some amount of vegetative cover as a source of shelter. The riparian habitat along Oso Canyon and its tributaries, as well as the oak woodland communities that occur in the western portion of the Project site and further to the west of the site, are expected to support more regional wildlife movement as described in detail in the Draft EIR from page 5.7-50 to 5.7-62. Indicator species are not likely to frequently use the earthen crossings depicted in order to move eastward, where the habitat is mostly grassland with few trees or tall shrubs. Those species moving from the Tehachapi's southward, are most likely intersecting with the SR-138 west of the Aqueduct, at which point the Aqueduct runs underground—a crossing that will not be impacted by the Project. The Commenter's statement that the Project overlaps prime crossing areas along the SR-138 is not consistent with the most current and widely accepted literature regarding this linkage zone: *Linkage Analysis for the Southernmost*

Portion of the Linkage from Sierra Madre to Sierra Nevada (please see Appendix 5.7-B for details and graphics). As described in the Draft EIR, this study clearly identifies the critical regional linkage to the west of the Project site (see Exhibit 5.7-6 on page 5.7-56 of the Draft EIR). Please also see responses to Comments F.3-24, F.3-25, F.3A-32, F.3A-33, F.3A-34, B.4-56, B.4-57, F.5-2, F.8-168, F.7-22, F.3A-34, F.3A-32, F.3A-33, B.4-34, B.4-35, B.4-36, B.4--37, F.8-165, F.8-165A, F.8-166, and F.8-167 for additional discussion of wildlife movement, crossings, and pronghorn.

Response to Comment F.5-5:

The comment states that the Draft EIR fails to address the wildlife movement unique to the Project site, and that the Project will permanently eliminate the only linkage from Tehachapi Mountain core habitat to core habitat. The claim made in the comment that the Project will permanently eliminate the only Tehachapi Mountains core habitat to core habitat connection is unfounded. The wildlife movement studies conducted in the Project region[536] do not support the notion that the Project site is situated within a crucial wildlife movement corridor. Local movement is mostly retained through the open space corridors scattered throughout the site, and regional wildlife movement largely occurs, based on the literature, west of the Project site.[537] The Project site itself does not represent high quality long-range movement habitat due to the existing California Aqueduct barrier and the overall lack of cover. Wildlife are not drawn to the Project site as it generally lacks attractive resources, topography, and cover.[538] Wildlife movement occurring from the Tehachapi Mountains to the San Gabriel Mountains south of the Project is much more likely to cross west of the Project site.

Response to Comment F.5-6:

According to the Antelope Valley Plan, the community of Neenach to the east of the Project site has been designated as Rural Land 5, with a maximum density of 1 residential unit for each 5 gross acres of land. This designation is intended to reflect the existing density of the rural town areas and is not intended to promote further land divisions. The claim that road density increases dramatically east of the Project is an overemphasis of the actual conditions. These areas will not likely experience increased development over time based on the land designations. As stated in the response to Comment F.5-5, the Project site itself does not represent high quality long-range movement habitat due to the existing California Aqueduct barrier, and the overall lack of cover.[539] Furthermore, it should be noted that the cumulative impacts on wildlife movement are considered potentially significant as discussed in Draft EIR Section 7.0, Cumulative Impacts.

Response to Comment F.5-7:

The Commenter states that the Draft EIR fails to consider impact avoidance to maintain habitat connectivity from the Tehachapi Mountains through the Project site and across the

536 DRP 2017. Table 5.7-2; *Id.,* pp. 5.7-23, -55, -56
537 *Id.,* pp. 5.7-56 to -64, -164 to -166
538 *Id.,* pp. 5.7-63, -64
539 *Ibid.*

SR-138 to the Angeles National Forest. The Project design has been dramatically reduced over time. The impact area in the west is significantly smaller than previously proposed. In redesigning the Project design west of the California Aqueduct, the intention was to lessen impacts on regional wildlife movement. The current impact footprint avoids the most high-quality wildlife movement corridor habitat. Wildlife is most likely to pass from the Tehachapi Mountains in the north to the Angeles National Forest in the south (and vice versa) west of the California Aqueduct, where the habitat provides greater cover.[540]

Additionally, the Commenter states that the earthen crossing over the California Aqueduct north of the Project is considered an important factor for a north-south linkage from the Tehachapi Mountains in the north, through the Project site, southward to the Angeles National Forest (and vice versa). As stated in the Draft EIR, "wildlife that cross the Aqueduct at this location would have to traverse open areas to reach the crossing from the north or east, then traverse over three miles of relatively open grassland and cross SR-138 to reach cover provided by woodlands south of SR-138. As a result, this crossing is likely to provide occasional wildlife movement opportunities for a subset of species of the region typical of grassland dominated landscapes similar to the project site". To summarize, the Project area does not represent an important habitat linkage for wildlife looking to move from the Tehachapi Mountains to the San Gabriel Mountains as it consists of a wholly different habitat type and generally lacks sufficient cover. The Draft EIR thoroughly analyzes potential Project impacts to wildlife movement (see Draft EIR Section 5.7.3, Environmental Setting, and Section 5.7.6, Environmental Impacts). The conclusion that Project impacts to wildlife movement are considered not potentially significant per State CEQA Guidelines is founded on various wildlife movement studies conducted on the Project site and in the Project region. Although impacts on local wildlife movement are considered less than significant and no mitigation is required, MM 7-14 is proposed to reduce impacts on local wildlife movement and to provide for habitat connectivity in the Quail Lake area.[541] Implementation of MMs 13-2 and 13-6 from Section 5.13, Visual Resources, which require the Project Applicant to develop a Lighting Plan to reduce potential impacts to biological resources caused by light and glare, would also reduce the level of the impact.[542] Implementation of MM 7-17 is also expected to further reduce impacts by requiring a public awareness program to restrict public access to the riparian and open space areas.[543] It should also be noted that the cumulative impacts on wildlife movement are considered potentially significant as discussed in Section 7.0 of the Draft EIR.

Response to Comment F.5-8:

The vast majority of the blueline streams on the Project site are ephemeral in nature and only contain water for a few days following a large storm.[544] There are ponded areas that hold water most of the year, and only drying up in the middle of summer, such as stock/cattle ponds but they are few and very small.[545] The Project site contains water troughs for cattle,

540 *Id.,* p. 5.7-57
541 *Id.,* p. 5.7-166
542 *Id.,* p. 5.7-167
543 *Id.,* pp. 5.7-192, -193
544 *Id.,* pp. 5.7-11, -48
545 *Id.*, pp. 5.7-10, -21, -39, -130

although most of them are placed out in the open as shown in Exhibit 5.7-17. The species mentioned in the comment (i.e. black bears, mule deer, foxes, bobcats, long-tailed weasels, and mountain lions) have relatively large home ranges, and would not be expected to occur in concentrated numbers in any area. Although tracks of black bear, bobcat, and mountain lion have been seen on the Project site, they are unlikely to be a common occurrence except for the potential home range of a bobcat, as discussed on pages 5.7-50 and 5.7-51 of the Draft EIR.

Response to Comment F.5-9:

As explained in the Draft EIR, one aspect of land use planning considered under CEQA is the consistency of the Project with relevant land use plans and regional growth projections.[546] In this case, the Project is located within the planning boundaries of the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS).[547] SCAG is the Metropolitan Planning Organization (MPO) for six counties, including Los Angeles County.[548] As the designated MPO, the federal government mandates that SCAG research and draw up plans for, among other topics, population growth management.[549] Therefore, two of SCAG's primary responsibilities are (i) developing demographic growth projections for the region, and (ii) preparing the Regional Housing Needs Assessment (RHNA) for review and approval by the State, including planning for future population, housing, and employment growth throughout the SCAG region, including the Antelope Valley Area Plan's (AVAP) planning area.[550]

SCAG divides the entire region into traffic analysis zones (TAZs) as a basic geographic unit for its population, household, and employment growth projections.[551] The 2016 RTP/SCS includes growth projections for the region through year 2040, which are set forth in TAZ maps.[552] These are the "growth projections" described in the Draft EIR. Where applicable, California Department of Finance regional population forecasts are also provided in the Draft EIR.[553] Although the County is not legally obligated to issue building permits for every residential unit or square foot of commercial or industrial use allowed under the AVAP on the Project site (i.e., "max out the AVAP," in the Commenter's words), it is legally obligated to implement and regularly update the long-term comprehensive General Plan capable of accommodating its allocated share of the RHNA, and to set forth the standards of population density and building intensity that the County recommends for the various land uses covered by such plan.[554] The AVAP is a component of the County's General Plan.[555]

546 DRP 2017, p. 5.8-4
547 *Ibid*.
548 *Id.,* p. 5.8-5
549 *Ibid*.
550 *Id.,* p. 5.8-6
551 *Id.*, p. 5.9-2, n. 1
552 *Id.,* p. 5.8-7
553 *Id.,* p. 5.9-4
554 California Government Code §§ 65302(a), 65580 *et seq*.
555 DRP. 2015 (June). *Antelope Valley Area Plan: Town & Country* (p. 1-2). Los Angeles, CA: DRP. http://planning.lacounty.gov/tnc.

Contrary to this comment's claim, the Draft EIR did not conclude that "Alternative E (as well as C and D) would not achieve enough housing and employment levels anticipated in the AVAP and growth projections." Rather, the Draft EIR expressly determined that "Alternatives C, D, and E would … meet the objective for an environmentally and economically sustainable master-planned community *while also being largely consistent with the land use designations for the site*" (emphasis added).[556] However, the Draft EIR also concluded that, under Alternative C, "the County would not be able to achieve the housing and employment levels anticipated by the AVAP and associated with the adopted growth projections unless development occurs in excess of projections in other areas of the Antelope Valley" because this alternative "would provide less development than the Project".[557] Alternative C would provide 92 fewer dwelling units on 35 fewer acres than would the Project.[558] Alternative C would also provide 200,000 fewer square feet of commercial, business park and employment areas on 21 fewer acres than would the Project.[559]

For an explanation of why it is appropriate for the Draft EIR to reject Project alternatives that would reduce land use densities below development levels assumed by Alternative C, please see response to Comment F.5-11. Nevertheless, the Draft EIR determined that Alternative C could attain the Project objective of implementing the AVAP policies applicable to the West EOA.[560]

The Commenter is correct that Draft EIR Table 8-3 mistakenly states that Alternative D would provide less development than the Project. In fact, as explained on Draft EIR page 8-51, Alternative D proposes the same development on the site as proposed by the Project. In response to this comment, the last paragraph in Table 8-3, row one, column two, is revised to correct a typographical error as follows:

> However, Alternative~~s~~ C ~~and D~~ would provide less development than the Project. Under thi<u>s</u>~~ese~~ alternative, the County would not be able to achieve housing and employment levels anticipated by the AVAP and associated with the adopted growth projections unless development occurs in excess of projections in other areas of the Antelope Valley.

Response to Comment F.5-10:

This comment states that the Draft EIR is "deficient for rigidly using a flexible planning document to dictate that no substantial biological impact avoidance should even be attempted". Contrary to this comment's claim, however, the Draft EIR does include alternatives that would accomplish substantial biological impact avoidance. In addition to preserving thousands of acres of contiguous natural open space and important biological resources, Alternative E would disturb approximately 656 fewer acres than the proposed Project, and would increase the ratio of acreage of open space and preserved lands to total

556 DRP 2017, p. 8-69
557 *Ibid*.
558 *Id.,* p. 8-15, Table 8-1
559 *Ibid*.
560 *Id.,* p. 8-69

site acreage by approximately 4 percent compared to the Project.[561] The reduced impact area would result in a comparable reduction in impacts to various biological resources, including vegetation types, habitat for special status plant and wildlife species, and jurisdictional drainages.[562]

The County disagrees with this comment's assertion that Alternatives C and D provide mere "window dressing" with respect to reduced biological impacts. Alternative C would reduce significant impacts to biological resources by reducing the Project's development footprint so as to avoid approximately 37 jurisdictional drainages that indirectly function as wildlife movement corridors and serve important ecological functions.[563] Whereas, Alternative D would relocate two of the Project's proposed water tanks and its proposed water treatment plant (WTP) to avoid impacts within the Oso Creek drainage, a sensitive habitat.[564] Like Alternative E, these two alternatives would also preserve thousands of acres of contiguous natural open space and important biological resources.[565]

The County also disagrees with this comment's assertion the Project and its alternatives do not benefit the public. Among other important benefits, the Project and its alternatives would all provide an economically sustainable master-planned community with housing and employment opportunities needed to accommodate regional growth projections while preserving thousands of acres of contiguous natural open space and important biological resources.[566]

Please also see response to Comment F.5-11.

Response to Comment F.5-11:

This comment claims that the Draft EIR's alternatives analysis "is deficient for not including the least damaging alternative it can conclude achieves enough housing and employment levels anticipated in the AVAP and growth projections." The County disagrees with the Commenter for the reasons stated below.

The Commenter misstates the legal standard for an adequate alternatives analysis under CEQA. CEQA does not require the EIR to include "the least damaging alternative it can conclude achieves enough housing and employment levels anticipated in the AVAP and growth projections," or to establish "a quantitative threshold of what minimum size and shape project would be consistent with the AVAP." Rather, CEQA requires the EIR to identify a reasonable range of feasible alternatives that could reduce or avoid some of the Project's significant environmental effects while attaining most of the Project objectives.[567] For purposes of CEQA, "feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and

561 *Id.,* p. 8-54
562 *Ibid*.
563 *Id.,* p. 8-17
564 *Ibid*.
565 *Id.,* p. 8-70
566 *Id.,* pp. 8-69, -70
567 PRC §§ 21002, 21002.1(a), 21100(b)(4); CEQA Guidelines § 15126.6

technological factors." The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[568]

Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[569] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[570] Thus, the adequacy of the EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[571]

The Draft EIR analyzes four on-site alternatives and one off-site Project alternative, in addition to the statutorily required "No Project" alternative (designated by the Draft EIR as "Alternative A"). All of the alternatives would be consistent with, and are designed to promote the policies of the Antelope Valley Area Plan (AVAP) and its Rural Preservation Strategy, with the exception of Alternative B.

Alternative B, the Previously Proposed Project alternative, is larger than the proposed Project and is based on the original Centennial Project application submitted in 2002, prior to the County's adoption of the AVAP. Alternative B covers approximately 11,676 acres and would permit development of 7,847 acres with a maximum of 22,998 dwelling units, approximately 12.2 million square feet (sf) of employment-generating uses, approximately 2 million sf of retail-serving centers, and approximately 943 acres of civic and institutional uses. Alternative B would exceed the approved population, housing, and employment projections included in the AVAP for the area.[572]

Alternative C, the Additional Drainage Avoidance alternative, would reduce significant biological resource impacts by reducing the Project's development footprint so as to avoid approximately 37 acres that would otherwise be impacted by the Project and preserve it as open space. The primary environmental benefit of Alternative C is that it would reduce impacts to jurisdictional drainages that indirectly function as wildlife movement corridors and serve important ecological functions.[573] Alternative C would reduce the number of residential units to 19,241, as compared to the Project's proposed 19,333 dwelling units.[574] Alternative C would also provide 200,000 fewer square feet of commercial uses as compared to the Project.[575]

Alternative D, the Infrastructure Relocation alternative, would relocate two of the Project's proposed water tanks and its proposed water treatment plant (WTP) to other areas on the Project site. This relocation would reduce the WTP's potential impacts within the Oso Creek

568 *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566 (Goleta)
569 *Id.,* at 562
570 *Id*., at 566
571 *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 447, 487
572 DRP 2017, p. 8-16
573 *Id.,* p. 8-17
574 *Id.,* p. 8-15
575 *Ibid*.

drainage, a sensitive habitat, would reduce the Project energy demand and would reduce certain visual and air quality impacts. No change in development capacity would occur under this alternative.[576]

Alternative E, the Density Clustering/East of Aqueduct alternative, would relocate proposed land use development from the east and west portions of the Project site to the central portion of the site, while maintaining the same number of dwelling units, employment generating uses, and other land uses, in a higher density cluster development pattern.[577] Alternative E would disturb approximately 656 fewer acres than the proposed Project, and would increase the ratio of acreage of open space and preserved lands to total site acreage by approximately 4 percent compared to the Project.[578] The reduced impact area would result in a comparable reduction in impacts to various biological resources, including vegetation types, habitat for special status plant and wildlife species, and jurisdictional drainages.[579]

Finally, Alternative F, the Central Economic Opportunity Area Development alternative, would relocate the Project from the AVAP's West Economic Opportunity Area (EOA) to its Central Economic Opportunity Area. This alternative assumes the same types of land uses, amount of development, public facilities, and other amenities as the proposed Project.[580] As compared to the Project, this alternative would likely have reduced biological impacts because the off-site location is expected to contain fewer jurisdictional drainages due to flatter terrain with fewer topographical variations and fewer oak woodland resources.[581] This alternative is also expected to have a reduced impact on wildlife movement and a reduced cumulative impact on special status vegetation types compared to the Project.[582]

Thus, in accordance with CEQA, the Draft EIR presents a reasonable range of potentially feasible on-site and off-site alternatives to the Project that would reduce and/or avoid some of the Project's potentially significant environmental effects. The selected alternatives promote informed decision making and public participation by providing for consideration a range of alternative land use patterns and siting options that will reduce and/or avoid some of the Project's significant environmental effects and attain most of the Project objectives. Accordingly, the alternatives analysis complies with the requirements of *Public Resources Code* §§ 21002, 21002.1(a).

The Draft EIR does not analyze any reduced density alternatives other than Alternative C. As explained in the Draft EIR, such alternatives were rejected for consideration because substantial reductions in the Project's proposed unit count and commercial square footage below levels assumed by Alternative C would result in a development proposal that is not

576 *Id.,* p. 8-17
577 *Id.,* p. 8-18
578 *Id.,* p. 8-54
579 *Ibid*.
580 *Id.,* p. 8-18
581 *Id.,* p. 8-63
582 *Ibid*.

consistent with the goals and policies of the AVAP related to development within the West EOA, or supportive of the Project's objectives.[583]

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[584] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals".[585] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[586]

In preparing the AVAP, the County undertook an extensive and inclusive 8-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[587] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations, forming the foundation of the AVAP.[588] This community vision is embodied in the AVAP's "Rural Preservation Strategy".

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[589] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[590] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[591]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[592] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[593] Rural Preserve Areas are located outside of Rural Town Centers and are largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[594]

583 *Id.,* pp. 8-10, -69
584 DRP 2015, p. 1-2
585 *Id.,* p. I-5
586 *Id.,* p. I-6
587 *Id.,* p. I-5
588 *Ibid*.
589 *Id.,* p. I-6
590 *Id.,* p. I-7
591 *Ibid*.
592 *Ibid*.
593 *Ibid*.
594 *Ibid*.

The Project site is located entirely within the AVAP's West EOA.[595] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[596] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses".[597]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[598] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[599] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan".

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to EOAs. (*See* AVAP Policies LU 1.1, 4.1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (*see* AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude EOAs, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (*See* AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within EOAs so as to preserve the rural character of the Antelope Valley outside of the EOAs.

Thus, contrary to the Commenter's claim, the Draft EIR's determination to reject alternatives that would not support the AVAP's recommended distribution of population density and building intensity within the West EOA is far from arbitrary. Rather, it is a reasonable and appropriate criterion when considered in the context of the AVAP's Vision and Rural Preservation Strategy.

In *Goleta*, the California Supreme Court discussed the importance of long-term comprehensive land use planning. In that case, the Court explained that land use plans like the AVAP "embody fundamental policy decisions that guide future growth and development" and that, when preparing such plans, "[l]ocal governments must confront, evaluate and resolve competing environmental, social and economic interests."[600] According to the Court,

595 DRP 2017, p. 4-4
596 DRP 2015, p. I-8
597 *Ibid*.
598 *Ibid*.
599 *Ibid*.
600 *Goleta,* at 571

such comprehensive planning processes "necessarily compels cities and counties to consider *alternate* land-use goals, policies and implementation measures" (emphasis in original).[601] "The process, moreover, is structured to transcend the provincial. Public participation and hearings are required at every stage, in order to obtain an array of viewpoints."[602] Because of this, the Court held, a project-level EIR, such as the Draft EIR in this case, "is not ordinarily an occasion for the reconsideration or overhaul of fundamental land use policy."[603]

As discussed above, the AVAP is the product of 23 public meetings conducted over the course of 8 years to "develop a shared vision for the future, identify community issues, draft proposals for the future, and prioritize their recommendations, forming the foundation of the Area Plan".[604] In addition, County planners "partnered with other County departments to explore the recommendations, refine the proposed goals and policies, plan for program implementation, and gather support to ensure success."[605] Indeed, development of the AVAP was "an iterative process, and in this case, the communities were included in the earliest steps of development and subsequent rounds of review".[606]

Not only were alternative land use visions for the AVAP debated and refined by the public and County over the course of the AVAP's eight-year planning process, they were also subject to environmental review in accordance with CEQA. The Antelope Valley Area Plan Draft EIR (AVAP EIR) analyzed a Reduced Intensity Alternative that would have reduced the number of dwelling units, population, and employment permitted under the AVAP by 23 percent.[607] The AVAP EIR also analyzed an Alternative Land Use Policy Map alternative that would have reduced the number of dwelling units permitted under the AVAP by 36 percent, the population by 39 percent and employment by 66 percent.[608] Thus the public has had ample opportunity to review and comment on the proposed use of the Project site with a building density and intensity comparable to the proposed Project. The fact that the applicant has proposed a project that is consistent with the AVAP's Rural Preservation Policy should not prompt reconsideration of the AVAP's planning policies in the Draft EIR.

In the words of the *Goleta* court:

> Informed and enlightened regional planning [does] not demand a project EIR dedicated to defining optimal alternative[s] … without regard to feasibility. Indeed, such ad hoc reconsideration of basic planning policy [is] not only unnecessary, but would [be] in contravention of the legislative goal of long-term comprehensive planning. … [T]he keystone of regional planning is consistency – between the general plan, its internal elements, subordinate ordinances, and all derivative land use decisions. Case-by-case reconsideration of regional land-use policies, in the context of a project-

601 *Ibid*.
602 *Ibid*.
603 *Id.,* at 573
604 DRP 2015, p. I-5
605 *Ibid*.
606 *Ibid*.
607 DRP 2014, p. 7-6
608 *Ibid*.

> specific EIR, is the very antithesis of that goal. … [A]n EIR is not ordinarily an occasion for the reconsideration or overhaul of fundamental land use policy.
>
> (*Goleta*, at 572-573)

Therefore, it is appropriate for the Draft EIR to reject Project alternatives that would require substantial reductions in the Project's proposed unit count and/or commercial square footage below levels assumed by Alternative C because such alternatives would result in a development proposal that is not consistent with the goals and policies of the AVAP.

Finally, the County's reasons for rejecting the so-called Public Input Alternative are set forth on Draft EIR page 8-13. First, this proposed alternative was recommended by the Conservation Biology Institute and South Coast Wildlands in 2006, well before the County's adoption of the AVAP. Second, this proposed alternative would include the development of approximately 4,990 acres of land located east and northeast of the Project within 5 separate and noncontiguous areas (much in Kern County) and would not be consistent with the Land Use Policy Map of the AVAP (e.g., portions of the alternative site are designated by the AVAP as Open Space Conservation, which does not support urban development). Third, this alternative would reflect an approximate 33 percent decrease in developable acreage and does not provide enough acreage to include both Project-proposed land use and on-site natural open space areas. Fourth, this alternative would also lead to the unavoidable loss of agricultural land, similar to the Project. Therefore, this alternative is infeasible and was not carried forward for consideration in the Draft EIR.

Response to Comment F.5-12:

The purpose of an EIR is "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided".[609] As such, an EIR neither accepts nor dismisses impacts, but discloses the impacts to the public and decision makers. This comment could apply to a decision on a project, but not to the CEQA documentation prepared for that project.

Consistent with CEQA and the State CEQA Guidelines, the Draft EIR for the Centennial Project fully discloses the environmental impacts of the Project and its alternatives, with implementation of all feasible mitigation measures, for consideration by the County of Los Angeles Board of Supervisors as part of its decision-making process. This includes analysis of geotechnical (Section 5.1), biological resources (Section 5.7), visual resources (Section 5.13), transportation (Section 5.10), and land use planning (Section 5.8). Specifically, the analysis of the Project site's proximity to the San Andreas Fault is presented under Threshold 1-1 beginning on page 5.1-16; the analysis of habitat modification is presented primarily under Threshold 7-1 beginning on page 5.7-142; the analysis of public transit is presented on under Threshold 10-6 beginning on page 5.10-141; and the analysis of scenic highways is presented under Threshold 13-3 beginning on page 5.13-23. The Project site is not presently served by public transit given the absence of transit ridership; however, the Project's planned transportation and transit features are included in MM 10-

609 CEQA Guidelines, Section 21002.1(a)

25 (i.e., construction of two transit hubs and implementation of a Transportation Management Association [TMA] to implement ongoing transportation improvements and programs). Regarding the second part of the comment regarding the Project's location and land use principles, this will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

Response to Comment F.5-13:

This comment proposes a Project alternative that would maintain a contiguous habitat linkage from Project-adjacent aqueduct overcrossings to State Route (SR) 138 and open space south of SR-138. The County disagrees with this comment.

First, as discussed in response to Comment F.5-11, the Draft EIR already presents a reasonable range of potentially feasible on-site and off-site alternatives to the Project that would reduce and/or avoid some of the Project's potentially significant environmental effects. The selected alternatives promote informed decision making and public participation by providing for consideration a range of alternative land use patterns and siting options that will reduce and/or avoid some of the Project's significant environmental effects and attain most of the Project objectives. Accordingly, the alternatives analysis complies with the requirements of CEQA.

Second, as discussed in the Draft EIR, areas providing wildlife movement connectivity—specifically, adjacent areas of similar habitat were generally available to a greater degree outside the Project's proposed development footprint, than within the footprint.[610] The area of the Project site that provides the greatest cover and is nearest to the regional wildlife corridor, located on the western edge of the Project site, is largely included in permanent open space that would be protected by the Project and all of the alternatives considered in the Draft EIR, with the exception of Alternative F, the off-site alternative.[611]

Moreover, although large areas of open space occur in and adjacent to the vicinity of the Project site, the California Aqueduct and Interstate (I) 5 substantially limit the site's ability to contribute to regional wildlife movement.[612] In particular, as shown in Draft EIR Exhibit 5.7-6, Regional Wildlife Movement, the Aqueduct presents a barrier to the regional movement of wildlife to and from the site in the east-west and north-south directions.[613] The Aqueduct's West Branch extends north to south through the center of the Project site to Quail Lake and is a barrier to east-west movement across the site.[614] The East Branch runs close to the northern boundary of the site and is a barrier to north-south movement in that area.[615] Underpasses and culverts located on I-5, north of its intersection with SR-138, do facilitate

610 DRP 2017, p. 5.7-60
611 *Id.,* p. 5.7-164
612 *Ibid*.
613 *Ibid*.
614 *Ibid*.
615 *Ibid*.

east-west movement of some species across this freeway.[616] Wildlife access to these would not be hindered by the Project or the alternatives considered in the Draft EIR.

Although the four identified potential wildlife crossings of the West Branch of the Aqueduct would remain intact, the feasibility of their use as such would become further reduced with Project buildout.[617] This reduction would result from increased barriers to access as well substantial increases in truck traffic at the SR-138 crossing due to the realignment of Cement Plant Road to intersect with SR-138 immediately adjacent to the potential local wildlife crossing point at the SR-138 (Location 4 on Draft EIR Exhibit 5.7-6). However, new dispersal impediments would only affect portions of populations of small organisms that are not considered to be of conservation concern, and these impediments are not expected to substantially affect the likelihood of the regional population persistence of those species.[618] Impacts on local wildlife dispersal are considered to be less than significant at the project level.[619] Thus, the Commenter's proposed alternative would not offer significant environmental advantages with respect to the Project's potential impact on wildlife movement corridors at the project level.

The Draft EIR conservatively concludes that the Project may contribute to a cumulative significant impact on *regional* wildlife movement, but that impact would not be reduced by this comment's proposed alternative. As explained in the Draft EIR, because most of the larger wildlife species in the region do not typically cross large expanses of sparsely vegetated landscape (such as the majority of the Project site), the central and eastern portions of the Project site are not likely to be used by wildlife to move between and within the regional open space areas in the site vicinity.[620] Thus, the Commenter's proposed alternative would not offer significant environmental advantages with respect to the Project's potential impact on wildlife movement corridors at the cumulative level.

Since this comment's proposed alternative would not offer significant environmental advantages as compared to the Project or with the alternatives that are presented in the Draft EIR, its analysis is not required by CEQA.[621]

Response to Comment F.5-14:

Regarding the first sentence of this comment, the "thousands of acres of proposed open space" in Kern County is assumed to be referring to the off-site portions of the proposed Mitigation Preserve. This is currently private land and would remain private land and is not part of the Project site. There is no connection between the environmental impacts identified in the Draft EIR and the need for public access to these areas. Regarding the second sentence of this comment, the Mitigation Preserve is proposed to reduce impacts to biological resources only. If the Commenter's use of the phrase "public resources" is intended to be a

616 Pioneer Environmental Services. 2004 (July). FINAL Evaluation of Potential Population Isolation for Wildlife at Tejon Ranch, Lebec, California (Prepared for Tejon Ranch Company). Logan, UT: Pioneer Environmental Services.
617 DRP 2017, 5.7-166
618 *Ibid*.
619 *Ibid*.
620 *Id.,* p. 7-17
621 CEQA Guidelines § 15126.6(b); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 929

synonym for biological resources, the provision for public access to the proposed Mitigation Preserve would not reduce this impact regardless. On the contrary, public access to the Mitigation Preserve is inappropriate because it would interfere with habitat restoration activities. Further, the proposed Project facilitates public access to on-site parks, trails, and other recreation activities (i.e., wildflower viewing, birdwatching) on land which is currently private and situated in an area of the County that has little local parkland.[622] As discussed in Section 5.14 of the Draft EIR, the Project would meet, and exceed, the parkland requirements of the County's Parkland Dedication Ordinance/Quimby Act and the General Plan standard. Regarding the third sentence of this comment, the lands constituting the High Desert Hunt Club are currently private and would remain private with Project implementation. The maintenance of this current use if the Project were implemented is not mitigation, nor is it presented as such in the Draft EIR. Therefore, the statement that the EIR calls for protection of this land for private use to mitigate impacts to public resources is erroneous.

Response to Comment F.5-15:

The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment F.5-16:

A revised NOP was distributed on October 2, 2015. The Scoping process is described in the Draft EIR on pages 2-3 through 2-5.

The NOP describes the Project as it was then proposed, which has been changed considerably, as noted in Comment F.5-1. The NOP comment letter states that there will be impacts to habitat linkages. These issues are fully addressed in the Draft EIR. The term is defined as Landscape Linkages on page 5.7-52. It is also discussed under Home Range on pages 5.7-52 to 5.7-55 and under Regional Wildlife Movement on pages 5.7-56 to 5.7-64. The sustainability of the linkages is addressed on pages 5.7-62 and 5.7-63. Impacts to regional movement are addressed on pages 5.7-164 to 5.7-166.

The SMMC also requested that all the development on the entire Ranch be addressed in one CEQA document. Although this would be a comprehensive approach, it is not a reasonable approach. The subject Project is a Specific Plan as defined by the State of California and this Draft EIR is analyzing the Plan per state requirements.

The Project's infrastructure would not be sized to accommodate growth beyond that which is proposed by the Project.[623] Moreover, the County is not responsible for analyzing development beyond the borders of the Specific Plan, except in the growth-inducing and cumulative analysis impacts sections, which were prepared and included in the Draft EIR.

622 DRP 2017, p. 5.14-1
623 *Id.,* p. 5.8-22

The Growth-Inducing analysis is in Section 6.0 of the Draft EIR and the Cumulative analysis is in Section 7.0 of the Draft EIR.

The biological analysis did include a regional analysis (Section 5.7) as requested. This section includes details on the Project footprint, linkages, adjacent land uses, as well as impacts to the onsite and surrounding resources. The section also looks at habitat values. The Project has been revised to avoid the SEA almost entirely. There are exhibits depicting vegetation communities as well as sensitive communities and resources, such as grasslands. Tables with vegetation acres are included in the Draft EIR.[624]

There are six alternatives included in the Draft EIR, all reducing significant impacts, but usually at the cost of increasing impact to other features.

The Draft EIR also incorporates conservation on thousands of acres of open space with the requirement for ongoing management. The Specific Plan requires ongoing management through establishment of Districts or similar mechanisms; however, this is not an environmental issue.

The Project is planned to be phased over many years and the mitigation, where appropriate, will be phased as well.

624 *Id.,* Exhibits 5.7-3 and 5.7-11

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From: Jodie Sackett <jsackett@planning.lacounty.gov>
Sent: Monday, July 24, 2017 10:41 AM
To: 'Paul Edelman'
Subject: RE: SMMC Comment Letter and attachments on Centennial DEIR

Greetings Paul, all attachments received.

Jodie Sackett
Zoning Permits N^

From: Paul Edelman [mailto:edelman@smmc.ca.gov]
Sent: Tuesday, July 18, 2017 6:19 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: SMMC Comment Letter and attachments on Centennial DEIR

Hello Jodie – please confirm receipt.



F.6-1

Thanks Paul

Responses to Comment Letter F.6
Santa Monica Mountains Conservancy
July 18, 2017

Response to Comment F.6-1:

Thank you for your comment and for your participation in this public process. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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Three Points-Liebre Mountain Town Council
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16 August 2017

SENT VIA EMAIL & US MAIL

Mr. Jodie Sackett
Los Angeles County
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
JSackett@planning.lacounty.gov
213.974.6443

Dear Mr. Sackett and Centennial Project Planners,

Subject: Centennial Draft Environmental Review, Project Number 02-232

Our town council appreciates the opportunity to participate in the review of the Draft Environmental Impact Review (DEIR), for the Centennial Project (Project). First let us state we have been forcefully and unequivocally opposed to this project for since its inception for a long list of reasons identified in this letter. The number of significant unmitigated impacts to our town council area, *our community* are unacceptable. If Regional Planning approves the Project's specific plan with "overriding considerations" describing housing, economic benefits, and selected instances of compliance with planning documents' policies, goals and objectives; instead, choosing to overlook the impacts to residents *already here* for residents of a planned, but not yet built, *city,* which fits description of "leapfrog development" (new development separated from existing development by substantial vacant land, alias for--sprawl), then Regional Planning and the County of Los Angeles have failed in implementing "Rural Preservation Strategy, "Smart Growth," "sustainability," and planning documents are ultimately not worth anything to rural communities' citizens who wish to maintain rural community character and lifestyle. F.7-1

The Town and Country outreach efforts and subsequent Antelope Valley Area Plan (AVAP) approved in 2015, has shown great bias and extended exclusive land use and development rights that run counter to Rural Preservation Strategy--in that Economic Opportunty Areas (EOAs) are excluded from Special Hazards Management Areas meant to protect residents, employees, and businesses from risks in building in those areas. Land Use Goals LU-2: "A land use pattern that protects environmental resources" describes this exclusion: F.7-2

> This new model, which directs new investment to areas with existing and/or planned services and facilities and away from areas with natural hazards and environmental resources, will shape land use in the Valley, with policies that emphasize resource

efficiency, economic growth, and the preservation of rural character. Over the next 20 years, this Element will balance growth and economic development, the desires of residents to preserve their rural way of life, and the need for hazard avoidance and mitigation to determine the level of development that these factors can support.

F.7-2 cont.

Additionally, AVAP Land Use Policies detail the Project's special exclusions:

AVAP Policy LU 2.2: Except within economic opportunity areas, limit the amount *of potential* development within Scenic Resource Areas, including water features, significant ridgelines, and Hillside Management Areas, through appropriate land use designations, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.

Goal LU 2: A land use pattern that protects environmental resources.

- Policy LU 2.1: Limit the amount of potential development in Significant Ecological Areas, including Joshua Tree Woodlands, wildlife corridors, and other sensitive habitat areas, through appropriate land use designations with very low residential densities, as indicatedin the Land Use Policy Map (Map 2.1) of this Area Plan.
- Policy LU 2.2: Except within economic opportunity areas, limit the amount of potential development within Scenic Resource Areas, including water features, significant ridgelines, and Hillside Management Areas, through appropriate land use designations, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
- Policy LU 2.3: Except within economic opportunity areas, limit the amount of potential development in Agricultural Resource Areas, including important farmlands designated bythe State of California and historical farmland areas, through appropriate land usedesignations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
- Policy LU 2.4: Except within economic opportunity areas, limit the amount of potential development in Mineral Resource Areas, through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
- Policy LU 2.5: Except within economic opportunity areas, limit the amount of potential development in riparian areas and groundwater recharge basins, through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
- Policy LU 2.6: Except within economic opportunity areas, limit the amount of potential development near the National Forests and on private lands within the National Forests, through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.

F.7-3

While the AVAP seeks to limit development in SEAs, Scenic Resource Areas, significant ridgelines, Hillside Management Areas, Agricultural Resource Areas, Mineral Resource Areas, riparian areas, groundwater reharge basins, and private lands within the National Forests, it is considering, with this Specific Plan, to override required "very low densities," that, in all other land use planning areas must

F.7-4

comply with Special Management considerations, ***except EOAs, i.e.*, Centennial Project**. This is *not* rural preservation. Moreover, Goal LU 3: "A land use pattern that minimizes threats from hazards," alternatively allows EOA high density housing and business development along two major fault zones, the San Andreas, and the Garlock faults; allows development in Very High Fire Hazard Severity Zones; development in Flood Zones designated by the Federal Emergency Management Agency; development on steep slopes identified as Hillside Management Areas; development in landslide and liquefaction areas; development in airport influence areas and near military lands (but not airspace?); which otherwise require compliance through "appropriate land use designations with very low residential densities."

F.7-4 cont.

When our town council participated in the Town and Country outreach, we sought a "Rural Preserve" designation, now implemented through "Rural Preservation Strategy" that limits both housing density and commercial development within our council boundaries. We have always understood the trade-off between convenience, infrastructure, and rural living, and always embraced rural living. It is interesting that Regional Planning considers our area "a very remote rural environment," whose residents "should be prepared to forego additional infrastructure in order to live in [that] very remote rural environment, and enjoy the benefits offered by such an environment" (AVAP I-8 June 2015). However, the currently and completely undeveloped land comprising the western EOA—the Project area, immediately adjacent to our rural preserve town council area, is somehow not considered "remote," without expectation of foregoing services and infrastructure, and whose significant environmental resources, and special hazard areas—seismic zones, flood and fire severity zones pose large and specific threat to not only significant environmental resources in the "remote" project area mentioned previously, but to current residents and future residents Regional Planning and this Project might allow. The AVAP, LU-7 June 2015 indicates:

> Rural preserve areas are areas of the unincorporated Antelope Valley outside of Rural Town Center and Town Areas, which are largely undeveloped and generally not served by existing infrastructure and public facilities. Many of these areas contain environmental resources, such as Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas. In addition, many of these areas contain safety hazards, such as Seismic Zones, Very High Fire Hazard Severity Zones, and Flood Zones. The primary benefit of these areas is that they provide habitat for regionally significant biological species while simultaneously providing scenic values to residents. A secondary benefit of these areas is that they contain natural resources which provide economic opportunities. Development in these areas should be limited to single-family homes at very low densities, light and heavy agricultural uses, including equestrian and animal-keeping uses, and other uses where appropriate.
>
> The lowest land use densities (RL20) of the Area Plan have been used primarily for the Seismic Zones and Significant Ecological Areas, as these are areas where it is critical to limit development to ensure the safety of residents as well as the preservation of important ecological resources in the area. These maximum densities shall apply to all new land divisions. Existing legal lots may be developed with one residential unit each, regardless of lot size, provided that such development meets applicable County Code requirements, and the siting of the structure is supportive of the policies in this Area Plan.

F.7-5

Before the lobbying efforts of the Antelope Valley Blue Ribbon Committee, the Project area was designated very low density rural land, included expanded Significant Ecological Areas, and might have actually satisfied Rural Preservation Strategies of protecting residents from Special Hazards, preserving environmental resources, scenic values, and valuable watershed and riparian areas. Tejon Ranch achieved a land use plan matching their desires for high-density residential development, and expansive industrial development that excised SEA designation from an incredibly high-value, relatively undisturbed natural environment—California Floristic Province—and will expose a projected 50,000 residents and employees of businesses to special hazards via EOAs given *carte blanche* to ignore ordinances with which others must comply. How ironic that the AVAP Introduction states, "This Area Plan covers issues that were important in 1986 and are still important to the communities; for example, managing growth, minimizing disruption of ecological resources, placing development away from natural hazards, and ensuring a variety of housing types and costs" (Antelope Valley Area Plan I-4, I-5). The only possible exception the Project could offer is "ensuring a variety of housing types and costs," albeit in an area of multiple Special Hazards. F.7-6

Concern arises from several statements in the Specific Plan Document. Firstly, the Specific Plan makes claims that it complements the implementation of the AVAP "by capitalizing on the transportation infrastructure investment that state and regional agencies are bringing into the area, *while still achieving the general goal of rural preservation in the Antelope Valley.*" The addition of over 19,000 homes and 10.2 million feet of industrial and commercial space spells 'sprawl,' not rural preservation, and Highway 138 expansion would not be necessary, nor would it occur in the foreseeable future if the Project did not go forward. Not only that, but language in the document asserts its primacy over the General Plan (GP) and the AVAP by stating, "The Specific Plan constitutes the land use regulations (zoning) for the subject properties. Subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Any development agreement for the project must also be consistent with this Specific Plan and the county's general plan. Should there be inconsistency between this Specific Plan and existing County ordinances, the provisions of the Specific Plan shall prevail," while at the same time claiming consistency with planning documents. With reference to rural council areas' Community Standards Districts, their efforts in preserving their communities via CSDs require consistency with planning documents and must allow an override clause for the Director of Regional Planning to approve projects that might be inconsistent with respective CSDs. Does Centennial get a pass, and are inconsistencies in the Specifical Plan, perhaps discovered later, allowed? Goals, policies, and ordinances should be applied equally across the board for all proposed development in Los Angeles County. Finally, the Specific Plan states its application was complete in 2008 and " The General Plan provides that pending projects for which an application has been deemed complete will be evaluated under the General Plan in effect when the application was deemed complete. Additionally, the Board of Supervisors adopted the updated Antelope Valley Area Plan on June 16, 2015. The application of Tejon Ranch, for this Specific Plan was deemed complete by the County as of May 13, 2008, as such this project will be evaluated under the General Plan and Area Plan in effect at the time of adoption of this Specific Plan" (1-11 | DRAFT 5/2017 SP)." How then, can the project use the Land Use Map granting high density housing zoning and Industrial-Commercial zoning that did not exist prior to the AVAP 2015, and skirt Significant Ecological Area Technical Advisory Committee scrutiny and recommendations, and EOA ordinance exclusions from all Special Hazards Management Areas, Hillside Management Areas, Scenic Resource Areas, Seismic Areas, FEMA Floodzones, significant ridgelines, Hillside Management Areas, Agricultural Resource Areas, Mineral Resource Areas, riparian areas, groundwater reharge basins? F.7-7

The Project claims economic benefit to the Antelope Valley through construction jobs, and employment opportunities as Project build-out begins and progresses over a twenty year period. However, we believe it is important to consider *existing* economic values that this project might affect. Two letters were received from branches of military defense, and listed in the NOP comment letters 2004. The Department of the Navy identified two military airspace areas that are directly over the Project, and the United States Marine Corps identified airspace and additional concerns regarding training missions, noise and developments attracting waterfowl. The Navy goes on to say the airspace above the Project is critical to ongoing mission essential training missions readiness requirements to meet national security objectives. Residents will be subject to high-speed low-flying aircraft and associated noise. This brings us to the potential economic impact to the Antelope Valley through Centennial's development and subsequent 'sprawl' in the surrounding area with the possibility of causing interference with flight missions via visibility issues—"dust, steam, or smoke: light emissions, direct (lasers) or indirect (reflective) that might interfere with pilot vision; electromagnetic transmission emissions that might affect aircraft instrumentation or capability; and lastly, the growing of certain types of vegetation or other land uses which would unnecessarily attract birds or waterfowl" (March 21, 2004, Department of the Navy NOP Response Letter, 42-49/444). If these impacts occur throughout the twenty-year projected build-out, how and what mitigation be implemented? If it cannot be adequately mitigated, the 1.6 billion dollar a year Edwards Air Force Base combined economic impact, plus aeronautic and aviation industries *that are already here in the AV and extend regionally,* and employ more than 47 thousand people (GAVEA "Econonomic Roundtable Report 2017," 40), will be negatively affected. Furthermore, the Navy indicates that "induced growth will result in substantive land use conflicts underlying existing major airspace training areas":

F.7-8

> It is likely that the Centennial Project would mark the beginning of the development of the western Antelope Valley. Such induced growth will result in substantive land use conflicts underlying existing major airspace training areas, and would also impact an additional route, Instrument Route 200, located 3 miles to the east of Centennial project. Instrument Route 200 is a major asset to the research, test, development and evaluation of new weapons systems conducted at Naval Base Ventura County and Naval Air Weapons Station China Lake.
>
> Development of the western Antelope Valley would likely subject future residents to noise and safety concerns from low-altitude aircraft and weapons operations on pre-existing military training routes, from the testing activities by the Navy and Air Force, as well as low-altitude aircraft noise and sonic booms from the heavily used R2508 Airspace Complex. The R2508 Airspace Complex is the most significant asset of its kind in the world, and is key to the training and testing conducted for not only the United States, but also our allies around the world. It is located 20 miles to the Northeast of the proposed Centennial development site.

(March 21, 2004. Department of the Navy NOP Response Letter, p.43/444).

Weighing elements of economic harm. and more importantly, elements of injury to military capability for national security reasons must be considered before approval of this Project, and may constitute fine reasons for stopping the Project from going forward. Furthermore. we ask if noticing was extended to NASA Armstrong Flight Research Center, Mojave Air and Space Port, Lockheed Martin. Boeing, Northrup Grumman. or Edwards Air Force Base. F.7-9

The Project site sits along two prominent earthquake faults. the San Andreas and Garlock Faults. While the Alquist-Priolo Zone is adjacent to the Project development boundaries. the DEIR earthquake field investigations identified two previously unidentified active faults. one outside development footprint, and the other crosses westerly through Village 9. Only 50 to 100 foot setbacks are required for buildings in the active fault zone. As unnamed faults. they are not included in the Alquist-Priolo program or otherwisee identified by the State (R:\Projects\PAS\CEN\000306\Draft EIR\5.1 Geo-051117.docx 5.1-10 Centennial Project Draft EIR). It may be useful to remember historically, the area was subject to the 1857 Fort Tejon Earthquake (approx. 7.9 Magnitude). According to the California Institute of Technology Center's Southern California Earthquake Data Index, The earthquake "was one of the greatest earthquakes ever recorded in the U.S., and left and amazing surface rupture scar over 350 kilometers in length along the San Andreas Fault" (http://scedc.caltech.edu/significant/forttejon1857.html). The website goes on to describe the severity of the quake: F.7-10

> The fact that only two lives were lost was primarily due to the the nature of the quake's setting; California in 1857 was ***sparsely populated***, especially in the regions of strongest shaking, and this fact, along with good fortune, kept the loss of life to a minimum. The effects of the quake were quite dramatic, even frightening. ***Were the Fort Tejon shock to happen today, the damage would easily run into billions of dollars, and the loss of life would likely be substantial, as the present day communities of Wrightwood, Palmdale, Frazier Park, and Taft (among others) all lie upon or near the 1857 rupture area.***
>
> As a result of the shaking, the current of the Kern River was turned upstream, and water ran four feet deep over its banks. The waters of Tulare Lake were thrown upon its shores, stranding fish miles from the original lake bed. The waters of the Mokelumne River were thrown upon its banks, reportedly leaving the bed dry in places. The Los Angeles River was reportedly flung out of its bed, too. Cracks appeared in the ground near San Bernadino and in the San Gabriel Valley. Some of the artesian wells in Santa Clara Valley ceased to flow, and others increased in output. New springs were formed near Santa Barbara and San Fernando. Ridges (moletracks) several meters wide and over a meter high were formed in several places. In Ventura, the mission sustained considerable damage, and part of the church tower collapsed. At Fort Tejon, where shaking was greatest, damage was severe. All around southern and central California, the strong shaking caused by the 1857 shock was reported to have lasted for at least one minute, possibly two or three!

"Only two lives were lost" due to sparse population. We must also mention the 1952 Kern County Quake (7.2 Magnitude) which came as a surprise to geolgists and seismologists: F.7-11

> The largest earthquake in southern California since the Fort Tejon earthquake of 1857 and the Owens Valley earthquake of 1872, the Kern County earthquake of 1952 caused immense and widespread damage. The quake occurred on the White Wolf fault, a reverse fault (with some left-lateral component of slip) north of the intersection of the Garlock and San Andreas faults.
>
> The area shaken by this quake was impressively large. It was felt in Reno, Nevada, and required a construction effort in Las Vegas to realign structural steel. In San Francisco, it was felt mainly by people on the upper floors of tall buildings. Power outtages occurred in Los Angeles, along with minor building

> damage. It was felt in San Diego as well, and even damaged one building there! At Owens Lake, about 200 kilometers away, the shaking broke a pipeline and disturbed salt beds, causing damage to a mining operation.
>
> The Kern County earthquake claimed 12 lives, was responsible for at least 18 injuries, and caused at least $50 million in property damage. This quake and its aftershocks (at least 20 were of magnitude 5.0 or greater) were responsible for damaging hundreds of buildings in the Kern County area, at least 100 of which had to be torn down. It devestated a section of the Southern Pacific Railroad line near Bear Mountain. It wreaked havoc on agriculture in the Arvin area, where the land has been reclaimed from the Kern River Delta, creating conditions which amplify the shaking of an earthquake. Slumping and surface rupture caused irrigation breaks and subsurface movement disturbed well output. Major relevelling had to be done in many places.

F.7-11 cont.

How many lives could be lost allowing this kind of high-density development in a Special Hazards Management Area of multiple risks, when the Rural Preservation Strategy Land Use Planning means to prevent loss life and property by encouraging low density rural development in hazard areas?

F.7-12

In addition to earthquake risk, current residents face a decrease in Sheriff's Deparment services through the initial and subsequent phases of development. One thousand homes must be built in order to 'qualify' for a substation. Moreover, the County must fund salaries for additional law enforcement employees, which is the larger real cost. Until homes and businesses are built, response times with currently understaffed Santa Clarita Sheriff's Station run an hour or more. California Highway Patrol wrote in their NOP Letter in 2004, response times would also be an hour or more. Their comments echo our community's worries:

> In reviewing this project, our concern was what effect these projects will have on traffic. The project will increase traffic volume on SR-138 and Interstate 5. The increased traffic will ultimately cause delays in emergency response times. Additionally, we have great concern for the purposed additional roadways which would necessitate additional resources and officers to provide traffic enforcement, emergency incident management, public service, assistance and accident investigation.

(CHP comments NOP Letter, April 6th, 2004).

F.7-13

Furthermore, the DEIR states that "the CHP would have increased responsibilities with the implementation of the Project. The CHP is funded out of revenues from car registration fees. The increase in registrations from development at the site would *partially* offset the impact so that the increased demand for CHP services would not be significant (DEIR 5.16-24). Partial offset of registration fees does not completely reduce impact of increased demand, and the Project needs to consider additional funding to responsibly reduce impacts to inadequately mitgated CHP staffing of administrative and patrol needs.

F.7-14

One might assume the project phases could continue for many years, adding commuter and personal business trips all along that time period without any mitigation to assuage traffic conditions. There is also no guarantee that the projected numbers employed will actually reside in the community, diminishing the idea of 'sustainability' and the premise of 'Smart Growth.' We would like to see studies of actual numbers of commuters and those employed within their communities in areas that have been built under specific plans, as those in the Santa Clarita Valley. Study of commuter numbers should be considered, especially when the Centennial Project is selling the plan to Regional Planning and potential residents and businesses based on the ideas of sustainability and Smart Growth previously mentioned. Subsequent stages of development should require "validation" of claimed internal traffic

F.7-15

useage and projected additional commuters outside the Project, as suggested by Caltrans in their NOP Letter. April 21st, 2004. suggesting entitlements tied to ongoing studies as the development progresses, and they have commented that:

> It is understood the project will be developed in phases over a twenty-year period. Residential will be developed first, followed by commercial, business and employment centers. Initially, a balance between housing and jobs on-site will not exist. Jobs will be off-site many miles from Centennial, thus, establishing commute patterns for early residents that may be difficult to change once jobs are finally introduced on-site. In many areas of the state, the promise of developing jobs for those living within new large develops has not materialized, thus requiring the continuation of long commutes. This possibility must be objectively considered and analyzed for Centennial.
>
> The proposed project includes eight communities, each having a village core including a mixed-use hub of retail/commercial/civic/residential uses. The village core design may enhance the sense of community and "neighborhood" while at the same time reducing the number of trips made on state highway facilities. To the extent that a high number of trips are captured internally, less mitigation to external transportation facilities will be needed. The NOP states that 80 percent of the residents could live within walking distances of the commercial service areas. This assumption must be validated.

(Caltrans NOP Letter. March 26th 2004).

F.7-15 cont.

Traffic increases on Pine Canyon Road from Ridge Route Road, east. to 3 Points Road will have a devastating effect on local residents. This uninproved, lane-and-half unmarked road. lined with ancient oak forest will become a commuter route or alternate route used by Centennial residents to avoid traffic congestion. inclement weather highway closures, and accident closures. This stretch of road borders the High Desert Hunt Club on the north. and the Angeles National Forest (Southern Spotted Owl habitat. and Condor nesting areas) on the south; the area is rich in biological value, has riparian habitats, is entirely in the San Andreas SEA 17. and should be protected from noise. development, construction/commuter traffic. It is used, as well, by road-racing automobile and motorcycle enthusiasts, creating dangerous conditions for residents and for wildlife crossing in the area.

F.7-16

Road access to the general public, including potential Centennial residents. will increase fire risk. Our community has experienced two incidents in the past three years caused by vehicles with hot exhaust parking in, or ending up on dry grass and brush. Our suggestion might be to acquire Pine Canyon Road, maintain it in perpetuity, and make it passable to only residents' vehicles, and then to visitors on foot or on bicycles. much like a bike trail with a walking trail. in order to protect wildlife. our properties, SEAs, and scenic viewshed within the Angeles and Los Padres Forests. More residents and visitors to the area—more fire risk due to recreational use and abuse. potentially causing loss of watershed, and rich biological resources.

F.7-17

The Project identifies increased fire danger as a significant impact. and by building fire stations, and as mitigation "The Project Applicant/Developer would provide funding for the construction of fire protection facilities in accordance with the approved Project, in lieu of paying established

F.7-18

developer fees at the time building permits are issued (MMs 16-1 through 16-3). Implementation of MMs 16-1 through 16-3 would provide for fire station sites and funding for fire protection services to serve the Project. Therefore, impacts on fire services would be reduced to a less than significant level." So, the Project will use developer fees that fund other services for fire stations and fire protection services, with less cost out of their pockets, and at the same time creating increased need for services. It is not detailed what those services are. We recommend services in place as the first phase of development ensues, and that it include a firefighting helicopter to assist fire supression for not only Centennial, but nearby areas like the Angeles and Los Padres National Forests, to be at increased risk as a result of Project-related increases in fire danger. We also recommend funding of increased staffing of US Forest Service and LA County Fire hand crews, and increased USFS firefighting personnel. F.7-18 cont.

Fire is just one of the many potential impacts to sensitive forests, riparian areas, grasslands, including Significant Ecological Areas. Our community is virtually encompassed by SEA designation, identifying the biologically valuable San Andreas SEA 21, and it will face increasing development pressures as a result of this Project; even though we are a Rural Preserve Area, these designations do not preclude development. We are well aware of biological impacts to the Project area, and request the SEA and openspace areas should be mitigated, funded and preserved in perpetuity by a reputable, qualified conservation entity that can provide and operate a Habitat Conservation Area and Plan, and provide ongoing monitoring to ensure the area's importance biological qualities are maintained (not Homeowner Associations) The Project was reviewed by SEATAC before mapping changes and SEA designated areas removed. Board of Supervisors actions removed SEA review requirements from EOAs, but the recommendations made by SEATAC are still valid now: F.7-19

> "To insure preservation of the biological resources of the open space there needs to be a detailed management plan. Although it is typical to have such a plan approved by County without public input after the EIR has been approved, in this case the impact is so substantial that SEATAC thinks the detailed plan should be part of the EIR and subject to SEATAC review as well as to public comment. The permit on the EIR once granted, cannot be revoked, neither legally, nor in the de facto sense" (SEATAC Meeting Minutes, 9/8/2008, 13/47).

We have no mention of final review of the AVAP Land Use Map by SEATAC, even though Community Standards District documents must be reviewed by them if community boundaries fall within SEAs. There was no public discussion of a habitat management plan as was suggested when the Land Use Map was created and went through various iterations. Furthermore, the Project's last visit to SEATAC was September 2008; subsequently, the Centennial Specific Plan land use desires were then inserted into the AVAP Land Use Map and previously detailed goals and policies exclude EOAs from ordinance requirements and SEATAC review. The Plan appears to have skirted continued scrutiny by SEATAC and more stringent environmental review that would have detailed cumulative impacts and sought input from the public. As the Specific Plan stood on the last review, "SEATAC determined that the present design of the Centennial project is **not compatible** with the principles of the Portal Ridge/Liebre Mountain SEA and **not compatible** with the principles of the Tehachapi Foothills SEA." It was requested the project incorporate changes and further recommendations would be forthcoming from SEATAC. F.7-20

The convergence of the San Gabriel, Tehachapi, and Transverse Ranges represents one of the most important wildlife corridors in Southern California. The Mitigation and Monitoring Plan suggests one underpass for movement at the State Route 138 and Cement Plant Road, and a 50 foot buffer zone along the Cement Plant Road. This is shockingly inadequate for wildlife movement along the length of development along SR 138 and 300th St. West. Development within the core areas of Centennial, increasing traffic along the SR 138 will direct wildlife movement to the western and eastern extent of the Project Area. Detailed, substantive surveys of wildlife movement at points along the highway from 300th St. West and Gorman Post Road must be required, and determination of multiple crossing areas to assist movement.

F.7-21

MM 7-14 The designated SR-138 underpass shall be located where the highway crosses the Project's western border near the current intersection with Cement Plant Road. The width of the underpass shall be 100 feet and shall flare out on both sides of the highway to a 150-foot width in the Project open space adjacent to the highway. These specifications areexpected to allow some local wildlife to safely pass between open space areas on opposite sides of the highway. In addition, a 50-foot open space buffer will be incorporated on the eastern and western sides of Cement Plant Road; this buffer shall be from the southern side of the bridge that spans the California Aqueduct to the nearest open space polygon that meets the property edge. The undeveloped 50-foot buffer shall run parallel with the Aqueduct along its southernbank. This buffer may be temporarily disturbed during construction, but shall be retained as greenspace to increase connectivity for local wildlife between open space areas and potential Aqueduct crossing locations.

"This area has enormous biological importance as the only potential montane connection between the 3200km Sierra Nevada-Cascade cordillera and the 1300-km cordillera of the Sierra Madre, Transverse, and peninsular Ranges of southern California. The region's diversity stems from its location the the juncture of four major ecoregions (Sierra Nevada, Sierra Madre. Great Central Valley, [and the] Mojave Desert" (Penrod et al. 2003). Finally, comments from "Conservation Significance of the Tejon Ranch. (2003)" describe the biological significance of the Centennial and greater Tejon Ranch area:

> The Tejon region is an irreplaceable piece of California whose future deserves careful consideration. It lies at the biogeographic crossroads of five geomorphic provinces and four floristic regions, all within the global hotspot recognized by scientists as the California Floristic Province. Within this hotspot, the 270.000-acre Tejon Ranch supports 23 different vegetation communities (60% of the vegetation communities in the region). Critical Habitat for the endangered California condor, and potential habitat for 20 state and federally listed species and 61 other rare and endemic species, all within about 40 miles of the largest population center of California. Tejon Ranch provides a unique opportunity to conserve low-elevation grasslands and oak woodlands that are underprotected in the region.
> Tejon Ranch is a largely roadless, biological core area with high habitat integrity and intact, functioning watersheds. It is one of the California Wilderness Coalition's ten most threatened wild places in California (CWC 2003). Los Angeles County has designated portions of the Ranch as Significant Ecological Areas (SEA) and is considering expanding the area under this designation (PCR Services Corp. 2000). The Ranch meets virtually all of the state Resources Agency priority criteria for conservation (Table 5). Significant conservation on the Ranch is crucial to ensuring that existing conservation investments remain intact and to linking the Sequoia National Forest with the Los Padres National Forest.

F.7-22

Our Council area and adjoining biologically valuable lands will forever be altered by the Project. We request that all possible mitigation efforts include public participation in preservation of environments, scenic qualities, water quality, air quality, and a real livability that makes this area so unique. F.7-23

Sincerely,

Richard Zahnter
President

Susan Zahnter
Vice President

Karen Plemmons
Secretary

Diane Phillips
Treasurer

Responses to Comment Letter F.7
Three Points-Liebre Mountain Town Council
August 16, 2017

Response to Comment F.7-1:

Thank you for your comment and for your participation in this public process. The Commenter's opinion of the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

The Lead Agency disagrees with this comment's assertion that the Project is inconsistent with the "Rural Preservation Strategy" that is the basis of the Antelope Valley Area Plan (AVAP). The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[625] The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[626] The AVAP contains regional goals and policies pertaining to land use, housing, community design, circulation, pubic services and facilities, governmental services, environmental resource management, public safety, and energy conservation, among other topics. The AVAP updates and supersedes the 1986 Antelope Valley Areawide General Plan (AVAGP), the previous community plan applicable to the Antelope Valley planning area.[627]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[628] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[629] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals".[630] At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[631]

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for

625 DRP 2015, p. 1-2.
626 DRP 2017, p. 5.8-9
627 *Ibid.*
628 DRP 2015, p. I-5
629 *Ibid.*
630 *Ibid.*
631 *Id.,* p. I-6

additional growth and development".[632] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[633]

Per the AVAP, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[634] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[635] Rural Preserve Areas are located outside of Rural Town Centers and are largely undeveloped, unserved by existing or planned infrastructure and public facilities, and contain important environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[636]

The Project site is located entirely within the AVAP's West EOA.[637] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[638] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses."[639]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[640] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[641] To ensure that this strategy is implemented, the AVAP specifies that the interpretation of [AVAP] policy should be governed by the AVAP's Rural Preservation Strategy.[642]

The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2016-2040 Regional Transportation Plan/Sustainable Communities Plan (2016 RTP/SCS) prepared by the Southern California Association of Governments (SCAG). For example, the AVAP reduces the projected number of new residential housing units in the planning area by 62 percent,

632 DRP 2015, p. I-7; DRP 2014a, p. 7-7
633 *Ibid.*
634 DRP 2015, p. I-7
635 *Ibid.*
636 *Ibid.*
637 DRP 2017, p. 4-4
638 DRP 2015, p. I-8
639 *Ibid.*
640 *Id.*, p. I-8
641 *Ibid.*
642 *Ibid.*

locates housing units closer to jobs, and increases the AVAP's jobs/housing ratio from 0.18 to 1.3 at buildout, as compared to the 1986 AVAGP it replaces.[643] As a result, implementation of the AVAP would generate just 17,065,721 vehicle miles traveled (VMT), a 50 percent reduction below the 33,787,619 VMT generated by the 1986 AVAGP.[644] Moreover, implementation of AVAP would convert to urban use only 6,169 acres of undeveloped agricultural land, compared to the 24,433 acres of agricultural land that would be converted under the 1986 AVAGP.[645] Finally, as compared to the 1986 AVAGP, the AVAP greatly expands the boundaries of Significant Ecological Areas within the planning area and specifically provides for greater protection of wildlife movement corridors.[646] Thus, the AVAP substantially limits the potential for "urban sprawl" development patterns in the Antelope Valley by focusing new development into compact and sustainably designed mixed-use EOA communities that place houses in close proximity to jobs and commercial uses while expanding SEA boundaries and preserving wildlife movement corridors and agricultural land.[647]

According to SCAG, "'smart growth' is a term that covers a range of development and conservation strategies that help protect the natural environment and make communities more attractive, economically stronger, and more socially diverse".[648] The Commenter's claim that the Project represents "classic sprawl" because the average trip length for project-generated traffic will be 25.5 miles disregards the fact that the Project is consistent with, and implements, regional and County plans to strategically locate future growth in a manner that both achieves statewide GHG reduction goals and relieves the potential adverse and social effects of focusing too much future growth in both agricultural areas and in infill, transit oriented areas. As discussed below, the Project is specifically designed to protect the natural environment by implementing an attractive and compact development pattern that places homes near jobs and commercial uses, all connected by a multi-modal circulation system that will reduce VMT and, by extension, GHG emissions.

The terms "urban sprawl" and its cousin "leapfrog development" are ambiguous as they are frequently used to describe a variety of conditions, such as a specific type of land use pattern or the aesthetic quality of urban and suburban development forms. However, "Leapfrog development" is often understood to refer to the development of land in a manner requiring the extension of public facilities from their existing terminal point through intervening undeveloped areas where such extension is not provided for in the existing plans of the local governing body.[649] And "sprawl" is typically understood to mean "'uncoordinated growth': the expansion of community without concern for its consequences; in short, unplanned,

643 DRP 2014a, p. 7-7
644 *Ibid.*
645 *Ibid.*
646 *Id.,* p. 7-8
647 *Id.,* p. 7-7
648 Southern California Association of Governments (SCAG). 2016d (April). *Final Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (SCH #2015031035) (p. 3.11-11). Los Angeles, CA: SCAG. http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx.
649 USLEGAL 2017

incremental urban growth which is often regarded as unstainable".[650] Per these definitions, the Project is neither sprawl nor leapfrog development.

The Project site is situated near the junction of Interstate 5 and the Northwest SR-138 Improvement Project, which links western Los Angeles County the major communities of Palmdale and Lancaster.[651] Thus, the Project site will not require major off-site roadway extensions to provide access to regional freeways. As shown on Draft EIR Exhibit 4-18, there are existing gas, power and telecom transmission facilities to serve the Project located on or immediately adjacent to the Project site. The Project will also construct two on-site wastewater treatment and recycled water distribution facilities to minimize potable water demand to treat Project wastewater and supply recycled water to the Project site.[652] To ensure adequate potable water service, the Applicant/Developer will design, permit, finance, and construct an on-site water treatment plant adjacent to the West Branch of the California Aqueduct, which is located on-site.[653] School, fire, police, emergency medical and library facilities needed to serve the Project will all be constructed on site, and in some cases, will be available to also serve existing Mountain Communities in accordance with existing mutual aid agreements.[654] Finally, none of the Project's backbone infrastructure will be sized to accommodate growth beyond that which is proposed by the Project.[655] Given the its clustered development pattern and self-contained infrastructure improvements, the Project simply does not exhibit the characteristics of leapfrog development.

While there may be some intervening undeveloped land that separates the Project site from other urban areas in the Antelope Valley, the resulting development pattern is anticipated by, and is at the heart of, the AVAP's Rural Preservation Strategy. As explained in the AVAP, the Rural Preservation Strategy "creat[es] a pattern of rural town center areas, rural town areas, rural preserve areas, and economic opportunity areas. Each town in the in the Valley will flow outward from vibrant town centers that offer a range of housing and local-serving activities for day-to-day living. Lower density rural residences will surround these town centers, buffered by large contiguous open spaces that contain habitat areas, recreational spaces, and rural economic activities".[656] This is precisely the "smart growth" clustered and mixed-use development pattern proposed by the Centennial Specific Plan, as demonstrated by its land use plan.[657]

The 2016 RTP/SCS anticipates development of the Project site at densities commensurate with the Centennial Specific Plan.[658] The Specific Plan is also consistent with "complete communities" land use policies described in the 2016 RTP/SCS. As envisioned by SCAG, "complete communities" are compact mixed-use districts that concentrate housing,

650 Batty et al. 2003, p. 1
651 DRP 2017, p. 4-2
652 *Id.,* p. 4-59
653 *Id.,* p. 4-55
654 *Id.,* p. 4-75
655 *Id.,* p. 5.8-22
656 DRP 2015, p. LU-2
657 DRP 2017, Appendix. 4.0-A, pp. 2-5, -16
658 *Id.,* p. 6-8

employment, and a mix of retail and services located in close proximity to each other.[659] As set forth in the Centennial Specific Plan, the Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers.[660] The Project includes a mix of housing options within each Village, ranging from apartment homes close to the proposed Town Center to single-family homes in lower-density areas.[661] A full range of light industrial, business, and other commercial uses are planned and will yield a broad range of employment opportunities, from retail services to large corporate employers.[662] The opportunities for employment diversity increase the overall economic sustainability of the Project and the West EOA.

Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[663] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[664] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80 percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[665] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[666] The Town Center will have a public gathering space of 1 acre or more, with street frontage on at least two sides.[667] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be within the Village Core.[668] High-density residential uses will be located adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[669] The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further reducing demand for SOV travel.[670] All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site.

659 Southern California Association of Governments (SCAG). 2016a (April 7). *The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life*. Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf.
660 DRP 2017, p. 4-10
661 *Ibid.*
662 *Ibid.*
663 *Id.,* p. 4-16
664 *Ibid.*
665 *Id.,* 4-17
666 *Ibid.*
667 *Ibid.*
668 *Ibid.*
669 *Id.,* p. 4-20
670 *Id.,* p. 4-35

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[671] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[672] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[673] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[674]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[675] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[676]

Consistent with the AVAP's Rural Preservation Strategy, the Project would ensure the preservation and management of natural resources and open space in and around the Project site. Specifically, no Project development would occur within the 3,866 acres of the San Andreas Significant Ecological Area (SEA 17) located on the Project site, which land would be permanently protected by a conservation easement provided by the Applicant/Developer.[677] Additionally, approximately 39,213 acres of offsite open space and habitat, which includes 8,913 acres of SEA 17 land, would be permanently protected to mitigate the Project's onsite impacts to biological resources.[678]

In addition, the Specific Plan's Green Development Program[679] requires all development within the Specific Plan to incorporate environmentally sustainable development practices to conserve water, energy and natural resources, reduce and divert waste from landfills, and promote a healthier environment.[680] In addition, to decrease the Project's dependence on carbon-based fuel consumption, a minimum of 50 percent of the anticipated electrical energy demand at build out (i.e. household, business, civic/institutional, recreational, and public

671 *Id.,* p. 4-30
672 *Ibid.*
673 *Id.,* p. 4-31
674 *Ibid.*
675 *Id.,* p. 4-30
676 *Ibid.*
677 *Id.,* p. 4-43
678 *Id.,* p. 4-44
679 *Id.,* Appendix 2-A to Appendix 4.0-A
680 *Id.,* p. 4-70

facilities) shall be met by onsite renewable energy, and ZEV charging stations will be provided throughout the Project area.[681]

Moreover, all buildings within the Specific Plan will be required to comply with state, regional, and local laws applicable to their design and construction including, without limitation, Pavley Motor Vehicle Standards (AB 1493); Low Carbon Fuel Standard;[682] Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations; Renewable Portfolio Standard (SB X1 2 and SB 350); Natural Gas Cooking Stoves and Fireplaces (SCAQMD Rule 445); Solid Waste Diversion (AB 939, AB 341, AB 1826, SB 1383); statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15); Model Water Efficient Landscape Ordinance (MWELO);[683] California Water Code;[684] EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles[685] and for medium- and heavy-duty vehicles;[686] Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels;[687] Advanced Clean Cars Program;[688] Under Inflated Vehicle Tires;[689] Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation;[690] Management of High Global Warming Potential Refrigerants for Stationary Sources;[691] Small Containers of Automotive Refrigerant;[692] High-Global Warming Potential Greenhouse Gases in Consumer Products;[693] Los Angeles Tree Planting Ordinance;[694] Los Angeles Green Building Standards Code;[695] and Los Angeles County Community Climate Action Plan.

In addition, the Project would be subject to Title 24 and CALGreen Code energy efficiency standards. However, as discussed in the Specific Plan and Section 5.21, Climate Change, the Project has committed to compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings, resulting in buildings that would exceed 2016 Title 24 requirements by 15 percent (see PDF 11-3 in Section 5.11, Air Resources), and with CALGreen voluntary measure A5.203.1.2.1 for non-residential buildings and residential buildings taller than four stories, resulting in buildings that would exceed 2016 Title 24 requirements by 10 percent (PDF 11 2). Renewable energy produced on the Project site will be primarily rooftop solar, and a minimum of 50 percent of the Project's anticipated electricity demand must be satisfied from on-site renewable energy generation (PDF 21-3). With this approach, development within the Specific Plan will meet and exceed the standards

681 *Id.,* p. 4-73
682 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.
683 *Id.,* Title 23, Division 2, Chapter 2.7
684 *Id.,* Division 6, Part 2.10, Sections 10910–10915
685 75 Federal Register (FR) 25324–25728 and 77 FR 62624–63200
686 76 FR 57106–57513
687 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 5, Section 95801 et seq.
688 *Id.,* Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts), Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts), Chapter 4.4 (parts), Chapter 8 (parts)
689 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.
690 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.
691 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.
692 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.
693 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 2
694 Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.
695 *Id.,* Title 31, Chapter 1, Sections 100 et seq.

of 2016 CALGreen Tier 1 as well as the requirements of the County's Green Building Ordinances.

For the reasons discussed above, the Project cannot fairly be described as "leapfrog development" or "sprawl." As clearly demonstrated by the its long planning history at the regional and County level, the Project is anything but "uncoordinated growth" undertaken without regard for its environmental consequences. The Project has been carefully designed to promote regional "smart growth" planning principles established by the 2016 RTP/SCS and the AVAP's Rural Preservation Strategy and will aid the County in its effort to accommodate its fair share of the regional housing need in a manner that reduces reliance on the automobile, reduces per capita GHG emissions, and promotes public health. The Project will also be required to implement an extensive list of Green Development design measures and to comply with and, in some cases exceed, applicable laws mandating efficient building design and construction. Finally, will permanently preserve thousands of acres of sensitive habitat. By any measure, the Project is not "sprawl" or "leapfrog development," particularly when viewed from a regional perspective that includes full consideration of regional planning priorities.

Response to Comment F.7-2:

This comment's opposition to aspects of the AVAP and its Rural Preservation Strategy are noted. The Lead Agency disagrees with this comment's assertion that the AVAP "extend exclusive land and development rights that run counter to [the] Rural Preservation Strategy" and that the AVAP's planning decisions exhibit any kind of bias. As explained in response to Comment F.7-1, the Project is consistent with the AVAP's Rural Preservation Strategy because it would implement the AVAP's land use policies applicable to the West EOA. Moreover, the AVAP does not extend exclusive land use and development rights that are inconsistent with the Rural Preservation Strategy. To the contrary, the AVAP focuses development in EOAs in order to achieve the Rural Preservation Strategy's goals of protecting the rural character of the AVAP planning area located outside of its Economic Opportunity Areas.

The AVAP does not preclude development outside of EOAs. As explained in response to Comment F.7-1, the AVAP authorizes compatible development in both Rural Town Centers and Rural Town Areas, in addition to EOAs.[696] Indeed, the AVAP also permits very low density residential development within Rural Preserve Areas.[697] Moreover, the AVAP establishes a transfer of development rights program intended to fully realize the potential development in the EOAs and encourage the preservation of designated Significant Ecological Areas (SEAs). Under this program, lands designated or identified as SEAs or Seismic Zones or are otherwise located in a Rural Preserve Area, with a land use designation of RL10 or RL20, may transfer their development rights to lands identified as EOAs.[698]

696 DRP 2015, pp. LU-5, LU-6
697 *Id.,* p. LU-7
698 *Id.,* p. IMP-5

This comment's reference to so-called "Special Hazards Management Areas" is unclear as this term is not used in the AVAP or in the Los Angeles County General Plan (General Plan). The General Plan does, however, recognize "Special Management Areas" as a designation applicable to areas that "require additional development regulations to prevent the loss of life and property, and to protect the natural environment and important resources."[699] As depicted on General Plan Figure 6.1, *Special Management Areas Policy Map*, the vast majority of unincorporated Los Angeles County is located in a Special Management Area, including the entire Antelope Valley. Thus, the Project site is not excluded from the General Plan's Special Management Area designation, as inaccurately implied by this comment.

In any case, the AVAP and the Project's proposed Specific Plan are both consistent with the General Plan's Special Management Area designation as both plans establish "additional development regulations to prevent the loss of life and property, and to protect the natural environment and important resources." For example, AVAP Chapter 5, Public Safety, Services and Facilities Element, sets forth goals and policies that ensure public safety, including but not limited to: restricting residential densities in fire hazard areas, flood zones and seismic zones through appropriate land use designations (AVAP Polices PS 1.1; PS 2.1; PS 3.1); requiring new development to provide sufficient evacuation routes and adequate access for fire and emergency services (AVAP Policy PS 1.2); limiting development on steep slopes (AVAP Policy PS 2.2); and strengthening coordination and collaboration between citizens, public agencies, and non-profit group to plan for disaster response (AVAP Policy PS 6). The Project's consistency with all of the goals and policies in AVAP Chapter 5 is demonstrated in Draft EIR Table 5.8-1.

Similarly, Centennial Specific Plan Chapter 2.4, Safety and Ecological Zones, establishes a Floodplain Safety Zone and a Geologic Safety Zone to address specific environmental conditions within the Project site. The Floodplain Safety Zone identifies Project areas with potential for flooding, as mapped by the Federal Emergency Management Agency, and provides regulations for development within areas subject to potential flooding that will protect public safety, promote public health, and minimize economic loss due to flooding. The Geologic Safety Zone establishes development review procedures and setback requirements for Project site areas that are subject to potential surface fault rupture, such as the designated Alquist-Priolo Earthquake Fault Zone. Moreover, Sections 3.10.5 and 3.10.6 of the Specific Plan establish standards for the provision of adequate fire, police and emergency services within the Project area, including a conceptual public services plan that identifies the location of up to four fire stations and a Sheriff's station to serve the public safety needs of Project residents and employees.

Finally, consistent with AVAP Goal LU-2, the Project's proposed Specific Plan provides a land use plan that protects environmental resources by, among other things, designating 3,866 acres of Project site land within Significant Ecological Area No. 17 as conserved open space in order to support plan communities, flora, and fauna representing a transitional area

[699] Los Angeles County Department of Regional Planning (LACDRP). 2015 (October 6, adopted). Los Angeles County General Plan 2035 (p. 67). http://planning.lacounty.gov/generalplan/.

between the Mojave Desert, the Transverse Range, and the Tehachapi Mountains and to provide a wildlife movement linkage between these mountain ranges.

Response to Comment F.7-3:

This comment accurately describes the text of AVAP Goal LU 2 and its implementing policies. The AVAP's designated Economic Opportunity Areas are excluded from application of AVAP Policies LU 2.2 through LU 2.6. This exclusion was adopted by the County in order implement the AVAP's Rural Preservation Strategy, which directs the majority of future Antelope Valley development to designated Economic Opportunity Areas (EOAs) in order to preserve the rural character of the balance of the AVAP planning area. Please see response to Comment F.7-1. However, neither the Project site nor any EOA are excluded from application of AVAP Policy LU 2-1, which limits the amount of potential development within Significant Ecological Areas (SEAs) through appropriate land use designations with very low residential densities. Indeed, the Project goes beyond the requirements of Policy LU 2-1 by prohibiting any ground disturbance or development within designated SEAs on the Project site.[700] One of the Project Objectives is to avoid development within, and that would affect, established SEAs to minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. The San Andreas SEA has been designated as Open Space in the Land Use Map for the Project, where development would not occur. The Project also preserves important regional wildlife corridors and the biological connectivity of regional open space lands, as discussed in Section 5.7, Biological Resources, of the Draft EIR.

Although EOAs, and thus the Project site, are expressly exempt from AVAP Policy LU 2.2, the Project is nevertheless consistent with such policy. The Project site is not located in or near a designated Scenic Resource Area. The majority of the site has slopes less than 25 percent and the areas with the greatest slopes would be preserved as Open Space. Development within the Hillside Management Areas (HMAs) would be required to comply with hillside provisions within the Specific Plan, which have been designed to protect sensitive hillside conditions as discussed further in EIR Section 3.3, Conceptual Grading Plan, and Appendix 1-B, Hillside Design Guidelines, in the Specific Plan.

The Project is also consistent with AVAP Policy LU 2.3. The Project site is located within the West EOA as indicated on the AVAP Land Use Policy Map and thus would accommodate urban development in the Antelope Valley to preserve agricultural areas outside the EOAs. Likewise, the Project is consistent with AVAP Policy LU 2.4 because it is located within the West EOA and outside of any Mineral Resource Areas. The Project is also consistent with AVAP Policy 2.5 because is located within the West EOA and would avoid or minimally impact riparian areas on the site by designating major drainage channels on the site as Open Space, as discussed in greater detail in EIR Section 5.7, Biological Resources. Finally, the Project is consistent with AVAP Policy 2.6 because the Project site is located within the West EOA and outside of all National Forests, including the Angeles National Forest.

700 DRP 2017, p. 6-1

Please also see Section 5.10, Land Use and Planning, of the County's Antelope Valley Plan Environmental Impact Report (SCH # 2014061043) for a discussion of its Rural Preservation Strategy and its associated land use impacts in the Antelope Valley. See also Section 3.11, Land Use, of the Southern California Association of Governments' Environmental Impact Report for the 2016 RTP/SCS (SCH # 2015031035) for a discussion of its preferred regional land use, which assumes the Projects, and its associated land use impacts in the region.

Response to Comment F.7-4:

This comment misstates the regulatory effect of the Project's proposed Specific Plan. Contrary to this comment's claim, the proposed Specific Plan would not "override" any applicable AVAP goal or policy. In fact, the Specific Plan goes beyond the requirements of the AVAP by prohibiting any disturbance or development within designated SEAs, whereas the AVAP allow very low-density development in such SEAs. As the Commenter already points out in Comment F.7-3, it is the AVAP – not the Project's proposed Specific Plan – that excludes Economic Opportunity Areas from many land use restrictions applicable to other AVAP planning areas. In adopting the AVAP, the County determined that such exclusions were appropriate for EOAs because those planning areas are targeted for future development in order to implement the AVAP's Rural Preservation Strategy, as discussed in response to Comment F.7-1. The AVAP is a component of the General Plan.[701] As such, by law, the Centennial Specific Plan must be consistent with, and cannot "override", the goals and policies of the AVAP.[702] Please see Draft EIR Table 5.8-1 for a detailed analysis of the Project's consistency with the AVAP.

As explained in Draft EIR Section 5.8, Land Use, Entitlements and Planning, the Project is consistent with the goals and policies of the AVAP, including its land use designations. The Land Use Policy map in the AVAP shows the land use designations for the Project site, which would regulate permitted land uses and development densities/intensities. The Land Use Plan in the *Centennial Specific Plan* includes the same land uses as the designations for the site, with the boundaries of the different land uses generally aligning with the land use designations in the AVAP. No change in land use designation, additional growth, or reduction in the amount of open space is proposed by the Project.[703] Contrary to this comment, the Centennial Specific Plan does not propose to override any "very low" density land use designation established by the AVAP.

The Conservation and Open Space Element identifies the site to have Class 1 and Class 2 constraints. Similarly, as discussed in response to Comment F.7-3, the Project site is located within a designated Scenic Resource Area, Mineral Resource Area or National Forest. Moreover, the majority of the Project site has slopes less than 25 percent and the areas with the greatest slopes would be preserved as Open Space. Project development within the Hillside Management Areas (HMAs) would be required to comply with hillside provisions within the Specific Plan, which have been designed to protect sensitive hillside conditions as

701 DRP 2015, p. 1-2

702 Government Code § 65454 ("No specific plan may be adopted or amended unless the proposed plan is consistent with the general plan.")

703 DRP 2017, p. 5.8-22

discussed further in Draft EIR Section 3.3, Conceptual Grading Plan, and Appendix 1-B, Hillside Design Guidelines, in the Specific Plan.[704]

As discussed in response to Comment F.7-1, since the Project is located within a designated EOA, it would promote, and is consistent with, the AVAP's Rural Preservation Strategy's goals of protecting the rural character of the AVAP planning area located outside of EOAs. Project protection from seismic and geologic hazards is addressed in Draft EIR Section 5.1, Geotechnical, while protection from flood hazards is addressed in Section 5.2, Hydrology and Flood. Project impacts related to fire hazards are addressed in Draft EIR Sections 5.3, Hazards and Fire Safety, and 5.16, Fire and Law Enforcement. Finally, as explained in Draft EIR Section 5.8, the Project site is not located within a designated airport influence area and is not near military lands. Moreover, Draft EIR Section 5.12 explains that the principal military authority has reviewed the Project development footprint and "has not identified any threshold issues that would render [Project] development plans incompatible with [Department of Defense] operations along [Military Training Routes] in the vicinity."[705]

In addition, the environmental impacts associated with developing the AVAP's designated EOAs consistent with the AVAP's land use policy map were examined in detail in the Antelope Valley Plan Environmental Impact Report (SCH # 2014061043) (AVAP EIR). Please see AVAP EIR Sections 5.1 (Aesthetics), 5.2 (Agricultural and Forestry Resources), 5.4 (Biological Resources, including riparian habitat), 5.6 (Geology and Soil), 5.8 (Hazards and Hazardous Materials), 5.9 (Hydrology and Water Quality), 5.10 (Land Use and Planning), 5.11 (Mineral Resources), 5.14 (Public Services), and 5.17 (Utilities and Service Systems).

Response to Comment F.7-5:

The Commenter's stated preference for rural living is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment questions propriety of the AVAP's designation of EOAs with present environmental conditions that purportedly share certain characteristics with designated Rural Preserve Areas. As an initial matter, it should be noted the Project is not "completely undeveloped," as this comment inaccurately claims. As explained in the Draft EIR, State Route (SR) 138 traverses through the Project site, as does a segment of the California Aqueduct.[706] The Oso Pumping Plant, which is part of the aqueduct system, is located in the north-central portion of the Project site.[707] In addition, Cement Plant Road is a paved roadway that runs north from SR-138 through the Project site to the National Cement Plant located northwest of the Project site in Kern County.[708] There are also several paved access roads present on the Project site in the vicinity of the aqueduct facilities.[709] Existing utilities on the Project site include overhead and underground utility lines owned by Southern California Edison, Southern California Gas Company and AT&T.[710] There is an aboveground water storage tank in the

704 Final EIR Appendix 4.0.Rev
705 DRP 2017, p. 5.12-30
706 *Id.,* pp. 5.8-14, -15
707 *Ibid.*
708 *Ibid.*
709 *Ibid.*
710 *Ibid.*

southwestern portion of the Project site, and water well in the central portion of the Project site that was formerly used as a homestead.[711] The High Desert Hunt Club is private hunt club totaling 7,530 acres, of which 1,147 acres are located at the southern end of the Project site.[712] Finally, a residential dwelling is located near the center of the northern property line and a significant portion of the Project site is currently used for livestock grazing and agricultural uses.[713]

As explained in the AVAP, designated Economic Opportunity Areas (EOAs) include areas identified as existing Rural Town Centers, or Rural Town Areas, but also have land use designations that permit a mix of residential, commercial and light industrial land uses to accommodate projected growth in a manner that preserves the rural character of surrounding areas.[714] Thus, the AVAP entails a "trade off" that targets certain open space areas for future development in order to protect other open space and rural areas in unincorporated Antelope Valley, as further discussed in response of Comment F.7-1.

The AVAP explains that the EOA locations were chosen on the basis of their adjacency to major transportation infrastructure projects planned by third-party agencies (e.g., the Northwest 138 Corridor Improvement Project) which would significantly impact the land use pattern in the unincorporated Antelope Valley by supporting commercial and industrial development, providing local employment opportunities, and reducing the need for long-distance commuting.[715] The AVAP's Conservation and Open Space Element also explains that the AVAP directs development to EOAs in order to protect significant natural areas of unincorporated Antelope Valley and their rural character.[716] Thus, although the Project site may currently exhibit some "remote" rural characteristics similar to areas of the AVAP designated as Rural Preserve Areas, the AVAP does not expect such conditions to be maintained. To the contrary, the stated purpose of the AVAP's Rural Preservation Strategy is to direct the majority of future Antelope Valley growth into EOAs so as to protect the "remote" rural character of Rural Preserve Areas from development pressures on a long-term basis.[717]

With respect to the Project site's purported fire hazards, Phase I Environmental Site Assessments were prepared for the Project site to investigate potentially hazardous current and historic land uses that could adversely affect Project site development.[718] Based on these reports, there are no adjacent land uses that represent fire hazards.[719] However, as disclosed in the EIR, portions of the Project site are designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a Very High Fire Hazard Security Zone (VHFHSZ) and as a High Fire Hazard Security Zone (HFHSZ), and the potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased

711 *Ibid.*
712 *Ibid.*
713 *Ibid.*
714 DRP 2015, p. LU-8
715 *Id.,* p. LU-13.
716 *Id.,* p. COS-2
717 *Id.,* p. I-8
718 DRP 2017, p. 5.3-38
719 *Ibid.*

human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[720]

CAL FIRE classifies a zone as having a moderate, high, or very high fire hazard based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. As explained in the EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. These characteristics would be addressed as the Project site is developed, as discussed below.[721]

The EIR explains that Project site's limited access will be significantly improved under Project conditions. The Project would construct an extensive backbone vehicular circulation system that would provide five points of access to the site via SR-138. The design of the Project's internal circulation system would implement the County's Fire Code standards, as applicable, regarding access (e.g., roadway widths, fire hydrant placement, length of single access streets, cul-de-sac dimensions, turning radius, street parking restrictions) (see Section 5.10, Traffic, Access and Circulation, for additional discussion of roadway design; see also the Mobility Plan described in Section 3.2 of the proposed Specific Plan[722]).

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

With respect to fire flows, the EIR explains that the Project would construct a Fire Code compliant water system to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires (refer to Section 5.18, Water Resources, for further discussion of the water system; see also the Water Service Plan described in Section 3.5 of the proposed Specific Plan[723]). The proposed water system includes water mains, water tanks, pump stations (where

720 *Id.,* pp. 5.2-35. -36
721 *Id.,* p. 5.2-35
722 Final EIR Appendix 4.0-A.Rev
723 *Ibid.*

necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and LACFD's fire-suppression standards for improved property and development. These standard requirements must be met prior to the approval of building permits; therefore, the Project would implement a water system that would meet all County requirements in support of fire-suppression activities so that less than significant water-related fire hazards would occur. Under Project conditions, fire flows at the Project site will be substantially improved as compared to existing conditions.

With regards to vegetative cover and topography, the majority of residential development is proposed for the flatter portions of the Project site. Some residential development, however, is proposed in areas that would be adjacent to large open space areas with moderate vegetative cover. Under existing conditions, the plant communities that make up this cover are highly combustible and would therefore present a high fire hazard and pose a potentially significant impact to development in these areas. As development of the Project site proceeds, however, fire hazards associated with the natural vegetative cover would be eliminated through its replacement with urban landscape vegetation, which is irrigated and less combustible than the existing vegetation.[724] Indeed, the Project's proposed Specific Plan includes a landscaping plant palette comprised of many plant species specifically selected for their fire resistance and requires that the Project's final plant palette be approved by the LACFD.[725]

As explained in the Draft EIR, topography is connected to wildland fire hazards because steep slopes are not only inaccessible to fire fighting vehicles, but steep canyons can create updraft conditions (much like a chimney) and a fire in a steep canyon can spread rapidly into adjacent areas.[726] Steep canyons that are densely covered with combustible vegetation are especially hazardous. Thus, the Draft EIR explains that the potential for wildland fire hazards would still exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[727] Generally, fire-prevention tactics for urban development in wildland fire hazard areas focus on (1) restricting the types of building materials used; (2) appropriate building design; and (3) incorporating setbacks, including fuel-modification zones.[728] All developments within a VHFHSZ and HFHSV are required to meet the building construction requirements specified in Chapter 7A of the County Building Code (Title 26) and in the Fire Code (Title 32).

The Project's proposed Specific Plan further ensures appropriate building placement and design by requiring LACFD review of all Project tentative tract maps and amendments.[729] Moreover, to further protect against fire, the Specific Plan's General Development expressly prohibits the use of wood-burning fireplaces on the Project site.[730] Finally, public access would be restricted in areas of the Project site that are undeveloped and contain steep slopes

724 DRP 2017, p. 5.3-36
725 *Id.,* Appendix 4.0-A, p. 3-42; Table 3-8
726 *Id.,* p. 5.3-35
727 *Id.,* p. 5.3-36
728 *Id.,* p. 5.3-34
729 *Id.,* Appendix 4.0-A, pp. 4-12, -14
730 *Id.,* Appendix 4.0-A, p. 2-70

in accordance with the Specific Plan's Trail Plan and Open Space Management Plan.[731] Despite limited access to the general population, those areas of the site with the greatest topographic relief would be accessible to fire-fighting equipment via helicopter, other air transport access, and existing unpaved fire roads. As required by the LACFD, upon their Project-level review (e.g., tract map review), clearance for fire access roads and gates would be incorporated into developed areas. Finally, Project implementation of the Fuel Modification Plan required by MM 3-9 would further reduce fire hazards at the wildland/urban interface. With adherence to the required and best-accepted practices for fuel-modification zone management, emergency access, building materials and methods, as well as the changes in land use, and existing mutual aid agreements, the Project's potential to constitute a potentially dangerous fire hazard, or to expose people or structures to a significant risk of loss, injury or death involving fires, would be reduced to a less than significant level.

With respect to purported flood risks, the proposed Project has been designed to meet or exceed County MS4 Permit, LID Standards Manual and LID requirements hydromodification and hydrology (flood control) requirements for new development. The Project incorporates MMs 2-1 and 2-2 that require Project compliance with hydromodification and flood-control performance standards be confirmed in a Drainage System Engineering and Planning Report submitted to the County during the review and approval of each Project tract map. Project runoff will not exceed the planned storm drain capacity and will not require construction of additional drainage facilities not considered in this EIR and that could have significant environmental effects, as discussed in Section 5.2, Hydrology and Flood.

As required by MM 2-3, portions of the Project site along the northern and eastern site boundaries located within a 100-year floodplain will be subject to a Specific Plan Floodplain Safety Overlay that precludes habitable residential, commercial, school and institutional structures in the floodplain. All applications for Project tract maps that would locate any structures not precluded by the Floodplain Safety Overlay in the floodplain must include a Drainage System Engineering and Planning Report that provides a detailed description of the floodplain boundaries and a description of applicable flood protection measures. This report must demonstrate that, after construction, structure designs and floodplain flows will comply with all applicable FEMA and County of Los Angeles floodplain flood flow and development standards. If required, a conditional letter of map revision (CLOMR) from FEMA will be obtained prior to any construction within a mapped 100-year floodplain. There will be no housing development in on-site floodplains, and no significant impacts will occur from placing structures within a floodplain.

Regarding purported seismic risks, with implementation of Project Design Feature (PDF) 1-1, the Project would not expose people or structures to potential substantial adverse effects (including the risk of injury or death) involving strong seismic ground shaking, seismic-related ground failure (e.g., liquefaction, settlement, lateral spreading), or location on an unstable geologic unit (e.g., collapse, expansive soils). As discussed in Section 5.1, Geotechnical, the Project has been designed with a Geologic Safety Zone so that areas with

[731] *Id.,* Appendix 4.0-A, pp. 3-88, -94

potential geologic and seismic constraints are not developed with habitable structures and are planned so that buildings near faults have a minimum 100-foot setback in either direction from the fault line (PDF 1-1). Therefore, the Project would not expose people or structures to potential adverse effects (including the risk of injury or death) from surface rupture of a known earthquake fault with implementation of PDF 1-1. Additionally, in accordance with California Department of Education's Title 5 and current building codes, no sensitive uses (i.e., schools, hospitals, or public assembly sites) would be located on sites presenting a significant geotechnical hazard, as determined by the site-specific geological and soils engineering study. Therefore, there would be less than significant impacts related to fault rupture, seismic ground shaking, and ground failure with implementation of PDF 1-1.

Please also see AVAP EIR Sections 5.6 (Geology and Soil), 5.8 (Hazards and Hazardous Materials), and 5.9 (Hydrology and Water Quality), as well as Sections 3.7 (Geology and Soils), 3.9 (Hazards and Hazardous Materials), and 3.10 (Hydrology and Water Quality) of the RTP/SCS EIR.

Response to Comment F.7-6:

This comment misconstrues the land use regulatory scheme established by the AVAP. Contrary to this comment's claim, the AVAP did not reduce the size of SEAs in the AVAP planning area. Rather, the AVAP expanded the total acreage of SEAs within the AVAP.[732] Indeed, some of the SEA boundary that overlaps portions of the Project site did not exist prior to adoption of the AVAP.[733] In fact, the AVAP substantially reduced the development intensity within SEA's by converting most of the SEA areas designated for residential development from N1- Non-Urban 1 (0.5 dwelling units/acre) and N2- Non Urban 2 (1 dwelling unit/acre) to RL20 – Rural Land 20 (1 dwelling unit/20 acres). The use of RL 20 designation for the SEAs was a compromise reached with the Blue Ribbon Committee, an is an integral part of the balanced Rural Preservation Strategy that the AVAP achieves.[734]

This comment also incorrectly states that the Project's land use plan is designed to achieve the Project Applicant's purported desire for "high density residential housing." In fact, the vast majority of the land within the Project's development footprint is designated for very low, or low-density housing.[735] Moreover, the Specific Plan prohibits all development within SEA land on the Project site, whereas the AVAP would allow some very low density residential uses in such areas.[736] Thus, the Specific Plan is even more protective of on-site SEAs than is the AVAP.

This comment's claim that EOAs are "given *carte blanche* to ignore ordinances with which others must comply" is not accurate. Per the AVAP, development within the Project area must proceed in accordance with a specific plan to ensure development occurs in an orderly and sustainable manner, and to ensure that the required infrastructure and public utilities

732 DRP 2014a, p. 5.4-59
733 *Id.,* Figure 5.4-4
734 *Id.*, p. 2-47
735 DRP 2017, Appendix 4.0-A, Figure 2-3
736 *Id.,* p. 1-6

are in place at a master planned level before new development proceeds.[737] As such, the Project will be required to adhere to the development standards and requirements of the Project's proposed Specific Plan, which itself must comply with the requirements of Government Code Section 65451(a), which provides that all specific plans must include text and a diagram which specifies all of the following:

1. The distribution, location, and extent of the uses of land, including open space, within the area covered by the plan;
2. The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan;
3. Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable, and;
4. A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out [the plan].

In addition, per Government Code Section 65454, the Specific Plan may not be adopted unless it is consistent with the terms and provisions of the AVAP and, per Government Code 65455, no public works project, no tentative map, and no zoning ordinance may be adopted within the Specific Plan area unless such action is itself consistent with the Specific Plan. Finally, as a condition of Project approval, the Project must comply with all applicable federal, state and local laws.

With regard to this comment's general references to unspecified "Special Hazards," environmental resources, scenic values, and wetland and riparian resources, please see responses to Comments F.7-4 and F.7-5. Please also see AVAP EIR Sections 5.1 (Aesthetics), 5.2 (Agricultural and Forestry Resources), 5.4 (Biological Resources, including riparian habitat), 5.6 (Geology and Soil), 5.8 (Hazards and Hazardous Materials), 5.9 (Hydrology and Water Quality), 5.10 (Land Use and Planning), 5.11 (Mineral Resources), 5.14 (Public Services), and 5.17 (Utilities and Service Systems).

Response to Comment F.7-7:

As this comment correctly notes, the Project's proposed Specific Plan accurately explains that it would complement the goals and policies of the AVAP by capitalizing on the transportation infrastructure investment that state and regional agencies are bringing into the area, while still achieving the general goal of rural preservation in the Antelope Valley.

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[738] As explained in the AVAP's vision

[737] DRP 2015, p. IMP-4
[738] *Id.,* p. 1-2

statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[739] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[740]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[741] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[742] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[743] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[744] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[745]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[746] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[747] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[748]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[749] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[750] During the AVAP community planning process, Economic Opportunity Areas "were

739 *Id.,* p. I-5
740 *Id.,* p. I-6
741 *Id.,* p. I-5
742 *Ibid.*
743 *Id.,* p. I-6
744 *Id.,* p. I-7
745 *Ibid.*
746 *Ibid.*
747 *Ibid.*
748 *Ibid.*
749 DRP 2017, p. 4-4
750 *Id.,* p. I-8

identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[751]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[752] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[753] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The AVAP calls for the development of a specific plan to ensure orderly and sustainable development and the provision of necessary infrastructure and public utilities on the Project site and the West EOA. The Project's proposed Specific Plan implements the AVAP's Rural Preservation Strategy by establishing a Land Use Plan consistent with the AVAP's land use designations for the Project site.[754] No change in land use designation, additional growth, or reduction in the amount of open space is proposed by the Project.[755] Moreover, the Specific Plan implements the AVAP's Rural Preservation Strategy and capitalizes on regional infrastructure investments by proposing an on-site circulation system that would accommodate future widening and realignment of the SR-138, a Caltrans project commonly known as the Northwest 138 Corridor Improvement Project.[756]

This comment's assertion that the Northwest 138 Corridor Improvement Project would not be necessary, nor would it occur in the foreseeable future, if the Project did not go forward is incorrect. As explained in the *Northwest State Route 138 Corridor Improvement Project*

751 *Ibid.*
752 DRP 2015, p. I-8
753 *Ibid.*
754 DRP 2017, p. 5.8-22
755 *Ibid.*
756 *Id.,* p. 5.8-23

Final Environmental Impact Report/Environmental Impact Statement (SR-138 EIR/EIS) approved by Caltrans and the Federal Highway Administration in August 2017, planning for the Northwest 138 Corridor Improvement Project significantly predates the Project and AVAP. The North County Combined Highway Corridors Study (NCCHCS), completed in 2004, identified SR-138 as a bypass corridor and recommend its expansion to a 6-lane freeway between Interstate 5 and State Route 14 to accommodate traffic demand that the NCCHS projected would double by 2025.[757] Four years later, in 2008, the voters approved Measure R, the Los Angeles County half-cent sales tax transportation funding initiative.[758] Measure R allocated $25 million for approval and environmental documentation of the Northwest 138 Corridor Improvement Project to be used between 2012 and 2018.[759] As this comment correctly notes, the Project's application was not deemed complete by the County until 2008 and the AVAP was not adopted until 2015, well after preparation of the NCCHCS and the Measure R campaign. The Northwest 138 Corridor Improvement Project is a long planned public works project needed to accommodate regional growth projections for areas well beyond the Project site, and its planning history demonstrates the error of this comment's inaccurate claim that SR-138 expansion would never occur but for the Project.

This comment's assertion the Specific Plan "asserts its primacy over the General Plan and AVAP" are incorrect. The AVAP is a component of the General Plan and expressly requires preparation and adoption of a specific plan for the Project site before any development of five or more residential units may occur.[760] Moreover, the AVAP expressly allows any specific plan adopted for the Project site to deviate from certain of the AVAP land use designations and other land use controls applicable to the Project site "[i]n order to allow for more flexibility in the future detailed site design of specific neighborhoods in this area."[761] However, consistent with the requirements of California Government Code Section 65454, the AVAP also expressly provides that any specific plan adopted for the Project must be consistent with the General Plan, which includes the AVAP. Indeed, this comment quotes the AVAP requirement that "[a]ny development agreement for the Project must be consistent with the county's general plan." As demonstrated by Draft EIR Table 5.8-1, the Project is consistent with the AVAP.

This comment correctly points out that the Project's proposed Specific Plan states that, "[s]hould there be any inconsistency between this Specific Plan and existing County ordinances, the provisions of the Specific Plan shall control." This regulatory hierarchy is expressly provided for by Los Angeles County Code, Title 22, Part 15, *SP Specific Plan Zone*, which sets forth the County's zoning regulations applicable to the "SP Specific Plan" zoning designation. As explained in the EIR, the Project would require rezoning to the SP zoning designation, consistent with the General Plan and AVAP.[762]

The SP zoning designation was established by the County to provide a zone for property which is subject to an adopted specific plan. As explained in County Code § 22.40.720, the SP

757 Caltrans 2017b, p. 8
758 *Id.,* p 1
759 *Ibid.*
760 DRP 2015, p. IMP-4
761 *Ibid.*
762 DRP 2017, p. 5.8-71

zoning designation "recognizes the detailed and unique nature of specific plans and the need to ensure that development conforms to the uses, development standards and procedures contained in specific plans." Accordingly, County Code § 22.40.730 provides that land located within the SP zone "may be used for any main use permitted by the specific plan *subject to all of the limitations and conditions of the specific plan*" (emphasis added). Moreover, County Code § 22.40.770 provides that land located within the SP zone "shall be *subject to … [a]ny development standards contained in the specific plan*" and "[a]ny development standards contained in [County Code] Title 22 *which are referred to in the specific plan*" (emphasis added). Accordingly, per the County Code, each specific plan adopted in the County establishes the zoning and development standards that are applicable within that specific plan's planning area, which standards *always* control in the event of a conflict with other provisions of the County Code. This regulatory hierarchy is not unique to the *Centennial Specific Plan*.

The lead agency agrees that County goals, policies and ordinances should be applied equally throughout the County, as applicable. Accordingly, the Project will not "get a pass" for any violation of County ordinances or regulations applicable to the Project site. As required by California Government Code § 65455, no public works project, subdivision map, or zoning ordinance may be approved for the Project unless such approval is consistent with the proposed Specific Plan. Moreover, as explained in Section 4.3 of the Specific Plan, the goals, the development standards applicable to the Project site will be adopted by ordinance and will be subject to the penalty provisions and citation procedures of the County Code.

The Department of Regional Planning is responsible for the overall administration and enforcement of the provisions of the Specific Plan, including: administering the application process, interpreting provisions of the Specific Plan. Specifically, the Director of the Department of Regional Planning (Director), the Regional Planning Commission, or in certain cases, a Hearing Officer, are responsible for approving Tentative Maps, Conditional Use Permits (CUPs), variances, and other use permits, in accordance with the Titles 21 (zoning) and 22 (subdivisions) of the County Code. The Regional Planning Commission, a Hearing Officer, or the Director may certify California Environmental Quality Act (CEQA) documentation, as appropriate, for permits or other approvals for which they have discretionary decision-making authority pursuant to state law, this Specific Plan, the Subdivision Ordinance, or the Zoning Ordinance. The Regional Planning Commission acts on appeals from decisions of the Director or the Hearing Officer. The Regional Planning Commission also makes recommendations to the Board of Supervisors regarding matters such as Specific Plan amendments or other legislative actions and any associated CEQA documentation. With respect to Specific Plan amendments, other legislative actions, or actions on final subdivision maps, the Board of Supervisors is responsible for making such determinations, acting on appeals of Regional Planning Commission decisions, and adopting and certifying associated CEQA documentation.

This comment correctly states that the Project application was deemed complete by the County in May 2008, prior to the October 2015 of the current County General Plan and the June 2015 of the AVAP. The Specific Plan quote regarding the County evaluation of complete applications that this comment accurately quotes is incomplete. As this comment notes,

page 1-11 of the Specific Plan states that "[t]he General Plan provides that pending projects for which an application has been deemed complete will be evaluated under the General Plan in effect when the application was deemed complete." In fact, Chapter 2, page 16, of the Los Angeles County General Plan 2035 states, for complete applications filed prior to the effective date of the current General Plan, "[t]he applicant may choose whether the application will be reviewed for consistency with the previously adopted General Plan or with this General Plan." The General Plan also provides that, if the applicant choses to have the application be reviewed for consistency with the previously adopted General Plan, the application may be modified prior to consideration by County decision makers.[763]

At present, the Project Developer/Applicant desires to have the Project application evaluated under the current General Plan and the AVAP. However, as explained on page 1-15 of the Draft EIR, the AVAP has been challenged in court, but no injunction against implementation of the plan has been sought or granted. The County's current General Plan was not challenged and is in effect. Consistent with land use law and CEQA requirements, these land use plans are being implemented and the EIRs prepared for each plan have been considered as part of the Project EIR and each is incorporated by reference. Should the approval and adoption of the AVAP or its accompanying EIR be invalidated pending further environmental and policy review, a possible judicial remedy could effectively revive the now-superseded former *Antelope Valley Areawide General Plan* (AVAGP), the earlier Area Plan for this area of Los Angeles County. In that case, the Project would be evaluated under the AVAGP, and would require an AVAGP amendment in addition to a zone change to Specific Plan and other entitlements, including a Conditional Use Permit for development within a SEA subject to review by the Significant Ecological Area Technical Advisory Committee. In the event the AVAP is invalidated, its various exclusions for economic opportunity areas related to Scenic Resource Areas, Agricultural Resource Areas, Mineral Resource Areas, riparian areas, and groundwater recharge basins (as described in AVAP Policies LU 2.2 through LU2.6) would not apply to the Project.

In response to this comment, the last two full paragraphs on page 1-11 of Draft EIR Appendix 4.0-A, Centennial Specific Plan, are hereby deleted in their entirety, as follows:

> ~~Prior to the date of adoption of this Specific Plan, the Board of Supervisors approved the update to the County's General Plan on March 24, 2015. The General Plan came back for final findings and was adopted on October 6, 2015. The General Plan provides that pending projects for which an application has been deemed complete will be evaluated under the General Plan in effect when the application was deemed complete.~~
>
> ~~Additionally, the Board of Supervisors adopted the updated Antelope Valley Area Plan on June 16, 2015. The application of Tejon Ranch, for this Specific Plan was deemed complete by the County as of May 13, 2008, as such this project will be evaluated under the General Plan and Area Plan in effect at the time of adoption of this Specific Plan.~~

[763] LACDRP 2015, p. 16

Response to Comment F.7-8:

The Applicant is aware that the United States Air Force, the U.S. Marine Corps, and the U.S. Department of the Navy control and use airspace over and near the area as Military Training Routes (MTRs). Military overflights and testing activities, and associated noise including the potential for sonic booms, are part of existing conditions in the Project area. The location of the MTRs and/or frequency of these operations would not change directly as a result of the proposed Project. Noise associated with military overflights is addressed in Section 5.12, Noise, of the Draft EIR.

As discussed in Section 5.12, "The MTR program is a joint venture by the Federal Aviation Administration (FAA) and the U.S. Department of Defense (DoD). The FAA has specific requirements regarding the altitude of MTR flights. Existing regulations prohibit military aircraft from flying lower than 500 feet above ground level (AGL) over sparsely populated areas and lower than 1,000 feet AGL over inhabited areas or lower than 1,000 feet over the tallest obstacle over any congested area of a city, town, or settlement (Federal Aviation Regulations [FAR], Section 91.119)".[764]

The Project Applicant has had discussions with military representatives concerning military flight routes in the vicinity of the Project site. Once development of the Project has progressed to the point where at least a portion of the site is considered to be inhabited, FAR Section 91.119 would prohibit aircraft flying at altitudes lower than 1,000 feet AGL. The principal military authority (Rear Admiral J.L. Betancourt, U.S. Navy), after examining the Project plans, concluded that "we have come to a mutual understanding that the existence of DOD (Department of Defense) Military Training Rates [sic] (MTRs) over Tejon Ranch Company (TRC) development footprints for Centennial . . . should not preclude your planning efforts with regard to [this] area. The military services' analysis of the information you have provided has not identified any threshold issues that would render Tejon Ranch's development plans incompatible with DOD operations along MTRs in the vicinity" (Betancourt 2004). The military has indicated they would cooperate to minimize impacts to the Centennial site, though no formal agreement has been implemented to date. Therefore, while it is acknowledged that the Project site would be subject to periodic and brief single noise event levels (SELs), estimated to range between 53.0 and 108.8 A-weighted decibels (dBA), due to military overflights that may be considered a nuisance, for the reasons described above, it would be considered a less than significant impact on the Project site.[765]

In summary, the DOD determined that the Project, as proposed in 2004, would not result in adverse effects associated with the MTRs in the Project area. The Centennial Project, as currently proposed, includes a similar range of land uses, densities, and associated infrastructure, on a smaller scale. As such, there is no significant impact related to hazards from military flight activity and no mitigation is required. Each development project in the path of any MTRs or other military flight areas would require coordination with the appropriate military representatives and application of FAA regulations, where applicable.

764 DRP 2017, p. 5.12-30
765 *Id.,* p. 5.12-30

As discussed on Draft EIR page 5.9-29, the Project is anticipated to create approximately 23,675 jobs at the on-site commercial uses, business parks, commercial recreation uses, and public facilities. These non-residential uses would not compete with jobs at the US Department of the Navy and US Marine Corps installations located several miles east and northeast of the site. Thus, no loss of jobs at the Edwards Air Force Base, Naval Base Ventura County and the Naval Air Weapons Station China Lake are expected due to the implementation of the Project. Rather, it is more likely that the Project would provide housing for employees at these facilities.

The potential of the Project to induce substantial growth is discussed on Draft EIR pages 5.9-23 through 5.9-32, which state that substantial increases in population, housing and employment would occur with the Project and this growth would be considered significant and unavoidable. Section 6.0, Growth Inducing Impacts, of the Draft EIR also discusses growth inducement potential and the growth inducing impacts of the Project. Again, the Project is expected to result in a significant adverse indirect growth-inducing impact. However, the Project is consistent with approved growth plans in the region, including the growth projections in the 2016 RTP/SCS and the AVAP.

With respect to this comment's concerns regarding the impact on Project residents caused by noise and related effects generated by existing military training operations, such impacts are not required to be analyzed in the EIR. As held by the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District*, "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents".[766] With respect to this comment's concern regarding the Project's purported adverse economic effects on regional military installations, CEQA only requires that the EIR evaluate the environmental impacts of the Project; the Project's purported economic and social effects are not treated as effects on the environment pursuant to CEQA Guidelines § 15131(a).

With respect to this comment's claim that the Project will result in "sprawl," please refer to response to Comment F.7-1.

Response to Comment F.7-9:

Please refer to response to Comment F.7-8. The principal military authority (Rear Admiral J.L. Betancourt, U.S. Navy), after examining the Project plans, concluded that the Project, as proposed in 2004, would not result in adverse effects associated with the MTRs in the Project area. The Project, as currently proposed, has a similar range of land uses, densities, and intensities, on a smaller scale. Accordingly, the Project would not result in adverse effects to military capability. As addressed in response to Comment F.7-8, the proposed Project would not result in adverse effects on the local economy as it relates to the military facilities and activities in the Antelope Valley, and such purported impacts need not be evaluated in the EIR per CEQA Guidelines § 15131(a).

[766] *CBIA* v. *BAAQMD* (2015) 62 Cal.4th 369, 386

The Notice of Availability (NOA) for the Draft EIR was mailed overnight to Marvin Sanders and Major General David A. Harris at the Edwards Air Force Base; however, the NOA was not provided to the NASA Armstrong Flight Research Center, the Mojave Air and Space Port, Lockheed Martin, Boeing, or Northrup Grumman, but such notice is not required by CEQA. The NOA was circulated consistent with the requirements of CEQA Guidelines § 15087, and was thus provided to (i) the State Clearinghouse, (ii) organizations and individuals who have previously requested notice, (iii) public libraries serving the area involved, (iv) owners and occupants of the property contiguous to the parcels that comprise the Project site, (v) public agencies with jurisdiction by law and/or special expertise with respect to the Project and Project location, and (vi) the US Department of Defense or any branch of the US Armed Forces that has given the Lead Agency written notice of the specific boundaries of a low-level flight path, military impact zone, or special use airspace and provided the Lead Agency with written notification of the contact office and address for the military service pursuant to CEQA Guideline §15190.5(b). Per CEQA Guidelines § 15087, the NOA was also posted on and in the vicinity of the Project site and in the office of the County Clerk, and was published in a least one newspaper of general circulation in the area affected by the proposed Project.

Response to Comment F.7-10:

The Geologic Safety Zone setback required for the two unnamed faults within the Project site is 100 feet, potentially reduced to 50 feet, to be consistent with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act (AP Act). As discussed on Draft EIR page 5.1-3, "City and County jurisdictions must require a geologic investigation to demonstrate that a proposed development project, which includes structures for human occupancy, is adequately set back (usually at least 50 feet) from an active fault prior to permitting." Additionally, the "purpose of the AP Act is to reduce the threat to life and property, specifically from surface fault rupture, by preventing the construction of building used for human occupancy of the surface trace of active faults".[767] Therefore, the setbacks of "only 50 to 100" feet are appropriate for purposes of avoiding impacts associated with surface rupture of an active fault. However, the risks from surface rupture of a fault are a different issue than the risks from strong seismic ground shaking during an earthquake.

The potential for the San Andreas Fault and other active faults in the region to generate moderate to severe ground shaking is fully disclosed and addressed in the Draft EIR.[768] A probabilistic seismic hazard analysis was prepared for the Project consistent with State and County building code requirements, and is summarized on Draft EIR pages 5.1-11 and 5.1-12. As shown, the Project site has seismic hazard parameters resulting in peak ground accelerations of 72 to 118 percent the force of gravity, depending on the statistical likelihood (i.e., probability) of occurrence. When considering the seismic hazard analysis as well as soil conditions on the site and planned structures, the geotechnical engineer for the Project concluded that there are no soil or geologic (which includes seismic) conditions that would preclude development of the proposed Project, provided that additional site-specific geotechnical studies are performed during later phases of Project implementation, such as

767 DRP 2017, p. 5.1-3
768 *Id.,* p. 5.1-17

tract maps.[769] Requirements for site-specific geotechnical analyses as part of tract map processing are part of the County Building Code. Although it may seem as though the Project area may experience heightened seismic activity due to proximity to the San Andreas Fault or past fault activity, in reality "…the overall seismic risk at the Project site is the same as Southern California in its entirety".[770] In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area.

Response to Comment F.7-11:

Refer to response to Comment F.7-10. As noted, the potential for the San Andreas Fault and other active faults in the region to generate moderate to severe ground shaking is fully disclosed and addressed in the Draft EIR.[771] Although it may seem as though the Project area may experience heightened seismic activity due to proximity to the San Andreas Fault or past fault activity, in reality "…the overall seismic risk at the Project site is the same as Southern California in its entirety".[772] In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area.

Response to Comment F.7-12:

Please refer to responses to Comments F.7-10 and F.7-11. The reference to "Special Hazards Management Area" is assumed to refer to Figure 6.1, Special Management Areas Policy Map, in the *Los Angeles County General Plan* (General Plan). [773] As shown, almost the entirety of the County is encompassed in the Special Management Areas designation. As discussed in the Land Use Element of the General Plan, there are several types of Special Management Areas, including those that represent hazards and those that represent natural resources. The earthquake-related hazards associated with the Project site are clearly acknowledged in the Draft EIR, including on Exhibit 3-4, Local Area Constraints, in Section 3.0, Environmental Setting; and Exhibit 5.1-1, Regional Faults, and Exhibit 5.1-2, Geologic Hazards, in Section 5.1, Geotechnical; and on pages 5.1-9 through 5.1-13 and pages 5.1-16 through 5.1-19 in Section 5.1.

Regarding the intent of the Antelope Valley Area Plan's (AVAP) Rural Preservation Strategy, there is not a connection between the location of low-density land use designations and "hazard areas". The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[774] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas

769 *Id.,* Appendix 5.1-A, p. 13
770 *Id.,* p. 5.1-15
771 *Id.,* p. 5.1-17
772 *Id.,* p. 5.1-15
773 Available here: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_6-1_special_mgt_overlay.pdf.
774 DRP 2015, p. I-7

(EOAs).[775] The Project site is located entirely within the AVAP's West EOA.[776] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[777] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[778]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[779] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[780] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to EOAs. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude EOAs, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the EOAs.

Response to Comment F.7-13:

As stated on Draft EIR page 5.16-21, prior to the development of the permanent Los Angeles Sheriff's Department (LASD) substation, the LASD could operate out of "store front" substation at the first development area – Village 1 (MM 16-4). This substation would become operational before the first certificate of occupancy for the Project is issued. The costs associated with the construction of the temporary substation would be paid by the Applicant and credited toward the Law Enforcement Facilities Mitigation Fee (LEFMF) that must be paid by new residential, commercial, office, and industrial development in the unincorporated Santa Clarita, Newhall, and Gorman areas.

775 *Ibid*.
776 DRP 2017, p. 4-4
777 DRP 2015, p. I-8
778 *Ibid*.
779 *Id.,* p. I-8
780 *Ibid*.

By the time the 1,000th dwelling unit is built on the site, an on-site fire station would be operational, as required by MM 16-3.[781] However, the permanent LASD substation would be built based on the service demand from the Project as determined by the LASD, with the Applicant and the LASD coordinating to finalize plans for the permanent LASD station upon approval of the applicable future tract map for the substation site.[782]

As stated on Draft EIR page 5.16-17, the LEFMF was established specifically to finance land acquisition, engineering, construction, installation, purchasing, and other direct costs related to capital law enforcement facilities and equipment, as required to serve new development in unincorporated areas of North Los Angeles County. The Applicant will pay the required LEFMF (MM 16-4) that would be used for the development of both the on-site temporary store front substation and the permanent LASD substation.

The operation of the temporary and permanent substations at the Project site would not result in response times from the LASD of an hour or more to the Project. Operation of the store front substation, as well as future operation of the permanent LASD substation, would also have beneficial impacts on response times to existing developments near the site due to proximity of the substation.

Section 5.10, Traffic, Access and Circulation, of the Draft EIR discusses increases in traffic volumes on SR-138 and I-5. The discussion under Threshold 10-5 addresses emergency access[783] and concludes that impacts to emergency access would be less than significant with implementation of the proposed roadway improvements at intersections with SR-138 and compliance with existing regulations and implementation of mitigation measures. In Draft EIR Section 5.3, Hazards and Fire Safety, the discussion under Threshold 3-7 addresses emergency response and evacuation[784] and states that traffic generation by the Project would not adversely affect emergency access or evacuation routes, with the Project Applicant/Developer continually updating the Emergency Response Plan prepared for the Project (MM 3-7) and the Project Applicant/Developer preparing a California MUTCD-compliant Traffic Control Plan for County and Caltrans approval for impacts to emergency access and circulation during activities in the roadway (MM 3-8). Draft EIR page 5.3-25 states that impacts on emergency response or evacuation activities would be less than significant after mitigation.

Response to Comment F.7-14:

The California Highway Patrol (CHP) is funded by the State Highway Account and Motor Vehicle Account of the State Transportation Fund, the Motor Carriers Safety Improvement Fund, the California Motorcyclists Safety Fund, the Federal Trust Fund, the Special Deposit Fund, the California Peace Officer Memorial Foundation Fund, and reimbursements. Over 95 percent of the CHP expenditures are supported by the Motor Vehicle Account that consists primarily of revenues from vehicle registration and driver license fees. Thus, the

781 *Id.,* p. 5.16-16
782 *Id.,* p. 5.16-22
783 *Id.,* pp. 5.10-140 and -141
784 *Id.,* pp. 5.3-23 to -25

vehicle registration and driver license fees paid by residents of the Project, as well as vehicle registration and driver license fees paid throughout the State, would fund the majority of the CHP services that include enforcement of traffic laws on County and State highways; assistance in emergencies exceeding local capabilities; provision of disaster and life-saving assistance; completion of truck and bus inspections; performance of air operations and vehicle theft investigations and prevention measures; protection of State property and employees; and completion of public education on driver safety.[785]

As stated on Draft EIR page 5.16-20, there are no long-range planning documents or uniform staffing requirements used by the CHP to project future needs in each service area. The CHP does not receive or base its deployment on the revenues that may be generated within its service area. Allocation of these fees to each service area is determined by CHP Headquarters in Sacramento. Therefore, no direct correlation between vehicle registration and driver license fees paid by residents of the Project and the cost of CHP services to the Project can be made and the vehicle registration and driver license fees would only partially offset Project impacts. However, the CHP has indicated that implementation of the Project would not require new or physically altered CHP facilities to maintain acceptable service ratios, response times, or other performance objectives.[786] Thus, impacts on CHP services would be less than significant and no additional funding is necessary.

Response to Comment F.7-15:

It is understood that a person's place of residence and employment are personal choices, but providing opportunities to work and shop near residences allows people to reduce vehicle use and by reducing travel times and encouraging walking and biking to work and shopping areas; which, in turn are the main goals of Smart Growth and Sustainability. The US Environmental Protection Agency (USEPA) has a Smart Growth webpage that provides links to examples of smart growth projects.[787]

Development of the Project can be expected to extend over a 20-year time frame; thus, vehicle use and commute patterns will also change over time. Section 4.6 of the Draft EIR discusses the phasing and implementation of the Project and acknowledges that the actual timing of development would be based on the state of the economy, market demand for on-site uses, and timing of regional and off-site infrastructure conditions and needs. As stated on page 4-92, the first phase of development will include services and infrastructure to serve early residents (e.g., schools, roadways, parks, and utilities).

Even if on-site jobs are not all filled by Project residents, there will still be a potential for residents to shop nearby and for on-site employees to look for residences in the Project. The Centennial Specific Plan includes a Design Metric that address village walksheds, density, and centers. One Metric is to "Design with the goal of achieving an 80% average, but no less than 50%, of all project dwelling units to be located within a ½ mile walking distance of a

785 *Id.,* p. 5.16-19
786 *Id.,* p. 5.16-23
787 Available at: https://www.epa.gov/smartgrowth/smart-growth-illustrated.

Village Core or the Town Center".[788] The Design Metrics would locate commercial areas, schools, parks, public service facilities, business parks, and other non-residential development within the Project site in accordance with Smart Growth principles. These Metrics have been incorporated into the Land Use Plan and Development Standards and other programs in the Specific Plan and approval of future developments and tentative tracts on the site would include reviews for compliance with the Specific Plan as part of the permitting process.

The Mobility Plan requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the first occupancy permit. The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Pages 4-30 through 4-31 of the Draft EIR discuss the TMA and the Mobility Performance Standards of the Project and pages 4-36 through 4-39 discuss the Transportation Demand Management (TDM) measures to be implemented by the Project. As stated on page 4-36 of the Draft EIR and page 3-25 of the Centennial Specific Plan, the TMA would manage compliance with the internal and external mobility performance standards of the Specific Plan by conducting transit mode surveys and other appropriate monitoring activities to verify the effectiveness of TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA.

As discussed on pages 5.10-49 to 5.10-51 of the Draft EIR, the Project analysis includes a discussion of internal and external "tripends" and "trips." A "tripend" refers to a trip start or destination point. An internal tripend is a trip that starts or begins in the Project site, such as from a residence. A "trip" includes a starting tripend and ending tripend. An internal trip is a trip that both starts and ends within the Project site. An external trip is a trip with either a starting or ending point outside of the Project site.

As discussed on Draft EIR pages 5.10-2 to 5.10-5, the Draft EIR uses the most recent version of the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County, including the Project site. This version of the model was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. The updated North County Sub-Area Model provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. The model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be internal to the site, and 35 percent will be external to the site.

The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model updated by the County are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As discussed on Draft EIR page 5.10-50, the Project includes schools, parks, and retail shopping areas within the Project site located and sized to meet the Project's residential and workforce needs. The Project site is relatively isolated and most of the trips generated by travel to and from these locations will be internal to the Project area.

[788] DRP 2017, Appendix 4.0-A, Table MV-1

In addition, at buildout, the Project will include approximately 10.1 million square feet (sf) of commercial office, shopping/retail, and industrial land uses that will provide approximately 23,675 jobs, many of which would be filled by future Centennial residents. In comparison, applicable traffic models for the Lancaster/Palmdale area, which is larger than the Project but also relatively isolated, project that 70 percent of all tripends are internal to the region.[789] Similarly, traffic models indicate that 74 percent of the total tripends in the Santa Clarita Valley will be internal when the region is built out.[790]

The North County Sub-Area Model estimates of the Project's average daily internal and external trips and tripends at buildout is consistent with available census bureau data of the percentage of residents who work within or outside of their places of residence for communities with similar locational characteristics as the Project. The table below summarizes the 2011-2015 American Community Survey (ACS) 5-Year Estimates of the percentage of all workers aged 16 or older working in their own community, or internal to 11 communities that are relatively isolated from other locations and that have approximately the same average total workforce as the Project at full buildout.

	Total Workforce Over 16 Years of Age	**Percent Working in Own Community**
Santa Maria California	43,861	60%
El Centro California	15,368	57%
Tehachapi California	3,343	54%
Porterville California	18,810	53%
Barstow California	7,927	51%
Paso Robles California	14,771	48%
Madera California	18,525	46%
Lancaster California	53,503	46%
Watsonville California	22,271	45%
Santa Clarita California	84,987	37%
Palmdale California	55,867	32%
AVERAGE	**30,839**	**48%**
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table S0810		

The ACS data indicates that the percentage of workers that are employed within their own community ranges from 60 percent in Santa Maria, California to 46 percent in Lancaster, California and 32 percent in Palmdale, California. The average percentage of residents who work within their communities is 48 percent. As discussed on Draft EIR page 5.10-50, most of the Project trips will be generated by residential land uses, and an average single-family residential unit generates approximately nine home-based trips per day. About two of these nine trips are home-based work trips related to travel directly to and from work. The remaining trips are related to travel between residential units for a non-work activity such as school, shopping, or recreation, which may be trips that are entirely local or may represent

789 Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale

790 Santa Clarita Valley Consolidated Traffic Model Version 4.1, City of Santa Clarita and the County of Los Angeles

one leg of a journey between home and the workplace. The percentage of internal trips and tripends for non-work activity in locations such as the Project which provide schools, recreational facilities and shopping opportunities that are relatively far from other options is generally higher than for work-related trips. Residents in relatively isolated locations are more willing to utilize local school, shopping, and recreational facilities than to modify or change employment even if the desired work requires a significant daily commute. The internal trip rate for the Project that results from the North County Sub-Area Model is approximately the same as the average internal trip rate for work commutes in similarly isolated communities in California (48 percent). Since more daily trips in a community are related to non-work purposes, and the percentage of non-work internal trips is typically higher than for employment purposes, these data indicate that the North County Sub-Area Model internal and external trip estimates for the Project are reasonable. The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[791] This comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

The Draft EIR discusses the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"), including State Route (SR) 138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7.0, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Project Draft EIR was filed by the County on May 15, 2017 and the 60-day comment period began on May 17, 2017.

As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements.

In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. As discussed on Draft EIR pages 5.10-2 to 5.10-5, both the Draft EIR and the NW SR-138 FEIR use the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County. The Draft EIR utilizes a more recent version of the model that was updated by Los Angeles County to reflect the Antelope Valley

[791] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362

Area Plan (AVAP) approved by the County in June 2015. The STS also uses the traffic forecasts from the updated North County Sub-Area Model provided by the County to analyze potential Project and cumulative impacts to reflect the most current information available regarding traffic conditions in the North County region.

The Draft EIR considered potential Project impacts with improvements required to accommodate the full buildout of the Project under existing traffic plus Project buildout conditions, and cumulative traffic plus Project buildout conditions. The Draft EIR identified MMs that would maintain acceptable level of service (LOS) standards at all applicable highway segments, intersections, and ramps. To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Draft EIR.[792] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[793]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[794]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[795]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[796]

The STS compares the Project's potential impacts identified in the Draft EIR for Interstate-5 (I-5), SR-14 and SR-99 facilities using the volume to capacity methodology specified by the

792 Final EIR, Appendix 5.10-C, Sections 2.5 and 3
793 *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
794 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
795 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
796 *Id.,* Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9

Congestion Management Plan for Los Angeles County and the Project's potential impacts using the Caltrans' recommended HCM methodology. HCM calculations were prepared for 62 locations within the Draft EIR study area consisting of freeway segments in advance of and after major system interchanges as well as representative locations between major system interchanges. The analyzed locations provide a comprehensive coverage of the Draft EIR study area because they include the freeway facilities with the greatest potential to be affected by congestion. Under existing plus Project conditions, the Draft EIR and the STS show that all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[797] Under cumulative plus Project conditions with mitigation, the Draft EIR and the STS show that almost all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[798] The STS indicates that certain study locations, such as the Grapevine grade segment of I-5, would not meet HCM-based LOS standards because topographic conditions, lane and speed controls, and other localized conditions would result in higher traffic densities. As shown in STS Table A-5, however, LOS conditions would be worse under cumulative without Project conditions, and LOS conditions improve under cumulative with Project conditions with the implementation of the Project MMs.[799] Consequently, the Project does not result in a significant impact at any location that does not meet HCM-based LOS standards under cumulative with Project conditions with mitigation.

As discussed above, the Draft EIR considered improvements to SR-138 that would be required to accommodate the full buildout of the Project under cumulative traffic conditions. The implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative conditions, and additional improvements consistent with the SR-138 facilities considered in the Draft EIR would be required to accommodate all of the Project's full buildout traffic under long-range cumulative conditions. The NW SR-138 FEIR also clarified certain aspects of the SR-138 design details that would be implemented with Alt 2, including the number and locations of intersections along SR-138 from I-5 to SR-14. The NW SR-138 FEIR addressed several types of intersection configurations for each location, but defers selection of the final configurations to the SR-138 design phase. Subject to minor adjustments for consistency with these Alt 2 design details, the SR-138 facilities that would result from the additional improvements to Alt 2 required for full Project buildout under long-range cumulative conditions as described in the STS are substantially similar to the full buildout SR-138 facilities discussed in the Draft EIR. The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[800]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that

797 *Id.,* Appendix 5.10-C, Table 4-1
798 *Id.,* Appendix 5.10-C, Table 4-2
799 *Id.,* Appendix 5.10-C, Section 5
800 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3

accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[801]

- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[802]

As discussed in the STS,[803] and as shown below, the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2. As required by MMs 10-3 and 10-4, the Project will contribute fair share funding or provide funding for SR-138 improvements in accordance with a mitigation agreement with Caltrans for the implementation of Alt 2, improvements required to connect the Project circulation system with the Alt 2 facilities, and, if confirmed in traffic studies submitted in conjunction with the review and approval process for future Project tract maps, additional SR-138 improvements that may be required to accommodate full Project buildout under cumulative traffic conditions.

As discussed in Draft EIR Section 5.10, Traffic, Access, and Circulation, the Project Applicant intends to implement and fund State transportation facility mitigation measures through a proposed Traffic Mitigation Agreement with Caltrans which would provide funding contributions, phasing, guarantees of payments, and collection of third- party contributions for required SR-138 mitigation. Alternatively, the Project will pay a fair share contribution towards the construction of transportation facilities that will mitigate for potential Project impacts. More specifically, as discussed on Draft EIR page 5.10-91, and in the Supplemental Traffic Study (STS) prepared to incorporate the identification of preferred Alternative 2 in the Northwest State Route 138 Corridor Improvement project Final EIR/EIS with the Project traffic analysis, MMs 10-3 and 10-4 require the Project Applicant to seek to enter into a Traffic Mitigation Agreement and transportation mitigation fee program that would fully mitigate for all impacts to SR-138 highway segments under cumulative plus Project conditions or to contribute fair share funding for the required improvements. The timing and need for these improvements will be evaluated in the traffic studies required for each Project tract map application in accordance with the MMRP for the Project.[804]

Consequently, the North County Traffic Model estimates of the amount of the Project's total daily trips and tripends that will be internal to the site is consistent with the results of model projections and available census data for other similarly situated locations. The Project analysis identifies and requires mitigation that will meet each phase of development incorporating the preferred SR-138 improvements identified by Caltrans in the NW SR-138 FEIR. The Project is required to contribute fair share funding for all required improvements to SR-138 and in other locations, and the timing and need for these improvements will be evaluated and implemented in conjunction with the tract map approval process as required by the MMRP.

801 *Id.,* Appendix 5.10-C, Section 2.1
802 *Id.,* Appendix 5.10-C, Section 2.4
803 *Id.,* Appendix 5.10-C, Section 5
804 *Id.,* Appendix 2.0-C.Rev

Response to Comment F.7-16:

This comment addresses the potential use of Pine Canyon Road, which extends along the southern Antelope Valley foothills from about Sandberg to the south of the Project site to Lake Hughes. As noted in the comment, the segment of Pine Canyon Road between Ridge Route Road and Three Points Road is narrow in width and has a winding alignment. Significant use of Pine Canyon Road by Project residents or non-residents seeking alternative routes to State Route (SR) 138, which extend east and west to the north of Pine Ridge Road is not likely to occur for several reasons. First the use of Pine Ridge Road to traverse east and west along the Antelope Valley would require substantially longer travel times than travel on SR-138 even under relatively congested conditions. Travel from the Project site or from SR-138 to Three Points Road via Pine Canyon Road would take significantly longer than using SR-138. In addition, under current conditions, the use of Pine Canyon Road to bypass SR-138 would increase travel time by approximately 300 percent as compared to using SR-138 (26 minutes versus 8 minutes).

Finally, as discussed in the Draft EIR, Caltrans is planning to improve SR-138 by implementing the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project").[805] As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. The implementation of the preferred Alternative 2 improvements identified in the NW SR-138 FEIR will further reduce travel times on SR-138 by reconstructing the roadway as a six-lane expressway between Gorman Post Road and 300th Street West. These improvements will increase the reliability of SR-138, minimize closures for inclement weather and accidents, and further reduce potential incentives to use Pine Ridge Road as a bypass option.

As a result, Pine Ridge Road is not now and will not become under future conditions a reasonable alternative route for travel that currently uses SR-138. The Project will not result in significant impacts to Pine Ridge Road or to any resources located along the roadway.

Response to Comment F.7-17:

The increased potential for wildfires due to increased human presence is acknowledged on page Draft EIR page 5.3-36, as follows "As development of the Project site proceeds, fire hazards associated with the natural vegetative cover would be eliminated through its replacement with urban landscape vegetation, which is irrigated and less combustible than the existing vegetation. However, the potential for wildland fire hazards would still exist at

[805] DRP 2017, pp. 4-39 to -41; 5.10-34 to -36; 7-8 and -9

the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes." Fire due to the operation and storage of vehicles near dry vegetation falls into the category of accidental causes. As indicated, arson-related causes are also disclosed as a potential wildfire source. The risk of both wildfire and structural fires, and response to those events, with implementation of the proposed Project has been thoroughly assessed by the Los Angeles County Fire Department (LACFD). The LACFD worked closely with the Project Applicant regarding site design, fuel modification planning, and fire infrastructure planning. With implementation of the Project, the Project vicinity would experience increased fire protection resources. This would include emergency fire response to brushfires or other fires caused by human activity on area roadways, such as Pine Canyon Road. However, requiring the Applicant to acquire and maintain the road, and manage the road for limited access is not feasible or warranted. This roadway, and all public roadways, would remain public roadways with proposed Project implementation. The LACFD has thoroughly reviewed the Project plans and provided the Applicant with all measures considered appropriate to minimize the risk of wildfires and ensure capable fire and medical emergency response with Project implementation.

Response to Comment F.7-18:

As stated on Draft EIR page 5.16-5, the County's Developer Fee Program was adopted specifically to fund the purchase of fire station sites; the construction of new stations and facility improvements; and the purchase of equipment. Thus, use of the developer fees paid by the Project would be in accordance with the County's intent for the Developer Fee Program. Separate fees are required for police protection services (Law Enforcement Facilities Mitigation Fee), school services (SB 50 school impact fees or agreements), and library services (Library Facilities Mitigation Fee).

MM 16-2 on Draft EIR page 5.16-16 allows the Applicant to enter into a program where the Applicant provides the land and constructs and equips the fire stations in exchange for credit towards the fee payments. MM 16-3 states that the Applicant will provide the land and construct and equip up to four new fire stations to serve the Project. These stations would meet the demand for fire protection services from the Project within the County's response time standards, as outlined in MM 16-1.

The construction of an on-site fire station prior to the start of the construction of the first phase of development is not considered necessary since fire services and emergency response during initial construction would be provided by the Los Angeles County Fire Department (LACFD) Fire Station 77.[806] Based on coordination with the LACFD, prior to the construction of the first fire station, the Project would pay developer fees, which may be used for the construction of facility improvements and the purchase of equipment at Fire Station 77.

The need for a helicopter would be dependent on the needs identified by the LACFD and would be funded by the developer fees from the Project and other developments in the area.

806 *Id.,* p. 5.16-12

However, the Project itself is not required to fund services for other areas, such as the Angeles and Los Padres National Forests, which are under the jurisdiction of the US Forest Service (USFS). Also, the Project site does not share a common boundary with these national forests and compliance with pertinent fire regulations and required setbacks, as well as implementation of a Fuel Modification Plan (MM 3-9 on page 5.3-39) in Section 5.3, Hazards and Fire Safety, of the Draft EIR, would reduce fire incidents at the site. Since no direct impact related to fires at the Angeles and Los Padres National Forests would occur with the Project, mitigation to fund increased staffing of the USFS hand crews and increased USFS firefighting personnel cannot be required of the Project. However, as discussed in Draft EIR Section 5.16.2, Fire Services, LACFD fire stations, facility improvements, and equipment would be funded by developer fees paid by the Project and/or a program between the LACFD and the Applicant and the on-site fire station operating and staffing costs would be funded by property tax revenues from the Project. Impacts on fire protection services would be less than significant after mitigation.

Response to Comment F.7-19:

The comment correctly states that the Project, in its previous design prior to 2008, was subject to Significant Ecological Areas Technical Advisory Committee (SEATAC) review. Prior to 2008, the Project was designed to overlap SEA 17 (previously SEAs 58 and 59), which would have resulted in impacts to the SEA. The prior design is described in the 2004 Notice of Preparation, included in Draft EIR Appendix 2.0-B. However, the Project design was subsequently changed and considerably reduced in size, and is currently designed to avoid all direct impacts on SEA 17. As a result, SEATAC no longer has jurisdiction to comment on the Project. In addition, implementation of Draft EIR PDF 7-1, dedication of a Mitigation Preserve, sets aside thousands of acres within SEA 17 and as such these areas shall be preserved and managed in perpetuity.[807] Further information on the SEA program in relation to the Project is included in response to Comment B.4-48.

Response to Comment F.7-20:

As stated in response to Comment F.7-19, the Project boundaries avoid direct impacts to SEA 17 completely. The comment correctly states that SEATAC determined the previous design of the Project was not compatible with the principles of the SEA. Since that time however, the Project was redesigned and a large portion of the Project located west of the California Aqueduct was removed and direct impacts to the SEA have been avoided completely. Since the Project no longer overlaps the SEA, no further SEATAC review is required.

Response to Comment F.7-21:

The comment correctly states that the convergence of the San Gabriel, Tehachapi, and Transverse Ranges (The Tehachapi Linkage) represent one of the most important wildlife corridors in Southern California. The main function of SEA 17 is to preserve and protect this important linkage area and the associated habitats.[808] Multiple studies have been conducted

807 *Id.,* pp. 5.7-135 to -137, revised Exhibit 5.7-10
808 *Id.,* p. 5.7-8

on regional wildlife movement in the Project area (see Table 5.7-2 in Section 5.7-3, Environmental Setting, of the Draft EIR). The general conclusion of these studies has been that the habitat types that occur within the Project area that border SR-138 are not ideal for facilitating movement from one preferred habitat type to another. Although some limited crossing may occur here, an overall lack of cover, food, and water make this particular area less attractive to wildlife wishing to cross from SEA 17 in the north to SEA 17 in the south.

Response to Comment F.7-22:

The comments about the biological importance of the Tejon Ranch (Ranch) property and surrounding region are recognized and reflected in the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA), as discussed in the Draft EIR at page 5.7-18, which explains that in recognition of the biological importance of Tejon Ranch, the project Applicant voluntarily agreed to permanently preserve 90 percent of the Ranch determined to be the most ecologically important, and limit Ranch development to the less than 10 percent of the Ranch determined to be developable without compromising the biological integrity and biological values. The proposed project is located in a development area, has relatively limited impact on oak woodland and riparian habitat, and fully mitigates its impacts to grasslands (please refer to Section 5.7.6, Environmental Impacts, and Section 5.7.7, Mitigation Measures).

Furthermore, as summarized in the Mitigation Preserve Review in Appendix 5.7-C of the Draft EIR, an evaluation of potential mitigation lands generally considers lands within closer proximity to the impacted lands as highest potential value. This generality stems from that fact that conditions are generally more similar in close proximity than further apart. Conditions include weather, geographic position, soil type, slope, and many others. The mitigation lands selected utilize this approach and include lands on site and immediately adjacent and then with the most similar conditions when moving further away from the Project site to capture additional acreage.

All of the lands selected for the Mitigation Preserve in Los Angeles County fall within the County's Significant Ecological Area designation. Although the designation does not preclude development, it is an indication of high biological value in the County. With inclusion in the Centennial Mitigation Preserve, these County SEA lands will now be preserved in perpetuity allowing the maximum protection of the biological values that the SEA designation was intended to protect, such as unique assemblages of oak tree species, wildflower fields, and regional wildlife movement corridors. Furthermore, the lack of future development or other landscape disturbances to these lands will also influence adjacent undeveloped SEA lands by reducing the potential for the spread of non-native plants and wildlife.

The majority of the acreage in the Mitigation Preserve was selected for its grassland resources. Extensive research was conducted in the grasslands on the Project site to understand and document composition of these distinctive communities of herbaceous plants and wildflowers. Grassland communities in the Mitigation Preserve were subsequently reviewed to support a reasonable expectation that their composition is similar and the quality is the same or better than grassland areas directly impacted by the Project.

Studies included native bunchgrass modeling, model testing/truthing, indices of nativeness, indices of similarity, plot sampling, and many other methods. In addition, through and a subsequent series of field visits, many populations of special status plant species—including California androsace, round leaved filaree, adobe yampah, Mojave spineflower, and Sylvan scorzonella—have been identified in the Mitigation Preserve and on many additional acres of potentially suitable habitat for these and other species. These findings support the effectiveness of the Mitigation Preserve to off-set the impacts to grasslands as well as the associated rare plant species impacted by the Project.

Another important element considered in the selection of mitigation lands was the potential to support existing populations/and or potentially suitable habitat for wildlife species impacted by the Project. In finding areas with similar vegetation types and in close proximity to the Project site, the Mitigation Preserve captures habitat that is very similar to the site, which would be expected to be occupied by a very similar suite of wildlife species. In addition, field visits in the Mitigation Preserve have identified several unique wetland habitat areas with potential to support tricolored blackbird breeding and hundreds of acres of potential foraging land. Some of these areas are, in fact, occupied by breeding colonies of tricolored blackbirds, which have been recorded foraging throughout the areas. Occupied burrowing owl habitat and hundreds of acres of potentially suitable habitat for this species has also been recently detected from within the Mitigation Preserve. These results are not unexpected given the process used in selecting these lands. Furthermore, regional wildlife movement corridors identified in the higher elevations of the surrounding landscape will benefit from the preservation of the selected lands due to the effect of buffering from undeveloped lands. The evidence gathered supports the determination that lands in the Mitigation Preserve are appropriate and well suited to meet the applicable mitigation requirement and adequately off-set Project impacts.

For greater details of the Mitigation Preserve lands, please see Appendix 5.7-C of the Draft EIR.

Regional montane connection specifically was considered in detail.[809] The assessment, which used various scientific studies, including site-specific studies listed in Table 5.7-2,[810] concluded that maintaining baseline connectivity between the two regions is essential, and although development of the Project would not significantly impact movement between these regions,[811] MMs 7-13 through 7-19 are proposed, which incorporate planning and construction methods to reduce potential indirect impacts to wildlife movement.[812]

A discussion of Regional Wildlife Movement, beginning on page 5.7-6, is provided in the Draft EIR. The section acknowledges the importance of movement in the region where several major biological regions come together stating that various recent reports that discuss the biotic resources in the vicinity of the Tehachapi Mountains (including the Project region) describe the importance of these mountains as a landscape linkage between the Sierra

809 DRP 2017, pp. 5.7-50 to -64, -164 to -170
810 *Id.,* p. 5.7-23
811 *Id.,* pp. 5.7-164 and -165
812 *Id.,* pp. 5.7-190 to -194

Nevada and the Coast Ranges (see Exhibit 5.7-6, Regional Wildlife Movement). Typically, landscape linkages facilitate wildlife movement between large areas of similar terrain, vegetation types, or habitats. Because of the unique adaptations required of wildlife species that inhabit the low elevations of the San Joaquin Valley to the north of the Tehachapi Mountains and the Antelope Valley and adjacent Mojave Desert to the south of the mountain range, most species that occupy these geographically separate and distinct ecosystems do not venture south or north, into or over, the Tehachapi Mountains.[813] As noted above, wildlife species within the mountains surrounding the Project site are expected to move freely within the mountains to satisfy their life history requirements. Accordingly, most wildlife movement in the mountains probably occurs within large landscape areas in upland portions of the Tehachapi range, and to the south of the Centennial property within the western extent of the San Gabriel Mountains much more than between these areas. The same can be expected of movement on the valley floor and surrounding low foothills, where the proposed Project is located.[814]

The Draft EIR goes on to discuss the long-term sustainability of regional linkages beginning on page 5.7-62. The section describes how two regional conservation plans, the TRCRWA and the Tehachapi Upland Multiple Species Habitat Conservation Plan (TUMSHCP), will assist in sustaining the functionality of the regional landscape linkage for future wildlife populations. These plans offer elements for long-term sustainability and management of a Tehachapi Mountains landscape linkage.

Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor, and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch. Maintenance of the open space or conserved lands will be the responsibility of the Conservancy, funded in large part by a fee based on a portion of the purchase price for each residential parcel on Tejon Ranch. Since Centennial constitutes over 75 percent of the currently planned residential units on the Ranch, it will bear the substantial costs of funding the Conservancy and maintaining wildlife movement corridor areas through the Ranch.[815] The Mitigation Preserve is available for mitigation under the TRCRWA, and development of the project will fund its ongoing management.[816]

In addition, the TUMSHCP ensures the persistence of covered species, including sustaining viable populations of those species, providing for (within property dispersal) and protecting current opportunities for wildlife movement beyond the Ranch by preserving existing landscape linkages. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and mitigation measures is a conservation commitment that is, by design,

813 *Id.,* p. 5.7-56
814 *Id.,* p. 5.7-57
815 *Id.,* pp. 5.7-62 and -63
816 *Id.,* p. 5.7-16

consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages across cismontane Southern California.[817]

With respect to condor, in approving the TUMSHCP, the U.S. Fish and Wildlife Service considered development within the region, specifically inclusive of several major projects including Centennial, Newhall, Tejon Mountain Village, and Grapevine, and concluded that the TUMSHCP includes measures to minimize and mitigate remaining impacts on condor, such that even with cumulative projects, the Ranch would contribute to conservation and recovery of the species.[818] Project impacts are carefully assessed and mitigated for in the Project Draft EIR. The Project area avoids SEA 17 completely and also avoids condor Critical Habitat. Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP), inclusive of open space designations, SEA protection, and preservation of habitat linkages.[819] The AVAP is a community-based plan that is a subset of the County of Los Angeles General Plan, which includes the Project area. The AVAP EIR provides an analysis of all potential, reasonably foreseeable environmental impacts related to the implementation of the AVAP "to indicate possible ways to reduce or avoid environmental damage and to identify alternatives" to the AVAP.[820] Additionally, the AVAP EIR discloses "significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present and reasonably foreseeable future projects".[821]

Response to Comment F.7-23:

Please refer to response to Comments F.7-1 through F.7-23, which address all issues raised in this letter, including comments regarding land use and, secondarily, biological resources, scenic quality, water quality, and air quality as they affect the living environment for existing residents. The Project is consistent with the intent of the AVAP, being located in the West EOA, which allows for urban development in selected areas while maintaining the rural nature of the majority of the Antelope Valley. It is unclear what is intended in the request for public participation to be part of "all possible mitigation efforts". Public participation in implementation of mitigation measures is not practical or in alignment with County policies on the implementation of the Mitigation Monitoring and Reporting Program (MMRP). The responsible parties for implementation and monitoring of all MMs would be clearly defined in the MMRP that was attached in the Final EIR in Appendix 2.0-C.Rev, for consideration by the Los Angeles County Regional Planning Commission and Board of Supervisors. The County of Los Angeles, as Lead Agency, has conducted all appropriate public and agency outreach, including a scoping meeting as well as an extended public review period. All comments on the Draft EIR, including any comments on mitigation measures, will be considered by the Regional Planning Commission and Board of Supervisors.

817 *Id.,* p. 5.7-63
818 *Id.,* pp. 5.7-16 to -18
819 *Id.,* Table 5.8-1, pp. 5.8-23 to -70
820 DRP 2014a, p. 2-1
821 *Ibid.*

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CENTENNIAL
at TEJON RANCH

Centennial Project

Consolidated Final Environmental Impact Report

Volume 2

State Clearinghouse No. 2004031072
Specific Plan No. 02-232
County Project No. 02-232-(5)
General Plan Amendment No. 02-232
Zone Change No. 02-232
Vesting Tentative Parcel Map No. 060022
Conditional Use Permit No. 02-232
Development Agreement No. RPPL2016003940

Lead Agency:

County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, California 90012

November 2018

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CENTENNIAL

at TEJON RANCH

August 16, 2017

Via Electronic Mail and USPS (w/exhibits and references)

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Re: Centennial Project Draft Environmental Impact Report

Dear Mr. Sackett:

These comments are submitted on behalf of the Center for Biological Diversity ("Center"), the Center for Food Safety and the California Native Plant Society regarding the Draft Environmental Impact Report ("DEIR") for the proposed Centennial Project ("Project"). The California Environmental Quality Act ("CEQA") mandated environmental review for the Project is inadequate and fails to comply with the requirements of the statute. The DEIR fails to adequately analyze a range of environmental impacts, mitigation measures, and alternatives. For the reasons detailed below, we urge that the Project be denied, or at a minimum, the DEIR must be revised and recirculated to remedy these deficiencies. F.8-1

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over one million members and online activists throughout California and the United Sates. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County. F.8-2

The Center for Food Safety ("CFS") is a nonprofit, public interest advocacy organization dedicated to protecting human health and the environment by curbing the proliferation of harmful food production technologies and promoting sustainable agriculture, including impacts to water resources. In furtherance of this mission, CFS uses legal actions, groundbreaking scientific and policy reports, books and other educational materials, and grassroots campaigns on behalf of its 850,000 farmers and consumer members across the country. F.8-3

The California Native Plant Society ("CNPS") is a non-profit environmental organization with 10,000 members in 35 Chapters across California and Baja California, Mexico. CNPS' F.8-4

mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

F.8-4 cont.

I. The Current Project Description Does Not Represent The True Scope of the Project and is Misleading.

Under CEQA, a "project" is defined as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment . . . ." (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222 (citing CEQA Guidelines § 15378, subd. (a).) An "accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 655 (project description held unstable and misleading) [hereinafter "*San Joaquin Raptor*"].) "However, a curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (*San Joaquin Raptor*, 149 Cal.App.4th, at 655.).

F.8-5

An inaccurate or truncated project description is prejudicial error because it fails to "adequately apprise all interested parties of the true scope of the project." (*See City of Santee v. Cnty. of San Diego* (1989) 214 Cal.App.3d 1438, 1454-55 [hereinafter "*City of Santee*"].) "Only through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives." (*San Joaquin Raptor*, 149 Cal.App.4th, at 655.)

F.8-6

The DEIR contains a number of misleading statements regarding the project description. For instance, the DEIR states "the Project anticipates and would complement the planned SR-138 improvements, as intended by the West EOA." (DEIR at 4-9.) The DEIR does not cite any portion of the West EOA that evidences an "intent" for the development of Centennial. Instead, the Antelope Valley Area Plan ("AVAP") merely defines the West EOA as specific lands including "large contiguous landholdings that have been proposed for master-planned developments . . ."[1] (AVAP at IMP-4.) The AVAP cautions that "any master-planned community within the West EOA will require further planning activities in addition to this Area Plan." (*Ibid.*) The AVAP further states that it requires the preparation of a specific plan even for extremely small developments of only five residential dwelling units. (*Ibid.*) Nowhere does the AVAP state that it expects or "intends" the development of a city of nearly 60,000 people in this remote area.

F.8-7

The DEIR's Project Description also misleadingly claims that "No new environmental impacts occur" as a result of permitting assessor dwelling units ("ADUs") on the project due to "variations in household occupancy." (DEIR at 4-18-19.) Obviously, a household that contains an ADU will on average have a significantly higher occupancy than a household that does not

F.8-8

[1] Los Angeles County Department of Regional Planning, Antelope Valley Area Plan (June 2015), available at http://planning.lacounty.gov/assets/upl/project/tnc_draft-20150601.pdf.

F.8-7A

contain an ADU. And with a higher occupancy comes greater environmental impacts – e.g., air pollution and GHG emissions arising from the additional occupants commuting to jobs. F.8-8 cont.

The DEIR needs to clarify whether the additional persons living in ADUs were calculated in assessing the Project's impacts. While it is unclear, it appears that the DEIR excluded persons living in ADUs from its analysis by claiming that "[t]here is also no basis for estimating whether or when an ADU would be built by any given homeowner, and CEQA does not require speculation." (DEIR at 4-19.) This claim is inconsistent with the rest of the DEIR – the DEIR includes estimates regarding the number of residents who would work onsite even though predicting such fact and location-specific phenomena is uncertain. Yet, at the same time, the DEIR avoids "speculation" regarding how many people or developers would build ADUs, even though the DEIR could easily determine ADU rates in neighboring communities. F.8-9

The Project Description does not adequately disclose whether grazing will be allowed on areas designated as "open space." The DEIR states that there will be "continued grazing in some areas." (DEIR at 4-24.) However, the actual Natural Resource/Open Space Management Plan ("OSMP") appears to permit grazing throughout the open space designation. (Appx. 4.0-A at 3-97.) The DEIR should be clear that the OSMP allows grazing throughout areas designated as "open space" if that is what the DEIR permits. The DEIR also vaguely states that grazing might be allowed "in perpetuity if determined necessary to maintain grassland values based Grassland Mitigation Plan." (DEIR at 4-44.) The DEIR needs to be clear who determines whether grazing is "necessary." F.8-10

The DEIR does not contain a firm timeframe as to when construction on the various phases will take place. Instead, the DEIR states that the various project phases would be timed depending upon (1) the state of the economy; (2) market demand for uses on the site; and (3) the timing of regional and off-site infrastructure conditions and needs. (DEIR at 4-91.) This indicates that the developer(s) and/or builders will be able to pick and choose which portions of the development are most profitable at any given time, and only develop those portions. For instance, if only residential – and not commercial development – is profitable, then the developer(s) and/or builders could avoid such commercial development. F.8-11

This lack of clarity renders the Project description unstable, such that the FEIR fails to inform decision-makers and the public of the true scope of the Project from which all interested parties could assess the direct and indirect environmental effects of the Project. (*City of Santee*, 214 Cal.App.3d, at 1454-55; *San Joaquin Raptor*, 149 Cal.App.4th, at 655; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 83-86.) F.8-12

More importantly, the lack of any firm phasing plan for the Project renders the Project's various calculations and commitments regarding traffic, air pollution, and GHGs unreliable. Even if the DEIR's extremely optimistic internal trip capture rates are correct, they will not be met if the developer(s) build the residential project pieces first and then either abandon or only later build the commercial portions. And even if the commercial portions were eventually built, the Project would still result in a "carbon debt" for the years in which the commercial portions were not built. F.8-13

The DEIR contains a similarly unstable description for school sites. In particular, the DEIR states that "any rejected school site shall revert to residential land use at the density of the F.8-14

surrounding residential designation; however, the maximum number of units allowed by the *Centennial Specific Plan* would not be exceeded." (DEIR at 4-26.) Neither the DEIR's Project Description (nor the text of the Specific Plan) explain the process for "rejecting" a school site. The developer may have an incentive to have school sites "rejected" so it can build more homes. Again, this means that the air quality, traffic, and quality of life benefits of having schools close to residences will not necessarily be realized. Instead, the Project could result in more traffic, air pollution, and GHGs as residents are forced to drive many miles to send their children to schools in other areas. Additionally, the public and local government would need to add expense limited resources in adding schools for residents of the Project.

F.8-14 cont.

The Project Description also provides that the Project "must" meet certain mobility performance standards, including minimum percentages of different types of non-single occupancy vehicle ("SOV") trips. (DEIR at 4-29 – 4-31.) The Project Description fails to describe how such minimum standards will be met. On a practical level, it is unclear what types of mechanisms the project proponent could use to mandate this minimum percentage. Will the project proponent or HOA require residents to report how often they take SOV trips and prohibit them from taking more than a certain amount? Such a system would be unprecedented and likely unworkable. In short, the Project Description should not include promises regarding the attributes of the Project or behavior of the residents that are not enforceable or feasible.

F.8-15

The Project Description further states that the Project will include a "transmit management authority" or "TMA." While the DEIR's Project Description does specify *when* the TMA will be formed, it does not specify how much funding it will receive or identify its funding source. (*See* DEIR at 4-36.) The DEIR also does not specify which entity will fund the "transit centers" near the "village cores." (DEIR at 4-37.) These omissions are especially problematic because the Project Description elsewhere states that "funding for the local transit system would come from a combination of Proposition A and property taxes." (DEIR at 4-37.) The Project Description needs to be clearer whether it will contain a self-funded public transportation system or whether the broader region will bear the cost of this system.

F.8-16

The DEIR states that Caltrans has not yet identified a "preferred alternative" for the Northwest State Route 138 Improvement Project (the "138 Improvement Project"). However, the 138 Improvement Project EIR has since been certified.[2] As such, the DEIR should be updated to reflect this.

F.8-17

The DEIR also is unclear as to whether areas designated as "open space" will remain undeveloped. Notably, while 5,624 acres are designated as "open space," only 3,681 acres are designated as "SEA 17 to be preserved in perpetuity within the Project site boundaries." (DEIR at 4-44.) This suggests that the remaining 1,943 acres will ***not*** be preserved in perpetuity. The DEIR is unclear as to whether the project proponent and/or County can revert any of the "open space" to developable space. Elsewhere in the DEIR, the DEIR states that the Project would "permanently preserve 5,624 acres of on-site open space…" (DEIR at 5.8-59.) If this statement regarding permanent preservation is accurate, the DEIR should include conditions of approval requiring conservation easements for all 5,624 acres.

F.8-18

[2] Northwest State Route 138 Corridor Improvement Project Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation (June 2017), available at http://www.dot.ca.gov/d7/env-docs/docs/NW_138-FED-06_28_17.pdf.

F.8-17A

II. The DEIR Fails to Adequately Assess the Project's Traffic Impacts.

The DEIR fails to adequately assess or mitigate the Project's traffic impacts. The report from Griffin Cove Transportation Consulting, PLLC attached as Exhibit A outlines many of deficiencies in the traffic analysis (the "Griffin Letter"). We request that the Final EIR provide specific responses to all of the comments raised in the Griffin Letter. F.8-19

A. Centennial is undisputedly a sprawl project.

One point that needs emphasis is that Centennial is a classic "sprawl" project and contains all of the worst elements of sprawl. As the Girffin Letter explains:

> Stantec Table 3-5 (p. 3.9) shows that the overall average trip length for project-generated traffic will be 25.5 miles, with "external" trips (i.e., those that have an origin or a destination outside the project) having an average trip length of 45.9 miles. Although trip lengths have no effect on the level of service at any of the intersections and roads within the study area, ***these extraordinary values demonstrate clearly that the project exemplifies the worst elements of "sprawl," with its related issues of fuel consumption and pollutant emissions***.

F.8-20

The County should not approve this 20th century sprawl project centered around the automobile. County residents deserve better than to have their air further impaired with disease-causing pollutants and their streets further clogged with cars. And by locking in significant greenhouse gas emissions for the next century, approval of the Project would be a huge step backward in the County and state's efforts to combat the climate crisis.

B. The DEIR does not accurately describe the baseline conditions.

The DEIR misstates the traffic baseline by including other Tejon projects such as Tejon Mountain Village and Grapevine Specific Plan. (*See* DEIR at 5.10-34.) The DEIR improperly suggests these are "approved" projects. While both projects do have certified EIRs, Grapevine is currently subject to litigation brought by CBD and CFS. And both projects have numerous other discretionary agency approvals that they must undergo before breaking ground; for example, both projects will likely require consultation and with U.S. Fish and Wildlife Service for impacts to endangered species and "take" permits. The DEIR's misinformation regarding the traffic baseline undermines its analysis. F.8-21

The DEIR also uses the outdated 2012 SCAG RTP/SCS in its analysis of growth projections. The DEIR should instead reference the 2016-2040 RTP/SCS, which was adopted on April 7, 2016. F.8-22

C. The DEIR understates the traffic impacts of the Project.

The DEIR optimistically claims that "Because of the balanced land use plan, all jobs could be filled by workers in the community and all service needs could be met by on-site retail and other service land uses." (DEIR at 5.10-49.) While this sentence identifies a desirable goal, the DEIR does not cite any evidence showing how all jobs would or could actually be filled by onsite residents. At best, this statement constitutes unfounded speculation; at worst, it is a F.8-23

misleading attempt to downplay the enormous traffic impacts of Project, given that DEIR itself estimates average trip lengths of 45.9 miles. F.8-23 cont.

In addition, as explained in the Project Description section of this letter, the DEIR's various traffic analysis are dependent upon buildout of the Project with both the residential and commercial portions. Yet, the DEIR does not require buildout in any particular order, and even allows the project proponent to avoid building entire portions of the Project if the project proponent so desires based upon "market conditions." Accordingly, the purported "23,675 jobs" generated by the Project may never materialize, thereby requiring *all* the residents to still commute many dozens of miles to their jobs. This lack of stability in the Project renders all of the traffic analyses fundamentally unreliable. F.8-24

The DEIR also contains unreasonable and unsubstantiated assumptions regarding the frequency of non-automobile trips by residents. For example, the DEIR assumes that people will make 3 mile bike trips within 15 to 20 minutes. The DEIR does not cite evidence that people will in fact make such trips on a regular basis. Nor does the DEIR appear to account for the fact that the Project is located in an arid and extremely hot area that contains hilly topography, which may make everyday cycling less desirable to the average resident. While CBD fully supports cycling as a form of transportation for commuting, currently only 0.6 percent of commuters in the U.S. bike to work.[3] The DEIR does not explain how the Project will be substantially different in the amount of cycling done by residents. F.8-25

The DEIR contains other unfounded assumptions regarding the traffic impacts of the Project. For example, the DEIR states that the "Existing plus Project analysis" assumes that "***existing background traffic conditions do not change***, other than changes directly due to the Project, over the approximate 20-year time frame required to build the Project." (DEIR at 5.10-53, emphasis added.) The DEIR again repeats this unfounded assumption later, claiming that "the amount of traffic that would be generated under future conditions in developed areas outside the Project site would not change with or without the Project." (DEIR at 5.10-88.) These statements are inconsistent with the Final EIR for the Northwest State Route 138 Improvement Project – this EIR stated that Highway 138 is "anticipated to experience traffic volumes ***in excess of its existing capacity***." (138 Improvement Project EIR at 4, emphasis added.) Indeed, the stated purpose of the 138 Improvement Project is to accommodate "foreseeable increases in travel and goods movement" in the area of the Centennial. (*Ibid.*) The DEIR for the Project later changes course and states that traffic on SR-138 "is forecasted to exceed available capacity in several locations under cumulative conditions with and without the proposed Project." (DEIR at 5.10-88.) In short, the DEIR cannot both maintain that traffic will increase and will stay the same. F.8-26

The DEIR also uses an outdated measure to analyze whether impacts are significant. In particular, the DEIR claims that if the 138 Improvement Project moves forward, then SR-138 "would operate within acceptable performance criteria . . ." (DEIR at 5.10-90.) The DEIR extensively uses "Level of Service" or "LOS" to analyze the Project's impacts. (*See, e.g.,* Table 5.10-25 & Table 5.10-28, Table 5.10-30.) This fixation on LOS is misplaced given that the State of California recently directed agencies to analyze projects using the Vehicle Miles Travelled F.8-27

[3] Alliance for Biking and Walking, "Bicycling and Walking in the United States 2016 Benchmarking Report," available at http://www.bikewalkalliance.org/download-the-2016-benchmarking-report. F.8-25A

("VMT") measure instead of LOS. In the Updated Guidance Document, the OPR stated, "vehicle miles traveled is the most appropriate measure to replace level of service."[4]

F.8-27 cont.

In addition, while the DEIR approvingly notes Caltran's plans to widen SR-138 are based upon the North County Combined Highway Corridors Study (DEIR at 5.10-35), this 2004 study should have no bearing upon whether the County now approves this growth-inducing and traffic-generating sprawl project. Indeed, the 2004 study did not take into account the impacts of further expanding freeways on air pollution and climate change. In fact, these detrimental impacts to expanding freeways are never mentioned in the report.[5]

F.8-28

D. The DEIR's Traffic Mitigation Measures Are Inadequate.

The County is required to adopt all feasible mitigation measures to lessen the traffic impacts of the Project. Nonetheless, the DEIR does not adequately analyze whether certain mitigation measures are feasible and instead short-circuits the process by assuming that certain impacts are "significant and unavoidable." More specifically, the DEIR states: "If improvements at Project access points on SR-138 are not constructed, impacts would be significant and unavoidable." (DEIR at 5.10-130.) The problem with this statement is that the DEIR does not consider whether such access points *can* be constructed, or whether it is feasible to do so. CEQA requires that if such improvements at project access points are "feasible," then the DEIR must include these measures are a condition of project approval. The DEIR cannot assume that impacts are "unavoidable" merely if such improvements are not constructed. The DEIR attempts to substantiate its claims by noting that the County lacks jurisdiction over state highway facilities. (DEIR at 5.10-130.) While this is generally true, the DEIR does not require the project proponent to fund such highway facilities. The County does have the power to require the project proponent to fund them as a condition of the Project. Again, the County is prohibited from approving the Project until it has required the project proponent to comply with all feasible mitigation measures within its power to lessen the Project's environmental impacts.

F.8-29

Other traffic mitigation measures identified in the DEIR are illusory and unenforceable. For instance, MM 10-2 merely requires the project proponent to submit a traffic study to the County. (DEIR at 5.10-145.) This is not a mitigation measure. Similarly, MM 10-6 states that the project proponent shall comply with the terms of the Centennial Transportation Improvement Plan ("CTIP"). (DEIR at 5.10-145.) Yet, as noted above, the DEIR does not require the project proponent to even enter into a CTIP; it only requires the project proponent to ***seek*** to enter into a CTIP. MM 10-3 also just requires the project proponent to "seek" to enter into a CTIP. (*Ibid.*) As such, MM 10-6 is not binding upon the project proponent. Likewise, MM 10-7, 10-8, and 10-9 contain language allowing the project proponent to either comply with the CTIP or contribute its "fair share" towards infrastructure improvements. (DEIR at 5.10-146.) At most, these measures commit the project proponent to paying some unspecified amount of money to alleviate the Project's impacts, with no assurances that such "fair share" payment will adequately mitigate such impacts.

F.8-30

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[4] https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf

[5] North County Combined Highway Corridors Study, SR-14, SR-138, and I-5, Final Report (June 2004), available at http://media.metro.net/board/Items/2004/07_July/NORTH%20%20COUNTY.pdf.

F.8-27A

F.8-28A

The DEIR elsewhere again states that the project proponent would either enter into an agreement with Caltrans to fund transportation facility mitigation measures or it would pay its "fair share" towards MM implementation. (DEIR at 5.10-1.) The DEIR does not explain what constitutes a "fair share" and does not commit the project proponent to paying for the MMs in the event that Caltrans lacks the funds to do so. MM 11-3 merely requires the project proponent to "seek" to enter into an agreement with the County and Caltrans called the CTIP to fund mitigation measures for the project. (DEIR at 5.10-52.) F.8-31

The DEIR therefore impermissibly puts the burden of significant impact reduction on Caltrans and their improvement of State facilities. F.8-32

Moreover, the DEIR does not analyze the environmental impacts of the traffic mitigation measures. The DEIR specifically calls for widening significant portions of SR-138 to a four-lane highway in order to mitigate impacts of the Project. (*See* DEIR at 5.10-84.) Yet, the DEIR does not consider the environmental impacts of these mitigation measures, which undoubtedly will result in habitat destruction, growth-inducing impacts, and impaired wildlife connectivity. F.8-33

III. The DEIR Fails to Adequately Assess the Project's Noise Impacts.

A. The DEIR fails to adequately assess noise impacts from traffic.

Traffic created and facilitated by the Project will cause direct, indirect, and cumulative environmental impacts, including increased traffic-related noise. The DEIR recognizes that Project-related vehicular traffic will cause significant impacts to sensitive receptors. However, the mitigation that the DEIR proposes does not meet CEQA's enforceability standards and must be revised. The mitigation measures regarding roadway noise impacts do not provide decision-makers or the public with any concrete information, as required by CEQA. (Guidelines § 15126.4(a)(2); *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development").) Mitigation must be binding and enforceable to be valid. (Guidelines § 15126.4, subd. (a)(2)). The project proponent cannot defer formulating enforceable mitigation that would reduce impacts until after project approval. (CEQA Guidelines § 15126.4, subd. (a)(1)(B); *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 240.) "[A]n agency goes too far when it simply requires a project applicant to obtain a [] report and then comply with any recommendations that may be made in the report." (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793.) F.8-34

As mentioned, traffic will be one the main Project-generated noise. Despite this, the DEIR fails to provide a satisfactory description of mitigation measures for reducing traffic created noise to less than significant. The DEIR states that methods for reducing traffic related noise are out of the control of the project proponent and require alterations to private property. (DEIR 5.12-1.) MM 12.1 proposes combatting significant noise impacts from traffic by requiring the project proponent to submit a noise assessment (DEIR 5.12-48), which may or may not be used to formulate mitigation and which may or may not be effective. Furthermore, the DEIR does not provide standards outlining how the decision-maker would be able to determine whether any future mitigation measures would be deemed effective, and any mitigation would be F.8-35

proposed only after project approval. CEQA requires more. The DEIR then suggests the project proponent/other parties may be required implement noise reduction measures but provides no guidelines to show whether any future mitigation would be effective. (DEIR 5.12-1.) The burden of mitigation measures rests on the project proponent, not on private parties to install their own noise cancelling features. Additionally the mitigation measures provided fail to include any tangible actions to be taken outside of conducting an acoustical analysis and including appropriate noise-reduction features. (DEIR 5.12-1.) The mitigation measures provided fail to meet basic CEQA requirements. F.8-35 cont.

The DEIR provides conflicting statements about mobile source noise levels: the DEIR states that project-generated traffic would potentially create noise levels in excess of the State and County Standards but then later states that mobile equipment noise levels would not exceed County standards and would be less than significant. (DEIR 1-20.) This ignores the fact that mobile equipment cannot be distinguished from "traffic" noise as both come from mobile sources. F.8-36

The DEIR also states without support that, although Project-generated traffic noise would be significant, noise increases of 3.3 dBA and 3 dBA are barely perceptible to most people. (DEIR 5.12-1.) This is both unsupported by substantial evidence and discounts the noise perceptibility of wildlife. F.8-37

B. The DEIR fails to adequately assess General Plan consistency and noise.

The DEIR states that maximum noise levels are prescribed by the County Code ("Noise Ordinance"). (DEIR 5.12-1). The DEIR attempts to underscore the noise related impacts of the project by stating that "the land uses proposed as part of the Project are routinely constructed in Southern California and are able to meet the applicable noise standards through use of common, feasible methods and materials[.]" (DEIR 5.12-1.) However, other land uses and their impacts are irrelevant to the current Project. Additionally, the DEIR states that the construction period for the Project is approximately 20 years but goes on to state, without any additional information, that despite this two-decade construction project, noise level due to construction would be relatively short-term and temporary. (DEIR 5.12-2.) F.8-38

MM 12-3 vaguely states that noise generated from stationary construction equipment would be mitigated by requiring stationary equipment to operate at greater than 450 feet (DEIR 5.12-2) but fails to give adequate information as to what this means: 450 feet from other equipment? 450 feet from sensitive receptors? It is unclear. The DEIR also states that equipment staging and maintenance areas should be located 500 feet from sensitive receptors, but only if feasible (DEIR 5.12-49), which creates no binding requirement on the project proponent. MM 12-3 would limit the hourly daytime noise level to 60 dBA or less, which the DEIR states would be less than significant. (DEIR 5.12-2.) However, Table 5.12-2 indicates that the County Code limits noise levels for noise-sensitive areas and residential properties at all times of the day to 50 dBA or less. (DEIR 5.12-6.) It is also unclear how Table 5.12-2 can be reconciled with Table 5.12-3 (DEIR 5.12-8) as deserving separate analyses because many of the construction noises will come from stationary sources. F.8-39

C. The DEIR fails to adequately assess cumulative impacts and noise.

CEQA defines "cumulative impacts" as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (Guidelines § 15355.) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project "when added to other closely related past, present, and reasonably foreseeable probable future projects." (CEQA Guidelines § 15355(b).) And while an agency is not expected to foresee the unforeseeable, it is expected to use its "best efforts to find out and disclose all that it reasonably can." (CEQA Guidelines § 15144; see also *City of Richmond*, supra, 184 Cal.App.4th at 96; *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 428 [hereinafter *Vineyard*].) F.8-40

The purpose of analyzing cumulative environmental impacts is to assess adverse environmental change "as a whole greater than the sum of its parts." (*Environmental Protection Information Center v. Johnson* (1985) 170 Cal.App.3d 604, 625.) Absent meaningful cumulative analysis there would be no control of development and "piecemeal development would inevitably cause havoc in virtually every aspect of the [] environment." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721.) F.8-41

The DEIR impermissibly relies on the aforementioned mitigation measures to conclude that there would be no cumulative noise impacts related to construction, stationary sources, and mobile source noise from traffic. (DEIR at 7-21.) The DEIR states that the potential for overlapping construction activity from this Project and SR-138 activities is low because of "the mobile nature of construction activities (moving from area to area on a site or alignment)." (*Id.*) This statement runs contrary to common sense; construction typically occurs within a confined area for the duration of that particular project. F.8-42

IV. The DEIR Fails to Adequately Disclose, Analyze, or Mitigate the Project's Impacts to Population, Housing, and Employment.

The DEIR states that the Project would provide an estimated jobs/housing ration of 1.22 through development of commercial and business park uses on site. (DEIR at 1-17.) The DEIR also claims that development of job opportunities at the site reduces vehicle trips and their associated emissions. (DEIR at 5.9-23.) However, there is no guarantee that those living in the area will work on site or that those working on site will live in the area. Moreover, there is no guarantee that the jobs being offered will provide adequate income to support the housing that the Project will be building. The DEIR relies on the assumption that local employment opportunities will meet most of Project residents' employment needs. (DEIR at 5.9-3.) However, this conclusion overlooks the current state of Kern County's job market. As the DEIR recognizes, Kern County is experiencing remarkably high rates of unemployment, and there is no evidence that this is a temporary phenomenon. (DEIR 5.9-22.) According to the DEIR, Kern County has an unemployment rate of 9.2 percent as of 2016—almost two times higher than the California average. (*Id.*) Employers in Kern County have been shedding rather than creating jobs, and these unemployed Kern County residents will likely welcome any new jobs the Project creates. It is therefore likely that workers residing offsite will flood the Project's job market. F.8-43

The DEIR states that the Project would substantially increase population and housing relative to the existing Project site conditions, which by the DEIR's own admission, is F.8-44

considered significant. (DEIR at 5.9-31). However, the DEIR attempts to negate this significance by stating that the Project would be growth accommodating and not growth inducing, citing consistency with regional growth plans. (DEIR at 5.9-31.) The DEIR cannot override their own finding of a significant impact by citing consistency with growth plans in the region, a separate and unrelated threshold standard. The increase in population and housing on the Project site is significant and unavoidable (DEIR at 5.9-33) and CEQA requires a discussion of mitigation measures relative to this significant impact.

F.8-44 cont.

There is also a much higher chance than the DEIR suggests that Project residents will work in the higher-paying, larger Los Angeles job market. It is quite possible that the main demographic that could afford Project housing will be current Los Angeles residents looking for housing outside of Los Angeles. The DEIR states that SCAG projects that Los Angeles County will experience substantial growth between 2012 and 2040 (DEIR 5.9-2); SCAG actually indicates that the average annual growth rate of population has been decreasing, and a rate faster than both California and the United States (SCAG Table 2.) "The SCAG region's population is projected to grow slower than that of the previous years." (SCAG at 12.) Moreover, SCAG indicates that the age of residents in regional households are increasing while the working age population of 16-64 years old have shown decline which "may result in a potential shortage of works and slower job growth unless the older population extends their retirement age." (SCAG Table 4, SCAG at 14.) This means few residents are of peak employment age living in the city, meaning the regional ability to fill employment (likely retail) of the Project are limited.

F.8-45

The DEIR fails to address cumulative impacts regarding population, housing, and employment and instead counteracts earlier disclosures regarding significant, stating that the impacts would be less than significant and do not require mitigation because of their relationship to County and regional plans. (DEIR 7-19.) Yet the DEIR then immediately follows this by stating that the existence of the Project creates a significant adverse indirect growth-inducing impact. (*Id.*)

F.8-46

V. The DEIR Fails to Adequately Analyze the Project's Growth-Inducing Impacts.

EIRs are required to provide a detailed discussion regarding the growth-inducing impacts of a project. (Guidelines §§ 21100(b)(5); 21156.) In addition, *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369 sets forth three factors to determine the level of detail required in a growth-inducing impacts analysis: (a) the nature of the project; (b) the directness or indirectness of the contemplated impact; and (c) the ability to forecast the actual effects the project will have on the physical environment. (*Id.*) Applied here, these factors militate in favor of a highly detailed analysis – (a) the Project is extremely large and will result in the installation of a city in a remote and undeveloped area; (b) the Project will result in direct impacts on thousands of acres of undeveloped land as well as indirect impacts such as further infrastructure growth; (c) forecasting the effects on the physical environment is generally feasible.

F.8-47

Despite *Napa Citizens*, the DEIR's growth-inducing impacts section is only nine pages in length, and the "analysis" portion is less than four pages. More importantly, the analysis is riddled with inconsistencies and faulty assumptions, as discussed below:

F.8-48

The DEIR for the current Project references an EIR that was conducted for AVAP in 2015 as though the AVAP EIR is relevant and supersedes an analysis for the current Project. (DEIR at 6-2.) Whatever previous environmental review has occurred is irrelevant for the current Project. Additionally, alleged consistency with planned growth in the region (*Id.*) does not negate a need for consideration of growth-inducing impacts for the Project. Yet, despite these statements indicating consistency with anticipated growth, the DEIR by its own admission states that the Project would substantially increase population and housing relative to existing site conditions and that it is reasonably foreseeable that future *unplanned* development may occur. (*Id.*) F.8-49

The DEIR suggests that the Ranchwide Agreement entered into in 2008 will limit growth. (DEIR at 6-4.) As a preliminary matter, given that the Ranchwide Agreement is extensively referenced in the DEIR, a copy of the Agreement must be included as an exhibit or appendix to the DEIR. The existence of this agreement does not negate a need to consider growth-inducing impacts for the current Project, especially considering at least one the projects covered under the Agreement is currently under litigation. CEQA requires that the DEIR analyze impacts that are indirect and impacts to on adjacent properties – not just the developer's own property. F.8-50

In addition, the Ranchwide Agreement is not a binding and enforceable mitigation measure under CEQA, such that the DEIR cannot rely upon it to mitigate growth-inducing impacts, impacts to biological resources, or any other impacts. Indeed, per section 3.9 of the Ranchwide Agreement, the only party that can enforce the Agreement is the Tejon Ranch Conservancy, which is partially controlled by the project proponent. F.8-51

The DEIR claims that the Project's infrastructure facilities are not sized to accommodate growth beyond that which is proposed for the Centennial Project. (DEIR at 6-7.) This statement oversimplifies growth-inducing impacts; a project would not build more infrastructure than the project requires, but the mere existence of those facilities makes increasing and connecting to those facilities much easier than if they did not exist in the first place. The DEIR does admit that future nearby landowners could propose to connect to or build upon the Project's infrastructure to serve future development in the surrounding area. (DEIR at 5.8-22.) F.8-52

The DEIR contains inconsistencies relating to significant impacts between and among sections of DEIR. Additionally, the DEIR does not adequately analyze impacts and develop mitigation measures for those impacts. For a finding of significant impact, CEQA requires that mitigation measures be identified to reduce the impact to less than significant. (Guidelines Appendix G p.327.) For example, in the Population section, the DEIR states that there will be significant and unavoidable increases in population and housing (DEIR at 5.9-3) but fails to address any mitigation measures. "The project would not result in significant growth-inducing impacts" (DEIR 6-9) immediately followed by "existence of project…could result in a significant impact on the environment…which is considered and an adverse indirect growth-inducing impact." (*Id.*) Not only is this a clear inconsistency, which frustrates CEQA's informational and public-participation goals, but this finding of significance nor mitigation measures are discussed in the Population section to which the DEIR is referring. [*See Laurel Heights Improvement Assn v. Regents of or the University of California* (1988) 47 Cal.3d 376, 390, 392 ("CEQA's fundamental goal that the public be fully informed as to the environmental consequences of action by their public officials.").] The DEIR states that there will be no F.8-53

changes by the Project that would affect population generation or otherwise lead to additional indirect growth (DEIR at 6-1) then later admits that there will be growth inducing impacts to the eastern fringes of project site. (DEIR at 6-2.) DEIR also states that the Project would not lead to substantial growth on the Project site. (DEIR at 5.9-27.)

F.8-53 cont.

Inconsistencies also exist between the growth-inducing impacts and other sections of the DIER. For example, as previously pointed out, the DIER states that there will be significant and unavoidable growth inducing impacts regarding population but none regarding traffic. This is a clear inconsistency and fails to consider that increases in population will necessarily implicate growth-inducing impacts regarding traffic. (DEIR at 9.4.)

F.8-54

The DEIR repeatedly attempts to understate the projects impacts by relying on the non-CEQA term "growth-accommodating." (DEIR at 5.9-33.) CEQA requires an analysis of growth-inducing impacts; the term "growth accommodating" has no basis in CEQA and the assertion that the Project is growth accommodating is not supported by substantial evidence.

F.8-55

The DEIR does not acknowledge its role in causing growth-inducing impacts, particularly regarding the Northwest State Route 138 Improvement Project (the "138 Improvement Project"), for which the final EIR was certified in June 2017.[6] The 138 Improvement Project will turn the existing 2-lane highway into a 6-lane freeway, thereby impairing wildlife connectivity and paving over habitat. The 138 Improvement Project EIR routinely references Centennial as one of the key projects expected to cause growth in the area, thereby necessitating the 138 Improvement Project. (*See* 138 Improvement Project EIR at 31, 47, 83, 336.) The 138 Improvement Project EIR further states that the purpose of the project is to "[a]ccommodate foreseeable increases in travel and goods movement within northern Los Angeles County." (*Id.* at 3.) In short, the specter of Centennial appears to be of the key reasons that the 138 Improvement Project was approved. The DEIR admits as much, stating that "the Project anticipates and would complement the planned SR-138 improvements." (DEIR 4-9.) Accordingly, the DEIR must analyze, disclose, and mitigate growth-inducing impacts arising from the 138 Improvement Project.

F.8-56

VI. The DEIR Fails to Adequately Analyze the Project' Impacts on Visual Resources.

The Aesthetics section of the DEIR contains numerous deficiencies and inaccuracies. The DEIR concludes that there will be a less than significant impact to the Pacific Crest Trail ("PCT") because MM 13-4 will construct a wall that would screen structures and residences (DEIR at 5.13-21.) Basic common sense indicates that it would be almost worse to put up a large wall in a scenic trail – it is difficult to conceive how this measure would mitigate the impact to hikers on the trail when compared the current environmental setting. Furthermore, the DEIR only claims that the U.S. Forest Service, Pacific Crest Trail Association, Tejon Conservancy, and Tejon Ranch Company are in ongoing discussions regarding an alternative realignment for the PCT, without giving any more on whether this is binding or how these discussions contribute to mitigating significant impacts. (DEIR at 5.13-11.)

F.8-57

[6] Northwest State Route 138 Corridor Improvement Project, Final Environmental Impact Report / Environmental Impact Statement and Section 4(f) Evaluation.

F.8-56A

The DEIR provides an unclear analysis regarding scenic highways. The DEIR seem to be indicating that, although many of the roads are considered scenic drives on the AVAP, inclusion of the site in the West EOA counteracts these considerations. (DEIR at 5.13-2.) This is incorrect – the DEIR must analyze all direct and indirect impacts of the Project and cannot generally cite to other plans in justifying the Project. Regardless, the DEIR is wrong in claiming that the Project would not substantially damage scenic resources within a state scenic highway. (DEIR at 5.13-24.) The DEIR States:

> The greatest change in scenic views would occur on SR-138 as development occurs on both sides of this road, as it passes through the site. Existing views of undeveloped land and agricultural land would be replaced with business parks and commercial structures, as well as residential development that would be constructed onsite. While distant views of the mountains will remain, the view of passing motorists will consist of urban structures that would be different than the existing rural environment. (*Id.*)

F.8-58

The DEIR states that there will be significant and unavoidable impacts regarding new sources of light and glare (5.13-2), counteracted by MM 13.6, referred to as a Dark Sky Plan (DEIR at 5.13-2.) The DEIR does not set forth adequate measures to mitigate the substantial light pollution caused by the Project. While the DEIR proposes a number of mitigation measures such as directing light downward and using time control devices (DEIR at 5.13-31), there is no way to mitigation the light impacts of installing thousands of people in an undeveloped wildlife area. The DEIR fails to cite any studies or biological opinions indicating that the mitigation measures proposed are sufficient to mitigate impacts on wildlife.

F.8-59

The DEIR states that construction will last 20 years and result in a significant and unavoidable impact to visual character, yet provides no mitigation measures to combat this. (DEIR at 5.13-14.)

F.8-60

The DEIR also states that converting the site from a rural to an urban condition, which would partially to wholly obstruct existing views, would result in a significant and unavoidable impact to the visual character of the Project site and surrounding area. (DEIR at 5.13-19.) The only mitigation measure discussed, though, are inadequate. MM 7-13 (DEIR at 1-58), discusses a landscaping plan including use of non-invasive species; MM 13-1 (DEIR at 5.13-19) discusses preservation of existing rock outcroppings, but only to the extent feasible,[7] and implementing designs that emulate natural contours of existing topography (although none of the visuals provided, especially Exhibit 5.1-4 with its use of extensive glass windows, seem to emulate this); MM 13-2 (DEIR at 5.13-19) discusses clustering development to minimize impacts to dense stands of oak trees, steep slopes, and existing natural drainages; and MM 13-3 (DEIR at 5.13-9) indicates that off-site electrical lines *may* be placed underground. None of these mitigation measures are sufficient and do not impose real requirements on the Project.

F.8-61

[7] What is "feasible" is not defined, therefore, this mitigation measure is also illusory and lacks enforceable performance standards because the project proponent may decide on its own that compliance is not "feasible."

F.8-61A

VII. The DEIR Fails to Adequately Analyze the Project's Impacts to Fire Services.

The DEIR concludes that MM's 16-1 through 16-3 would reduce the impact to fire services to less than significant. However, these mitigation measures do not take into consideration the environmental analysis or impacts of building new facilities; instead, the DEIR defers analysis stating that actual square footage of each fire station would be determined at the time of Project development. (DEIR 5.16-12.) The DEIR also fails to conduct an analysis of environmental impacts from the construction of water systems/access to existing bodies of water or the construction of internal roadways to accommodate emergency ingress and egress. (DEIR 5.16-13, 5.16-14.) F.8-62

The DEIR states that the Project would introduce urban development into an undeveloped area that is subject to wildfire hazards. (DEIR at 5.16-14.) The DEIR also states that portions of the Project are within a very high fire hazard safety zone but never discloses where this area is in relation to the Project. (*Id.*) This fails to inform the public as to the fire dangers associated with the Project. Additionally, building houses in "high" and "very high" Fire Zones will require compliance a "Fuel Modification Plan." (DEIR at 5.16-14.) Nonetheless, the DEIR does not provide any information regarding the specifics of this fuel modification plan, nor does the DEIR analyze the environmental impacts on biological resources of implementing such a plan. F.8-63

The DEIR should include areas impacted by fuel modification plans as part of the development "footprint" of the Project, and be analyzed as such. Moreover, no fire clearance/thinning activities should occur within the boundaries of any federally designated critical habitat, open-space, natural area or wildlife movement corridor. Finally, fuel modification plans must ensure that no invasive species are planted as part of the plans. F.8-64

VIII. The Alternatives Analysis in the DEIR Is Inadequate and Fails to Comply with CEQA.

CEQA mandates that significant environmental damage be avoided or substantially lessened where feasible. (Pub. Res. Code § 21002; Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d).) Moreover, although "an EIR need not consider every conceivable alternative to a project . . . it must consider a reasonable range of potentially feasible alternatives that will foster informed decision decision-making and public participation." (Guidelines § 15126.6(a).) Additionally, the "key to the selection of the range of alternatives is to identify alternatives that meet most of the project's objectives but have a reduced level of environmental impacts." (*Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089.) Accordingly, a rigorous analysis of reasonable alternatives to the Project must be provided to comply with this strict mandate. Unfortunately, the DEIR fails to meet this requirement on two levels: the DEIR analysis of the alternatives proposed is inadequate and the DEIR fails to include a reasonable range of alternatives. F.8-65

A. The DEIR does not adequately analyze and compare the proposed alternatives.

The first project objective – which is to "Implement the Antelope Valley Area Plan…" – impermissibly restricts the alternatives analysis because it too narrowly frames the goal of the F.8-66

project as somehow flowing from a need to respond to the existence of this area plan. (DEIR 8-69.)

F.8-66 cont.

In analyzing the No Project Alternative, the DEIR impermissibly rejected this alternative in a conclusory fashion. (*See Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 ("To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions."). The DEIR states that this alternative is not consistent with the AVAP without giving any more information. (DEIR at 8-30.) It is likely that the DEIR intends to argue that the existence of the AVAP somehow *mandates* development; yet, this is not correct. Additionally, if the reasons for rejection the No Project Alternative is for feasibility reasons, case law indicates the standard for feasibility is high and the project proponent has not demonstrated lack of feasibility for other locations.

F.8-67

The DEIR provides insufficient and confusing reasons given for eliminating the Public Input Alternative from further consideration. The impetus for this alternative seems to be to design a wildlife reserve and proposes to set aside the majority of the Tejon Ranch property as open space. (DEIR at 8-13.) Yet, the DEIR rejects this alternative, claiming that this alternative does not provide enough acreage to include on-site natural open space areas and leaves a substantial amount land undeveloped. (*Id.*)

F.8-68

In analyzing Alternative B – Previously Proposed Project, The DEIR impermissibly tries to break up the "footprint" by land use type (i.e. residential, commercial, etc.) in order to argue that the proposed project has decreased its footprint/site acreage from the previously proposed project site. Although the proposed Project may have a smaller designation for *commercial* uses, the overall footprint of the project is larger. The DEIR itself admits this when it states that the proposed Project expands site boundary by approximately 647 acres (DEIR at 8-9.) Table 8-1 additionally indicates that the proposed project site will consist of 12,323 acres while the previously proposed project site consisted of 11,676 acres. The current project increases the project site by 647 acres. (DEIR at 8-15.) The DEIR also confusingly states that Alternative B is a larger alternative than the proposed Project (DEIR at 8-16.)

F.8-69

In analyzing Alternative C – Additional Drainage Avoidance, the DEIR fails to explain why this alternative is not considered the preferred alternative given that is has fewer environmental impacts than the proposed Project, meets the project goals, and creates no more significant and unavoidable impacts than the proposed Project. (DEIR at 8-44). And in analyzing Alternative E – Density Clustering/East of Aqueduct, the DEIR similarly fails to explain why this alternative is not considered the preferred alternative given that is has fewer environmental impacts than the proposed Project, meets the project goals, and creates no more significant and unavoidable impacts than the proposed Project. (DEIR at 8-59 – 8-60.) The DEIR lists Alternative E as the environmentally superior option but provides no explanation for why the project proponent chose not to make this their preferred alternative. Under CEQA, "the public agency bears the burden of affirmatively demonstrating that, notwithstanding a project's impact on the environment, the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish & Game Com.* (1997), 16 Cal.4th 105, 134.)

F.8-70

In analyzing Alternative D – Infrastructure Relocation, it is unclear why Alternative D was even considered or what value it adds at all to the project/public reviewing the DEIR. (DEIR at 8-51.)

F.8-71

B. The DEIR should have considered accommodating development in disturbed areas.

In analyzing all of the alternatives, the DEIR should have discussed the need for the Project and whether the uses that would potentially utilize the Project can be accommodated in existing areas. As CAPCOA states in its white paper, one way local governments can avoid significant increases in GHG emissions and help solve the problem of climate change is to "facilitate more efficient and economic use of the lands" already developed within the community. (CAPCOA 2008.) Reinvesting in existing communities is "appreciably" more efficient than new development and may even result in a net reduction of greenhouse gases. (CAPCOA 2008.) The DEIR should consider an alternative that relies more on higher-density mixed commercial/residential development projects on existing disturbed lands in order to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and encourage efficient delivery of services and goods. (Office of the California Attorney General 2008.). Here, the objectives do not indicate that this specific site is necessary to accomplish the project goals (other than the first objective, which as previously stated, is impermissibly narrow).

F.8-72

C. The DEIR should have considered a wider range of alternatives, including those with a significantly smaller development footprint.

The DEIR should have analyzed a wider range of alternatives. As courts have made clear, "[a] potential alternative should not be excluded from consideration merely because it would impede to some degree the attainment of the project objectives, or would be more costly." (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal. App. 4th 1437, 1456-57 (quotations omitted).) The DEIR should have included a larger range of alternatives from which decision-makers could choose.

F.8-73

The DEIR improperly refused to consider any alternatives for projects with a significantly smaller development footprint. The DEIR states:

> Because the proposed Project was substantially reduced compared to the previously proposed project (Alternative B) in both development footprint and land use intensity to avoid and/or reduce environmental impacts, further consideration of a reduced development scenario (e.g., reduced grading footprint; reduced dwelling units; reduced nonresidential square footage) was not considered reasonable. (DEIR 8-10.)

The implication here is that is if the project footprint is somewhat reduced from an (1) extremely large project to (2) a very large project, then any project smaller than a very large project is "unreasonable," such that the County is excused from considering any smaller project alternatives. Neither the CEQA Guidelines nor case law support this proposition, nor does the EIR cite any authority supporting this striking assertion.

F.8-74

The DEIR again trots out the unfounded claim that the Project is "required" to be very large in order to support "the goals and policies of the AVAP." (DEIR 8-10.) Contrary to the DEIR's misleading assertions, the AVAP does not mandate that a very large version of Centennial go forward; it envisions that some level of development ***may*** occur in the area, provided that such development is approved by applicable authorities and complies with applicable laws, including CEQA and the state and federal Endangered Species Acts. Indeed, the sentences following this claim undermine it – the DEIR states that the Project would require significant amendments to applicable land use plans (e.g., amendment to the AVAP Highway Plan and adoption of a Specific Plan). (*Id.*) If the Project is "required" by the AVAP, then why does the project necessitate amendments to land use plans? F.8-75

The DEIR also claims that "any reduction" in the proposed project size would not be "supportive of the project objectives." (*Id.*) The DEIR does not provide any evidence indicating that a smaller version of the project is not feasible. Such conclusory claims are insufficient under CEQA. (*See Concerned Citizens*, 42 Cal.3d at 935 ("To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions."). Such conclusory claims are especially inappropriate here when the County is considering whether to approve the installment of a city in a remote and undeveloped area. F.8-76

By refusing to include any alternatives that provide for a significantly reduced project size, the DEIR sets up a false "all or nothing" decision for the County and prohibits the County from considering or approving a smaller version of the Project that does not have such profound environmental impacts on California's grasslands, air quality, and carbon footprint. The DEIR's failure to include any alternatives with a significantly reduced footprint also violates CEQA's mandate that a reasonable ***range*** of alternatives be considered. F.8-77

The project could be significantly down-sized and still be considered "feasible." Whether a project is economically unfeasible "is not measured by increased cost or lost profit, but upon whether the effect of the proposed mitigation is such that the project is rendered impractical." (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 600 (internal citation omitted).) In *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1180, the Court agreed with the trial court that the administrative record did not contain analysis of the project alternatives in terms of comparative costs, comparative profit or losses, or comparative economic benefit to the project proponent or the community at large. F.8-78

IX. The DEIR Fails To Adequately Analyze, Disclose, And Mitigate The Project's Greenhouse Gas Emissions.

Climate change and the finite nature of fossil fuel energy sources require the increased development of renewable sources of energy, such as solar and wind. (Cameron 2012) However, these developments, especially when done on a large scale, can have negative impacts on local species and their habitats. (Subramanian 2012; Lovich 2011) Renewable energy development projects need to ensure that the solution to environmental harm does not become part of the problem. (Cameron 2012; Walston 2016) Distributed solar, as opposed to utility scale, is one way to avoid energy developments that convert prime habitat into unusable areas for species. F.8-79

(McDonald 2009) When solar becomes part of already existing infrastructure and development, its footprint and impact is reduced. (Elkind 2009)

F.8-79 cont.

A. Electricity generation is a key contributor to greenhouse gas pollution.

The generation and consumption of electricity pose many negative impacts to human and environmental health. Therefore, it is necessary to both reduce consumption through conservation and efficiency, and also transition to less damaging forms of generation. Electricity generation accounts for 20% of California's greenhouse gas emissions. Without energy efficiency measures, California's combined electricity demand is projected to grow by 1.41 percent from 2010-2020, while efficiency measures could reduce that to a projected .91 percent. (CEC 2011) Electricity generated from fossil fuels contributed to air pollution from carbon dioxide and fine particulate matter, and water pollution from direct spills or impacts to groundwater through drilling, mining and injection activities. (Heberger 2015) The generation of electricity is highly water intensive, which is problematic in persistent drought conditions. (Larson 2007) In order to reduce the negative impacts to water supplies, water and energy utilities should work together to design more efficient systems for both resources. (Tarroja 2016) Wildlife and their habitats are impacted by electricity generation and transmission. (Cameron 2012) The land-use footprint of energy production is significant and will continue to grow with population unless conservation and distributed generation siting measures are put in place. (Trainor 2016)

F.8-80

The concept of energy efficiency as a resource has the potential to decrease energy production requirements and associated costs and negative impacts. Energy efficiency reduces the need for resource consumption and is thereby in itself a consumable resource with positive impacts rather than negative. (Hopper 2009) Shifting from non-renewable fossil fuels to renewable energy sources will reduce greenhouse gas emissions, air and water pollution and impacts to wildlife and habitat provided these renewable sources are sited appropriately in the vicinity of the demand they serve. (McDonald 2009; Hernandez 2015) As mentioned above, distributed solar, often referred to as rooftop or on-site solar, is a good example of appropriately sited renewable energy that maximizes system and cost efficiency and protects open space, wildlife and habitat. (Elkind 2009; Powers 2009) Legislation that supports the appropriate siting of renewable energy, such as the California Green Building Standards Code, which requires solar-ready roofs and solar-ready pre-wiring, is needed to ensure that renewable energy is able to realize its full potential. (LA Dept. Public Planning 2013) Building codes that support and encourage passive solar design contribute to even greater energy efficiency. (LA DPP 2013) Another building design concept that offers a variety of benefits from greater energy security to cost efficiency and environmental protection is the zero energy building. Such buildings produce enough renewable energy to meet annual needs, and when combined into communities, the zero energy design means that these areas are no longer reliant upon nonrenewable energy grids that harm human and environmental health, contribute to climate change and are vulnerable to outages and natural disasters. (Peterson 2015) The California Public Utilities Commission has committed to the goal of zero net energy for all new residential construction by 2020 and for all new commercial construction by 2030. (CPUC 2008)

F.8-81

B. The DEIR does not adequately disclose or analyze the Project's GHG impacts.

The DEIR's GHG analysis underestimates the amount of GHGs generated by the Project by relying upon the unrealistic assumptions that most residents will find onsite employment. (*See* DEIR at 5-21-64.) The DEIR's GHG emissions analysis also fails to consider the GHG emissions if the Project is not built in the order proposed, which is likely given the flexibility in the DEIR for the developers to modify the Project based upon market conditions and other factors. (*See* DEIR at 4-91.) F.8-82

C. The DEIR should take a more aggressive approach to reducing the Project's energy demands and increasing use of renewable energy onsite.

The DEIR should take a far more aggressive approach to reducing GHGs arising from the Project. Mitigation measures to reduce vehicle miles traveled, energy use, waste, water consumption as well as use of solar power could lower the Project's impact on climate change (as well as air pollution and water use). CAPCOA has identified existing and potential mitigation measures that could be applied to projects during the CEQA process to reduce a project's GHG emissions. (CAPCOA 2008). The California Office of the Attorney General also has developed a list of reduction mechanisms to be incorporated through the CEQA process. (CAPCOA 2008 at Table 16.) These resources provide a rich and varied array of mitigation measures to be incorporated into the Project. F.8-83

In general, the EIR should consider mitigation measures that will ensure the Project will use energy efficiently and conservatively. In doing so, it should analyze incorporating "green building" in the development. Green buildings are those buildings that lower energy consumption, use renewable energy, conserve water, harness natural light and ventilation, use environmentally friendly materials and minimize waste. (Commission for Environmental Cooperation 2008.) F.8-84

Specific mitigation measures for the GHG emissions generated by the Project's energy consumption include, but are not limited to: F.8-85

- Requiring that all developers seek and obtain the U.S. Green Building Council's LEED or comparable standards for energy- and resource efficient building during pre-design, design, construction, operations and management;
- Designing buildings for passive heating and cooling, and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.;
- Designing buildings for maximum energy efficiency including the maximum possible insulation, use of compact florescent or other low-energy lighting, use of energy efficient appliances, etc.;
- Reducing the use of pavement and impermeable surfaces;
- Requiring water re-use systems;
- Installing light emitting diodes (LEDs) for traffic, street and other outdoor lighting
- Limiting the hours of operation of outdoor lighting;
- Maximizing water conservation measures in buildings and landscaping, using drought tolerant plants in lieu of turf, planting shade trees;
- Ensure that the Project is fully served by full recycling and composting services;

- Ensure that the Project's wastewater and solid waste will be treated in facilities where GHG emissions are minimized and captured;
- Installing the maximum possible photovoltaic array on the building roofs and/or on the project site to generate all of the electricity required by the Project, and utilizing wind energy to the extent necessary and feasible;
- Installing solar water heating systems to generate all of the Project's hot water requirements;
- Installing solar or wind powered electric vehicle and plug-in hybrid vehicle charging stations to reduce emissions from vehicle trips.

F.8-85 cont.

The Project should further utilize the following mitigation measures related to construction:

- Utilize recycled, low-carbon, and otherwise climate-friendly building materials such as salvaged and recycled-content materials for building, hard surfaces, and non-plant landscaping materials;
- Minimize, reuse, and recycle construction-related waste;
- Minimize grading, earth-moving, and other energy-intensive construction practices;
- Landscape to preserve natural vegetation and maintain watershed integrity;
- Utilize alternative fuels in construction equipment and require construction equipment to utilize the best available technology to reduce emissions.

F.8-86

D. The DEIR should require "zero net energy" as a condition of the Project.

Other projects in the County that have recently been approved include a goal of zero net GHG emissions. Such projects intend to achieve that goal through reducing onsite GHG emissions to the greatest extent practicable, but also by offsetting any other emissions through local emissions reductions projects.[8] Here, the DEIR fails to provide substantial evidence that such additional reductions needed to achieve zero net energy are infeasible – for instance, the DEIR could include more robust EV charging requirements, more onsite renewable energy, and a program to offset the remaining GHG emissions locally.

F.8-87

Any offset program must ensure "Additionality." California law establishes specific standards for greenhouse gas offset credits used in the AB 32 cap-and-trade system. Health and Safety Code section 38562(d) requires, in relevant part, that:

> (1) The greenhouse gas emission reductions achieved are real, permanent, quantifiable, verifiable, and enforceable by the state board.
>
> (2) For regulations pursuant to Part 5 (commencing with Section 38570) [i.e., regulations implementing the market-based cap-and-trade system], the reduction is in addition to any greenhouse gas emission reduction otherwise required by law or regulation, and any other greenhouse gas emission reduction that otherwise would occur.

F.8-88

[8] *See* California Department of Fish and Wildlife, *Newhall Ranch Resource and Development Management and Development Plan, Final Additional Environmental Analysis*, Appendix 2.1, available at http://planning.lacounty.gov/assets/upl/case/tr_53108_appendix-2-0-cdfw-final-aea-excerpts.pdf.

F.8-87A

(3) If applicable, the greenhouse gas emission reduction occurs over the same time period and is equivalent in amount to any direct emission reduction required pursuant to this division.

F.8-88 cont.

In particular, the two-part definition of "additional" under subdivision (d)(2) requires not only that credited reductions are not otherwise legally required, but also that credited reductions would not otherwise occur in the absence of the offset project.

F.8-89

This definition of "additional" also applies in the CEQA context, as the regulatory history of the relevant CEQA Guidelines makes clear. The CEQA Guidelines specify that only GHG reductions that are "not otherwise required" may be used to offset project emissions. (CEQA Guidelines, § 15126.4, subd. (c)(3).) However, as the California Resources Agency's Final Statement of Reasons for adopting this Guideline explains, the "not otherwise required" language was intended to make clear that only "additional" emissions reductions—that is, reductions not otherwise required by law or likely to occur anyway—may be used to generate offsets for CEQA mitigation.[9] The Final Statement of Reasons explicitly interprets CEQA's mitigation requirements, including requirements governing use of offsets, as "consistent with the Legislature's directive in AB32 that reductions relied on as part of a market-based compliance mechanism must be 'in addition to any greenhouse gas emission reduction otherwise required by law or regulation, and any other greenhouse gas emission reduction that otherwise would occur.'" (*Ibid.*)

F.8-90

In short, if the County does decide to approve an iteration of this Project, we urge the County to require that it be zero net energy and include sufficient safeguards to ensure that any offsets are in fact "additional," as defined by California law.

F.8-91

E. The DEIR fails to adopt all feasible mitigation measures to reduce the Project's GHG emissions.

Mitigation of a project's environmental impacts is one of the "most important" functions of CEQA. (*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41.) Therefore, it is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." (Pub. Res. Code § 21002.)

F.8-92

In the GHG context, the CEQA Guidelines specifically requires lead agencies to "consider feasible means, supported by substantial evidence and subject to monitoring or reporting…" (14 Cal. Code Regs. § 15126.4(c).) These measures can include (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision; (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F; or (3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions.

F.8-93

[9] California Natural Resources Agency, Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 at 48, 87-90 (December 2009).

F.8-90A

As a preliminary matter, many of the proposed mitigation measures are styled as "Project Design Features" or "PDFs." (*See* DEIR at 5.21-41.) Mitigation measures must be binding and enforceable. (Pub. Res. Code § 21081.6(b); Guidelines § 15126.4(a)(2)). In addition, CEQA prohibits an agency from incorporating proposed mitigation measures into the description of the project in order to conclude that the project's impacts will be less than significant. (*See Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 655-56.) The PDFs should be incorporated into the DEIR as mitigation measures so that they are binding, enforceable, and subject to monitoring under CEQA. F.8-94

While we are heartened the Project includes some mitigation measures to reduce the Project's GHG impacts, there are significant areas in which the measures could be much stronger. Below are a few of the instances in which the mitigation measures/PDFs should be strengthened:

- The Project should generate more than the proposed 50 percent of renewable energy onsite. (*See* DEIR at 5.21-88; MM 21-2.) Given the extremely sunny climate of the Project site, this percentage could be higher, especially if the Project is to achieve zero net energy. In addition, the DEIR should specify that most or all of this energy will come from distributed rooftop solar. As currently written, the DEIR does not appear to consider impacts on raptors and wildlife – including the critically endangered California condor – of employing wind energy onsite.

- EV chargers should be more widely available for residents of multifamily units as well as people travelling to the Project area for work, shopping, etc. EV chargers in commercial parking lots should have "Level 3" DC fast charging instead of slower Level 2 charging. As currently written, PDF 21-11 and PDF 21-12 could provide for some technology other than EV-charging for multifamily and business uses. (*See* DEIR at 5.21-43.) Alternatives to EV-charging should be in addition to – and not in lieu of – EV charging stations. In addition, the Project should require more charging stations per 50,000 square feet of commercial area as well as more charging stations for multifamily units. F.8-95

The DEIR does not explain why stronger mitigation measures – including zero net energy standards – are infeasible. Instead, the DEIR generally states that "the Project's climate change impacts would remain significant and unavoidable." (DEIR at 5.21-94.) This is not sufficient under CEQA. The DEIR must provide evidence supporting this claim. (*See Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 600 (whether a project is economically unfeasible "is not measured by increased cost or lost profit, but upon whether the effect of the proposed mitigation is such that the project is rendered impractical.").) F.8-96

F. The DEIR fails to adequately analyze the Energy Conservation Mitigation Measures set forth in Appendix F of the CEQA Guidelines.

The DEIR is required to analyze whether the energy conservation mitigation measures in Appendix F of the CEQA Guidelines could be adopted as part of the Project. (*See California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 209 (an EIR is defective when it fails to include a detailed statement setting forth the mitigation measures proposed to reduce wasteful, inefficient, and unnecessary consumption of energy in accordance F.8-97

with Appendix F of the CEQA Guidelines) [hereinafter "CCEC"].) Nonetheless, the DEIR does not appear to contain any analysis of Appendix F. F.8-97 cont.

X. The DEIR's Water Quality Analysis Is Inadequate.

A. The DEIR's analysis of baseline water quality conditions is inadequate.

The DEIR contains inconsistent information regarding the baseline hydrology conditions for the Project. In the Hydrology section, the DEIR states that 55 percent of the Project site is in the Gorman Drainage Area. (DEIR at 5.2-18.) Yet in the Water Quality section, the DEIR states that only 4 percent of the site drains into Gorman Creek. (DEIR at 5.4-4.) The DEIR needs to explain how these statements are consistent or reassess the Project area hydrology. F.8-98

The Project does not adequately analyze the impacts on water quality and biological resources of residential use of pesticides and chemicals associated with the Project. In particular, the DEIR fails to include an analysis – including appropriate surveys – of the aquatic and riparian wildlife present in Gorman Creek, Oso Creek, and Quail Lake. Moreover, because Gorman Creek is within the Santa Clara River watershed (DEIR at 5.2-15), the DEIR should analyze the baseline and potential impacts to aquatic and riparian wildlife in the Santa Clara River. F.8-99

B. The DEIR does not adequately disclose the water quality impacts of the Project.

The DEIR claims that that it will not have any significant impacts to water quality. This likely inaccurate because the Project will install a city adjacent to a lake and multiple creeks, which are home to special status wildlife. The Project will result in the discharge of metals, nutrients, pesticides, organic compounds, sediments, trash and debris, oxygen demanding substances, and oil and grease. These substances will runoff from the site and drain into the adjacent lake and creeks. F.8-100

The Project similarly fails to analyze the impacts on water quality and biological resources of commercial use of chemicals associated with the Project. The DEIR does not list which chemicals will be permitted for use within the Project area, which suggests that any otherwise legal chemicals – including those used for industrial activities – will be permitted onsite. Many of these chemicals can be extremely harmful to wildlife. The DEIR contains no analysis of using such industrial chemicals in a largely undeveloped area surrounded by creeks and wildlife, including the Angeles National Forest. In general, the DEIR claims that adherence to existing regulations will ensure that impacts are not significant. Yet, this is insufficient under CEQA. (*See Californians for Alternative to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17.) This lack of detail and appropriate mitigation makes it impossible for the public to ascertain the true environmental impacts of the Project F.8-101

C. The DEIR's water quality mitigation measures are vague and inadequate.

While the DEIR provides a list of Best Management Practices ("BMPs") that may reduce impacts, none of BMPs listed are specified as enforceable mitigation measures, which is required under CEQA. The DEIR does not indicate that these mitigation measures are binding on the project or that the project proponent is required to comply. F.8-102

The DEIR fails to adequately analyze the impacts to water quality and wildlife – including from pesticides – of adding tens of thousands of people to an undeveloped area. F.8-103

Moreover, the DEIR claims that it will implement "integrated pest management" or "IPM" and generally references "guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program. (DEIR at 5.4-30.) The DEIR does not appear to explain or describe those Guidelines, nor does it contain these Guidelines as enforceable mitigation measures or conditions of project approval. F.8-104

Because the project proponent is under no legal duty to adhere to each of the Guidelines, the County cannot and should not rely on this measure to reduce harm to individuals, water quality, or wildlife on or near the Project property. (CEQA Guidelines § 15126.4(a)(2); *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development").) Additionally, the DEIR does not point to any study or analysis that would suggest IPM is an effective means to mitigate harm to sensitive species, including amphibians such as the California treefrog, California toad, and black-bellied salamander. Thus, the DEIR fails to present IPM for the Project to interested members of the community from becoming fully informed of the benefits and risks of this form of mitigation. (Cal. Pub. Res. Code § 21002, 21003.) F.8-105

The Project will include 28 on-site detention and retention basins. (DEIR at 5.4-45.) While erosion control measures are important, the DEIR analyze whether these basins may attract or harbor invasive bullfrogs, which are known to harm native wildlife populations. F.8-106

XI. The DEIR Fails To Adequately Analyze Or Mitigate The Impacts Of The Project On Biological Resources.

A. Habitat destruction is a leading cause of extinction.

Species diversity is critical for healthy ecosystems, and ensuring habitat integrity if a key component to species survival. (Dobson 1997.) Habitat destruct or alteration can increase incidents of wildfire and flooding as the ecosystem becomes imbalanced, making it more susceptible to these events. (Brooks 2004; Nilsson 2000.) Developments that convert open space into another use, such as housing, industry, energy or agriculture, negatively impact the species that live in these areas, and the ecosystem as a whole. (Walston 2016; Chaplin-Kramer 2015; Minnich 1998.) Many of the species that have potential to occur in the project area are already imperiled or endangered, and further encroachment onto their habitat worsens the threat to their success and survival. F.8-107

While the entire habitat may not be converted or destroyed through development, it may be fragmented such that it becomes useless as a habitat for particular species. Even if the habitat remains intact, light and noise pollution can negatively impact the health and reproductive rates of species that are sensitive to these types of pollution. (Slabbekoorn 2008; Longcore 2004.) Pollution in the form of pesticides and rodenticides are also a threat, in addition to run-off pollution from roads that impacts water quality and aquatic life and the species that depend on it. (Perez 2007; Miller 2006; Relyea 2005.) Roads create habitat fragmentation since they act as dangerous physical barriers that many species won't cross, or are killed or injured if they do. F.8-108

(Poessel 2014; Ware 2015; Brock 2004; Swihart 1984.) Additionally, roads facilitate the spread of non-native and invasive species, particularly plants and their seeds, which threaten the survival of species native to these areas. (Gelbard 2003.) Fences create another type of habitat fragmentation by reducing mobility and prevent species from accessing all areas that they depend on for survival, or worse, they ensnare the animals that do try to cross them, resulting in injury or death. (Baines 2003; Paige 2008.) For many species, climate change will mean the need for adaptation in the form of migration to new habitats that support their needs. Fragmentation or obstruction of this mobility will result in greater mortality. (Scheffers 2016.)

F.8-108 cont.

Urban infill projects reuse land that has already been disturbed and that is located near urban centers, thus removing the need for conversion of open space for housing, businesses, shopping, roads and other infrastructure. (Wheeler 2002.) These projects are also good candidates for citing distributed solar, further reducing impacts to species and habitat. (Powers 2009.) Wildlife corridors, bridges and underpasses can be constructed in places where roads bisect and disconnect habitat and mobility. (Servheen 2007.) Fences should be used with an understanding of the impacts they have on species mobility, and should be constructed in such a way as to specifically exclude the target species, not all species. Consideration should be given to the type of fencing and the ways in which species could become entangles, injured or killed. (Paige 2008.) Connective corridors between fragmented habitats will enable species to utilize the habitat and retain needed mobility for survival. (South Coast Wildlands 2008.) Alternatives to toxic and poisonous pesticides and herbicides should be used whenever possible to reduce harm to species and their habitats. (Litmans 2004.)

F.8-109

B. The Project Site is unsuitable for development and will the Project will cause significant impacts.

The proposed project site is primarily undisturbed habitat for numerous sensitive species and provides crucial linkages for imperiled terrestrial animals and avian species. For this reason alone, the proposed project area is unsuitable for development and particularly for the intensive type of suburban sprawl proposed in the DEIR where a new city of approximately 20,000 houses along with significant commercial and industrial development and all the requisite infrastructure will be constructed. The Centennial proposal reflects 20th century development concepts that have created unsustainable communities that impact and fragment crucial open space, wildlife connectivity and imperiled species habitat. We urge the County to withdraw this proposal and focus on crafting sustainable development within the County in order to meet human development goals while sustaining the ability of natural systems to continue to provide the natural resources and ecosystem services upon which our local economy and society depend.

F.8-110

The DEIR's conclusion that "Project impacts are considered less than significant after mitigation." (DEIR at 5.7-195) are not supported by the DEIR. We discuss the reasons below:

F.8-111

In general, the DEIR goes to great lengths in interpreting the collected data to downplay the uniqueness of the proposed Centennial area. Three ecoregions – the Sierra Nevada, the Mojave Desert, and the South Coast – converge in the proposed project area.[10] Few other

F.8-112

[10] Conservation Biology Institute and South Coast Wildlands 2006. Proposed Reserve Design for Tejon Ranch - A Threatened California Legacy. Pgs. 43 http://www.scwildlands.org/reports/ProposedReserve_TejonRanch.pdf

F.8-112A

locations in California have the distinction of three ecoregions converging.[11] These ecoregions are the manifestation of the convergence of California's two largest earthquake faults – the San Andreas Fault, the largest fault in California that runs southeast to northwest through the proposed project site, and the Garlock fault, the second largest fault in California that runs northeast to southwest and intersects the San Andreas fault at the "Big Bend" considered to be the most significant tectonic area in California.[12] This unique location and geological structure that gives rise to the unique soil horizons create the conditions that support unique biological and botanical resources that occur on the proposed project site. Those unique features coupled with the historic and contemporary land management has kept much of the botanical resources in place.

F.8-112 cont.

The DEIR however obfuscates the uniqueness of the proposed project site, particularly of the grasslands and wildflower fields that the proposed project will destroy the very heart of by focusing so closely on highly detailed mapping instead of the value of the intact grassland as a whole. As a metaphorical analogy, the DEIR loses the forest by focusing only on individual trees. Indeed one of the reports included in Appendix 5-7-b as Plant 2 states:

> "The perennial bunchgrass community on the site covers approximately 5,500 continuous acres distributed across a distinct geomorphic feature consisting of weathere ridges and terraces from old and very old alluvium. The stand has minimal intrusion of introduced annual grasses and a high richness of bunchgrass species. Six different species occur within the greater stand. Four of these are either dominant or subdominant and form a complex matrix with semi-predictable distribution patterns across the ridges and terraces based on landscape position" (at PDF pg. 641)

F.8-113

Interestingly, in 2008, the Center attended a Los Angeles County Significant Ecological Area Technical Advisory Committee meeting and received from the County a prior final version of the Vollmar report than the version that is included in the DEIR. We submit the version that we received from the County as Exhibit B. The reason that we submit it is because the conclusions reached are different from the conclusions included in the DEIR's version, and this discrepancy we will discuss further below.

F.8-114

The proposed mitigation strategy is inadequate because it tries to justify the development of habitat for the rare species and plant communities and proposes to mitigate the impacts through set aside of lands that have little data documenting adequacy of supporting the botanical and biological resources that are proposed to be impacted. In other words, the information provided in the DEIR is unclear that the proposed mitigation will actually mitigate the species- and habitat- specific impacts. Additionally, three of the proposed mitigation areas already have conservation easements on them because California's Wildlife Conservation Board paid the Tejon Ranch Company $15.8 million dollars to place conservation easements over 62,003 acres of the ranch and 12,145 of those acres are now proposed to be used as mitigation (DEIR at exhibit 5.7-10) for the proposed Centennial project. California taxpayers should not be paying for mitigation of a private company's development. In addition the "on-site" mitigation areas

F.8-115

[11] https://calswap.wordpress.com/2013/06/

[12] http://www.sci.sdsu.edu/salton/San%20AndreasFaultSyst.html

F.8-112B

F.8-112C

appear to only be included in the proposed project area so that they can be set aside as "mitigation". F.8-115 cont.

This shell game of "mitigation" is obvious and only allows wholesale destruction of habitat that should be avoided. When the 12,145 acres of already conserved lands are subtracted out of the proposed mitigation lands, the project effectively only proposes 15,267 acres (11,402 acres of off-site mitigation and 3,866 acres of "on-site" mitigation) (DEIR at exhibit 5.7-10). Because the proposed project area is 12,323 acres with 3,866 acres being "on-site" mitigation, the actual impact area (recognizing the impact level varies) would be 8,457 acres. The DEIR proposes an unrealistic mitigation of impacts for resident rare and common species, including landscape connectivity of only 1.8:1 (conserved:developed). Because habitat is already inhabited and used by the same species for which mitigation is sought, this mitigation strategy ensures a *net decrease* in habitat for impacted species. To actually provide mitigation that lessens species' habitat losses, mitigation ratios must be actually address the impacts to each species and unique habitat type and must be high enough to fully mitigate the impacts to those species.[13] A *minimum* 3:1 (conserved:developed) mitigation is more appropriate for this very threatened landscape and rare species. A 3:1 ratio (conservation:development) also helps to assure that project impacts are mitigated appropriately but also that the net losses of habitat for rare species are decreased. It would also help to allay fears that the proposed mitigation actions, for which plans will be written in the future will actually work (see discussion below on missing plans). This strategy is also essential to prevent future listings under Endangered Species Acts – both state and federal. F.8-116

C. The DEIR fails to adequately describe the environmental baseline.

Field Surveys

The DEIR and appendices document the intermittent survey efforts on various areas of the proposed project site between 1999 and 2015, however, most of the surveys were not comprehensive in nature i.e. they did not cover the whole project site but instead often focused on specific habitats. While this may be appropriate for certain species, as the County recognizes, this area has been understudied by biologist and botanists due to lack of access. Because of the geographic uniqueness of the area, it is surprising that the diversity of animal species in particular is so low, but not surprising that the diversity of plants is high. While the DEIR is unsuccessful in synthesizing the data into a comprehensive overview of the biological resources, as mentioned above, the synthesis also downplays the landscape-scale uniqueness of the landscape. F.8-117

Botanical Resources

[13]Moilanen, A., A.J.A. van Teeffelen, Y. Ben-Haim and S. Ferrier. 2008. How much compensation is enough? A framework for incorporating uncertainty and time discounting when calculating offset ratios for impacted habitat. Restoration Ecology 17(4): 470-478 http://www.academia.edu/download/42103667/pdf.pdf ; Norton, D.A. 2008. Biodiversity offsets: two New Zealand case studies and an assessment framework. Environmental Management 43(4):698-706. http://docketpublic.energy.ca.gov/PublicDocuments/Regulatory/11-AFC-2%20Hidden%20Hills/2013/FEB/TN%2069406%2002-04-13%20Intervenor%20Center%20for%20Biological%20Diversity's%20Testimony,%20Exhibit%20List%20and%20Exhibits/Exhibit%20502.%20Norton%202009.%20Envt%20Mgt.pdf F.8-116A

Section 5.7, entitled "Biological Resources," in the EIR devotes significant effort to characterizing the onsite grasslands, which includes Native Perennial Grasslands ("NPG") and Wildflower Fields ("WFF"). The high quality of the NPG and WFF on the site were first documented in the Vollmar Consulting 2003/2004 study. The project proponent subsequently hired Natural Resource Consultants ("NRC") to conduct a follow-up study in 2006/2007 that was intended to be a more rigorous and objective as a basis for quantifying the quality and potential impacts to these habitats. F.8-118

The following comments from our review of the EIR need to be more fully addressed in the DEIR:

1) Because plants communities are often highly correlated with soil types and their underlying geological formations, the Vollmar Consulting study (Appendix 5-7b, Plant-2) included geologic formation as a fundamental parameter for understanding the distribution and quality of NPG on the site that is lacking in the subsequent grassland analysis and in the DEIR itself. The influence of geology and soils on plant community distribution and variations in plant species diversity and richness within a plant community on a local scale is broadly acknowledged as a foundational concept in vegetation ecology. During the 2003 field surveys conducted by Vollmar Consulting, the team anecdotally observed a clear difference in the size and quality of NPG and WFF stands in different areas of the Project site supporting grasslands. In particular, the team observed that the Continental Deposits and Terrace Deposits geologic formations in eastern portion of the site between Highway 138 and the northern Project site boundary appeared to support much larger contiguous stands of NPG and WFF and also supported a much higher number of native grass and forb species. This distribution appears to be due to the unique combination of geology and topography within these geologic formations in this portion of the Project site. This specific area supports a landform with generally east-west trending ridges and associated valleys that provide a maximum diversity of landscape positions and thin upper slope and ridge top soils able to support a high diversity and cover of native grass and forb species. These conditions are not replicated elsewhere in the local region. On the south side of Highway 138, the mapped Continental Deposits generally slope north. North of the project site, the mapped Continental Deposits and Terrace Deposits generally slope south. Both areas (especially to the north) generally lack the extensive and well-developed ridges that support high diversity NPG and WFF in the central eastern portion of the Project site. The western portion of the Project Site supports a different set of geologic formations with soils that are generally less weathered and windblown which reduces habitat suitability and quality of the NPG and WFF habitats. This distribution of different geologic formations on the proposed project site brings into question the evaluation of the grasslands in the areas proposed to be developed versus the areas that would provide mitigation for the developed areas. F.8-119

2) The Vollmar Consulting report describes in detail the unique geologic and topographic characteristics in the central eastern portion of the Project site and how these characteristics relate to the exceptional quality of the NPG and WWF in this area. For F.8-120

reasons that are unclear, NRC opted not to include geology or soils as part of their study. This omission strongly compromises the study results and also prevents the ability to differentially characterize the quality of the NPG and WWF in different areas of the Project site. The analysis should be redone with the data stratified by geologic formation (as well as the other parameters already included). This approach would strongly improve the accuracy of the habitat model to predict the cover of native perennial bunch grasses ("NPBG") in different landscape positions. The current study achieved only a 37% predictive accuracy in NPBG cover with four cover classes. A re-analysis including geology would show that the central eastern portion of the Project site in fact supports much higher quality NPG and WFF in terms of native grass and forbs species richness and diversity than other portions of the site.

F.8-120 cont.

3) Paragraph 2 on Page 5.7-25 (Delineation of Grasslands section) in the DEIR's Biological Resources section states that there is no accepted definition of NPG but that a commonly accepted standard is to identify native grasslands as areas with 10-20 percent cover of native grasses. The paragraph then goes on to state that, given historical uncertainty, the standard definition was not used but that a specific definition was developed for the NRC analysis that incorporates regional and site-specific information. However, the DEIR never provides a formal definition of what constitutes NPG for the purposes of the study and mitigation analysis. The DEIR needs to be revised to include a formal definition of both NPG and WFF and those definitions need to be used in the analysis of impacts and mitigation.

F.8-121

4) The Vollmar Consulting and NRC studies differ in their approach to cover with the former using relative cover and the latter using absolute cover. While either approach can be justified, the Vollmar Consulting report records and analyzes the high cover of bare soil in high quality NPG areas which makes relative cover an important metric. Also, the 'bare soil' areas can have a high cover of native forbs (WFF) during favorable rain years (such as 2003). The NRC study should have also considered relative cover values as a metric of the relative contribution and prominence of native grasses (as well as native forbs) within the grassland habitats.

F.8-122

5) As a general comment, characterization and mapping of WFF within the Project site is largely missing and appears to be well below the level of analysis required to accurately assess impacts and mitigation within an EIR. WFF is a recognized sensitive plant community as the DEIR notes (at pg. 5.7-158) – requiring the same level of consideration as the sensitive NPG – but there is almost no analysis or discussion of the distribution, species richness, stand size, habitat acreage calculation, etc. of this plant community within the proposed project site. The Vollmar Consulting study found exceptional species richness of native forbs within the Project site, especially within NPG habitat on the Continental Deposits and Terrace Deposits in the central eastern portion of the site. During the 2003 plot sampling, all forb species within each plot were recorded. A total of over 70 native species were recorded, an exceptionally high number within a local California grassland community. The study also found that the level of native forb richness and cover was positively correlated with increasing NPG cover. The NRC study and Project EIR treats the WFF habitat very differently. On Page 5.7-41 in the EIR, a

F.8-123

statement reads as follows: "Wildflowers are typical for this type of vegetation (both native perennial and non-native annual grasslands), and their density varies from year to year." This statement, which is consistent with the overall poor treatment of WFF habitat in the DEIR, implies the wildflowers generally occur in the native and non-native grasslands throughout the site with no real distinction. In fact, the Vollmar Consulting study found very distinct distribution patterns in the richness and cover of native wildflowers with the non-native grasslands having a generally low cover and richness and the NPG having a generally high cover and richness. The NRC study needs to be revised to include a much more rigorous analysis of the WFF habitat, including a consideration of geology as well as the other parameters used in the analysis of NPG. Such an analysis would show that the central eastern portion of the Project site within the Continental Deposits and Terrace Deposits supports exceptional WFF habitat with much larger contiguous stands and a much higher species richness than WFF habitat in the western portion of the site.

F.8-123 cont.

6) Table 5.7-3 and 5.7-11 summarize the different vegetation types and acreages within the Project Site. In both tables, all vegetation types are presented at the Alliance level (based on Keeler-Wolf) - except for "Grass and Herb-dominated Vegetation Types." Instead, this type is identified as "Native Perennial Grassland/California Annual Grassland." This lumping is done in spite of the fact that grasslands occur over more than 9,000 acres (70%) of the Project site and include at least two distinguishable sensitive plant community types subject to EIR review – NPG and WFF. NRC completed a detailed study of NPG (but not WFF) that yielded a map of predicted distribution. Also, the data were collected in a manner that alliance level vegetation types for NPG and WFF can be described and mapped. As currently treated, the lumping has the effect of dismissing NPG and WFF as an inextricable component of the overall grassland habitat on the site. This approach is carried through on Exhibit 5.7-1 that shows undifferentiated 'grasslands' within the Project site. Nowhere in the DEIR is there a map showing the distribution of NPG (or WFF) within the Project site. Also, there is no definition in the DEIR of what constitutes NPG for the purposes of this Project though the standard definition is explicitly rejected as described above. The DEIR needs to be revised to provide specific definitions of NPG and WFF and a map needs to be prepared showing the specific distributions of these vegetation types based on these definitions. Based on the Vollmar Consulting study, it is appears that the distribution of WFF is closely correlated with the distribution of NPG and it may be appropriate to map both vegetation types together where NPG occurs. The current treatment of inexplicably lumping the NPG, WWF and non-native grasslands together effectively devalues the uniqueness of the NPG and WWF as separate and sensitive plant alliances. Accurate alliance mapping is absolutely necessary in order to apply the appropriate avoidance and minimization measures. It impacts are still proposed, adequate mitigation can only be proposed if the impacts are accurately analyzed.

F.8-124

7) The treatment of NPG and WFF are further downgraded in the mitigation sections of the EIR. The mitigation for impacts to NPG and WFF is lumped under generic 'grassland' mitigation within the proposed preserves (see Table 5.7-12). However, based on the discussion above of the uniqueness of the NPG and WFF within the central eastern

F.8-125

portion of the Project site due to the regionally unique geomorphic setting, and the apparent flaw in the NRC study in omitting geologic/soils as a parameter in the analysis, it is not at all clear that the proposed mitigation preserves replace the NPG and WFF habitat values that will be lost on the proposed project site. The mitigation analysis needs to be revised based on a revised NRC analysis that includes geology in the analysis and a subsequent revised analysis of NPG and WFF habitat within the Project site. The results of the revised NRC analysis can then be compared to habitat conditions within the proposed preserves to determine if, in fact, they support similar resource values as the Project site. Based on the data in Appendix 5.7b, the results may show that the central eastern portion of the proposed project site actually supports very unique NPG and WFF habitat that is of higher quality in terms of species richness than the NPG and WFF habitats on most or all of the proposed preserves.

F.8-125 cont.

8) The Vollmar Consulting study notes that one of the exceptional characteristics of the NPG habitat in the central eastern portion of the Project site is the size of the contiguous stands. As part of the study, the team research and visited other known stands of NPG in California and found that the stand within the Project site far exceeded the size (and in many cases the quality) of all other known occurrences at the time. Since the Vollmar Consulting study was completed, extensive NPG habitat has been documented along the lower flanks for the Tehachapi Mountains to the north and northeast of the Project site. However, as noted above, these stands seem to be very different from the NPG within the proposed project site. The slopes are mostly south-facing and there is a general a lack of the ridge tops and broad slope/landscape position diversity that drives the exceptional native species richness within the Project site. The concept of NPG stand size is briefly touched in in the DEIR on Page 5.7-159. This section notes that NPG has been reduced to perhaps 0.1 percent of its historical (pre-European) extent, making it one of the rarest and most endangered vegetation types in California. It also notes:

> "***from either a statewide or regional perspective, the quality and extent of native perennial grasslands on the site is excellent.*** Most of the remaining stands in the southern California area are generally small (less than 100 acres) and isolated in widely scattered areas". (Emphasis added.)

F.8-126

Given this reality, the loss of several thousand acres of what constitutes some of the highest quality remaining NPG habitat in the state should be considered a non-mitigable significant impact, regardless of the acreage of preserved habitat set aside as mitigation. This section of the DEIR does discuss the roughly 22,000 acres of NPG habitat mapped along the lower flanks of the Tehachapi Mountains north and northeast of the Project site. However, the NPG (and WFF) habitat on the Continental Deposits and Terrace Deposits within the proposed project site appears to be very different from the other NPG habitats in the region due to the unique geomorphic setting within the Project site as discussed above.

F.8-127

D. The DIER does not adequately mitigate the Project's impacts on rare plants.

The DEIR reports numerous rare plant species and substantial impacts to some of those species from the proposed project. Many of these plants are associated with the unique

F.8-128

grasslands on the site. Numerous populations of the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah, will be impacted by the proposed project and it is appropriate that the County is recognizing that despite not being under Endangered Species Act protections but because they are rare in the County and in a botanically underexplored area, mitigation is necessary. However, the DEIR relies on Mitigation Measure 7-1 for all these species to mitigate the impacts from the development of the proposed project to less than significant levels. Unfortunately MM 7.1 defers surveys of mitigation lands to confirm the presence and populations numbers or absence of the species to the future (DEIR at 5.7-173). It also requires a Special Status Plant Species Restoration Plan, which actually needs to be included as part of the DEIR, so that the public can be informed about the methodology that is being proposed and comment on it (see section on missing plans below). While the criteria laid out in the second paragraph on pg. 5.7-174 is helpful, it still does not inform the public and decision-makers on how those criteria will be addressed successfully and if the plan is actually feasible. We have seen poor plans implemented multiple times and fail. We have seen agencies allow the developer to then walk away from the mitigation, after spending significant funds on an ill-conceived plan that was never available for public review.

F.8-128 cont.

Furthermore the DEIR states that "Adoption of this plan shall be used as the performance standard" (at pg. 5.7-174) which is unfathomable. Adopting a plan is not mitigation. There needs to be a *requirement for implementation* and safeguards that require successful mitigation to actually be achieved. We are particularly concerned about this issue because the track record for enhancing/re-establishing or establishing new populations of rare plants is abysmal, particularly the long term, with a success rate of mitigation-related transplantation, relocation, and reintroduction attempts being only being 8%.[14]

F.8-129

MM 7-1 also states "An overview of the plan objectives is provided in the Biological Resource Mitigation Program to be submitted and approved by the County prior to issuance of grading permits." However, we were unable to locate a Biological Resource Mitigation Program in the DEIR. Such a Program's availability during the environmental review process is key for decision-makers and the public to be able to understand the strategy proposed for mitigation. Instead the DEIR appears to be relegating this foundational program to a behind-closed-door review and adoption after the project is permitted.

F.8-130

The DEIR is mute on the management of the mitigation lands for plants, which of course is key to effective mitigation. The Mitigation Preserve Review (Appendix 5.7-c) does not include the current management of the on- and off-site mitigation areas. We are concerned that the Ranch Wide Management Plan[15], which focuses on cattle grazing as the primary management tool, will be the management document for the mitigation lands which is not appropriate.

F.8-131

E. The DIER does not adequately mitigate the Project's impacts on Oaks.

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[14] *Fiedler, P.L. 1991. Mitigation Related Transplantation, Relocation, and Reintroduction Projects Involving Endangered and Threatened and Rare Plant Species in California. Final Submitted to the California Department of Fish and Game – Endangered Plant Program. June 14, 1991. Pgs.144.*
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=3173

F.8-129A

[15] http://www.tejonconservancy.org/rwmp.htm

F.8-131A

Results from the oak surveys on the proposed project site indicate that not only does the site have great diversity of oaks – ten different species– but that it is a living laboratory of oak hybridization (Appendix 5-7-b, Plant-10). F.8-132

However, neither the Oak Woodland Mitigation Plan nor the Oak Maintenance Plan are available for public review as part of the DEIR. MM 7-11 gives some guidance on requirements for the plan. Yet, it does not include performance criteria for the to-be-developed Monitoring Plan (at 5.7-186). If oaks are impacted from the proposed project construction, we support mitigating with local propagules. However, we failed to see any criteria that required that the mitigation reflect the species-specific or hybrid-specific impact (i.e. if 50% of the impact occurred to blue oaks, then 50% of the required mitigation be of the successful establishment of blue oaks), or that the ultimate creation of mitigation woodlands replicate the species/hybrid make-up of the oak woodlands that will be destroyed. F.8-133

Absent the actual plans, decision-makers and the public can not actually evaluate the effectiveness of the plans in achieving adequate mitigation. F.8-134

Appendix 5-7-b, Plant-11 recommended including Alternative G – Reduction of Oak Woodland Impact Alternative. However, this Alternative was not included in the Alternatives analysis. It should be included and analyzed in the revised and recirculated EIR for all the benefits that it would provide, not only to oaks but to the species that depend on them. F.8-135

F. The DIER does not adequately mitigate the Project's impact on wildlife

As stated above, while the site does support numerous rare and common wildlife species over the 12,323 acres site, the paucity of on-site wildlife species is striking. This may be attributed to current management of the site, and that and other factors must be taken into consideration when evaluating the potential impacts from the proposed development. Based on the wildlife reported on site in the DEIR, we have the following concerns: F.8-136

State fully Protected Species

Four rare species that were documented on the project site or directly adjacent are fully-protected species under California law (Fish and Game Code §5050)[16], meaning that individuals of the species may not be "taken" (as defined in the Fish and Game Code) at any time, unless and Natural Communities Conservation Plan is prepared and implemented. These species include California condor (Appendix 5-7-b, Birds-6 and Birds-10), golden eagle (Appendix 5-7-b, Gen-6 and other places), bald eagle (Appendix 5.7-b, Gen-6, and Birds-1)- although it was not identified in the DEIR, and the white-tailed kite (Appendix 5.7-b, Gen-6 and Birds-1) , Therefore all mortal impact must be avoided. F.8-137

[16]CDFW 2017 California's Fully Protected Species List. http://www.dfg.ca.gov/wildlife/nongame/t_e_spp/fully_pro.html F.8-137A

a. California Condor

The California condor recovery efforts, despite setbacks, are a success[17] and California condors continue to expand their populations in the wild and re-inhabit historic habitat, including Tejon Ranch and the proposed project area. F.8-138

The DEIR documents the presence of California condors on the proposed project site in surveys from 1999 to 2004 (Appendix 5-7-b, Birds-1) and through telemetry data from the 1990s to the present (Birds-6 and Birds-10). The telemetry data confirms flyovers of the proposed project site by telemetered birds and the DEIR reports an observed landing of a condor (at pg.5.7-119). Despite the DEIR's statement that "All California condors are wing-tagged and fitted with radio transmitters" (at pg. 5.7-148), the DEIR is wrong - not all California condors are radio-telemetered, and although a subset do have GPS units, some condors only have wing tags. The most recent publicly available data set that we have accessed - cellular GPS from March 31, 2017 - continues to show consistent use of the proposed project site by California condors. F.8-139

The Cogan report (2009)[18] includes not only location data on condor sitings and GPS locations, but also flight lines of condors over the Tejon Ranch, including the proposed project area. These data provide additional information on how condors have used the proposed project area. F.8-140

The DEIR downplays the potential serious impact that the proposed project may have on the California condor. The DEIR erroneously concludes that "Project implementation is not expected to result in any impacts on these two species and no mitigation is required" (at pg. 5.7-119) - the two species referenced are condors and bald eagles. This conclusion is in direct conflict with the data and analysis in Appendix 5-7-b, Birds-6 which states "indirect effects associated with the development and operation of the site, as defined by CEQA, could potentially occur." (at PDF pg. 1611). The report continues, stating "these effects can be substantially reduced and/or eliminated through project design features and implementation of various mitigation and conservation measures, including the provision for additional radio telemetry transmitters to be affixed to free-flying condors that may reduce the potential for mortality of individual condors, provide more insight into overall condor health and mortality issues, and ultimately aid in the recovery of the species." (at PDF pg. 1611) Yet the DEIR ignores this recommendation and fails to include it as part of the mitigation package to help reduce impacts to California condor. F.8-141

The DEIR does include MM 7-6 which addresses construction-related safeguards for condors (microtrash, litter, vehicle fluids, and food waste removal), and the implementation of APLIC standards for antennae and phone/utility lines. It also requires the removal of "dead cattle that are found or reported within 1,000 feet of the boundary of a residential or commercial development" (at pg. 5.7-178) but fails to provide a timeline for how quickly the removal must F.8-142

[17] USFWS 2015. California Condor Recovery Program 2015 Annual Condor Population Status Update. Pgs. 6. https://www.fws.gov/cno/es/pdf%20files/Ca-Condor-Recovery-Prog2015PopulationStatus.pdf F.8-138A

[18] Cogan, Christopher B. 2009. California Condor Activity in the Tejon Ranch Region. Center for Biological Diversity Report, 12 June 2009. San Francisco, CA, USA. 22pp. http://www.biologicaldiversity.org/species/birds/California_condor/pdfs/CondorActivityInTheTejonRanchRegion.pdf F.8-140A

happen after reporting occurs. It also fails to address the long-term impacts of microtrash, litter, vehicle fluids, and food waste as 55,000+ people move into the area if the project moves forward.

F.8-142 cont.

While the whole of Tejon Ranch is critical to the survival and recovery of the California condor, this species is in such dire circumstances and requires such large swaths of habitat that each acre of occupied habitat contributes to its ongoing recovery. The development of natural foraging habitat reduces the amount of contiguous habitat and could cause a range contraction – just what the California condor can't afford. The erroneous determination in the DEIR that project implementation will not result in any impacts to condors is not supported in the DEIR or its appendices. Because of the inadequacy of impact analysis and resulting mitigation measures for the critically imperiled California condor, the County needs to vastly improve the avoidance, minimization and mitigation measures in a supplemental and recirculated DEIR.

F.8-143

b. Golden eagles

Golden eagles were documented foraging on the project site (DEIR at pg. 5.7-150) and the DEIR states that "nesting has not yet been documented on the Project site". However, apparently no aerial nest surveys were done in the area. Currently in other areas in California, USFWS is requiring surveys within 10 miles of a proposed project site in order to document nest sites. The DEIR goes on to state "Project implementation would result is the loss of approximately 6,416 acres of foraging habitat for these raptors that would be considered adverse, but less than significant" (at pg. 5.7-150), where "these raptors" include golden eagles, northern harrier and white-tailed kites. The fact remains that significant amounts of foraging habitat will decrease carrying capacity of the landscape and could result in a potential loss of habitat needed to support a nesting pair of golden eagles, which would impact reproductive capacity of golden eagles and result in "take". In addition, numerous other known causes of golden eagle mortality will be introduced into the area from the development, including potential poisoning, collisions, electrocutions and others[19]. The erroneous determination in the DEIR that project implementation will not result in any impacts to golden eagles is not supported in the DEIR or its appendices. Instead the DEIR relies on MM 7-6 which suffers the same inadequacies discussed above regarding condors. Indeed MM 7-6 addresses construction impacts primarily associated with condors (microtrash, litter and vehicle fluids), which thankfully golden eagles are not as vulnerable to, but fails to address the impacts that eagles are vulnerable to, including poisoning, collisions and electrocutions.

F.8-144

Scientific literature on this subject is clear - the presence of humans detected by a raptor in its nesting or hunting habitat can be a significant habitat-altering disturbance even if the human is far from an active nest.[20] Regardless of distance, a straight-line view of disturbance affects raptors, and an effective approach to mitigate impacts of disturbance for golden eagles involves calculation of viewsheds using a three-dimensional GIS tool and development of

F.8-145

[19] USFWS 2016. U.S. Fish and Wildlife Service. 2016. Bald and Golden Eagles: Population demographics and estimation of sustainable take in the United States, 2016 update. Division of Migratory Bird Management, Washington D.C., USA. Pgs 115. https://www.fws.gov/migratorybirds/pdf/management/EagleRuleRevisions-StatusReport.pdf

F.8-144A

[20] Richardson, C.T. and C.K.Miller 1997. Recommendations for protecting raptors from human disturbance: a review. Wildlife Society Bulletin 25(3):634-638 http://docketpublic.energy.ca.gov/PublicDocuments/09-AFC-07C/TN200071_20130729T152048_CBD's_Comments_on_PSA_Final__Attachment_15.pdf

F.8-145A

buffers based on the modeling.[21] Golden eagles have also been documented to avoid industrialized areas that are developed in their territory.[22] Additionally, the DEIR does not actually clearly analyze the impacts to and mitigations for the golden eagle under the Bald Eagle and Golden Eagle Protection Act, which prohibits, except under certain specified conditions, the take, possession, and commerce of such birds. Due to the potential impact to golden eagles from the proposed project development, the project proponent needs to apply for a "take" permit for golden eagles under the Bald Eagle and Golden Eagle Protection Act.

F.8-145 cont.

c. Bald Eagle

Bald eagles have been documented to use Quail Lake which is directly adjacent to the proposed project area. (DEIR at 5.7-121.) No estimation of the amount of suitable foraging, roosting or nesting habitat is present on the site or how much will be impacted is provided in the DEIR. As with the California condor, the DEIR determines that the proposed project is not expected to result in any impacts to golden eagles (at pg. 5.7-148), yet the DEIR provides no support for this conclusion. Instead it relies on MM 7-6 which suffers the same inadequacies discussed above regarding condors. Indeed MM 7-6 addresses construction impacts primarily associated with condors (microtrash, litter and vehicle fluids), which thankfully bald eagles are not as vulnerable to, but fails to address the impacts that bald eagles are vulnerable to, including poisoning, collisions and electrocutions.

F.8-146

No mention is made in the DEIR about limiting access in and around roosting/nesting sites. The scientific literature supports restrictions from 250 meters to 400 meters[23] and maybe more depending on numerous factors that affect behavior. A larger management zone from 1,360-1400 m has been prescribed in the scientific literature for non-breeding bald eagles roosting sites.[24] CEQA requires that this issue be addressed.

F.8-147

As with the golden eagle, the DEIR does not actually clearly identify the impacts to and mitigations for the bald eagle under the Bald Eagle and Golden Eagle Protection Act.

F.8-148

d. White-tailed kite

The white-tailed kite is documented on the proposed project site. (DEIR at 5.7-150) The DEIR states "Project implementation would result is the loss of approximately 6,416 acres of

F.8-149

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[21] Camp R.J., D.T. Sinton and R.L.Knight. Viewsheds: a complementary management approach to buffer zones. Wildlife Society Bulletin 25(3): 612-615 http://docketpublic.energy.ca.gov/PublicDocuments/09-AFC-07C/TN200060_20130729T145348_CBD's_Comments_on_PSA_Final__Attachment_4.pdf ; Richardson, C.T. and C.K.Miller 1997. Recommendations for protecting raptors from human disturbance: a review. Wildlife Society Bulletin 25(3):634-638

F.8-145B

[22] Walker, D., M. McGrady, A. McCluskie, M. Madders and D.R.A. McLeod 2005. Resident Golden Eagle Ranging Behaviour Before and After Construction of a Windfarm in Argyll. Scottish Birds 25: 24-40. http://www.natural-research.org/projects/documents/SB25-EAGLESDOC.pdf

F.8-145C

[23] Stalmaster, M.V. and J.R. Newman 1978. Behavioral responses of wintering bald eagles to human activity. Journal of Wildlife Management 42(3): 506-513; Craig, G.R. 2002. Recommended buffer zones and seasonal restrictions for Colorado raptors. Prepared By Colorado Division of Wildlife, Updated December 19, 2002. Pgs 7. https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/RaptorBufferGuidelines2008.pdf

F.8-147A

[24] Buehler, D.A., T.J. Mersmann, J.D. Fraser, and J.K.D. Seegar. 1991. Nonbreeding bald eagle communal and solitary roosting behavior and roost habitat on the northern Chesapeake Bay. Journal of Wildlife Management 55(2): 273-281.

F.8-147B

foraging habitat for these raptors that would be considered adverse, but less than significant…" (DEIR at 5.7-150.) "These raptors" include golden eagles, northern harrier and white-tailed kites. The fact remains that significant amounts of foraging habitat will decrease carrying capacity of the landscape and could result in a potential loss of habitat needed to support a nesting pair of white-tailed kites, which would impact their reproductive capacity and result in "take". Therefore the DEIR is inadequate in disclosing all the environmental impacts. This deficiency needs to be included in a supplemental EIR.

F.8-149 cont.

e. Swainson's hawk

Antelope Valley is the southernmost portion of the current California Swainson's hawk breeding range. Recent data indicate that conversion of agricultural land and open space to other uses including solar power projects and other types of development is threatening the Antelope Valley Swainson's hawk population and its possible future expansion and identifies the remaining breeding territories in the Antelope Valley as tenuous and likely to be extirpated[25]. However, during numerous surveys on the proposed project site, Swainson's hawks were documented from 2000 through 2016. (DEIR at 5.7-148). While all of the Swainson's hawks documented on the proposed project site were identified as migrating birds, some were also noted to be foraging. (DEIR at 5.7-148.)

F.8-150

While the DEIR states "Project implementation would result in the loss of habitats used by migrating Swainson's hawks, occasional non-breeding birds in summer, and potentially suitable nesting habitats in the eastern portions (i.e., alfalfa fields and surrounding trees) of the Project site" (at pg. 5.7-149), it then concludes, without any support in the DEIR that "these impacts are considered adverse but less than significant and no mitigation is required." (at pg. 5.7-149). MM 7-2 does require pre-construction protocol surveys on the project site for Swainson's hawks nests, but the DEIR fails to provide any analysis of impacts to this highly imperiled Antelope Valley breeding population of Swainson's hawks, much less any avoidance, minimization or mitigation if impacts are identified.

F.8-151

f. Ringtail

One of the fully protected species whose range overlaps with the proposed project site[26] is the ringtail (*Bassariscus astutus*) however, no surveys were implemented, no estimate of on-site habitat is provided, and no analyses of impacts discussed and for this secretive species. While ringtail are not common within the general area of the proposed project (CDFG 1980), the DEIR still needs to evaluate potential habitat for this unique and fully protected species in a revised and recirculated DEIR

F.8-152

Threatened, Endangered and Candidate Species

a. Willow Flycatcher, Least Bell's Vireo and Western Yellow-billed Cuckoo

While all three of these bird species were identified on the proposed project site, all were determined to be migrants. (DEIR at 5.7-148). The DEIR determines that the flycatcher species

F.8-153

[25] http://www.wildlifeprofessional.org/western/tws_abstract_detail.php?abstractID=764

F.8-150A

[26] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2582

F.8-152A

that was present on site was not a federally endangered southwestern willow flycatcher because of the time of year that the birds were detected and their subsequent disappearance from the proposed project site. However, all subspecies of willow flycatchers (*Empidonax traillii*) are listed as state endangered species[27], which the DEIR fails to mention. The DEIR also appears to downplay the presence of the birds on the proposed project site by dismissing the importance of the habitat resources for these threatened or endangered migratory birds. Based on that erroneous perspective, the DEIR concludes that "the Project site is not considered to be occupied by the western yellow-billed cuckoo, southwestern willow flycatcher, or least Bell's vireo." (at 5.7-148) Clearly this statement directly conflicts with the survey results, where these species were documented to occupy the site, granted without documented nests on site. However, in order for these migratory birds to reach breeding sites, migration habitat must be present in order to provide adequate resources (food, roost sites etc.) to sustain them. The DEIR then erroneously states that "Project implementation is not expected to impact these three listed species and no mitigation would be required." (DEIR at 5.7-148) but fails to provide any analysis of the impacts in order to reach that conclusion.

F.8-153 cont.

Ultimately the DEIR does recognize the fact that these highly imperiled birds do occur on site and states "Since all three of these listed species are migratory, however, and may occur as breeders in the future, MM 7-5 is included to conduct pre-construction protocol surveys for the western yellow-billed cuckoo, southwestern willow flycatcher, and least Bell's vireo to confirm absence prior to disturbance." (DEIR at 5.7-148.) However MM 7-5 actually fails to requires surveys for the western yellow-billed cuckoo. (DEIR 5.7-177.) Furthermore, the DEIR fails to evaluate the impacts to these migratory species that may occur on-site as breeders in the future from development itself and the influx of 55,000+ human residents and their pets. While dogs are proposed to be required to be on leash in conserved areas (DEIR at 5.7-169), and DEIR recognizes the impact that free-roaming cats can have on the native fauna (DEIR at 5.7-169), the only requirement for domestic pets is that they be spayed (DEIR at 5.7-169). While we support spaying pets for all the benefits it provides, the DEIR must incorporate a requirement to keep domestic cats indoors at all times to reduce the impacts not only to threatened and endangered birds, but to other species as well.

F.8-154

a. Tricolored Blackbird

The tri-colored blackbird is currently a candidate species under the California Endangered Species Act, due to historical and continuing loss of nesting substrate and upland foraging area, continuing declines in the populations and Significant, large-scale reproductive failures in tricolored blackbird colonies nesting in agricultural areas of the San Joaquin and Sacramento valleys. The DEIR states "The tricolored blackbird was observed nesting in large numbers along the north-central edge of the Project site and was also observed in Oso Creek (BonTerra Consulting 2008; Impact Sciences 2004a)" and "Five distinct breeding colony locations were detected in the bulrush vegetation on the shores of Quail Lake" (DEIR at 5.7-113).

F.8-155

In analyzing the impact that the proposed project could have on the nesting colonies, the DEIR states "A review of the Quail Lake and the on-site colony subset identified a potential

F.8-156

[27] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline

F.8-153A

post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In a given year, if these two areas were used for nesting, the reduced availability of suitable foraging land could result in substantial reduction in nesting success." (DEIR at 5.7-149)

F.8-156 cont.

While the DEIR suggests numerous enhancement factors of tri-colored blackbird nesting habitat at several sites (at 5.7-149 to 150), there is no requirement or obligation committed to for such enhancements in the DEIR. MM 7-7 is proposed for construction of open space buffer features, including restricting permanent impacts to a minimum distance of 400 feet from the nesting area and project design features that incorporates a buffer of greater than 1,000 feet along the northern shore of Quail Lake to minimize impacts to adjacent foraging grounds and "at the east end of the Lake, east of the mouth of the aqueduct, where a small section of shoreline is close to the project impact footprint, land uses include a regional park within a low density development zone so that lands immediately beyond the required 400 foot buffer (if nesting is identified) remain permeable and retain some potential for foraging for this species." (at 5.7-150). MM 7-7 also includes the following:

> The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat. Potentially suitable areas for enhancement and preservation include lower Oso Canyon in close proximity to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source. (DEIR at 5.7-179)

F.8-157

The MM fails to provide critical metrics – how much enhancement/restoration/creation/ preservation will be done? What is the timeline for doing so? What are the success criteria?

F.8-158

California Species of Concern

Numerous species of concern are located on the proposed project site and have potential to be significantly impacted. Species specific issues are discussed below:

a. Badger

Badgers were identified to occur throughout the project area (DEIR at 5.7-153). Literature on the highly territorial badger indicates that badger home territories range from 340 to 1,230 hectares (840 to 3,040 acres)[28]. Therefore, the proposed project could displace *several* badger territories. While surveys prior to construction are clearly essential as required by MM 7-2, even passive relocation of badgers into suitable habitat may result "take". Studies need to be provided on both on- and off-site badger territories if animals are to be passively relocated in

F.8-159

[28] Long, C.A. 1973. Taxidea taxus. Mammalian Species 26:1-4; Goodrich, J.M. and S.W. Buskirk 1998. Spacing and ecology of north American badgers (*Taxidea taxus*) in a prairie-dog (*Cynomys leucurus*) complex. Journal of Mammology 79(1): 171-179. http://cosb.us/Solargen/feir/v2/b026refs/Goodrich%20and%20Buskirk%201998%20%20Spacing%20and%20Ecology%20of%20North%20Amer.pdf

F.8-159A

order to increase chances of persistence. At a minimum, the revised or supplemental DEIR should identify suitable habitat nearby if the project is relying on passive relocation as a mitigation strategy.

F.8-159 cont.

b. Silvery legless lizard

The DEIR admits that no surveys were performed for the silvery legless lizard although one was incidentally encountered (at 5.7-110). The impact analysis of the proposed project on this species states "Of the roughly 7,000 acres impacted by the Project, it is estimated that no more than 700 acres of potentially suitable habitat occurs for both species, though is likely much less for the legless lizard. These two species are expected to be relatively abundant in the region; therefore, the loss of roughly 700 acres associated with Project implementation would be considered adverse, but less than significant for the silvery legless lizard and coast horned lizard and no mitigation is required." (at 5.7-147) Failing to identify the extent of the occupied habitat and then determining that the impacts are less than significant is baseless.

F.8-160

MM 7-2, which is proposed to minimize impacts to this species is proposed to be a single pass of a biologist doing 50-meter belt transects. Common sense suggests that the proposed protocol would assure that no silvery legless lizards would be found on the proposed project site, but it certainly would not prevent impacts to the species. MM 7-3 addresses moving silvery legless lizards out of harms way – a "feel good" strategy that has no basis in scientific literature for success. In fact, relocation of reptiles in general has a poor record of success[29] and we are unaware of any data on the success of silvery legless lizard translocations.

F.8-161

c. Migratory Birds and Sensitive Birds

Numerous migratory birds have been documented on the site. The DEIR does not quantify the number of birds (rare, migratory or otherwise) that use/traverse the project site from the avian point count surveys, nor does it evaluate the impact to birds by the elimination of almost over 10,000 acres of habitat. The revised DEIR needs to analyze likely impacts to birds from the proposed project based on the point counts. The failure to provide the baseline data from which to make any impact assessment violates CEQA. This failure to analyze impacts is not only a CEQA violation, but for migratory birds, may also lead to a violation of the Migratory Bird Treaty Act, 16 U.S.C. §§ 703 -711, because migratory birds may be "taken" if the proposed project is constructed. This project should actually include an Avian (and Bat) Protection Plan which would provide the information needed to determine key avoidance measures for birds, and provides adaptive management measures to mitigate any remaining impacts to less than significant levels. We request that at a minimum, the supplemental DEIR include such a plan.

F.8-162

Numerous sensitive birds occur on the proposed project site some of which are discussed below in more detail:

F.8-163

1. Burrowing owl

[29] Dodd, C.K. and R.A.Seigel 1991. Relocation, repatriation and translocation of amphibians and reptiles: are they conservation strategies that work? Herpetologica, 47(3): 336-350 http://www.seaturtle.org/PDF/DoddCK_1991_Herpetologica.pdf

F.8-161A

The DEIR states that "One pair of burrowing owls was observed on the site in 2001 (Impact Sciences 2004a); one individual was observed just off the site to the north during surveys in 2006 (BonTerra Consulting 2008)." (DEIR at 5.7-115.) The lack of burrowing owls on the site is surprising based on the results from the 2006-7 burrowing owl census which identified the western Mojave desert including the Antelope Valley as important and abundant burrowing owl habitat – particularly the grasslands.[30] Interestingly, the DEIR identifies MM 7-2 to benefit burrowing owl because MM 7-2 requires preconstruction surveys that follow the California Department of Fish and Wildlife's (CDFW's) 2012 burrowing owl survey protocol (DEIR at 5.7-176), however MM 7-2 (or any other MM) does not identify requirements if burrowing owls are located where development will occur. While "passive relocation" is often implemented to minimize immediate direct take of burrowing owls, ultimately the burrowing owls' available habitat is reduced, and "relocated" birds are forced to compete for resources with other resident burrowing owls and may move into less suitable habitat, ultimately resulting in "take". Additional mitigation measures needs to provided that explicitly include long-term monitoring of any burrowing owls that are moved whether through passively relocated birds or actively relocated birds, in order to evaluate their survivorship.

F.8-163 cont.

2. Northern Harrier and Loggerhead Shrike

While the DEIR acknowledges that impacts to these sensitive species that occur on site, it does not actually fully analyze what those impacts are. Instead the DEIR brushes off impacts and proposes to mitigate through acquisition of open space, which of course the birds are already using.

F.8-164

Pronghorn

Pronghorn are the namesake of the Antelope Valley. The southern-most herd in California is located on the proposed project site and is already critically imperiled.[31] A recent evaluation of the status of the pronghorn population on the proposed project site concludes the following:

> "1. Small population size: Although almost 100 individuals were originally translocated to Tejon Ranch, the population declined to a perilous size of less than 50 animals. This population appears to be critically endangered due to its current population size and its historic trend of remaining small and isolated.
> 2. Low growth rates: The herd currently has a low potential for sustained growth, with observed maximum per-capita growth rates falling far below the biologically possible value in other ranges. Recently, livestock foraging has been accelerated and standing vegetative biomass has declined to the detriment of pronghorn neonate protective cover, and abundant nutritious forage. This loss is exacerbated by the Centennial Project, for the forage on these rangelands will eventually be lost when the project is completed.

F.8-165

[30] Wilkerson, R. L. and R.B. Siegel 2011. Distribution and abundance of western burrowing owls (Athene cunicularia hypugaea) in southeastern California. The Southwestern Naturalist 56(3):378–384 http://www.elkhornsloughctp.org/uploads/files/1408734389Wilkerson%20and%20Siegel.%202011.%20Distribution%20and%20abundance%20of%20Western%20Burrowing%20Owls%20(Athene%20cunicularia%20hypugaea)%20in%20Southeastern%20California..pdf

F.8-163A

[31] Kohlmann, S. G., and J.D. Yoakum. 2009. A literature review and analysis of pronghorn populations at Tejon Ranch, California. Tierra Resource Management, San Ramon, California, USA.pgs. 89

F.8-165A

3. Climatic variability: Pronghorn at the Tejon Ranch exist under a highly variable precipitation regime. There is a robust relationship between autumn fawn ratios and the autumn precipitation 2 years prior. Predicted autumn precipitation of 3.4 inches must be achieved for positive population growth (>20 fawns / 100 does in late summer), but was not reached in 35 years out of 61 years of weather data (57%).
4. Habitat quality: The expansive perennial grasslands of a high quality are probably the reason why this population is still marginally persistent. Losing a portion of these grasslands or a persistent degradation by overgrazing could severely impact this highly vulnerable population.
5. Landscape connectivity. Pronghorn at Tejon Ranch are currently isolated from other herds. Given the small population size and stochastic vulnerability of this herd, the establishment of a metapopulation through migration corridors is of critical importance. If Tejon Ranch pronghorn can cross over the crest of the Tehachapi Mountains and Interstate 5, a viable possibility for population linkage may exist.
6. Genetics: Genetic variability is influenced by small founding population, persistently small population size, and isolation by geographic features (e.g., mountain ridges, unsuitable habitat) or human induced barriers (e.g., fences, fragmented landscapes). All these factors are prevalent at the Tejon Ranch pronghorn population. Genetic variation within the Tejon Ranch pronghorn population has not been studied, but can be considered critically in danger of having lost genetic variability."

F.8-165 cont.

The DEIR totally downplays the importance and status of the pronghorn on the proposed project site despite the fact that the proposed project will likely extirpate this population. However, the DEIR completely fails to analyze the proposed project's impacts to this iconic and charismatic animal.

F.8-166

Interestingly, in 2017, pronghorn have been documented to be re-inhabiting portions of the Antelope Valley in the region of the State's Poppy Preserve and near the Petersen mitigation bank (CDFW, personal communication). The pronghorn could have only originated from the Tejon herd, and successfully navigated across State Highway 138 and easterly across the valley. Documentation of persistence occurred in late July 2017. This persisting occurrence confirms that the Antelope Valley, through contemporary conservation improvements, can host a resident population of pronghorn. However, if the Tejon herd is impacted by the proposed project development, pronghorn will once again likely be extirpated from their namesake valley.

F.8-167

Wildlife Connectivity

The evaluation of the wildlife connectivity in the DEIR (at pg. 5.7-57) is not useful because it shows no wildlife movement on the proposed project site, and instead identifies the locations of bridges across the aqueduct. The studies in Appendix 5-7 are too general to be useful in informing the connectivity situation on the proposed project site. The discussion of connectivity follows suit and is inadequate because if fails to identify connectivity for different guilds of species. For example, connectivity for mountain lions and bears is going to be very different than for rodents or plants.

F.8-168

Based on the inadequacy of the description of the current connectivity, the DEIR fails completely to be able to evaluate the impact of the proposed project on the wildlife connectivity in the area. The revised and recirculated DEIR must thoroughly address this key issue. F.8-169

Significant Ecological Areas

Los Angeles County started identifying Significant Ecological Areas (SEAs) as a component of its General Plan in 1976. SEAs are "identified as having irreplaceable biological resources."[32] Developments within SEAs require a higher level of environmental review by the SEA Technical Advisory Committee. The County initiated a revision of the SEAs over a decade ago. The SEAs in the vicinity of the proposed project area were updated through the AVAP. In 2014, the County released the Draft Plan and EIR for the AVAP for public comment. In that Plan, the proposed project area was rezoned to include rural lands (RL1 – 1 du/net acre), residential (H-5 – 0-5 du/net acre), light industrial (IL) and open space conservation (OS-C). It also included an SEA overlay over a majority of the proposed project area (Exhibit C). The Los Angeles County Board of Supervisors adopted the Final EIR, but, among other things, they removed the SEA designation from the proposed project site, without any environmental review or analysis. The legality of this action is currently being challenged.

But the point here is that for years the proposed project site was known to meet the five of the six criteria that the County required in order to qualify as and SEA[33]: F.8-170

- On a regional basis, biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution.
- Within the County, biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution
- Habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting, migrating grounds and is limited in availability either regionally or in the County.
- Biotic resources that are scientific interest because they are either an extreme in physical/geographical limitations, or represent unusual variation in a population or community.
- Areas that would provide for the preservation of relatively undisturbed examples of the original natural biotic communities in the County

The DEIR confirms that the proposed project area still qualifies as an SEA and should be placed into that designation. F.8-171

Regional Conservation Investment Strategy

Currently, as the County is aware, a new type of non-regulatory conservation program has been put in place in California called the Regional Conservation Investment Strategy Program.[34] The program allows for California Department of Fish and Wildlife ("CDFW") or any public agency to develop a regional conservation investment strategy ("RCIS") for the protection of focal plant and wildlife species and other important conservation elements. A F.8-172

[32] http://planning.lacounty.gov/sea F.8-170A
[33] http://planning.lacounty.gov/sea F.8-170B
[34] https://www.wildlife.ca.gov/Conservation/Planning/Regional-Conservation F.8-172A

regional approach to advance mitigation planning can ensure that compensatory mitigation actions ultimately provide conservation benefit for affected species. One of the pilot RCIS is in the Antelope Valley at the bequest of the Desert Mountains Conservation Authority.[35] Currently, the Antelope Valley RCIS process has completed an administrative draft and will be submitting it to the CDFW for review and approval. The administrative draft identifies that most of the proposed project site are a core areas (Western Antelope Valley Core and Pine Canyon Core), with large areas of the highest biological value and intactness. It also identifies the proposed project site as having the best "least cost corridor" for wildlife movement, where least cost means the animals have the easiest time moving through the area. While the administrative draft of the Antelope Valley is not a publicly available document, as a stakeholder in the process, we were given access to the administrative draft document, as was Los Angeles County. The County needs to incorporate the results of results of the RCIS process, which is wholly based on recent, best available science, into a revised and recirculated DEIR.

F.8-172 cont.

DEIR Fails to Provide Key Plans

Many of the plans that are identified in the DEIR that are necessary to adequately minimize or mitigate impacts are simply not provided in the DEIR for public review. For example:

- Special Status Plant Species Restoration Plan (at 5.7-174)
- Biological Resource Mitigation Program (at 5.7-174)
- Wildlife Relocation Plan (at 5.7-176)
- Native Perennial Grassland and Wildflower Field Mitigation Plan (at 5.7-182)
- Oak Woodland Mitigation Plan (at 5.7-185)
- Streambed and Wetland Habitat Creation and Enhancement Plan (at 5.7-188)
- Landscaping Plan (at 5.7-190), and
- Implementation Plan, including fire risk abatement measures (at 5.7-194)

F.8-173

While the CEQA lead agency has the responsibility of assuring that mitigation meets all the LORS and conditions, the Center has not always found that to be the case. Studies of mitigation compliance have borne this out as well. Making all of the required plans available as part of the public process is important to assure the public that their public trust resources are being protected – without public disclosure of these plans during the environmental review process there is no way to evaluate whether the CEQA lead, in this case the County, has put in place adequate plans to prevent degradation of our natural heritage, clean air and water. The County must supply these essential plants as part of the public process that enables public input on the various "mitigation" plans that are being proposed as conditions of this proposed project.

F.8-174

G. The DEIR Fails to Adequately Identify and Analyze Biological Resources under Climate Change.

The DEIR fails to identify or analyze the impacts of the proposed project on the biological landscape that is already responding to climate change. In fact, climate change is not mentioned in the biological section of the DEIR, and the climate change section does not discuss impacts to biological resources. The DEIR addresses risks associated with global climate change

F.8-175

[35] http://dmca.ca.gov/Attachment%204.pdf

F.8-172B

in context of including the need for climate change mitigation strategies (e.g., reducing greenhouse gas emissions) but not for the need of climate change adaptation strategies (e.g., conserving intact wild lands and the corridors that connect them). All climate change adaptation strategies underline the importance of protecting intact wild lands and associated wildlife corridors as a priority adaptation strategy measure. F.8-175 cont.

The habitat destruction and fragmentation, loss of connectivity for terrestrial wildlife, and introduction of predators and invasive species associated with the proposed project in the proposed location may run contrary to an effective climate change adaptation strategy. Siting the proposed project in the proposed location impacting the best native grasslands remaining in California and world class wildflower fields, occupied habitat and important habitat linkage areas for numerous sensitive species, and other fragile biological resources could undermine a meaningful climate change adaptation strategy with a poorly executed climate change mitigation strategy. The way to maintain healthy, vibrant ecosystems is not to fragment them and reduce their biodiversity. F.8-176

Lacking any requirement for a management plan for the conserved lands management, the DEIR makes it impossible to evaluate if the conserved lands would be managed to benefit species conservation particularly under on-going climate change. The Ranchwide Management Plan[36] focuses primarily on grazing management, not sensitive species conservation as it is, and when coupled with on-going climate change is inadequate to achieve the proposed mitigation goals for the proposed project. F.8-177

The revised and recirculated EIR needs to add a section in the Biological Resources section on climate change and address the impacts of the proposed project on biological resources under climate change scenarios. F.8-178

H. The DEIR fails to adequately mitigate the Project's impacts on wetlands.

While the Center supports habitat restoration in general, in the absence of the plan, it is impossible to evaluate or determine the efficacy of proposed minimization and mitigation to actually adequately mitigate impacts F.8-179

Disturbed lands that could be restored should first be considered for the proposed project site, because impacts to the suite of imperiled species and plant communities would be considerably less. It makes no sense to impact fully functioning habitat for unique and imperiled species when an alternative disturbed site is available. It makes even less sense and is much more expensive to impact fully functioning habitat and mitigate it by "restoring" disturbed areas. Restored habitat has never been documented to support the full functioning ecosystem processes of undisturbed habitat.[37] F.8-180

I. The DEIR cannot rely upon the Ranchwide Agreement to mitigate the Project's impacts.

[36] http://www.tejonconservancy.org/rwmp.htm F.8-177A

[37] Longcore, T., R. Mattoni, G. Pratt and C.Rich 1997 On the perils of ecological restoration:Lessons from the El Segundo blue butterfly. *2nd Interface Between Ecology and Land Development in California* J.E. Keeley, Coordinator. Occidental College, April 18-19, 1997. http://www.urbanwildlands.org/Resources/perils.pdf F.8-180A

As mentioned above, none of the terms or provisions in the Ranchwide Agreement are binding and enforceable mitigation measure under CEQA. The Ranchwide Agreement is a private agreement between the project proponent and other conservation groups that is not enforceable by the County. As such, the County cannot rely upon any of the conservation proposed in the Agreement in order to mitigate the impacts of this Project. Again, per section 3.9 of the Ranchwide Agreement, the only party that can enforce the Agreement is the Tejon Ranch Conservancy, which is partially controlled by the project proponent. F.8-181

XII. The DEIR Fails To Mitigate The Project's Land Resource Impacts.

A. The DEIR fails to analyze or address the potential for off-site land use changes associated with the project.

The DEIR claims that, "there would be no other changes in the environment… that would indirectly result in conversion of Farmland to nonagricultural use…" (DEIR at 5.5-18.) However, the DEIR offers no evidence to support this conclusion. In fact, as shown in Exhibit 5.5-1 of the DEIR, the eastern side of the project is in the vicinity of farmland of local importance (incorrectly labeled "L" in exhibit 5.5-1), as well as Prime Farmland. While the DEIR admits that the Project would result in a significant impact if it provides incentive for other agricultural landowners to convert farmland to non-agricultural use (DEIR at 5.5-18), the DEIR makes no mention of how nearby farmland might be impacted by the Project. These impacts could be considerable, given for example, that a large area of land identified as Prime Farmland would be bordered on three sides by the Project, with the potential to make farming activities and access to this location unviable. The DEIR also fails to consider the strong economic incentives for surrounding landowners to convert farmland to commercial and residential uses as a result of the Project. By claiming that the Project would not result in the indirect conversion of Farmland to nonagriculatural use without offering analysis to support this assertion, the DEIR fails to allow decision-makers and the public to make an informed decision on the extent that Project development will impact land resources. (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 ("To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions.")) F.8-182

B. The DEIR's proposed mitigation measures for impacts to land use changes are vague and inadequate.

While the DEIR acknowledges that the conversion of 642 acres of Prime Farmland to non-agricultural uses is a significant impact under CEQA, mitigation measures proposed in the DEIR are vague and are not demonstrated to mitigate these impacts. Although Project Design Feature 5-1 of the DEIR allows continued grazing on portions of the Project site and accommodates some small-scale agricultural and agricultural-related uses, it fails to directly address or mitigate the conversion of hundreds of acres of Prime Farmland to non-agricultural uses. Agricultural preservation easements would help to directly address this issue by preserving Prime Farmland. However, the use of an agricultural preservation easement is not included in any Project Design Features and is only cursorily mentioned in section 5.5-13 of the DEIR. The DEIR purports to put an agricultural preservation easement on 489 acres of Prime and Unique farmland outside of the Project site on the Tejon Ranch property, but provides no details as to the location or feasibility of this easement. The implementation of an adequate agricultural F.8-183

preservation easement, would in theory, help to mitigate the significant land-use impacts associated with the Project. As such, a thorough analysis of this proposed mitigation measure is necessary to properly evaluate the impacts of the proposed Project. (*Napa Citizens for Honest Gov't v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342, 360 ("the EIR must propose and describe mitigation measures that will minimize the significant environmental effects that the EIR has identified.")) F.8-183 cont.

C. The DEIR fails to demonstrate that impacts to farmland are unavoidable.

The DEIR claims that impacts to 642 acres of Prime Farmland cannot be mitigated "[f]or the same reasons as described in the AVAP EIR." (DEIR at 5.5-1.) The DEIR needs to provide evidence and analysis describing why these impacts to these specific 642 acres of Prime Farmland cannot be mitigated. The DEIR cannot generally cite to an EIR for a different project in order to claim impacts cannot be mitigated. F.8-184

Similarly, the DEIR generally cites to the AVAP EIR's impacts to 6,169 acres of Important Farmland in justifying the Project's conversion of 642 acres of Prime Farmland. (DEIR at 5.5-13-14.) The DEIR does not explain how impacts to a large amount of "Important" Farmland have any bearing upon the Project's impacts to 642 acres of "Prime" Farmland. Important Farmland and Prime Farmland are separate classifications. Again, the DEIR cannot claim these impacts cannot be mitigated by generally referencing "the same reasons described in the AVAP EIR…" (DIER at 5.5-14.) The DEIR offers no evidence that the AVAP EIR specifically concluded that impacts to these 642 acres of Prime Farmland are unavoidable. Accordingly, the DEIR lacks any evidence to support its conclusion that there are no feasible mitigation measures to reduce impacts to 642 acres of Prime Farmland. (*See* DEIR at 5.5-18.) F.8-185

XIII. The DEIR's Hydrological Analysis Is Flawed.

The DEIR's assertions that the Project will not result in significant hydromodification impacts rely heavily on an analysis that utilizes the Erosion Potential (Ep) methodology, which the DEIR describes as "alternate" methodology identified in the County LID Manual. (DEIR at 5.2-23.) As part of this methodology, flow conditions and volumes for peak events were analyzed for existing locations or "nodes" and compared to estimated post-development flow conditions and volumes at these same locations (as summarized in Tables 5.2-7 and 5.2-8 of the DEIR). However, the DEIR fails to offer a rationale for how and why these node locations were picked for analysis over other locations at the Project site. In fact, many of the chosen nodes appear to be strategically located downstream of proposed infiltration basin locations, which would serve to reduce flow discharge and runoff volumes during storm events. As such, the DEIR fails to accurately disclose post-development changes in flow conditions, particularly those that are upstream of chosen nodes. Post-development flow discharge and runoff volumes could significantly increase at upstream locations due to the development of impervious surfaces at the site. F.8-186

As described in the DEIR, increases in stream discharge and runoff volumes, particularly during major storm events, are likely to result in hydromodification impacts including channel erosion, modification, or sedimentation. (DEIR at 5.2-23.) Since the Project would result in a significant impact if it would "alter the course of a stream or river" (LA County Environmental F.8-187

Threshold 2-1, 2-2), an analysis of hydromodification impacts under CEQA should evaluate these potential impacts across all locations at the Project site. Moreover, the DEIR fails to evaluate potential hydrologic or hydromodification impacts for streams located in the northernmost portions of the Project. The DEIR justifies the decision to exclude these streams from analysis by stating that, "East Tributaries 7, 8, and 9… do not have defined channels in either the existing or proposed condition" (DEIR at 5.2-24). However, it remains to be seen how these tributaries might be consistently mapped and delineated in DEIR figures without the existence of defined channels.

F.8-187 cont.

XIV. The DEIR Fails To Adequately Analyze And Mitigate The Air Quality Impacts Of The Project.

Air quality is a significant environmental and public health concern as unhealthy, polluted air contributes to, and exacerbates, many diseases and mortality rates. In the U.S., government estimates indicate that between 10-12 percent of total health costs can be attributed to air pollution. (VCAQR 2003) Many plants and trees, including agricultural crops, are injured by air pollutants. This damage ranges from decreases in productivity, a weakened ability to survive drought and pests to direct mortality. (VCAQR) Wildlife is also impacted by air pollution as the plants and trees that comprise their habitats are weakened or killed. Aquatic species and habitats are impacted by air pollution through the formation of acid rain that raises the pH level in oceans, rivers and lakes. (EPA 2016) Greenhouse gases, such as the air pollutant carbon dioxide which is released by fossil fuel combustion, contribute directly to human-induced climate change. (EPA 2016) In this feedback loop, poor air quality that contributed to climate change will in turn worsen the impacts of climate change and attendant air pollution problems. (BAAQMD 2016)

F.8-188

Some of the nation's most polluted counties are in Southern California with LA County continually topping the list. (ALA 2016) Air pollution and its impacts are felt most heavily by young children, the elderly, pregnant women and people with existing heart and lung disease. People living in poverty are also more susceptible to air pollution as they are less able to relocate to less polluted areas, and their homes and places of work are more likely to be located near sources of pollution, such as freeways or ports, as there areas are more affordable. (BAAQMD 2016; ALA 2016) Pollution sources include transportation, industry and manufacturing, construction, the importation and movement of goods, and energy development. Transportation presents one of the most significant sources of pollution in urban areas, where large segments of the population are constantly exposed to roads and traffic. (BAAQMD 2016; Newman)

F.8-189

Although there are many different types of air pollution, Ozone, Fine Particulate Matter and Toxic Air Contaminants are of greatest concern in urban areas, particularly Southern California. These three air pollutants have been linked to an increased incidence and risk of cancer, birth defects, low birth weights and premature death, in addition to a variety of cardiac and lung diseases such as asthma, COPD, stroke and heart attack. (Laurent 2016; ALA 2016) Ozone, also commonly referred to as smog, is created by the atmospheric mixing of gases resulting fossil fuel combustion and other volatile organic compounds and sunlight. Although it is invisible, ozone poses one of the greatest health risks, prompting the EPA to strengthen its National Ambient Air Quality Standard for Ozone in 2015. (ALA 2016) Fine Particulate Matter is generally found in urban areas as a result of vehicle exhaust emissions, and these microscopic

F.8-190

particles are what contribute to visible air pollution. These tiny participles are dangerous because they are small enough to escape out body's natural defenses and enter the blood stream. Fugitive dust is a term used for fine particulate matter that results from disturbance by human activity such as construction and road-building operations. (VCAQR 2003) Fine Particulate Matter can also result from ash caused by forest fires, which will continue to impact that living in the urban-wildland interface and increasingly beyond as climate change exacerbates the risk of forest fires. (BAAQMD 2016) Toxic Air Contaminants are released from vehicle fuels, especially diesel, which accounts for over 50% of the cancer risk from TACs. (BAAQMB 2016) This is especially relevant for Southern California with its abundance of diesel shipping traffic. (Bailey; Betancourt 2012)

F.8-190 cont.

Urban infill is an effective plan for reducing the air pollution and greenhouse gas emission resulting from heavy reliance on vehicles. Centrally locating housing, shopping and places of employment reduces vehicle miles travelled and new road construction. With fewer roads and less traffic, it will be less likely that housing will be located near busy, polluting roads, which is a large source of exposure. (BAAQMD 2016) Infill planning also allows for realistic promotion of alternative transportation such as walking or biking. Public transportation options should be converted or retrofitted to clean fleets. A life-cycle assessment of the entire project should be conducted to inspect the totality of the resultant air pollution, from manufacturing of the materials to their transport to the site, and beyond. (BAAQMD 2016; Ghattas 2013)

F.8-191

The Project would affect several areas that are in violation of the Clean Air Act's National Ambient Air Quality Standards ("NAAQS"). The South Coast air basin is in extreme nonattainment for the 2008 8-hour ozone standard, moderate nonattainment for the 2012 PM 2.5 standard, serious nonattainment for the 2006 PM 2.5 standard, and moderate nonattainment for the 1997 PM 2.5 standard.[38] The San Joaquin Valley air basin is in extreme nonattainment for 2008 8-hour ozone standard, moderate nonattainment for 2012 PM 2.5 standard, and serious nonattainment for the 2006 PM 2.5 standard, and 1997 PM 2.5 standard.[39] The Mojave Desert Air Basin is in severe 15 nonattainment for the 2008 8-hour ozone standard, and moderate nonattainment for the 1997 PM 10 standard.[40] State and local air agencies determined that attainment required massive emission reductions from all pollution sources, even in the absence of any growth in emissions associated with new projects, if these areas are to attain the standards. The EIR fails to adequately address the project's significant increase in emissions in the San Joaquin, South Coast, and Mojave Desert air basins and adequately analyze to what extent the ambitious reductions required under the State Implementation Plans will be hindered by the project.

F.8-192

The EIR fails to adequately analyze the project's impacts because of the difficulty of determining, in the absence of adequate modeling, whether the project, and other potential projects interfere with attainment of NAAQS. From an air quality perspective, a new project of the magnitude of the Centennial project, coupled with other potential projects (e.g. Grapevine,

F.8-193

[38] U.S. EPA, Nonattainment Areas for Criteria Pollutants (Green Book), available at https://www.epa.gov/green-book

F.8-192A

[39] U.S. EPA, Nonattainment Areas for Criteria Pollutants (Green Book), available at https://www.epa.gov/green-book

F.8-192B

[40] U.S. EPA, Nonattainment Areas for Criteria Pollutants (Green Book), available at https://www.epa.gov/green-book

F.8-192C

Newhall Ranch, Tejon Mountain Village), has the potential to interfere with the air plans' tasks of reducing ambient pollutant concentrations to levels no greater than federal air standards for PM and ozone.

F.8-193 cont.

The EIR must assure that the Project would not conflict with AVAQMD, SCAQMD, MDAQMD, and SJVAPCD air quality management plans ("AQMP"), the Southern California Association of Governments ("SCAG") 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"), and the SCAG 2016–2040 RTP/SCS. The EIR must assure that the combined population growth projections and development that are cumulatively expected as part of the range of approved projects conform to the assumptions in the AQMPs and RTP/SCS. A leapfrog project of this scale, combined with other massive new development projects such as Grapevine, Newhall Ranch, Tejon Mountain Village, threatens to exceed the projections, assumptions, and mitigations incorporated into those plans. The EIR must provide substantial evidence that the cumulative development in the South Coast, Antelope Valley, Mojave Desert, and San Joaquin Valley Air Basins, combined with this project, will not exceed the projections underlying those plans. Conclusory statements that the projects do not conflict with those standards does not provide the public or decisionmakers with the information necessary to make an informed decision on the environmental impacts, mitigation measures, or alternatives related to the Project.

F.8-194

The EIR must also assure that the analysis is not segmented to avoid analyzing the Project's whole impacts on affected air quality thresholds or air quality management plans. The EIR must not minimize the whole of the Project's impacts or emissions by only applying a portion of the emissions from the Project in different areas because those emissions cannot be controlled within the air district. The total emissions from the Project must be analyzed against the thresholds and air quality management plans for the South Coast air basin and Antelope Valley air basin. The EIR must also prepare proper modeling to analyze the potential for drift and project emissions from mobile sources as they would be affecting the Mojave Desert and San Joaquin Valley Air Basin.

F.8-195

The EIR must adequately analyze the potential health risks from the Project's air pollution. The Guidelines require EIRs to discuss health problems caused by proposed projects. (Guidelines § 15126.2.) The EIR must assure that this is a robust health assessment for all criteria pollutants, Mobile Source Air Toxics, such as acrolein, benzene, 1,3-butadiene, diesel particulate matter, formaldehyde, naphthalene, and polycyclic organic matter, and Toxic Air Contaminants. Simply providing emissions levels or general descriptions of health impacts provides no context to decisionmakers or the public of the Project's actual effects on public health. An EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 653.) Numbers or general descriptions without translation for the public or application to the project do not meaningfully inform the public. Because the project will be built over many years and decades the EIR must analyze the potential for project construction at later phases to affect the residents of the development that will already be living and working there. A sensitive receptor baseline that does not account for the future residents of the Project area overlooks the whole of the project and employs a flawed baseline to minimize impacts to public health and the affected environment.

F.8-196

A. The DEIR underestimates the air quality impacts of the Project.

The DEIR estimates that approximately 23,675 employment opportunities will be created in relation to the Project, and that the resident population will be approximately 57,150 persons. According to the latest US census figures, the average percent of the U.S. population in the civilian workforce is 63.3 percent, meaning that a reasonable estimate for the employed population of the proposed Project is 36,176 persons. Given the specific skills and experience needed for many of the jobs that are proposed to be generated by the Project, such as those in research and development, it is highly unlikely that the entirety of generated employment opportunities would be filled by persons residing in the community. However, even assuming this unlikely scenario, the Project would still result in an estimated 12,501 persons commuting externally for employment. As such, the Project traffic study (Appendix 5.10-A) predicts that the majority of daily trip generation will be external to the Project site. Given that the Project is located more than 40 miles from major centers of population and employment, the impacts of these external trips on air quality (in addition to noise and carbon emissions) would be significant. However, the DEIR fails to adequately to analyze these impacts or to propose meaningful mitigation measures. F.8-197

Regarding air quality, the DEIR admits that "the primary source of long-term emissions would be from vehicle operations" (DEIR at 5.11-1), and that as a result long-term operational emissions of VOC, NOx, CO, PM10, and PM2.5 would exceed AVAQMD and SCAQMD CEQA significance thresholds. While the DEIR cites MM 11-4, 11-5, and 11-6 in response to air quality impacts, these mitigation measures are inadequate and fail to address air quality problems related to external automobile trips. F.8-198

The Project impacts areas where attainment planning for air quality standards is most challenging and understates the magnitude of the problem and impacts. Both ozone and Particulate Matter ("PM") 2.5 and their gaseous precursors are by their nature capable of being transported by prevailing winds within air basins and between adjoining air basins. Because of its location, emissions from the Project affect not only the South Coast air basin and Antelope Valley air basin but also the adjacent San Joaquin Valley air basin and the Mojave Desert air basin. The DEIR must fully analyze the Project's potential impacts and vehicle trips on adjacent areas and air basins, not only through the transport of those emissions via wind, but also through the emissions resulting from the vehicles themselves as they enter those air basins. It is not simply enough to assert that the Project will only affect air basins where it is physically located when vehicle trips and weather patterns with take emissions into adjacent air basins such as the San Joaquin Air Basin or Mojave Air Basin. The DEIR must also analyze the Project's potential to exceed significance thresholds for other air basins such as the thresholds set up by the San Joaquin Valley Air Pollution Control District and Mojave Desert Air Quality Management District. F.8-199

The Project impacts three of the most heavily polluted areas in the country. Los Angeles County in the South Coast air basin and Antelope Valley air basin, Kern County in the San Joaquin Valley air basin and San Bernardino County in the Mojave Desert Air Basin rank among the nation's worst in overall ozone and PM 2.5 pollution. (American Lung Association 2016.) The Project cannot avoid the Project's air quality impacts by avoiding the potential emissions from vehicle trips associated with the Project by improperly narrowing the geographic breadth of F.8-200

the analysis or avoiding the trips that would occur beyond the immediate area. The DEIR underestimates trip length by overestimating the capture rate for traffic and cannot be supported by substantial evidence because it ignores the jobs/housing imbalance in the Project area and how the inability of the immediate vicinity to provide jobs for the over 57,150 new residents. (DEIR 1-23.) A comprehensive analysis of air quality impacts is acutely important where, as here, the Project is in an area already experiencing adverse air quality. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 723-724.) The DEIR fails to project an accurate trip length in generating air quality emissions, including greenhouse gases and criteria pollutants, considering the leapfrog nature of this project that is located far from existing job and commercial centers. This inconsistent and incomplete data fails to provide the public and decision-makers with the necessary information required under CEQA. This grave threat to both wildlife and natural resources must be fully analyzed and accounted for in the EIR. Successfully addressing the area's unique pollution problems is made more difficult by projected growth in population and activity levels, increasing the amount of pollution generated within the area, the geographic extent of the polluted area, and the size of the population exposed to these extraordinarily high pollution levels.

F.8-200 cont.

B. The DEIR's proposed mitigation measures are inadequate.

MM 11-4 states that "facilities shall be installed to support future electric vehicle charging at each non-residential building with 30 or more parking spaces." (DEIR at 5.11-80.) MM 11-4 then specifies different guidelines for "when a single charging space is required" opposed to "when multiple charging spaces are required." However, the DEIR fails to specify under what situation multiple charging spaces might be required, leaving the possibility that in large parking lots, only one charging station might be available for hundreds of cars. MM 11-6 suffers from the same vague language regarding charging space requirements, but exacerbates the problem by applying only to parking structures and lots with 20 or more parking spaces. CEQA requires that mitigation measures "must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." (CEQA Guidelines § 15126.4(a)(2).) The vague mitigation measures fail to meet CEQA's requirements. The DEIR makes no mention of making electric charging stations accessible to residential buildings, which given the substantial investment associated with installing electric vehicle service equipment at a personal residence, would present a significant obstacle to the adoption and use of electric vehicles at the project site. Thus, the DEIR does almost nothing to facilitate the use of electric vehicles, which would otherwise help to mitigate the substantial air quality impacts and GHG emissions associated with the Project.

F.8-201

MM 11-5 describes proposed requirements to make bicycle parking accessible within the community, which is consistent with proposed measures that promote bicycle use in other sections of the DEIR. While the use of transportation by bicycle should be encouraged, high temperatures in the area – including maximums that meet or exceed 100 °F – would provide an obstacle to the widespread adoption of bicycle transportation within the community. Furthermore, given the considerable distance between the Project and major population centers, bicycle transport would not address concerns related to trips external to the Project site.

F.8-202

The EIR fails to disclose and analyze many feasible mitigation measures that would reduce the significant impacts of the project. CEQA requires that an EIR propose "feasible"

F.8-203

mitigation measures "to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." (Pub. Res. Code §§ 21000(b)(3), 21002.1(b); CEQA Guidelines § 15126.4(a)(1); *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors*, 91 Cal. App. 4th 342, 360 (2001).) "Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified." (CEQA Guidelines § 15126.4(a)(1)(B).) Therefore, it is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." (Pub. Res. CODE § 21002.)

F.8-203 cont.

Fortunately, many mitigation measures to be considered and adopted are described in detail in the documents attached: (1) San Joaquin Valley Air Pollution Control District: Mitigation Measures, (2) Bay Area Air Quality Management District, *California Environmental Quality Act: Air Quality Guidelines* (2011), (3) Sacramento Metropolitan Air Quality Management District, Recommended Guidance for Land Use Emission Reductions Version 3.3 (for Operational Emissions) (2016), (4) San Luis Obispo County Air Pollution Control District, CEQA Air Quality Handbook: A Guide for Assessing the Air Quality Impacts For Projects Subject to CEQA Review (2012), (5) California Air Pollution Control Officers Association (CAPCOA), *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act* (2008), and (6) California Attorney General's Office, *Addressing Climate Change at the Project Level* (2010). The documents identify existing and potential mitigation measures that could be applied to projects during the CEQA process to reduce a project's air pollution and GHG emissions. These mitigation measures also provide the co-benefit of reducing many criteria emissions that contribute to the significant impacts to air quality from this project and should be evaluated for their feasibility in reducing both greenhouse gases and criteria pollutants.

F.8-204

Because CEQA requires the adoption of all feasible mitigation measures to reduce significant impacts, the Project must adopt all feasible mitigation measures to reduce air quality and GHG impacts or provide "substantial evidence" as to why the mitigation measures are infeasible. (Guidelines § 15091(b).) Even if the Project's impacts are *unavoidable* that does not absolve the County of its obligation to *mitigate* significant impacts to the extent feasible. The Center therefore suggests the EIR adopt all feasible mitigation measures set forth in the attached. Their feasibility is proven, in many cases, by their actual implementation by cities and counties across California.

F.8-205

XV. The DEIR Fails To Adequately Disclose And Analyze The Seismic Risk Of The Project.

The DEIR erroneously claims that "the overall seismic risk at the Project site is the same as Southern California in its entirety" (DEIR at 5.1-15). In fact, due to its location at the junction of the San Andreas and Garlock fault systems, the Project is located in an area that is categorized as having the highest level of earthquake hazard in the state, according to probabilistic seismic hazard maps prepared by the United States Geological Survey and California Geological Survey. (USGS 2003.) While the DEIR claims that "the Project would not expose people or structures to potential adverse effects (including the risk of injury or death) from surface rupture of a known

F.8-206

earthquake fault …" (DEIR at 5.1-1.), this assertion hinges largely upon the implementation of Project Design Feature (PDF) 1-1, which institutes a 100-foot setback from fault lines located in the area of development. However, the DEIR provides no evidence to support the claim that a 100-foot setback, which could be reduced to 50-feet with County approval, would be sufficient to mitigate the seismic risk associated with a project located adjacent to one of the most hazardous fault zones in the country. Since the Project would result in a significant impact if it would expose people or structures to potential substantial adverse effects from strong seismic groundshaking, according to County threshold criteria, such an analysis is necessary to properly evaluate the seismic risk associated with the Project.

F.8-206 cont.

In addition to the failure to evaluate whether proposed mitigation measures would be effective in reducing seismic risk to non-significant levels, the existing analysis of seismic risk at the Project site is flawed. The DEIR evaluates seismic hazard for the center of the Project site, rather than for the areas of the Project that would be most affected by a seismic event. While portions of the Project are located immediately adjacent to the San Andreas fault zone, Table 5.1-1 of the DEIR estimates peak ground acceleration (PGA), a measure of ground motion that is indicative of potential damage to buildings and infrastructure, for a distance of 0.7 miles from the San Andreas fault. Since peak ground acceleration and other measures of ground motion are generally observed to attenuate exponentially with distance from fault rupture, this approach may significantly underestimate ground motion at the most-affected areas of the Project site. Since the DEIR proposes locating structures as close as 100-feet from major faults, a proper evaluation of seismic risk should analyze the seismic hazard for these near-fault areas of the Project site, particularly considering the considerable maximum earthquake magnitude (8.2) and ground acceleration potential for the Project site. In fact, the DEIR acknowledges that "in the event of a major seismic event, no structure is completely safe from damage." (DEIR at 5.1-15.)

F.8-207

Other than proposed Project Design Feature 1-1, which has not been demonstrated to effectively mitigate concerns regarding seismic risk, the DEIR attempts to allay seismic hazard concerns by agreeing to conform with applicable building codes and to incorporate geotechnical recommendations presented in existing and future geotechnical reports. However, a promise to comply with existing laws is not sufficient to demonstrate that impacts are less than significant. (*See Californians for Alternative to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17.) Additionally, a dependence on recommendations from future geotechnical reports inappropriately defers necessary analysis at the Project level to the various phases. (*Stanislaus Natural Heritage Project, Sierra Club v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 204-206 (analysis of significant effects may not be deferred to later developments under the specific plan, nor to later tiered EIRs.))

F.8-208

The DEIR also defers proper consideration of sensitive land uses including schools, hospitals, and public assembly sites, in relation to the seismic hazard associated with the Project site. For example, the DEIR states that "the California Department of Education's (CDE's) Title 5 requirements would be implemented by local school districts and would ensure that school site location decisions and building designs meet all applicable seismic and public safety concerns…" (DEIR at 5.1-16.) Applicable CDE requirements state that school siting should place a "emphasis upon an engineering investigation made of the site to preclude locating the school on terrain that may be potentially hazardous….including whether the site is situated on or near a pressure ridge, geological fault or fault trace that may rupture" (CDE, Title 5, § 14011.

F.8-209

Procedures for Site Acquisition State-Funded School Districts). Given that the Project site is located in an area of high seismic hazard and that the inclusion of schools, hospitals, and public assembly sites is essential to the viability of the Project as a whole, the DEIR should properly evaluate whether the Project can accommodate sensitive land uses in accordance with existing regulations regarding seismic risk.

F.8-209 cont.

A. The DEIR fails to evaluate risk associated with earthquake-triggered landslides, despite evidence indicating significant risk from coseismic landsliding at the Project Site.

While the Project is located in an area of high seismic hazard, and while the topography and geology of the area make the Project site highly susceptible to landsliding, the DEIR fails to evaluate or mitigate risks associated with earthquake-triggered landsliding. Dipping sedimentary units such as those found throughout the Project site, are at considerable risk of failure along existing planes of weakness, particularly during seismic events, as attested to by the observation of bedding plane shears in exploratory borings conducted at the Project site. (DEIR at 5.1-9.) The DEIR also notes that shallow landslides and slumps were observed during on-site geotechnical investigations. (DEIR at 5.1-5.19.) Of particular concern is the large landslide identified in the northwest corner of the Project site, which has an area of approximately one square mile and contains debris that are as much as 200 feet thick. (Appendix 5.1-A.) While the DEIR describes that land uses are configured to avoid placing structures in this vicinity, the existence of this landslide indicates that the Project area is susceptible to similar large landsliding events.

F.8-210

Landslide risk would be anticipated to be particularly high in the steeper topography located in the western portion of the Project site, although steeply sloping arroyos found throughout the Project site would also pose a risk of landsliding. Seismic events are highly likely to trigger landsliding via ground shaking. The 1994 (Mw) 6.7 Northridge earthquake triggered more than 11,000 landslides, 57 deaths, and billions of dollars of economic damage in the Los Angeles area (Harp and Jibson, 1995). According to Table 5.1-1 of the DEIR, the Project site is located within 25 miles of 8 dominant faults that could produce an earthquake magnitude greater than that of the Northridge event. Since the Project would result in a significant impact if it would "expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides" (County of Los Angeles Environmental Checklist, Threshold 1-4), an evaluation of the risk posed by earthquake-triggered landsliding is necessary.

F.8-211

XVI. The DEIR Fails To Adequately Analyze And Mitigate The Project's Impacts On Water Supplies.

The DEIR's analysis of the Project's water supply fails to adequately consider all potential significant impacts. The DEIR fails to include adequate mandatory or enforceable water mitigation strategies.

F.8-212

A. The DEIR Fails to Provide Assurance that the Project Has a Long-Term Water Supply

The DEIR relies on the water shortage analysis from the driest three-year historic sequence of 1931-1933, which should be updated to reflect the new droughts from 2011 onward,

F.8-213

as this submission is dated 2009 (DEIR Appendix 5.18A p. 22). The modeling for future water delivery reliability was done from 1922-2003. (Centennial Water Supply Assessment 3-11). However,§ 10632(a)(2) requires this estimate to be based off the driest three-year historic sequence for the agency's water supply. The DEIR should include the new drought information for two key reasons: the first being that climate change is going to continue to exacerbate weather abnormalities, making the 1931 drought too conservative an estimate, and the second being that the purpose of the legislation is having suppliers "carr[y] out their long–term resource planning responsibilities," which should mean including up-to-date drought data (Cal Wat Code § 10610.2(b)).

F.8-213 cont.

In addition, the water shortage response plan has been "designed based on the assumption that during a long-term drought the California Department of Water Resources will have a reduction in water deliveries, which is unlikely considering only government-mandated water conservation measures reduce demand, and then only for a temporary period of time." (DEIR at 28; *see also* Emily Guerin, 'Water use in California is increasing. Should we care' *KPCC.org,* Sept. 07 2016)... Further, "[r]educed water supplies coupled with increases in demand are likely to exacerbate competition for over-allocated water resources" (IPCC 2007 Working Group II: Impacts, Adaptation and Vulnerability 14.2.1)

F.8-214

Finally, the DEIR misguidedly relies on a water bank balance greater than zero. Water sustainability should be done based on a starting point of 0 AF; using the number of 6700 AF (minus 10%) as the beginning availability inflates the water availability analysis in the long-term and does not account for unforeseen water bank losses: for instance, earthquakes altering the water bank loss factor; reduced groundwater percolation recharge; water loss due to pollution. By not projecting sustainability analyses from 0 AF, the DEIR has an inflated margin of water availability that is entirely speculative.

F.8-215

For instance, the DEIR states that the water bank balance equal to the previous year's balance plus net transfers to or from the water bank minus 10% general loss. (DEIR 5.18 at 5-1). Phase 1 projections presumably demonstrate that groundwater is not needed to meet this demand, and therefore it is not included in the net amount of surplus water transferred. (*Id.*) This all assumes water is a static entity which can be reasonably relied on. Further, these projections are based on the 1931-33 drought, not the most recent drought, which has presumably altered the net amount of banked water, as well as the surface water upon which Phase 1 relies.

F.8-216

The DEIR supposes that it will bank water in wetter years when the actual deliveries are greater, and extracting stored water for use in drier years, to average a total of 2,607 AF available *if it is properly managed.* (Id). The dry years, which would pull upon the reserves, "are assumed to follow years of long-term average water availability." (*Id.*)This assumption is untenable in the face of climate change, where prolonged droughts of escalating irregularity are projected to occur. (IPCC, *supra*). Finally, the DEIR assumes that responsible ('proper') management will ensure availability of the water bank. Management of water banks is infamously poor, and because of limited regulatory oversight, easily 'improperly' managed.

F.8-217

Thus the margin of error in these calculations is only 2,600 AF, or the equivalent of the use for 5200 residences (using the standard 0.5AF/household/year). Centennial is planning on allowing 19,333 dwelling units. This margin, then, accounts for water use of roughly 25% of the

F.8-218

entire project development. (Centennial DEIR, 1-4). By not starting at zero banked water, the DEIR is gambling with a significant amount of water.

F.8-218 cont.

Finally, Centennial states that the Antelope Valley groundwater basin is subject to an ongoing adjudication. (DEIR Appendix 5.18 at 4.-2). Because of the uncertainty surrounding the water rights, assumptions built upon access to the water must be revised in light of the decision.

F.8-219

B. The DEIR fails to include mandatory or enforceable water mitigation strategies.

The DEIR relies on a backstop of increased conservation to mitigate uncertainty rather than planning for it:

> In the event that future water demands are determined to exceed available supplies, the Project Water Purveyor must implement measures to ensure that supplies will be adequate to meet future demand, including such measures as enhanced water budget based rates consistent with applicable legal requirements, increased enforcement, faculty repairs or upgrades, or obtaining supplemental water supplies. No additional development will occur until water use report response measures have been implemented [...].(DEIR at 5.18-2).

If these provisions are to curb excessive water demands, they must be 'mandatory' measures. Currently DEIR Appendix 5.18 only requires that "customers are in the best position to implement no-waste policies" and urban water suppliers "may use any time of consumption reduction methods…that would reduce water use." (DEIR Appendix 5.18A, at 26). These statements do not demonstrate actual mitigation strategies that can be implemented, nor their enforceability, in times of overconsumption of water. Section 10632(a)(4) of the Water Code states: "Additional, mandatory prohibitions against specific water use practices during water shortages, including, but not limited to, prohibiting the use of potable water for street cleaning." As the DEIR is written, no mandatory prohibitions besides potable water for street cleaning is specifically mentioned. This provision would be meaningless if applicants could do what Centennial has done, which is deferring listing specific practices to the water suppliers.

F.8-220

C. The DEIR Fails to Analyze the Environmental Impacts of the Project's Use of the Nickel Water & Its Reliability

The DEIR fails to discuss any potential environmental impacts of the Project's use of the Nickel water. The Nickel water reliance is a significant source of its base water supply projection, with 51% of the water for years 1-10 coming from it. (Centennial Water Supply Assessment at 5-3). All aspects of the arrangement, from the withdrawal of the water from the Kern River (or from the Delta, the ground, or wherever else) to the transfer of the water to the Project to the use of the water at the Project site, must be disclosed and analyzed. Any prior environmental reviews regarding Nickel water, including all supporting documentation, must be disclosed and analyzed in the DEIR (and included in full). Other information that should be included and analyzed in the EIR is all information regarding prior use of Nickel water, including before and after any prior environmental review. The DEIR's analysis, by placing the transfer in a vacuum, fails to consider all potential significant environmental impacts of this Project. It may be that the Project's water supply, being a return on loaned water at an interest

F.8-221

rate is truly reliable, though located in one of the most drought-prone parts of drought-prone California. But this needs to be explained and supported by facts fully disclosed in the DEIR. The DEIR cannot rely solely on the Water Transfer Contract to conclude that the Project's water supply is completely reliable.

F.8-221 cont.

D. The EIR must analyze climate change's effect on water supply in determining water supply impacts.

Significantly for the state, as well as the Project area, is climate change's impact on water supply. The Intergovernmental Panel on Climate Change (IPCC) specifically identified the American West as vulnerable, warning, "Projected warming in the western mountains by the mid-21st century is very likely to cause large decreases in snowpack, earlier snow melt, more winter rain events, increased peak winter flows and flooding, and reduced summer flows . . . ." (IPCC 2007b.) Recently, researchers found that an increase in atmospheric greenhouse gases has contributed to a "coming crisis in water supply for the western United States. . . ." (Barnett 2008.) Using several climate models and comparing the results, the researchers found that "warmer temperatures accompany" decreases in snow pack and precipitation and the timing of runoff, impacting river flow and water levels. (Barnett 2008.) These researchers concluded with high confidence that up to 60 percent of the "climate related trends of river flow, winter air temperature and snow pack between 1950-1999" are human induced. (Barnett 2008.) This, the researchers wrote, is "not good news for those living in the western United States." (Barnett 2008.)

F.8-222

The California Center on Climate Change has also recognized the problem climate change presents to the state's water supply and predicts that if GHG emissions continue under the business-as-usual scenario, snowpack could decline up to 70-90 percent, affecting winter recreation, water supply and natural ecosystems. (Cayan 2007.) Climate change will affect snowpack and precipitation levels, and California will face significant impacts, as its ecosystems depend upon relatively constant precipitation levels and water resources are already under strain. (Cayan 2007.) The decrease in snowpack in the Sierra Nevada will lead to a decrease in California's already "over-stretched" water supplies. (Cayan 2007.) It could also potentially reduce hydropower and lead to the loss of winter recreation. (Cayan 2007.) All of this means "major changes" in water management and allocation will have to be made. (Cayan 2007.) Thus, climate change may directly affect the ability to supply clean, affordable water to the residents, or change how the Project will utilize water, and it may also impact other activities outside the Project area, such as agriculture.

F.8-223

Scientists indicate that climate change will also exacerbate the problem of flooding by increasing the frequency and magnitude of large storms, which in turn will cause an increase in the size and frequency of flood events. (NRDC 2007.) The increasing cost of flood damages and potential loss of life will put more pressure on water managers to provide greater flood protection. (NRDC 2007.) At the same time, changing climate conditions (decreased snowpack, earlier runoff, larger peak events, etc.) will make predicting and maximizing water supply more difficult. (NRDC 2007.) These changes in hazard risk and water supply availability must be considered during environmental review.

F.8-224

Water quality, in addition to water quantity and timing, will also be impacted. Changes in precipitation, flow, and temperature associated with climate change will likely exacerbate water quality problems. (NRDC 2007.) Changes in precipitation affect water quantity, flow rates, and flow timing. (Gleick 2000.) Shifting weather patterns are also jeopardizing water quality and quantity in many countries, where groundwater systems are overdrawn. (Epstein 2005.) Decreased flows can exacerbate the effect of temperature increases, raise the concentration of pollutants, increase residence time of pollutants, and heighten salinity levels in arid regions. (Schindler 1997.) F.8-225

Accordingly, the DEIR must contain a realistic assessment regarding climate change's effects on the Project's planned water supplies. F.8-226

XVII. The DEIR Fails Establish Consistency with Applicable Plans and Policies.

Land use decisions must be consistent with all applicable land use policies, including the Los Angeles County General Plan ("General Plan") and all of its elements. (See *Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal. App. 4th 1552, 1562-1563.) Unfortunately, the DEIR fails to establish inconsistently with the General Plan, AVAP policies, and other policies as set forth below. F.8-227

The DEIR claims the Project complies with the 2016-2040 RTP/SCS. However, the DEIR admits the "resident population of the Project at buildout is 82.46 percent of the projected resident population of traffic analysis zone (TAZ) 20280000 and TAZ 20281000 by 2035, ***but exceeds the Southern California Association of Governments (SCAG) projections for 2040***." (DEIR at 5.8-2.) While the DEIR dismisses this inconsistency by claiming the projects are "non-binding," the Project is nonetheless inconsistent with SCAG projections. As such, the DEIR is misleading when it repeatedly claims that the Project and the growth caused by the Project is expected, planned, or anticipated. More importantly, the inconsistency with SCAG projections renders the Project inconsistent with the Sustainable Communities Strategy, as required by SB 375. F.8-228

The DEIR further acknowledges that while the AVAP EIR is subject to litigation brought by the Center, the DEIR "does not tier from, nor is it legally reliant upon, the EIRs for either the AVAP…" (DEIR at 5.8-3.) This statement is undermined by the hundreds of references to the AVAP or AVAP EIR throughout the DEIR. Indeed, as discussed above, the DEIR repeatedly generally cites to analyses in the AVAP EIR. (*See* DEIR at 1-11, 5.5-1, 5.5-14.) F.8-229

A. The Project is inconsistent with the General Plan.

The DEIR concludes it is consistent with the LA County General Plan's policy of promoting a balanced distribution of jobs and services. (DEIR at 5.8-20.) Yet, this conclusion is belied by the fact that average trip lengths will be 45.9 miles. In addition, as discussed above, the developer(s) or builder(s) could avoid any of the commercial or school development if they believe such an approach is warranted based upon "market conditions." F.8-230

The LA County General Plan on page 92 explains that "Jobs-housing balance is reached by working toward increasing opportunities for people to work and live in close proximity, and F.8-231

reduce long commutes that are costly both economically and environmentally."[41] This Project will do the opposite of achieving "balance" by siting thousands of people many dozens of miles from employment opportunities. Similarly, the General Plan states on page 74:

> Suburban sprawl is a land use pattern that extends urban infrastructure and residential development into undeveloped areas with limited or no infrastructure, such as roads, public utilities, and public transit.

F.8-231 cont.

The Project typifies this land use pattern because there is currently no development anywhere near the Project site and extremely limited infrastructure. As the General Plan further explains, sprawl results in the fragmentation of open space areas, loss of agricultural lands, and contributes to "traffic congestion, air pollution, and greenhouse gas emissions." The Project will disproportionately add to all of these harms. As such, the Project is inconsistent with LU 3, which provides that development patterns should discourage sprawl.

F.8-232

B. The Project is inconsistent with the AVAP's Land Use Element.

The DEIR claims that the Project is consistent with the AVAP's Goal LU 2, which requires land use patterns that protect environmental resources. The DEIR claims this goal will be met by compliance with SEAs and the Ranchwide Agreement. (DEIR at 5.8-24.) However, the SEAs were reduced with no corresponding environmental review, as explained in the Center's litigation regarding the AVAP EIR. In addition, as discussed in the Biological Resources section, the County previously had considered the Project area as a SEA, but removed the designation. Moreover, as discussed above, the County cannot rely upon the private Ranchwide Agreement to fulfill its obligations under CEQA, the AVAP, or the General Plan. The DEIR is inconsistent with Policy LU 2 for similar reasons.

F.8-233

The Project is inconsistent with Goal LU 3, Policies LU 3.1 and 3.5 for the reasons discussed in section XV -- particularly that the Project site is sited in an area prone to natural hazards.

F.8-234

The Project is inconsistent with Goal LU 5, which requires that land use patterns decrease greenhouse gas emissions. (DEIR at 5.8-28.) As discussed in above, the Project will disproportionately add to the region's GHG emissions by siting residents far from existing employment, schools, and city centers. The Project also is inconsistent with LU 5.1, which requires consistency with the Sustainable Communities Strategy. The Project is the antithesis of sustainable development and the DEIR even admits that the Project would exceed SCAG's population projections in the 2016-2040 RTP/SCS. (*See* DEIR at 5.8-2.) The Project similarly is not consistent with Policy LU 5.2, Policy LU 5.3, and Policy LU 5.4 because the Project will not necessarily provide for local employment opportunities, given that the developer can avoid developing commercial portions of the Project based upon "market conditions."

F.8-235

The Project is inconsistent with Policy LU 5.3, which requires the preservation of open space areas. (DEIR at 5.8-29.) The Project will result in approximately a reduction of approximately 6,000 acres of open space. The DEIR misleadingly states that the Project will

F.8-236

[41] *See* Los Angeles County General Plan (Oct. 6, 2015), available at http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan.pdf.

F.8-231A

help implement the Ranchwide Agreement and thereby preserves over 240,000 acres of contiguous open space areas (in perpetuity)…." (DEIR at 5.8-29.) Again, any commitments in the Ranchwide Agreement are unenforceable by the County and therefore irrelevant to the project proponent's mitigation here. Moreover, as discussed above, the DEIR only promises to preserve 3,681 acres "in perpetuity." (DEIR at 4-44.)

F.8-236 cont.

C. The Project is inconsistent with the AVAP's Mobility Element.

The DEIR is inconsistent with many of the goals and policies in the Mobility Element for the same reasons discussed throughout this letter – the Project will ***not*** require land use patterns that promote alternatives to the automobile (Goal M 1); (2) the Project will not minimize travel times or reduce vehicle trips (Policy M 1.1); (3) the Project will not reduce vehicle trips through effective transportation demand systems (Goal M 2). (*See* DEIR at 5.8-30.) Similarly, the Project will not effectively encourage trip reduction through carpools, vanpools or public transit (Policy M 2.2, Policy M 2.3, Policy M 2.4) because the DEIR contains no firm plans for actually reaching the goal of reducing single occupancy automobile use by 30 percent. (*See* DEIR at 5.8-31 & 5.21-66.)

F.8-237

D. The Project is inconsistent with the AVAP's Conservation and Open Space Element.

The Project is inconsistent with the AVAP's water resources policies for the reasons set forth in section XVI above. In particular, the Project is not guided by water supply constraints (Goal COS 1) and fails to identify sustainable water sources (Policy COS 1.1). (*See* DEIR at 5.8-41.) Likewise, although Policy COS 2.1 requires compliances with efficiency standards in the County Code, the DEIR only generally states that the Project's "Green Development Program" will reduce water use. (DEIR at 5.8-42.) Moreover, the DEIR's Water Resources section does not appear to add any further detail on whether the Project actual complies with the County Code.

F.8-238

The Project also is inconsistent with the previous version of the AVAP, which designated the Project site as an SEA. The DEIR should have required the implementation of Policy COS 4.4, which requires new development in SEAs to consider various factors, including preservation of biologically valuable habitats. (*See* DEIR at 5.8-45.)

F.8-239

As discussed in section XIV above, the Project would further impair air quality in the region by requiring residents to commute many miles to employment. Accordingly, the Project is not consistent with Air Quality COS 9, Policy COS 9.1, Policy COS 9.2, and Policy COS 9.3. (*See* DEIR at 5.8-51.)

F.8-240

E. The Project is inconsistent with the AVAP's Public Safety, Services, and Facilities Element.

The Project is inconsistent with the policies in the Public Safety, Services and Facilities element for the reasons discussed in sections VII and XV. For example, the Project will not adequately protect residents from fire or seismic hazards, violates policies limiting development in active seismic areas, and fails to contain proper measures to prevent landslides. (*See* DEIR at 5.8-60-61.)

F.8-241

Because the DEIR improperly concludes that the Project is consistent with the General Plan and AVAP, the DEIR's conclusion that no mitigation is required is similarly flawed. (*See* DEIR at 5.8-71.)

F.8-242

XVIII. Conclusion

Given the possibility that the Center will be required to pursue appropriate legal remedies in order to ensure enforcement of CEQA, we would like to remind the County of its duty to maintain and preserve all documents and communications that may constitute part of the "administrative record." As you may know, the administrative record encompasses any and all documents and communications which relate to any and all actions taken by the County with respect to the Project, and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . . ." (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further contains all correspondence, emails, and text messages sent to or received by the County's representatives or employees, which relate to the Project, including any correspondence, emails, and text messages sent between the County's representatives or employees and the project proponent's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the County (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

F.8-243

Thank you for the opportunity to submit comments on the Project. We look forward to working to assure that the Project and environmental review conforms to the requirements of state law and to assure that all significant impacts to the environment are fully analyzed, mitigated or avoided. In light of many significant, unavoidable environmental impacts that will result from the Project, we strongly urge the Project not be approved in its current form. Please do not hesitate to contact the Center with any questions at the number listed below. We look forward to reviewing the County's responses to these comments in the Final EIR for this Project once it has been completed.

F.8-244

Sincerely,



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Exhibit A

July 13, 2017

Mr. Jonathan Evans
Center for Biological Diversity
1212 Broadway, Suite 800
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Subject: ***Review of Traffic, Access, and Circulation Analysis***
Centennial Project Draft Environmental Impact Report
Los Angeles County, California

Dear Mr. Evans:

As requested, Griffin Cove Transportation Consulting, PLLC (GCTC) has completed a review of the "Traffic, Access, and Circulation" analysis completed with respect to the proposed Centennial project in Los Angeles County, California. The proposed project is the subject of a Draft Environmental Impact Report (DEIR) prepared for the County of Los Angeles, Department of Regional Planning. (Reference: Bonterra Psomas, *Centennial Project Draft Environmental Impact Report*, May 2017) The DEIR incorporates (as Appendix 5.10-A) a traffic study prepared by Stantec. (Reference: Stantec, *Centennial Specific Plan Traffic Study*, May 2017) F.8-350

Our review focused on the technical adequacy of the "Traffic, Access, and Circulation" analysis, including the detailed procedures and conclusions documented in the Stantec report. F.8-351

TRAFFIC, ACCESS, AND CIRCULATION ANALYSIS REVIEW

Our review of the traffic impact analysis for the proposed Centennial project revealed several issues that must be addressed prior to certification of the environmental document and approval of the project by the County of Los Angeles. These issues are presented below. F.8-352

1. ***Traffic Volume Data*** – We identified a number of issues relating to the traffic volume data used in the analysis. F.8-353

   Obsolete Intersection Traffic Volume Data

   DEIR p. 5.10-21 states that the intersection traffic volume data used in the analysis was collected in 2014 and 2015. Thus, some of the traffic volumes are now three years old. F.8-354

   This is a violation of Los Angeles County policy. Specifically, page 3 of the document entitled, *Traffic Impact Analysis Report Guidelines* (Reference: County of Los Angeles, Department of Public Works, January 1, 1997) states: F.8-355

   > *Count data should not be over one year old.*

   Furthermore, the Los Angeles County Metropolitan Transportation Authority (Metro) provides similar guidance (Reference: LACMTA, *2010 Congestion Management Program*, Appendix D – Guidelines for CMP Transportation Impact Analysis, Section D.5.1 – Existing Traffic Conditions, p. D-2): F.8-356

   > *Traffic counts must be less than one year old at the time the study is initiated.*

Although the exact date on which the Stantec study was initiated is unknown, the Notice of Preparation for the DEIR was issued on October 2, 2015. Thus, any count conducted prior to October 2014 would be out of date, according to the guidance from Los Angeles County and Metro. F.8-357

In addition to violating local standards regarding traffic volume data, this is contrary to accepted practice within the traffic engineering profession. Page 19 of the 2006 Institute of Transportation Engineers (ITE) document, *Transportation Impact Analyses for Site Development*, specifically states that: F.8-358

> *. . . traffic volume data should generally be no older than 1 year.*

Stantec Table 2-2 (p. 2.10) lists the dates on which the intersection counts were conducted. Thirteen locations were counted in March or April 2014, including the following: F.8-359

- 28. Interstate 5 (I-5) Northbound Ramps/State Route 126 (SR 126) – March 4, 2014;
- 29. I-5 Southbound Ramps/SR 126 – April 1, 2014;
- 30. The Old Road/I-5 Southbound Ramps – March 11, 2014;
- 31. I-5 Southbound Ramps/Magic Mountain – March 11, 2014;
- 32. I-5 Northbound Ramps/Magic Mountain – March 5, 2014;
- 33. I-5 Southbound Ramps/Valencia – March 11, 2014;
- 34. I-5 Northbound Ramps/Valencia – March 11, 2014;
- 35. I-5 Southbound Ramps/McBean – March 13, 2014;
- 36. I-5 Northbound Ramps/McBean – March 11, 2014;
- 37. I-5 Southbound/Marriott & Pico/Lyons – March 11, 2014;
- 38. I-5 Northbound Ramps/Lyons Ave. – March 11, 2014;
- 39. I-5 Southbound Ramps/Calgrove – March 11, 2014; and
- 40. I-5 Northbound Ramps/Calgrove – March 11, 2014.

All of the counts listed above exceed the one-year standard set forth by Los Angeles County and Metro.

Intersection Counts Not Conducted on School Days

In addition to the age of the intersection traffic volume data, a number of the counts violate the Metro standard with respect to when counts may be performed. Specifically, the Congestion Management Program guidelines state (Reference: LACMTA, *2010 Congestion Management Program*, Appendix A – Guidelines for Biennial Highway Monitoring, Section A.4 – Traffic Count Requirements, p. A-2): F.8-360

> *Traffic counts must be taken on days when local schools or colleges are in session.*

Referring again to Stantec Table 2-2 (p. 2.10), we see that the counts at the following sixteen locations were performed in July 2015, when local schools and colleges were almost certainly not in session:

- 3. 300th St. W./State Route 138 (SR 138) – July 14, 2015;
- 6. Three Points Road/SR 138 – July 14, 2015;
- 7. 245th St. W./SR 138 – July 14, 2015;
- 8. 230th St. W./SR 138 – July 14, 2015;
- 9. 190th St. W./SR 138 – July 14, 2015;
- 10. 170th St. W./SR 138 – July 14, 2015;
- 11. 110th St. W./SR 138 – July 14, 2015;
- 12. 90th St. W./SR 138 – July 14, 2015;
- 13. 60th St. W./SR 138 – July 14, 2015;
- 14. 30th St. W./SR 138 – July 14, 2015;
- 15. State Route 14 (SR 14) Southbound Ramps/SR 138 – July 14, 2015;
- 16. SR 14 Northbound Ramps/SR 138 – July 14, 2015;
- 17. 90th/Willow Springs/Rosamond – July 14, 2015;
- 18. Willow Springs/Oak Creek – July 14, 2015;
- 19. Willow Springs/Highline – July 14, 2015; and
- 20. Bear Mountain Blvd./SR 223/Wheeler Ridge Rd. – July 14, 2015.

F.8-361

Obsolete State Route 138 Traffic Volume Data

The DEIR (p. 5.10-21) states:

> *For State highways, traffic count data was obtained from the Caltrans Traffic Census, the Caltrans Performance Measurement System (PeMS) and the Los Angeles County Department of Public Works Machine Count Traffic Volumes database. These traffic counts represent 2014 and 2010 conditions, which is the most current data available from Caltrans and the County, respectively, at this time.*

F.8-362

Stantec p. 2.20 provides additional detail:

> *Along SR-138, traffic counts were collected in 2015 and supplemented by 2010 peak hour traffic count data obtained from the LA County Department of Public Works (LADPW) Machine Count database. The peak hour data was used to derive representative K and D factors for the SR-138 from the I-5 to SR-14 freeways.*

F.8-363

Obviously, data from the year 2010 is too old to be valid, given the guidance referenced above from Los Angeles County and Metro. Even if the 2010 values were only used to "derive representative K

F.8-364

and D factors," there is no certainty that factors from 2010 would, in fact, be representative of conditions prevailing at the time the study was initiated. F.8-364 cont.

Given that California and the nation were still suffering from the effects of the "Great Recession" in 2010, travel patterns were certainly atypical during that period. This would particularly affect the K factor, which is an indication of the proportion of daily traffic that occurs in the peak hour. Since employment rates were reduced during the recession, peak-hour travel (which largely consists of commuter trips) was also reduced, so the K factor would not represent typical conditions. According to information on the California Employment Development Department website, the seasonally-adjusted unemployment rate (by month) in 2010 in California was 12.1 – 12.2 percent. In contrast, the seasonally-adjusted unemployment rate for October 2015 (when the NOP was issued) was 5.8 percent. (Attachment A contains that data.) This strongly suggests that K factors derived in 2010 would be too low to provide an accurate indication of current peak-hour travel patterns. In particular, the peak-hour volumes are probably underestimated, which would lead to overly-optimistic V/C ratios and levels of service. F.8-365

Freeway Peak-Hour Volumes Estimated

With respect to the freeway traffic volumes used in the traffic analysis, Stantec p. 2.6 says: F.8-366

> *Peak hour traffic count data were derived by using K (peak hour volume factor) and D (directional factor) values in the AM and PM peak periods for each respective segment in order to calculate peak hour volumes by direction. . . . These peak hour volumes represent the mean (average) weekday volume plus one standard deviation for weekdays for the month of October 2013.*

Thus, instead of being based on actual traffic volumes determined through counts on the freeway facilities, the analysis is based on estimated values. There is no certainty that these estimates accurately reflect the volume of traffic on the freeway facilities evaluated in the traffic study. The use of such estimated values in place of actual data must be further explained and justified. F.8-367

Moreover, the estimated volumes represent the level of activity in October 2013, which violates the guidelines discussed above with respect to the appropriate age of traffic volume data. Also, with respect to the validity of the K factor used to estimate these values, as shown in Attachment A, the seasonally-adjusted unemployment rate in California in October 2013 was 8.5 percent, compared to 5.8 percent in October 2015 when the NOP was issued. Thus, the peak-hour volumes are likely to be underestimated. F.8-368

Conclusion

Because the traffic volumes represent the most critical input parameter in the level of service calculation process, any inaccuracies in those values directly affect the validity of the level of service results. In short, to the extent that the existing traffic volumes fail to represent current conditions in the study area, the corresponding level of service results reported in the DEIR are invalid, and a misleading representation of the environmental setting and project-related impacts will be provided. F.8-369

New traffic volume data must be obtained for the study intersections and other roadway facilities, and the analysis must be revised to incorporate that new data. F.8-370

2. ***Study Area*** – Stantec Figure 1-3 (p. 1.5) illustrates the study area for the traffic analysis. (No equivalent figure is presented in the DEIR "Traffic, Access, and Circulation" section.) To the north of the Project site, the study area includes State Route 99 (SR 99), north of the point where it splits off from I-5. The section of I-5 north of that point is ignored, however. F.8-371

   Stantec Figure 2-4 (p. 2.9) indicates that I-5 north of SR 99 carried about 48,000 vehicles per day (VPD) in 2014 or 2015, compared to 27,000 VPD on SR 99. According to Stantec Figure 4-1 (p. 4.4), the proposed Project would add 2,100 trips per day to this section of I-5, for an "Existing Plus Project" total of 50,100 VPD. The "Existing Plus Project" total on SR 99 just north of the I-5 split will be 33,200 VPD. Thus, the daily traffic volume on I-5 will substantially exceed the corresponding volume on SR 99 under "Existing Plus Project" conditions. (Cumulative conditions traffic forecasts for this segment of I-5 are discussed below.) F.8-372

   To ensure a thorough analysis of project-related impacts on the regional freeway system, I-5 north of SR 99 must be added to the study area. F.8-373

3 ***Freeway Mainline Analysis Procedure*** – Stantec p. 9 says:

   > *Caltrans utilizes the methodology described in the Highway Capacity Manual (HCM) to estimate density and LOS* [Level of Service] *for freeway analysis, so for the purpose of this study those same HCM methods have been utilized to derive the capacities employed for the V/C* [Volume/Capacity] *calculations . . .*

   Moreover, Stantec p. 1.12 states:

   > *Capacities for calculating peak hour V/C ratios for freeway mainline segments are derived with the methodology utilized in the* HCM 2010.

   Similarly, DEIR p. 5.10-16 says: F.8-374

   > *Freeway capacities on a per-lane basis within the Project study area were derived for existing conditions using the methodology outlined in the* 2010 Highway Capacity Manual *(TRB 2010).*

   These statements suggest that the analysis of freeway mainline segments was performed using the pertinent methodology documented in Chapter 11 of the *Highway Capacity Manual 2010* (Transportation Research Board, Fifth Edition, December 2010.) This is not the case, however.

   Caltrans, in its December 2002 document, *Guide for the Preparation of Traffic Impact Studies*, identifies the appropriate methodologies for analysis for various types of roadways. With respect to freeway segments, page 5 of that document states that the operational analysis within the *Highway Capacity Manual* should be employed. This point is reinforced in Appendix C to the Caltrans document (which is Attachment B here), which presents the accepted "measures of effectiveness" (MOE) for various types of roadway facilities. As shown there, the appropriate MOE for freeways is density, in terms of passenger cars per mile per lane (PC/MI/LN). Density is determined through application of the *Highway Capacity Manual* procedure. F.8-375

   In contrast, the DEIR analysis of freeway mainline segments was based on development of volume/capacity (V/C) ratios for each analysis scenario and comparison of the derived values to information presented in Exhibit 23-2 (p. 23-4) of the year 2000 edition of the *Highway Capacity* F.8-376

Manual. Those values are presented in Stantec Table 1-3 (p. 1.13), which also contains a footnote that correctly states:

> *Density is the primary determinant of LOS.*

F.8-376 cont.

In short, it is clear that Caltrans calls for freeway mainline analyses to be performed using the current version of the *Highway Capacity Manual*, but that the DEIR did not employ that method. As such, it might be valuable to present information describing the differences between the two methods.

F.8-377

As described above, the freeway segment analysis presented in the DEIR is a relatively simplistic volume/capacity (V/C) ratio evaluation, which is typically used in the most broad brush sorts of planning analyses. In such an analysis, the volumes represent either the existing traffic volumes or the future traffic forecasts.

F.8-378

The current state-of-the-art for analysis of freeways is documented in the *Highway Capacity Manual*. The *Highway Capacity Manual* represents the culmination of thousands of hours of research into the nature of vehicular traffic flow on all types of roadway facilities, including freeways. Chapter 11 of the *Highway Capacity Manual 2010* describes the concepts underlying the analysis of freeway segments, as well as the pertinent analysis procedures. According to the *HCM 2010*, level of service on freeway segments is determined based on traffic density, in terms of passenger cars per mile per lane (PC/MI/LN).

F.8-379

Although traffic operations is a highly complex subject, it may be worthwhile to compare the various factors employed in the simplistic V/C ratio evaluation used in the DEIR versus the methodology identified in the *HCM 2010*.

F.8-380

Comparison of Input Parameters

Completion of a V/C analysis requires the following inputs:

- Volume (either measured or estimated), and
- Capacity (typically estimated or assumed; rarely measured).

F.8-381

In contrast, completion of a level of service analysis for a freeway segment under the *HCM 2010* methodology requires the following input parameters (*HCM 2010*, Exhibit 11-16, p. 11-21), in addition to hourly vehicular volume:

- Number of lanes,
- Lane width,
- Lateral clearance,
- Interchange density,
- Specific grade or general terrain description (i.e., level, rolling, or mountainous),
- Base free-flow speed,
- Length of analysis period,

F.8-382

- Peak-hour factor (i.e., a representation of the distribution of traffic flow over the peak-hour period),
- Percentage of heavy vehicles (i.e., trucks and recreational vehicles), and
- Driver population factor.

F.8-382 cont.

Clearly, the nature and quantity of the input requirements associated with the *HCM 2010* analysis procedure would lead to a more accurate representation of conditions on the study area freeway segments than the DEIR discloses. This leads to an initial conclusion that the level of service results derived using the *HCM 2010* procedure would be more reflective of the physical and operational characteristics of those facilities than would ever be possible using the simplistic V/C approach. However, other considerations also apply, as described below.

F.8-383

Comparison of Analysis Procedures

With the various input parameters established, it might be helpful to summarize the analysis procedures associated with each of the two techniques.

F.8-384

For a standard V/C ratio analysis, the procedure requires the following:

1. Divide measured or estimated volume by estimated or assumed capacity.
2. Compare the resulting V/C ratio to appropriate level of service criteria.

F.8-385

On the other hand, conduct of a freeway segment level of service analysis using the *HCM 2010* method involves the following steps. (*HCM 2010*, Exhibit 11-7, p. 11-10):

1. Establish and input the data listed above.
2. Compute the road's free-flow speed, adjusting as necessary to reflect the number of lanes, lane width, lateral clearance, and interchange density.
3. Select the speed-flow curve.
4. Adjust the traffic volume to reflect traffic flow patterns (i.e., number of lanes, peak-hour factor, heavy vehicle percentage, driver population, and terrain/grades) for use in estimating the flow rate.
5. Determine the speed using the speed-flow curve.
6. Compute the density using the flow rate and speed.
7. Determine the level of service.

F.8-386

While we are not suggesting that complexity alone equates to a higher level of accuracy, we are inclined to believe that the numerous adjustments incorporated into the *HCM 2010* methodology result in an analysis procedure that better reflects the actual physical characteristics of the roadway, as well as the local traffic flow patterns.

F.8-.387

In summary, it is readily apparent that, compared to the simplistic V/C ratio approach used in the DEIR, the *HCM 2010* methodology would provide a superior indication of operating conditions on I-5, SR 99, and SR 14 through the study area. Consequently, in keeping with the guidance provided in the Caltrans *Guide for the Preparation of Traffic Impact Studies*, we believe that the analysis should

F.8-388

be revised to incorporate an analysis using the *HCM 2010* procedures, and the results should be circulated for further public review. F.8-388 cont.

4 ***Freeway Ramp Analysis Procedure*** – Referring again to Attachment B, we see that Caltrans has identified density as the appropriate measure of effectiveness for freeway ramps. Despite this, the DEIR analysis of freeway ramps was based on development of V/C ratios for the ramp roadways and comparison of those ratios to defined level of service ranges. These calculations again employ certain assumptions with regard to the capacity of the ramps (e.g., 1,500 vehicles per hour for a one-lane ramp). F.8-389

However, the *Highway Capacity Manual 2010* specifically states (p. 13-4): F.8-390

> *LOS is not defined for ramp roadways . . .*

Instead, the *HCM 2010* methodology (which measures ramp operations in terms of traffic density) addresses operations in the "ramp influence area," which is defined as the 1,500-foot section of freeway in advance of an off-ramp or downstream of an on-ramp. This particular approach reflects the *HCM 2010* statement (p. 13-2): F.8-391

> *Ramps and ramp junctions do not operate independently of the roadways they connect. Thus, operating conditions on the main roadways can affect operations on the ramp and ramp junctions, and vice versa.*

The DEIR approach totally ignores this interaction between the ramps and the adjacent freeway segments. It is, therefore, virtually meaningless and provides a misleading indication of the ramp operations. The ramp analyses must be revised, using the *HCM 2010* procedures. F.8-392

5. ***State Route 138 Analysis Procedure*** – For Existing and Existing Plus Project conditions, SR 138 was analyzed using the *Highway Capacity Manual 2010* methodology for two-lane highways. (Stantec, pp. 1.18 & 4.1) F.8-393

In the future, SR 138 will be improved to a four-lane expressway. (Stantec, p. 2.28) Under Cumulative and Cumulative Plus Project conditions, the Stantec analysis determined level of service based on V/C ratios, instead of using the *Highway Capacity Manual 2010* procedures for multi-lane highways. (Stantec, p. 1.20) According to the *HCM 2010*, level of service on multi-lane highways is, ". . . defined on the basis of density [in passenger cars/mile/lane], which is a measure of the proximity of vehicles to each other in the traffic stream." (*HCM* 2010, p. 14-4) V/C ratios, as employed in the Stantec analysis, are not considered meaningful indicators of the quality of traffic flow on such facilities. F.8-394

This inconsistency in approach, in which the *HCM 2010* procedures were used for certain scenarios but not for others, must be justified. If the *HCM 2010* methodology is appropriate for short-term conditions, why not also for cumulative conditions? F.8-395

6. ***Cumulative Conditions Daily Traffic Forecasts*** – Detailed review of the "without project" and "with project" traffic volume figures for cumulative conditions (Stantec Figures 4-3 and 4-4, pp. 4.26 and 4.27) reveals certain apparent anomalies in the future year traffic forecasts and the assignment of project trips to I-5, both north and south of the project site. F.8-396

Interstate 5 North of the Proposed Project

Stantec Figure 2-4 (p. 2.9) indicates that I-5 north of the I-5/SR 99 split currently carries 48,000 VPD. That value is not shown on the figure, but can be easily derived by subtracting the volume on SR 99 north of the split (27,000 VPD) from the combined I-5/SR 99 volume south of the split (75,000 VPD). F.8-397

In comparison, Stantec Figure 4-3 (p. 4.26) indicates that under Cumulative No Project conditions (in the year 2035 or 2040), I-5 north of the I-5/SR 99 split will carry only 44,000 VPD, a reduction of 4,000 VPD from the current volume. Again, that value must be derived by subtracting the 66,000 VPD projected to be on SR 99 north of the I-5/SR 99 split from the 110,000 VPD shown south of the split. Clearly, this significant reduction in traffic on I-5 in the future seems counter-intuitive and must be explained. F.8-398

Even under "Cumulative Plus Project" conditions, Stantec Figure 4-4 (p. 4.27) indicates that only 49,000 VPD will be on I-5 north of the split, an increase of only 1,000 VPD over the existing volume. F.8-399

To gain additional perspective on this issue, we sought out other sources of traffic volume projections on I-5. The primary source of such information is the *Interstate 5 Transportation Concept Report* (Caltrans, Office of System Planning, District 6, February 2013). Attachment C presents excerpts from that document. The Transportation Concept Report provides daily and peak-hour traffic volume information for the years 2011, 2020, and 2035. The portion of I-5 immediately south of the I-5/SR 99 split is designated Segment 3, and I-5 just north of the split is Segment 4. Table 1 summarizes the daily traffic volume information for these two segments, as presented in Summary Chart 2A in the *Transportation Concept Report*. For comparison, the corresponding Cumulative Plus Project traffic projections presented in the DEIR are also shown. F.8-400

Table 1
Traffic Volume Summary
Interstate 5 – Segments 3 and 4

Year	Annual Average Daily Traffic (AADT)			
	Caltrans – I-5 Transportation Concept Report[1]		DEIR/Stantec – Cumulative (2035/2040) Plus Project[2]	
	Segment 3 (South of I-5/SR 99 Split	Segment 4 (North of I-5/SR 99 Split)	Segment 3 (South of I-5/SR 99 Split	Segment 4 (North of I-5/SR 99 Split)
2011	81,000	41,000		
2020	115,500	58,500		
2035	179,900	91,100	118,000	49,000

Notes:
1 Reference: Caltrans, Office of System Planning, District 6, *Interstate 5 Transportation Concept Report*, February 2013.
2 Reference: Stantec, *Centennial Specific Plan Traffic Study*, May 2017

On Segment 3 (south of the split), Caltrans forecasts a year 2035 daily traffic volume of 179,900 VPD. In comparison, the DEIR indicates that the 2035/2040 daily volume on that segment of I-5 will be 118,000, which is approximately two-thirds of the Caltrans forecast. On Segment 4 (north of the split), Caltrans projects 91,100 VPD in 2035, while the DEIR indicates a daily volume of 49,000 in 2035 or 2040, which is only 54 percent of the Caltrans estimate. F.8-401

Clearly, the DEIR analysis substantially underestimated the future year traffic volumes on I-5 north of the project site. This leads, in turn, to understatement of the V/C values on I-5 and, potentially, the failure to identify significant project-related impacts. In short, the DEIR provides no meaningful indication of the future level of service for that facility. F.8-402

The analysis must be revised to reflect the level of traffic growth projected by Caltrans and to provide an accurate indication of the future operating conditions on I-5. F.8-403

Interstate 5 South of the Proposed Project

Table 2 summarizes the cumulative conditions project traffic volumes on I-5 between SR 138 and SR 126. F.8-404

Table 2
Project Traffic – Interstate 5

Interstate 5 Segment	Daily Traffic Volume (Vehicles/Day)		
	Cumulative With Project	Cumulative Without Project	Project Traffic
SR 138 – Smokey Bear Rd.	127,000	105,000	22,000
Smokey Bear Rd. – Vista Del Lago Rd.	129,000	110,000	19,000
Vista Del Lago Rd. – Templin Hwy.	129,000	117,000	12,000
Templin Hwy. – Lake Hughes Rd.	130,000	114,000	16,000
Lake Hughes Rd. – Parker Rd.	158,000	140,000	18,000
Parker Rd. – Hasley Canyon Rd.	175,000	160,000	15,000
Hasley Canyon Rd. – SR 126	174,000	163,000	11,000

Source: Stantec, *Centennial Specific Plan Traffic Study*, May 2017, Figures 4-3 & 4-4 (pp. 4.26 & 4.27) and Table 4-6 (p. 4.33).

As shown, the project traffic volumes steadily drop from 22,000 vehicles per day (VPD) at SR 138 to 12,000 VPD at Templin Highway, but then they jump up to 16,000 VPD at Lake Hughes Road. Then, they jump even higher (18,000 VPD) at Parker Road before beginning to fall again. F.8-405

The apparent loss of a substantial amount of project traffic between Vista Del Lago Road and Templin Highway is particularly interesting. Attachment D contains a Google Earth aerial image of I-5 at Vista Del Lago Road. As shown, that road connects only to the Vista Del Lago Visitors Center on the east side of Pyramid Lake, immediately west of I-5. No connections exist that would allow F.8-406

project traffic to enter or exit I-5 at this location. Further, nothing in the DEIR or the Stantec traffic study indicates that any future road connections will be provided that might accommodate project traffic at this location. F.8-406 cont.

At Templin Highway, such road connections might exist (e.g., Old Ridge Route/Ridge Route Road), but they are twisty, two-lane roads that are not well-suited to carrying commute traffic or other trips where travel time is a consideration. Aside from recreational trips, I-5 would certainly be a preferable route. F.8-407

These inconsistent project traffic numbers raise questions regarding the validity of the project traffic assignment. Why would the project traffic between Vista Del Lago Road and Templin Highway be so much lower than on either of the adjacent I-5 segments? And why would the project traffic volume on I-5 between Lake Hughes Road and Parker Road be greater than on either adjacent segment? F.8-408

If the answer to either of these questions is that project traffic has been assigned to minor roads that eventually feed into I-5 (but that apparently have not been fully described in the DEIR), then this must be documented and the ability of those minor roads to accommodate that traffic must be evaluated. If, on the other hand, no logical explanation can be provided for these inconsistencies, then the project traffic assignment must be modified to eliminate the anomalies. F.8-409

7. ***Deficient Construction Traffic Analysis*** – The Stantec study completely fails to address the potential construction-related traffic impacts of the proposed project. Oddly, the only mention of construction-related traffic impacts in either document occurs at DEIR pp. 5.10-140 – 5.10-141 under "Threshold 10-5 Will the project result in inadequate emergency access?" At the end of that section is the following "analysis" of construction-related impacts: F.8-410

> *Construction of the proposed off-site project features would lead to temporary obstruction of roadways where utility lines connections* [sic] *and roadway improvements are planned but this impact would be temporary and would occur at scattered locations. Compliance with the Greenbook and Graybook and implementation of traffic management plans during construction (MM 10-5) would prevent traffic and emergency access obstruction. Impacts would be less than significant.*

This significance determination is unsubstantiated, as no analysis was documented that would allow such a conclusion to be reached. For example, how much traffic will be generated during each phase and sub-phase of construction? What analysis was performed with respect to construction-related capacity impacts? F.8-411

Full consideration of construction-related impacts at the study locations would identify both the number of construction-worker vehicles and the volume of heavy trucks in each phase. Further, appropriate factors would be applied to convert the truck volumes to "passenger car equivalents," in recognition of the reduced operating characteristics of heavy vehicles (e.g., greater size, slower acceleration, increased braking distance, etc.). F.8-412

In this case, no evidence is presented to document the number of peak-hour employee and truck trips that would occur during the construction period associated with each phase of the proposed project. Without that basic information, it is simply impossible to make a determination regarding the significance of project-related construction impacts. F.8-413

The DEIR must be revised to incorporate a credible analysis of the project's construction-related impacts. F.8-414

8. ***Average Trip Length*** – Stantec Table 3-5 (p. 3.9) shows that the overall average trip length for project-generated traffic will be 25.5 miles, with "external" trips (i.e., those that have an origin or a destination outside the project) having an average trip length of 45.9 miles. Although trip lengths have no effect on the level of service at any of the intersections and roads within the study area, these extraordinary values demonstrate clearly that the project exemplifies the worst elements of "sprawl," with its related issues of fuel consumption and pollutant emissions. F.8-415

9. ***Transit Trips*** – Stantec Table 5-2 (p. 5.4) says the project will generate 10,604 daily transit trips, including 810 AM peak hour transit trips and 850 PM peak hour transit trips. There is no indication, though, as to how these trips will be accommodated. F.8-416

   DEIR Mitigation Measure 29 (which is equivalent to Stantec Mitigation Measure 24) calls for implementation of a "Mobility Plan," including provision of a Transportation Management Association (TMA) that would coordinate and manage a variety of "ongoing transportation improvements and programs," including a ride share program, a transit program, and a commuter bus program. (DEIR, p. 5.10-104) F.8-417

   It is not clear, however, how much actual transit service would be provided through the TMA. Stantec p. 4.59 describes provision of "10 to 15 commuter vans or 2 buses to (AM) and from (PM) the Santa Clarita Valley and 5 to 7 commuter vans or 1 bus [to/from] the Antelope Valley." Based on the stated capacity of 50 passengers per bus, this will serve 150 commuters (300 daily transit trips). What about the other 10,304 daily transit trips? F.8-418

   Similarly, this leaves 660 AM peak hour and 700 PM peak hour transit trips unaccounted for. Using the 50 passengers/bus factor presented in the Stantec study, another 14 busloads worth of transit passengers need to be accommodated in each of the peak hours. On a daily basis, the stated transit demand equates to 212 busloads, yet the DEIR provides no certainty that the necessary transit service will actually materialize. F.8-419

   The DEIR must be revised to provide specific information regarding the level of transit service to be provided, both internal and external to the proposed project. F.8-420

CONCLUSION

Our review of the Traffic, Access, and Circulation analysis completed in connection with the proposed Centennial project revealed several issues affecting the validity of the conclusions presented in the Draft Environmental Impact Report. These issues must be addressed prior to approval of the proposed project and its environmental documentation by the County of Los Angeles. F.8-421

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact us at (906) 847-8276.

F.8-422

Sincerely,

GRIFFIN COVE TRANSPORTATION CONSULTING, PLLC

Neal K. Liddicoat, P.E.
Principal

Attachments

ATTACHMENT A

"LABOR FORCE AND UNEMPLOYMENT RATE FOR CALIFORNIA STATEWIDE"

(Source: California Employment Development Department)

Unsaved View Save As... Revert

Based on Labor Force and Unemployment Rate for California Statewide

This dataset contains statewide aggregate

	Area Name	Area Type	Date	Year	Month	Seasonally	Unemployment Rate	Status (Prelim
1	California	State	12/01/2010	2010	December	N	12.1%	Final
2	California	State	12/01/2010	2010	December	Y	12.1%	Final
3	California	State	11/01/2010	2010	November	Y	12.1%	Final
4	California	State	11/01/2010	2010	November	N	12.3%	Final
5	California	State	10/01/2010	2010	October	N	11.9%	Final
6	California	State	10/01/2010	2010	October	Y	12.2%	Final
7	California	State	09/01/2010	2010	September	Y	12.2%	Final
8	California	State	09/01/2010	2010	September	N	11.9%	Final
9	California	State	08/01/2010	2010	August	Y	12.1%	Final
10	California	State	08/01/2010	2010	August	N	12.3%	Final
11	California	State	07/01/2010	2010	July	Y	12.1%	Final
12	California	State	07/01/2010	2010	July	N	12.6%	Final
13	California	State	06/01/2010	2010	June	N	12%	Final
14	California	State	06/01/2010	2010	June	Y	12.1%	Final
15	California	State	05/01/2010	2010	May	N	11.7%	Final
16	California	State	05/01/2010	2010	May	Y	12.1%	Final
17	California	State	04/01/2010	2010	April	N	12%	Final
18	California	State	04/01/2010	2010	April	Y	12.2%	Final
19	California	State	03/01/2010	2010	March	Y	12.2%	Final
20	California	State	03/01/2010	2010	March	N	12.6%	Final
21	California	State	02/01/2010	2010	February	Y	12.2%	Final
22	California	State	02/01/2010	2010	February	N	12.6%	Final
23	California	State	01/01/2010	2010	January	Y	12.1%	Final
24	California	State	01/01/2010	2010	January	N	12.7%	Final

Unsaved View Save As... Revert

Based on Labor Force and Unemployment Rate for California Statewide

This dataset contains statewide aggregate

	Area Name	Area Type	Date	Year	Month	Seasonally	Unemployment Rate	Status (Prelim
1	California	State	12/01/2013	2013	December	N	8%	Final
2	California	State	12/01/2013	2013	December	Y	8.2%	Final
3	California	State	11/01/2013	2013	November	Y	8.3%	Final
4	California	State	11/01/2013	2013	November	N	8.3%	Final
5	California	State	10/01/2013	2013	October	N	8.5%	Final
6	California	State	10/01/2013	2013	October	Y	8.5%	Final
7	California	State	09/01/2013	2013	September	Y	8.6%	Final
8	California	State	09/01/2013	2013	September	N	8.5%	Final
9	California	State	08/01/2013	2013	August	Y	8.7%	Final
10	California	State	08/01/2013	2013	August	N	8.9%	Final
11	California	State	07/01/2013	2013	July	Y	8.8%	Final
12	California	State	07/01/2013	2013	July	N	9.3%	Final
13	California	State	06/01/2013	2013	June	N	9.2%	Final
14	California	State	06/01/2013	2013	June	Y	8.9%	Final
15	California	State	05/01/2013	2013	May	N	8.6%	Final
16	California	State	05/01/2013	2013	May	Y	9%	Final
17	California	State	04/01/2013	2013	April	N	8.7%	Final
18	California	State	04/01/2013	2013	April	Y	9.1%	Final
19	California	State	03/01/2013	2013	March	Y	9.2%	Final
20	California	State	03/01/2013	2013	March	N	9.3%	Final
21	California	State	02/01/2013	2013	February	Y	9.3%	Final
22	California	State	02/01/2013	2013	February	N	9.7%	Final
23	California	State	01/01/2013	2013	January	Y	9.5%	Final
24	California	State	01/01/2013	2013	January	N	10.2%	Final

F.8-423 cont.

Unsaved View Save As... Revert

Based on Labor Force and Unemployment Rate for California Statewide

This dataset contains statewide aggregate

	Area Name	Area Type	Date	Year	Month	Seasonally	Unemployment Rate	Status (Prelim
1	California	State	12/01/2015	2015	December	N	5.6%	Final
2	California	State	12/01/2015	2015	December	Y	5.7%	Final
3	California	State	11/01/2015	2015	November	Y	5.8%	Final
4	California	State	11/01/2015	2015	November	N	5.7%	Final
5	California	State	10/01/2015	2015	October	N	5.7%	Final
6	California	State	10/01/2015	2015	October	Y	5.8%	Final
7	California	State	09/01/2015	2015	September	Y	5.9%	Final
8	California	State	09/01/2015	2015	September	N	5.6%	Final
9	California	State	08/01/2015	2015	August	Y	6%	Final
10	California	State	08/01/2015	2015	August	N	6.1%	Final
11	California	State	07/01/2015	2015	July	Y	6.1%	Final
12	California	State	07/01/2015	2015	July	N	6.5%	Final
13	California	State	06/01/2015	2015	June	N	6.3%	Final
14	California	State	06/01/2015	2015	June	Y	6.2%	Final
15	California	State	05/01/2015	2015	May	N	6.1%	Final
16	California	State	05/01/2015	2015	May	Y	6.3%	Final
17	California	State	04/01/2015	2015	April	N	6.2%	Final
18	California	State	04/01/2015	2015	April	Y	6.4%	Final
19	California	State	03/01/2015	2015	March	Y	6.5%	Final
20	California	State	03/01/2015	2015	March	N	6.7%	Final
21	California	State	02/01/2015	2015	February	Y	6.6%	Final
22	California	State	02/01/2015	2015	February	N	6.9%	Final
23	California	State	01/01/2015	2015	January	Y	6.8%	Final
24	California	State	01/01/2015	2015	January	N	7.2%	Final

F.8-423 cont.

ATTACHMENT B

APPENDIX C
CALTRANS MEASURES OF EFFECTIVENESS

(Source: Caltrans, *Guide for the Preparation of Traffic Impact Studies, December 2002*)

F.8-424
cont.



GUIDE FOR THE PREPARATION

OF

TRAFFIC IMPACT STUDIES

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

December 2002

APPENDIX "C"

MEASURES OF EFFECTIVENESS

BY

FACILITY TYPE

MEASURES OF EFFECTIVENESS BY FACILITY TYPE

TYPE OF FACILITY	MEASURE OF EFFECTIVENESS (MOE)
Basic Freeway Segments	Density (pc/mi/ln)
Ramps	Density (pc/mi/ln)
Ramp Terminals	Delay (sec/veh)
Multi-Lane Highways	Density (pc/mi/ln)
Two-Lane Highways	Percent-Time-Following Average Travel Speed (mi/hr)
Signalized Intersections	Control Delay per Vehicle (sec/veh)
Unsignalized Intersections	Average Control Delay per Vehicle (sec/veh)
Urban Streets	Average Travel Speed (mi/hr)

Measures of effectiveness for level of service definitions located in the most recent version of the Highway Capacity Manual, Transportation Research Board, National Research Council.

F.8-424 cont.

ATTACHMENT C

SUMMARY CHART 2A
INTERSTATE 5 TRANSPORTATION CONCEPT REPORT

(Reference: Caltrans, Office of System Planning, District 6,
***Interstate 5 Transportation Concept Report*, February 2013)**

F.8-425
cont.

STATE ROUTE

INTERSTATE 5

TRANSPORTATION CONCEPT REPORT

OFFICE OF SYSTEM PLANNING · DISTRICT 6 · FEBRUARY 2013







Caltrans

Interstate 5 Transportation Concept Report

Interstate 5: From the Los Angeles County line to the Merced County line

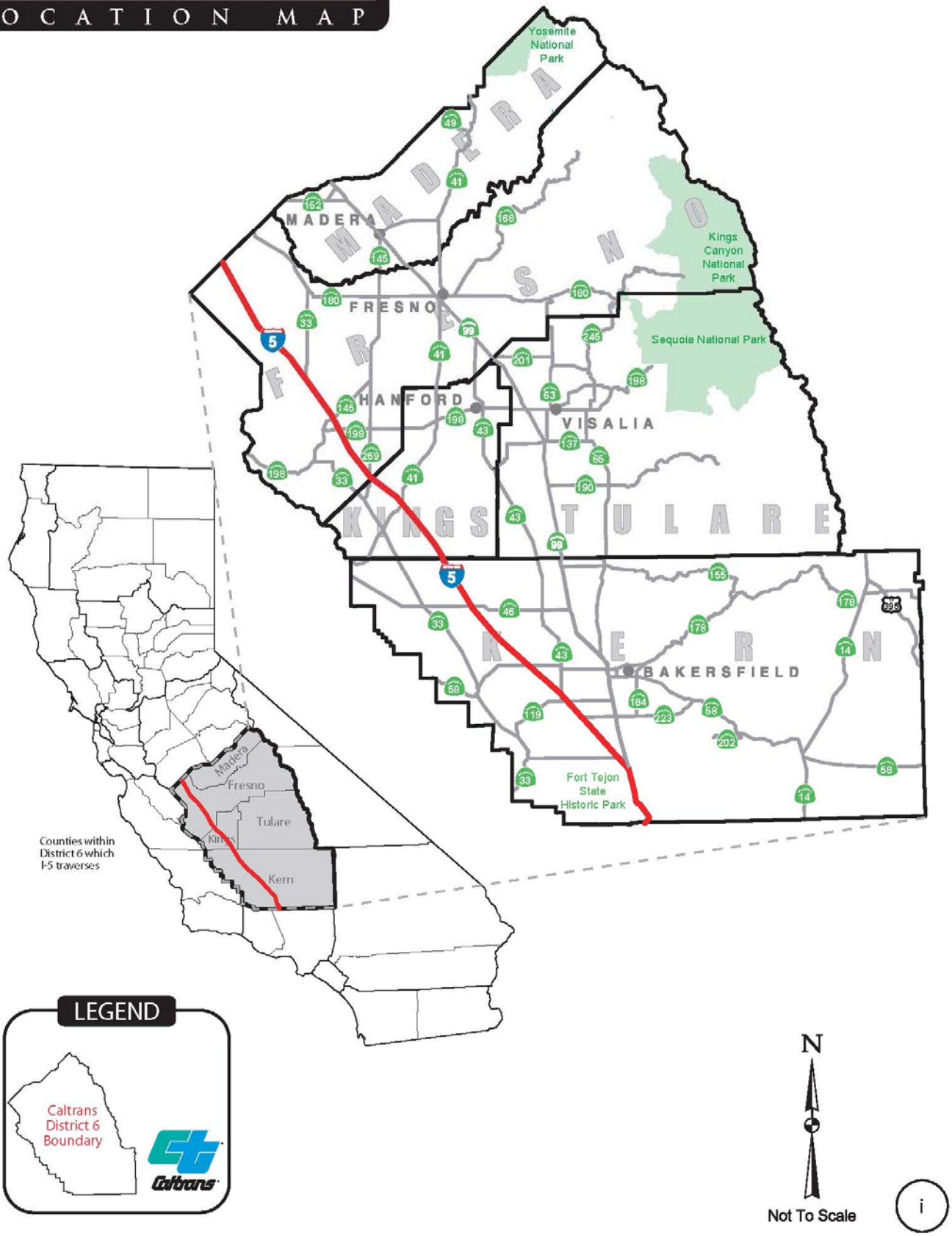
Caltrans District 6 – Pos tmile: (KER R0.00 to FRE 66.16)

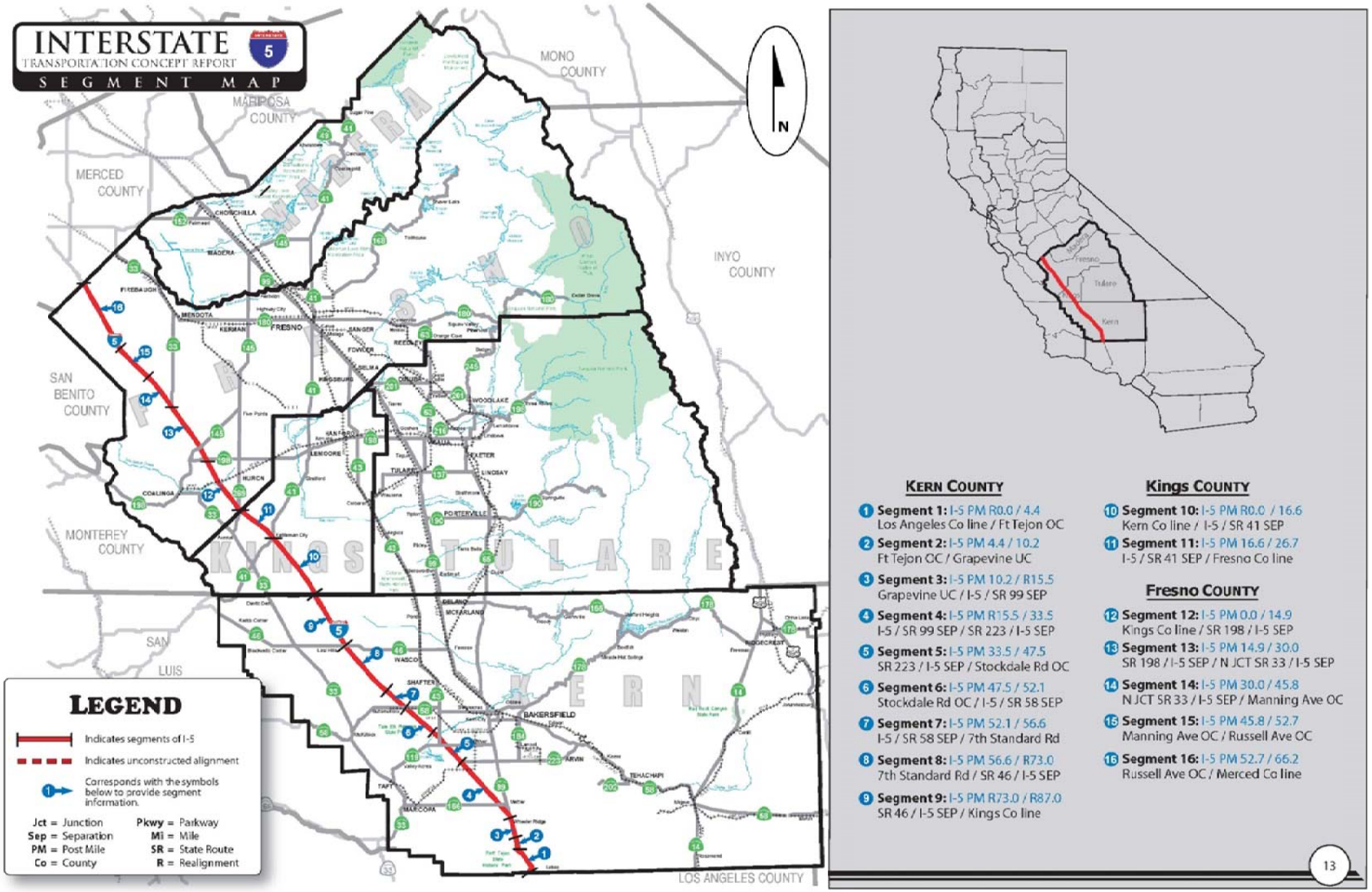
I approve this Transportation Corridor Report as the overall Policy Statement and Strategic Plan that will guide transportation decisions and investments for the Interstate 5 Corridor.

Gail Miller
Deputy District Director
Planning and Local Assistance
Caltrans - District 6

Sharri Bender-Ehlert
District Director
Caltrans – District 6

INTERSTATE 5
TRANSPORTATION CONCEPT REPORT
LOCATION MAP




INTERSTATE 5
TRANSPORTATION CONCEPT REPORT
SEGMENT MAP
MONO COUNTY
MARIPOSA COUNTY
MERCED COUNTY
INYO COUNTY
SAN BENITO COUNTY
MONTEREY COUNTY
SAN LUIS
LOS ANGELES COUNTY
FRESNO
KINGS
TULARE
KERN
BAKERSFIELD
N
LEGEND
Indicates segments of I-5
Indicates unconstructed alignment
Corresponds with the symbols below to provide segment information.
Jct = Junction
Sep = Separation
PM = Post Mile
Co = County
Pkwy = Parkway
Mi = Mile
SR = State Route
R = Realignment
KERN COUNTY
1 Segment 1: I-5 PM R0.0 / 4.4
Los Angeles Co line / Ft Tejon OC
2 Segment 2: I-5 PM 4.4 / 10.2
Ft Tejon OC / Grapevine UC
3 Segment 3: I-5 PM 10.2 / R15.5
Grapevine UC / I-5 / SR 99 SEP
4 Segment 4: I-5 PM R15.5 / 33.5
I-5 / SR 99 SEP / SR 223 / I-5 SEP
5 Segment 5: I-5 PM 33.5 / 47.5
SR 223 / I-5 SEP / Stockdale Rd OC
6 Segment 6: I-5 PM 47.5 / 52.1
Stockdale Rd OC / I-5 / SR 58 SEP
7 Segment 7: I-5 PM 52.1 / 56.6
I-5 / SR 58 SEP / 7th Standard Rd
8 Segment 8: I-5 PM 56.6 / R73.0
7th Standard Rd / SR 46 / I-5 SEP
9 Segment 9: I-5 PM R73.0 / R87.0
SR 46 / I-5 SEP / Kings Co line
Kings COUNTY
10 Segment 10: I-5 PM R0.0 / 16.6
Kern Co line / I-5 / SR 41 SEP
11 Segment 11: I-5 PM 16.6 / 26.7
I-5 / SR 41 SEP / Fresno Co line
Fresno COUNTY
12 Segment 12: I-5 PM 0.0 / 14.9
Kings Co line / SR 198 / I-5 SEP
13 Segment 13: I-5 PM 14.9 / 30.0
SR 198 / I-5 SEP / N JCT SR 33 / I-5 SEP
14 Segment 14: I-5 PM 30.0 / 45.8
N JCT SR 33 / I-5 SEP / Manning Ave OC
15 Segment 15: I-5 PM 45.8 / 52.7
Manning Ave OC / Russell Ave OC
16 Segment 16: I-5 PM 52.7 / 66.2
Russell Ave OC / Merced Co line
13

F.8-425
cont.

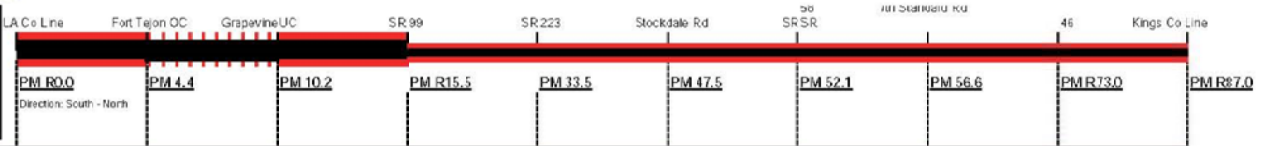
Transportation Concept Report

Interstate 5

SUMMARY CHART 1A

LEGEND

Existing Lanes
Planned or Programmed by 2035
Add Through Lanes Add Auxiliary Lanes
Freeway
Number of Lanes
4
8
* Length of segments not to scale



Segment: Is self-explanatory except for several data sets:

Rural/Urban: Indicates whether the segment is in a rural area or city limits.

Terrain: Shows the general highway grade: minimal grade = level; moderate grade = rolling; and severe grade = mountainous.

ROW: Portrays Right-of-Way (ROW) and geometric data in feet.

Shoulder Range: Is a range of treated surface (8' standard), both inside and outside shoulders.

Ultimate Transportation Corridor (UTC): Is the typical ROW needed for the ultimate facility,i.e., 8 lane freeway (8F) 216 feet is the standard typical UTC ROW - will be updated upon corridor plan lining by specific sections of highway.

Facility: Shows the Existing Facility, the desired facility type (2035 Concept) by 2035- RTPA's and Caltrans, and the Ultimate Facility to preserve ROW and plan line beyond 2035. 2C(I) indicates that the highway has been improved in select locations with operational or safety improvements.

LOS: The current (2011) LOS (level of service), along with the expected calculated LOS in 2020 and 2035. The 2035 Concept is the target LOS desired, i.e., LOS C, for attainment by 2035 Caltrans.

Deficiency: Occurs when the target LOS is degraded, i.e., LOS D worse than LOS C, with the year of occurrence shown. It also shows whether a capacity improving project is in the STIP, and what the LOS would be with the 2035 Concept improvement.

Directional Split: Denotes the split in the peak hour traffic flow on a directional basis (NB/SB or WB/EB) either in the morning (AM) or evening (PM).

AUX++ Auxiliary lanes are Truck Climbing lanes.

AADT: signifies Annual Average Daily Traffic.

Peak Hour: Indicates a representation of the maximum hour of traffic flow during the day.
99P: Median is variable width greaters than 100 feet

N/A* - Deficient, no project recommended.

+ The Ultimate ROW is generally the same as the existing ROW

(-) Deficient with Improvement

* Concept Facility meets Concept LOS.

SEGMENT	1	2	3	4	5	6	7	8	9
County / Interstate	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5
Description Begin	LOS ANGELES CO LINE	FORT TEJON OC	GRAPEVINE UC	SR 99 SEP	SR 223 SEP	STOCKDALE RD OC	SR 58 SEP	7TH STANDARD RD	SR 46 SEP
Description End	FORT TEJON OC	GRAPEVINE UC	SR 99 SEP	SR 223 SEP	STOCKDALE RD OC	SR 58 SEP	7TH STANDARD RD	SR 46 SEP	KINGS CO LINE
Postmile Limits Begin/End (PM)	R0.0 / 4.4	4.4 / 10.2	10.2 / R15.5	R15.5 / 33.5	33.5 / 47.5	47.5 / 52.1	52.1 / 56.6	56.6 / R73.0	R73.0 / R87.0
Length (MI)	4.4	5.8	5.3	18.0	14.0	4.6	4.5	16.4	14.0
Rural / Urban	Rural	Rural	Rural	Rural	Rural	Rural	Rural	Rural	Rural
Terrain	Mountainous	Mountainous	Flat	Flat	Flat	Flat	Flat	Flat	Flat
ROW: Range Existing (FT)	214 / 340	218 / 400	208 / 230	208 / 208	208 / 230	208 / 208	208 / 208	208 / 208	208 / 208
Median Range (FT)	36 / 46	46 / 99P	36 / 99P	84 / 99P	79 / 84	79 / 84	74 / 84	79 / 84	84 / 84
Shoulder Range (FT) - Treated	8 / 10	8 / 10	8 / 10	5 / 10	5 / 10	5 / 10	5 / 10	5 / 10	5 / 10
Lane Width (FT)	12	12	12	12	12	12	12	12	12
Ultimate ROW (FT)	+	+	+	+	+	+	+	+	+
Facility: Existing	8F	6F+2AUX++	8F	4F	4F	4F	4F	4F	4F
2035 Concept	10F	6F+4AUX++	10F	6F	6F	6F	6F	6F	6F
UTC	10F	6F+4AUX++	10F	8F	8F	8F	8F	8F	8F
LOS: 2011	D	D	C	C	C	C	C	C	C
LOS: 2020	F	F	D	D	D	E	E	E	D
LOS: 2035	F	F	F	F	F	F	F	F	F
LOS: Concept 2035	C	C	C	C	C	C	C	C	C
Deficiency/Year Deficient	2010	2010	2020	2020	2020	2020	2020	2020	2020
Project in STIP/RTP (Y/N)	No	No	No	No	No	No	No	No	No
LOS W/ Concept Improvement	F(-)	F(-)	F(-)	N/A*	N/A*	N/A*	N/A*	N/A*	N/A*
Directional Split (Peak Hour)	70/30	70/30	52/48	56/46	52/48	60/40	65/35	54/46	53/47
AADT: 2011	75,000	75,000	81,000	41,000	33,000	33,000	33,500	34,000	31,500
AADT: 2020	107,000	107,000	115,500	58,500	47,100	49,900	50,600	49,600	46,500
AADT: 2035	166,600	166,600	179,900	91,100	73,300	83,600	84,800	79,600	75,700
Peak Hour: 2011	7,700	7,700	8,700	4,550	4,900	5,100	5,300	5,500	4,900
Peak Hour: 2020	10,980	10,980	12,410	6,490	6,990	7,710	8,010	8,020	7,230
Peak Hour: 2035	17,100	17,100	19,320	10,110	10,880	12,910	13,420	12,880	11,770
% Trucks: AADT	28%	28%	28%	29%	29%	31%	31%	31%	31%
% Trucks: Peak Hour	9%	9%	9%	14%	12%	11%	11%	11%	12%

F.8-425 cont.

ATTACHMENT D

GOOGLE EARTH IMAGE –
INTERSTATE 5 / VISTA DEL LAGO ROAD

F.8-426
cont.



Google Earth

feet 3000
meters 900

ATTACHMENT D
INTERSTATE 5 / VISTA DEL LAGO ROAD
(Note lack of road connections)

Responses to Comment Letter F.8
Center for Biological Diversity, Center for Food Safety, California Native Plant Society (Center for Biological Diversity, et al)
August 16, 2017

Response to Comment F.8-1:

The Commenter's opinion regarding the adequacy of the Draft EIR is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Lead Agency disagrees with this comment's assertion that the EIR fails to comply with the requirements of the California Environmental Quality Act (CEQA). Please see responses to Comments F.8-5 through F.8-349.

Response to Comment F.8-2:

The comment is an introduction to the commenting organization. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-3:

The comment is an introduction to the commenting organization. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-4:

The comment is an introduction to the commenting organization. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-5:

The Commenter accurately quotes various legal opinions regarding the CEQA definition of the term "project" and the standards for an adequate EIR project description. These legal citations are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As this comment does not concern a significant environmental effect of the Project or the adequacy of the Draft EIR, no further response is required.

Response to Comment F.8-6:

The Commenter's legal citations regarding the standard for an adequate project description under CEQA are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As this comment does not concern a significant environmental effect of the Project or the adequacy of the Draft EIR, no further response is required.

Response to Comment F.8-7:

The Lead Agency disagrees with this comment's inaccurate assertion that the Draft EIR contains misleading statements regarding the project description. The administrative record is clear that the proposed Centennial Specific Plan has long been anticipated as a potential use of those portions of the West EOA controlled by the Project Applicant/Developer. As explained on page 4-9 of the Draft EIR, "[t]he Project Applicant/Developer's Project application was deemed complete on May 31, 2008; therefore, the potential implementation of the Project was known by the Los Angeles County Department of Regional Planning (LACDRP) and was accounted for in the development of the AVAP. As such, the potential benefits and impacts associated with the Project implementation[,] as reflected on the AVAP Land Use Policy Map, is considered within the AVAP and within the AVAP EIR's and are further considered in this EIR." This fact is confirmed by AVAP EIR, which explains that the Centennial Specific Plan was identified as a topic for analysis as early as that EIR's CEQA scoping meetings conducted on June 26, 2014 and July 7, 2014.[822] Although this EIR does not tier off of the AVAP EIR, the AVAP EIR nevertheless explains that it assumed development of the Centennial project, stating that "any future development projects within the Proposed Area Plan, *including Centennial*, may tier off the Program EIR for the Area Plan" (emphasis added).[823]

As discussed in response to Comment F.8-20, the Southern California Association of Governments (SCAG) is required by law to prepare a Regional Housing Needs Assessment (RHNA) based on regional growth projections and the County is in turn required to periodically update its General Plan to accommodate the County's fair share of the regional housing need by identifying sufficient land designated for residential use. SCAG's latest growth forecasts were adopted in 2016 and included forecasts at the regional, county, city, subregional, and TAZ levels.[824]

SCAG projects that, through 2040, the regional population will grow by 20 percent, resulting in a net increase of approximately four million additional residents. SCAG projects that the population of Antelope Valley will grow from 302,188 in 2020 to 784,310 in 2035.[825] The entire North Los Angeles County Subregion, which includes Antelope Valley and the Project site, will have 245,473 households by 2020 and 331,399 households by 2040, an increase of 85,926 households over 20 years.[826] The unincorporated portion of this subregion is projected to have 69,982 households in 2020 and 116,546 households in 2040. As explained in Draft EIR Section 5.9, Population and Housing, the County's housing element indicates that 30,145 new housing units are needed to meet future housing demand through 2021, a portion of which will be provided by the Project.

SCAG's growth projections also included a breakdown at the Traffic Analysis Zone (TAZ) level.[827] The Project site is located in portions of two TAZs and population projections for

822 DRP 2014a, p. 2-2
823 DRP 2014b, p. 2-97
824 DRP 2017, p. 5.9-4
825 *Id.,* p. 5.9-10
826 *Id.,* p. 5.9-16
827 *Id.,* p. 5.9-10

these TAZs are provided in Draft EIR Table 5.9-5, reprinted below. TAZ 20280000 includes the area north of SR-138 and east of I-5, while TAZ 20281000 includes the area south of SR-138.[828] As shown in Draft EIR Table 5.9-5, significant population growth is anticipated in TAZ 20280000, which covers the portion of the Project site north of SR-138. Specifically, SCAG projects that TAZ 20280000 will grow from 372 people in 2008 to 50,505 people by 2040, as shown in EIR Table 5.9-5.

The County adopted the AVAP in 2015 as a component of its General Plan in order to establish a comprehensive land use plan for accommodating projected growth in the planning area, as required by Government Code §65583. Indeed, the AVAP expressly states that it was prepared "[i]n anticipation of future growth" and is thus "focused on ways to manage this growth".[829] In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[830] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[831] This community vision is embodied in the AVAP's "Rural Preservation Strategy." At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[832]

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[833] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[834] Per the AVAP, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[835] Rural Town Areas serve as transition areas between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[836] Rural Preserve Areas are located outside of Rural Town Centers and are largely undeveloped, unserved by existing or planned infrastructure and public facilities, and contain important environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[837]

The Project site is located entirely within the AVAP's West EOA.[838] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major

828 *Id.,* Exhibit 5.9-1
829 DRP 2015, p. I-6
830 *Id.,* p. I-5
831 *Ibid.*
832 *Id.,* p. I-6
833 DRP 2015, p. I-7; DRP 2014a, p. 7-7
834 *Ibid.*
835 DRP 2015, p. I-7
836 *Ibid.*
837 *Ibid.*
838 DRP 2017, p. 4-4

infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[839] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[840] Indeed, the very first policy described in the AVAP - Land Use Policy LU 1.1 – requires that the County "[d]irect the majority of the unincorporated Antelope Valley's future growth to … identified economic opportunity areas".[841] Accordingly, the AVAP Land Use Policy Map establishes land use designations for the Project site that correspond to the land use densities and intensities proposed by the Centennial Specific Plan, as shown on Exhibit 4-2a and as discussed in Section 5.8, Land Use, Entitlements, and Planning.[842] Moreover, as this comment correctly notes, the AVAP expressly states its expectation that the Project site will be developed as a "master-planned community" pursuant to a "specific plan."

As discussed above, it is AVAP's stated intent to establish a land use plan that will accommodate projected growth while also preserving the rural character of Antelope Valley. The AVAP is also clear that it intends to focus the majority of that new growth in designated EOAs, including the West EOA where the Project site is location. In addition, the AVAP Land Use Policy Map designates the Project site for new growth commensurate with the Centennial Specific Plan, which application was pending at the time of the AVAP was prepared and was evaluated in the AVAP EIR. Finally, the AVAP expressly states its expectation that the Project be developed as a master-planned community pursuant to a specific plan. Taken together, these facts make clear that AVAP "evidences an 'intent' for development of Centennial," despite this comment's claim to the contrary.

The Daft EIR makes no misleading statements regarding the West EOA's relationship to the Northwest 138 Corridor Improvement Project, a joint project recently approved by Caltrans and the Los Angeles County Metropolitan Transportation Authority that would widen and realign SR-138 to a limited access expressway in order to accommodate projected growth.[843] As the Draft EIR explains, that the AVAP designates the location of the West EOA due in part to its proximity to the Northwest 138 Corridor Improvement Project.[844] The Northwest 138 Corridor Improvement Project is an integral part of the AVAP's Rural Preservation Strategy, as discussed on AVAP page I-8:

> Economic opportunity areas are defined clusters of land along the routes of two new proposed major infrastructure projects in the Antelope Valley, namely the High Desert Corridor and the Northwest 138 Corridor Improvement Project. These areas were identified as having tremendous potential for economic growth and development. Thus, any development induced by these two infrastructure projects should be guided to these areas

839 DRP 2015, p. I-8
840 *Ibid.*
841 *Id.,* LU-3
842 DRP 2017, pp. 5.8-21 to -71
843 *Id.,* pp. 4-4, -9, -96; 5.8-21
844 *Id.,* pp. 4-4, -9; 5.5-7; 5.8-21, -34, -35, -68, -70

> so that the areas around them can be preserved an maintained at low density, or agricultural uses. This is intended to balance the growth and development which the two projects will undoubtedly bring, with the general intent of this Area Plan to preserve the ecological value and rural character of the Antelope Valley.

The Northwest 138 Corridor Improvement Project was also included in the SCAG RTP/SCS as part of the regional transportation projects needed to achieve the transportation, air quality, greenhouse gas, and economic development goals required by federal RTP laws and SB 375.[845] In light of these facts, there is no evidence to support this comment's claim that Draft EIR's project description is misleading with regards to the Project's relationship to the West EOA and the Northwest 138 Corridor Improvement Project.

The Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation for the Northwest 138 Corridor Improvement Project (SR-138 Project EIR) was certified on June 28, 2017 and is available for public review.[846] The author(s) of this comment letter filed comments on the draft SR-138 Project EIR which were addressed in the Final SR-138 Project EIR.[847] Although not specifically noted in this portion of the comment letter, the Commenter has filed a CEQA lawsuit challenging the AVAP generally, and targeting the Centennial project specifically. The Commenter lost this lawsuit in Superior Court, and recently filed an appeal.[848,849] The Commenter's objections to the AVAP generally, and the Centennial project within the West EOA specifically, are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

In response to this comment, the following documents are hereby added to the administrative record:

California Department of Transportation (Caltrans). 2017a (June). EIR Certification and Findings: California Department of Transportation Findings For Northwest State Route 138 Corridor Improvement Project From Interstate 5 to State Route 14 In Los Angeles County. Los Angeles, CA: Caltrans. http://media.metro.net/projects_studies/nw138/images/feir-feis/nw138_eir_certification_fsoc.pdf.

California Department of Transportation (Caltrans). 2017b (June). Final Environmental Impact Report/Environmental Impact Statement and Section 4(F) Evaluation: Northwest State Route 138 Corridor Improvement Project. Los Angeles, CA: Caltrans.

845 SCAG 2016a Exhibit 5.4, p. 101

846 California Department of Transportation (Caltrans). 2017a (June). EIR Certification and Findings: California Department of Transportation Findings For Northwest State Route 138 Corridor Improvement Project From Interstate 5 to State Route 14 In Los Angeles County. Los Angeles, CA: Caltrans. http://media.metro.net/projects_studies/nw138/images/feir-feis/nw138_eir_certification_fsoc.pdf.

847 Caltrans 2017b, Appendix J, pp. 73-80

848 Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cnty. of Los Angeles*, No. BS156932 (L.A. Cnty. Sup. Ct. May 22, 2017) ("AVAP Ruling") at p. 21

849 Center for Biological Diversity (CBD). 2017. Appeal Challenges Massive Growth Plans for L.A. County's Antelope Valley. Los Angeles, CA: CBD. https://www.biologicaldiversity.org/news/press_releases/2017/antelope-valley-08-10-2017.php.

http://media.metro.net/projects_studies/nw138/images/feir-feis/nw138_feir-feis.pdf.

Center for Biological Diversity (CBD). 2017. Appeal Challenges Massive Growth Plans for L.A. County's Antelope Valley. Los Angeles, CA: CBD. https://www.biologicaldiversity.org/news/press_releases/2017/antelope-valley-08-10-2017.php.

Response to Comment F.8-7A:

This comment's citation to the AVAP is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As this comment does not concern a significant environmental effect of the Project or the adequacy of the Draft EIR, no further response is required.

Response to Comment F.8-8:

The Draft EIR includes an appropriate calculation and analysis of the potential residential population of the Project, based on an average household size within the Project, which varies by residential product type. For example, a larger single-family home in either the Very Low Density Residential (VLDR), Low Density Residential (LDR), or Medium Density Residential (MDR) designation, is assumed to be occupied by more people and thus generate more traffic trips and consume more water.[850] The population generation rates assume 3.17 residents per single-family detached unit.[851] Conversely, smaller, multi-family units in the High Density Residential (HDR) or Very High Density Residential (VHDR) designation are assumed to be occupied by fewer people and thus generate fewer traffic trips and consume less water.[852] The population generation rate assumes 2.38 residents per single-family attached and multi-family units.[853] The Draft EIR therefore uses an estimate of approximately 57,150 maximum residents at Project buildout, which is estimated to occur in 2035.[854] This is in fact a conservative estimate, because the number of dwelling units constructed in each planning area are not likely going to be at maximum densities for every area, but would vary within the density range throughout the Project.[855] Similarly, household sizes may differ from the averages used, and the resulting residential population would likely be less than the 57,150 people assumed as a Project maximum.

The Project's consideration of so-called "ADUs" is also appropriate and consistent with CEQA requirements. As explained in the Centennial Specific Plan, a second unit or accessory dwelling unit (ADU) is "an additional dwelling unit accessory to a primary dwelling unit, sometimes called a granny flat, located on the same lot as a residence that does not require subdivision. It may have kitchen facilities and be rented without age restrictions, but not

850 DRP 2017, Appendix E of Appendix 5.10-A, Table E-1; *Id.,* Appendix 5.18-A, Table 2.1.2; *Id.,* Appendix 5.19-A, p. 3-2
851 *Id.,* Appendix 5.10-A, p. 2-14
852 *Ibid.*
853 *Id.,* Appendix 4.0-A, p. 2-14
854 *Id.,* p. 5.9-1
855 *Ibid.*

sold."[856] Under the Specific Plan, ADUs are not an additional unit, but rather are a reconfiguration of a single-family home. Consistent with the above-described average household sizes which inform the Draft EIR analysis, ADUs are permitted in the higher occupancy VLDR, LDR, and MDR designations (which would allow a reconfiguration of approximately 16,978 homes to include an ADU), and not permitted in the lower occupancy HDR or VHDR designations.[857] ADUs were therefore properly accounted for in Project residential population assumptions. As noted in the Draft EIR at page 4-19, whether any given single-family home is occupied by a large family, or is an "empty nest" occupied by only one or two adults, and whether the home has only one primary income earner or three income earners (e.g., a young adult or an adult resident of an ADU), is both speculative and irrelevant to the data-based estimates described above. Further, regardless of the actual makeup of a family in a single-family home, development must be consistent with the development standards for each applicable land use designation. Project population estimates have appropriately been prepared by experts under County supervision, including with regard to estimated household size and the associated environmental impacts of different types of dwelling units and configurations that include ADUs in permissible land use designations. In any case, under no circumstances may the Project exceed the maximum number of building units, which is 19,333, without further CEQA review.[858] If any dwelling units are proposed over the maximum allowable number as described in Draft EIR Section 4.0, Project Description, the County would need to consider an amendment to the adopted Specific Plan, and the amendment would legally be subject to the requisite CEQA review.

The development of ADUs has long been encouraged by state law, and as discussed further in *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437 ("S*ave Round Valley*"), CEQA does not compel a project description that assumes the development of any or a particular number of ADUs. As the Fourth District Court of Appeal explained in *Save Round Valley*, whether applicable lot owners will seek permission to build ADUs in permissible land use designations "depends initially upon the desires of future lot owners, who are unknown," and "there is no factual basis for believing that a future land owner is likely to do so. Any conclusions about their intentions to build second units would therefore be speculation."[859] As such, "even if the building of some second units might be foreseeable, it is impossible to predict how many units will be built, the size of such units, on which lots they might be built, their location within a lot, the visibility of a second unit from outside the subdivision, or how such units might impact the environment."[860] Therefore, rather than rely on speculation, the Project Draft EIR relied on peer-reviewed and County-reviewed methodology to prepare a data-based, conservative residential population assumption. Consistent with CEQA requirements, the Project Draft EIR has appropriately considered the impact of residential components of the Project, including with regard to the reconfiguration of a qualifying single-family unit to provide for an ADU.

856 *Id.,* Appendix 1-A of Appendix 4.0-A, p. 8
857 *Id.,* Appendix 4.0-A, Table 2-16, p. 2-46
858 *Id.,* p. 4-19
859 *Save Round Valley,* at 1450
860 *Ibid.*

Response to Comment F.8-9:

The use of ADU development rates in neighboring communities to create an estimate for the Project would be speculative, is irrelevant to the Project and Draft EIR analysis, and is not required under CEQA. Please see response to Comment F.8-8 for further discussion of ADUs and the Draft EIR's appropriate consideration of the anticipated Project residential population. With regard to on-site employment counts, and the related impact analyses including with regard to traffic, the Draft EIR relies on established, technical methodologies that have been peer reviewed by experts (see, e.g., letter submitted by Caltrans indicating concurrence with the methodology used in the Centennial Traffic Study, at Draft EIR Appendix 5.10-B) and reviewed by the County, including for example the employee assumptions associated with different categories of land use, such as retail and commercial. The methodologies are discussed, for example, in both Draft EIR Section 5.9, *Population, Housing, and Employment*, and the Centennial Specific Plan Traffic Study included as Draft EIR Appendix 5.10-A.

As discussed in more detail in response to Comment F.8-23, Draft EIR page 5.10-91 explains that the traffic analysis assumes that a portion of the Project workforce and resident population will live or work outside the Project area and will commute to jobs outside or within the Centennial Specific Plan area. The analysis also assumes that on-site residents and workers will travel for services and amenities outside of the Project. The porportion of internal and external Project area trips was derived from the North County Sub-area Traffic Model updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The North County Sub-area Traffic Model used for the Project analysis is the same model used by the County and other public agencies for transportation planning studies in the region, including the 2015 Antelope Valley Area Plan (AVAP) and County General Plan update EIRs. The model was also used by Caltrans in the preparation of the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS.

As discussed on pages 5.10-49 to 5.10-51 of the Draft EIR, the Project analysis includes a discussion of internal and external "tripends" and "trips." A "trip end" refers to a trip start or destination point. An internal tripend is a trip that starts or begins in the Project site, such as from a residence. A "trip" includes a starting tripend and ending tripend. An internal trip is a trip that both starts and ends within the Project site. An external trip is a trip with either a starting or ending point outside of the Project site. As discussed on Draft EIR pages 5.10-2 to 5.10-5, the Draft EIR uses the most recent version of the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County, including the Project site. This version of the model was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[861] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct.

[861] CEQA Guidelines § 21167.2

July 16, 2015); Petitioner's Opening Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[862]

The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. The model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be internal to the site, and 35 percent will be external to the site. The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As discussed on Draft EIR page 5.10-50 the Project includes schools, parks, and retail shopping areas within the Project site located and sized to meet the Project's residential and workforce needs. As discussed in more detail in response to Comment F.8-23, the model results for the Project's proportion of internal and external trips and tripends are consistent with available applicable traffic models for the Lancaster/Palmdale and Santa Clarita Valley areas and available information regarding internal, external and travel time to work from the 2011-2015 ACS 5-Year Estimates for 11 communities that with similar geographic characteristics and a comparable average workforce as the Project. The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[863] The comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable. Consequently, the North County Sub-Area Model used in the Draft EIR provides the best available information concerning the projected onsite population that would reside in the Project area and the onsite and offsite transit activity associated with the Project.

Draft EIR Section 5.9, Population, Housing, and Employment also analyzes historical and projected employment growth for the region contained in SCAG's 2012-2035 RTP/SCS, 2016-2040 RTP/SCS, and the AVAP, including for the entire SCAG region, Los Angeles County, the North Los Angeles County Subregion, the Antelope Valley, and the Project site specifically.[864] The section includes an anticipated number of permanent jobs that would be created by the Project, which is 23,675, and analyzes the relationship between this number and the above-described projections for the region and the Project site specifically,

862 Ruling on Submitted Matter, Ctr. For Biol. Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

863 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362

864 DRP 2017, pp. 5.9-18 to -21

concluding that no conflict would occur with regard to employment.[865] Rather, the Project would help to improve the region's jobs-housing ratio.[866] As is the case with the traffic analysis, the Draft EIR does not conclude that all such jobs *will* be filled by Project residents or provide an estimated number of jobs that would be filled by Project residents, but does appropriately evaluate the potential impact of creating 23,675 permanent jobs in a mixed use, Specific Plan setting.

Response to Comment F.8-10:

The Draft EIR clearly states that the Open Space designation allows for continued grazing, and refers the reader to Draft EIR Appendix 4.0-A.[867] Grazing would include temporary and long-term activities, possibly in perpetuity if determined necessary to maintain grassland values based on the Ranch-wide Management Plan (RWMP) (refer to MM 7-10).[868] The grazing timing and intensity within open space areas will be determined by the Project Biologist as a grassland management tool, if appropriate, for the potential benefit of native grasslands. Through implementation of MM 7-10, if managed cattle grazing is shown to adequately retain grassland resources, managed cattle grazing in portions of the Mitigation Preserve would continue to be utilized.

Response to Comment F.8-11:

This comment concerns potential future development that may substantially deviate from the balanced development described in the Draft EIR. The comment does not include relevant portions of the phasing discussion referenced on Draft EIR page 4-91, which state that although the phasing program may be revised by the Project Applicant/Developer, any such revision is subject to County approval during the tentative tract map (TTM) process required by the Los Angeles County Subdivision Ordinance and the development requirements in the Centennial Specific Plan.[869]

The Draft EIR discusses the Project Description in Section 4.0 and complies with all applicable requirements of the CEQA Guidelines. As discussed on page 4-1 of the Draft EIR, Section 15124 of the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations [CCR], Title 14) requires that an environmental impact report's (EIR's) project description contain (1) the precise location and boundaries of a proposed project; (2) a statement of objectives sought by the proposed project including the underlying purpose of the project; (3) a general description of the project's technical, economic, and environmental characteristics; and (4) a statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of the permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, State, or local laws, regulations, or policies. An adequate project description need not be exhaustive, but should supply the detail necessary for project evaluation. An EIR is the most

865 *Id.,* pp. 5.9-29 and -30
866 *Id.,* pp. 5.9-30 and -31
867 *Id.,* pp. 3-18, 4-24
868 *Id.,* p. 5.7-180
869 Final EIR Appendix 4.0-A.Rev

comprehensive form of environmental documentation identified in CEQA and the CEQA Guidelines. The Project Description in Draft EIR Section 4.0 provides the information needed to assess the environmental effects associated with the planning, construction, and operation of the Project. The mitigation measures for the Centennial Project are listed in the Mitigation Monitoring and Reporting Program (MMRP).[870]

The Draft EIR includes a Conceptual Phasing Plan implemented over a 20-year period.[871] As summarized in Draft EIR Table 4-1, Centennial Project Overview, and on Draft EIR page 4-6, at full buildout the Project would include approximately 12,323 acres and would allow up to 19,333 dwelling units (du) on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light manufacturing uses) on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. Proposed sites for major utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass approximately 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on approximately 145 acres. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use.

Development within the Project site will require the preparation and implementation of TTMs for each phase and component of the Project. As discussed on Draft EIR page 4-92, the TTMs serve as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[872] Chapter 4 of the Specific Plan describes the processes and procedures for implementing the Specific Plan, including the processes and procedures for subsequent Project approvals such as future TTMs. Chapter 4 of the Specific Plan also establishes mechanisms that allow for flexibility in the development of the Project to respond to market conditions over the anticipated buildout of the Project while ensuring consistency with the purpose and intent of the Specific Plan. Specific Plan Section 4.5.2, Discretionary Conformance Review, provides that significant modifications of the Specific Plan, including land use adjustments under Specific Plan Section 4.6, (Specific Plan Adjustment, Transfer, and Conversion Regulations) are subject to discretionary review and approval, including additional CEQA analysis as applicable.[873]

Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan.

870 *Id.,* Appendix 2.0-C.Rev
871 DRP 2017, Exhibit 4-20; pp. 4-91 and -92
872 Final EIR Appendix 4.0-A.Rev
873 DRP 2017, Appendix 4.0-A, p. 4-8

Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to the Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[874] sets forth the conditions for approval of subdivision maps and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and the physical improvements to be installed. The primary objectives of the Act include the coordination of subdivision design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[875] The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted cumulative conditions, are implemented without resulting in undue burdens to County and other taxpayers.

The MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. MMs 10-25 and 10-26[876] require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation, and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an

874 Government Code § 66410, et seq.

875 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.

876 Final EIR Appendix 2.0-C.Rev

environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the Draft EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, as the comment suggests, the Project's residential development substantially outpaces the proposed onsite employment or commercial land uses, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the Draft EIR. If these differences are found to generate new or more severe significant impacts, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

At that time, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

The Specific Plan and the MMRP require that project infrastructure be in place prior to residential, employment-generating and commercial development. As discussed on pages 4-92 to 4-96 of the Draft EIR, the first phase of development will include permanent and temporary uses, major infrastructure, public services, and roadway/circulation improvements to ensure that all services and infrastructure components are of sufficient size and capacity to serve early residents and occupants (e.g., schools, roadways, public park maintenance, and utilities). The MMRP requires that sufficient services and infrastructure, such as water, wastewater, utilities, roadways, be confirmed during the review and approval process for each TTM (see references to a "Tentative Tract Map" in the column titled, "When Monitoring to Occur" in Final EIR Appendix 2.0-C.Rev). The Draft EIR states that if future development phases are delayed or do not occur, these facilities will continue to provide permanent services and infrastructure. As a result, the Project will have incentives to develop residential, commercial and employment-generating uses in accordance with the balanced pattern discussed in the Draft EIR and required by the Specific Plan to ensure that early-phase infrastructure investments are efficiently utilized over time.

In summary, the Project Description provided in the Draft EIR meets all applicable CEQA requirements and provides sufficient information to analyze potential impacts. Future development will be implemented in accordance with the Specific Plan and the review and approval of TTMs for the site. The extent to which the balanced development required by the Specific Plan and discussed in the Draft EIR is being achieved over time, including environmental and traffic impacts, will be evaluated during the TTM review and approval process. If Project development does not occur as projected, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved. As a result, the Project cannot generate long-term development that substantially deviates from the

balanced development and associated interim and long-term traffic patterns described in the Draft EIR.

Response to Comment F.8-12:

The Commenter's opinion that the absence of specificity in project phasing renders the project description inadequate under CEQA is noted for the record, and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As discussed above in response to Comment F.8-11, information provided in the Draft EIR meets all applicable CEQA requirements and provides sufficient information to analyze potential impacts. The cases cited in the comment are inapposite to the Project and the Draft EIR. The Draft EIR significantly differs from the relevant factors considered by the courts in the cited cases, does not suffer from the shortcomings discussed in the vases, and is consistent with CEQA requirements. Each case cited in the comment concerns an environmental impact report (EIR) that did not describe or analyze clearly foreseeable project components or provided descriptions and analyses that were found to be so inconsistent that the Draft EIR was inadequate as an informational document.

In *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1450-51 ("*Santee*") the County of San Diego certified a Final EIR in which the project description described a "temporary" or "interim" project to expand a detention facility in Santee, but failed to specify any estimated timeframe for the project in the EIR.[877] The EIR's traffic analysis was "based on measuring the interim or temporary project at three years," but after preparation of the EIR, the lead agency stated a defined time period of *seven* years for the project.[878] At the same time, however, the lead agency also noted that it was the agency's intent to keep the detention facility remaining open into the foreseeable future if permanent replacement facilities could not be built and begin operating in the desired timeframe.[879] Under these circumstances, the *Santee* court held that the project description in the EIR was inadequate.[880] The *Santee* EIR defined as "temporary" a project that was in fact potentially indefinite, and as a result the EIR failed to analyze the reasonably foreseeable future use of the facility.[881]

Unlike the EIR in *Santee*, the Project Description and the Draft EIR accurately state that the Project involves permanent development that will operate into the foreseeable future. The Draft EIR properly examines the Project's full buildout impacts during both an estimated 20-year buildout period and during future operations. Future development will be implemented in accordance with the Specific Plan and the review and approval of tentative tract maps (TTMs) for the site. The extent to which the balanced development required by the Specific Plan and discussed in the Draft EIR is being achieved over time, including environmental and traffic impacts, will be evaluated as required by the Mitigation Monitoring and Reporting Program (MMRP)[882] the during the TTM review and approval process. If Project

877 *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1450-51 ("*Santee*")
878 *Id.,* at 1451
879 *Id.,* at 1451, 1454
880 *Ibid.*
881 *Id.,* at 1454
882 Final EIR Appendix 2.0-C.Rev

development does not occur as projected, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved. As a result, the Project cannot generate long-term development that substantially deviates from the balanced development and associated interim and long-term traffic patterns described in the Draft EIR as suggested in the comment. The comment provides no support for the claim that unbalanced development (e.g., solely residential development) could reasonably occur under the applicable land use approval process, the MMRP requirements for the Project, and the extreme outcome referenced in the comment is highly unlikely and purely speculative.

In *San Joaquin Raptor Rescue Center v. County of Merced* (2010) 149 Cal.App.4th 645, 655 ("*San Joaquin Raptor*"), the Court of Appeal concluded that the County of Merced's EIR for the expansion of an existing aggregate mining operation fundamentally misinformed readers regarding the mine's future operations: "[the EIR] indicates, on the one hand, that no increases in mine production are being sought, while on the other hand, it provides for substantial increases in mine production if the Project is approved." The expansion project allowed an increase in available mining acreage from 90 to 304 acres, which would result in an additional 30 years of operation, but the EIR concluded that the expansion "is not proposed to substantially increase daily or annual production."[883] The EIR said that the project would provide for an average production of 260,000 tons per year, and a maximum production level of 500,000 tons per year, whereas the average production rate over the four previous years had been 240,000 tons per year, and the highest production rate *ever* recorded was 312,890 tons per year in 1999.[884] The project also revised project hours of operation to allow for batch plant and loadout nighttime operations, which could periodically be "24-hours per day, and up to seven days per week for limited periods…" with unspecified durations that would depend on the needs of projects requiring the mine's materials at night.[885] The court concluded that the EIR was inadequate and fundamentally misleading, because it gave conflicting information about the nature and scope of the activity being proposed by emphasizing that it would not substantially increase production, despite the potential 24-hour per day operation for undefined periods and the new maximum production of 500,000 tons per year, which made the EIR's assumed average 260,000 ton per year baseline for analysis very unlikely.[886] Perhaps most importantly, as in *Santee*, it was "clear that this curtailed or shifting project description affected the EIR process" – the EIR's analysis explicitly assumed production of 260,000 tons per year analysis, which very likely understated the true volume.[887]

By comparison, the Project Draft EIR fully and consistently defines the scope of development, which is a maximum of 19,333 dwelling units, approximately 7,363,818 square feet of Business Park uses, 1,034,550 square feet of Commercial uses, 1,568,160 square feet of Institutional/Civic uses, 130,680 of Recreation/Entertainment uses, and 5,624 acres of Open

883 *San Joaquin Raptor Rescue Center v. County of Merced* (2010) 149 Cal.App.4th 650 ("*San Joaquin Raptor*")
884 *Ibid.*
885 *Id.,* at 651-652
886 *Id.,* at 655-657
887 *Id.,* at 657

Space.[888] The Draft EIR includes proposed infrastructure and service use locations, and sufficiently describes the process for future Tract Map approval for Project refinement. The Draft EIR also fully analyzes Project impacts, both during the approximately 20 years of buildout and during foreseeable future operations. The Draft EIR does not make, and the comment does not provide a citation to any inconsistent statement about the term or intended scope of the development in any way comparable with the findings in *San Joaquin Raptor.*

In *Communities for a Better Environment v. City of Richmond* ("*CBE*") (2010) 184 Cal. App. 4th 70, 76-77, 81-12, an EIR for increased and altered production at a Chevron refinery in Richmond acknowledged that "upgrades would expand the Refinery's options for using a wider range of crude oils." At the same time, the EIR stated that the project would not increase the refinery's ability to process heavier, lower quality crude and did not include any analysis of public health or other impacts related to processing heavier crude. Chevron's, however, filed conflicting information with the federal Securities and Exchange Commission which indicated that the central purpose of the project was to process heavier crude.[889] Further, the EIR contained conflicting statements about project objectives, indicating in different parts that the project "does not include any process and equipment changes that would facilitate the processing of heavier crudes at the Chevron Richmond Refinery," while also explaining that refiners have had to adapt to crude oil supply that is increasingly heavier and the project was being proposed in the context of those changes in crude oil supply.[890] The court concluded that the EIR was inappropriately vague and obscure because it did not appropriately explain its conclusion that the future crude processed would be "similar to that which is currently processed," especially given the conflicting information in the Draft EIR and other parts of the record.[891]

By contrast, the Project Draft EIR consistently and completely describes the proposed Project and fully analyzes foreseeable impacts during approximately 20 years of buildout and during foreseeable future operations. Further, the Specific Plan[892] and Draft EIR provide detailed information about the construction equipment anticipated to be required, proposed conceptual Project features including circulation, land use mix, open space, proposed infrastructure and service needs, and feasible mitigation to reduce Project impacts. The Draft EIR and Specific Plan do not make conflicting representations regarding the scope, impact of or any other aspect of the Project and do not obscure the Project's purpose and planned development components. The comment does not provide a cite to any statement made by the lead agency, Project Applicant or in any other source that is in any way inconsistent with the Draft EIR Project Description as discussed in *CBE.*

The Project Draft EIR provides detailed information about and analyzes the impacts of all proposed phases of development and Project operation, and also discloses that the precise Project buildout would be based on future market conditions, over an approximate 20-year

888 DRP 2017, page 4-6
889 *Communities for a Better Environment v. City of Richmond* ("*CBE*") (2010) 184 Cal. App. 4th 84
890 *Id.,* at 83
891 *Id.,* at 85, 89
892 Final EIR Appendix 4,0-A.Rev

period through a series of future subdivision maps.[893] This approach is fully consistent with CEQA requirements. The First District Court of Appeal, in *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal. App. 4th 1036 ("*CSTI*") held that a project description may provide the flexibility needed to respond to conditions and events that could affect its final design, provided the description contains information sufficient to evaluate and review the project's environmental impacts. In *CSTI*, the appellant contended that the City and County of San Francisco failed to certify a legally adequate EIR for the Treasure Island/Yerba Buena Island Project, a comprehensive plan to redevelop a former naval station on Treasure Island and Yerba Buena Island in the middle of the San Francisco Bay, into a large mixed-use community.[894] The EIR described the mixed-use community as including up to 8,000 residential units, 140,000 square feet of new commercial and retail space, up to 100,000 square feet of new office space, restoration and reuse of historic building on Treasure Island, approximately 500 hotel rooms, public utilities, 300 acres of parks, playground, and public open space, bicycle and transit facilities, and a new ferry terminal and intermodal transit hub.[895] The EIR indicated that construction and buildout of the project would be phased, and was anticipated to be completed over an approximately 15- to 20-year period.[896] The EIR included a conceptual description of each proposed phase, but explained that as the project was implemented over time, "the phasing could be adjusted for economic or constructability reasons," and such adjustments could "affect the number, order, and timing of phases."[897]

CSTI challenged the certification of the EIR, arguing that "at best, the EIR constitutes conceptual, program-level CEQA analysis", and was therefore insufficient as a project-level environmental document.[898] The court upheld the EIR, explaining that "the EIR made an extensive effort to provide meaningful information about the project, while providing for flexibility needed to respond to changing conditions and unforeseen events that could possibly impact the Project's design" and noting that "the basic characteristics of the Project under consideration in this case remained accurate, stable, and finite throughout the EIR process."[899] The *CTSI* court specifically rejected the arguments of the appellants in that case – which is also raised in the comment – that an EIR project description must "anticipate every permutation or analyze every possibility" and found that "[C]ourts [have not] required resolution of all hypothetical details prior to approval of an EIR, as CSTI implies."[900]

Consistent with *CSTI*, the Draft EIR includes a description of and an exhibit depicting the conceptual phasing plan, but fully discloses that market conditions may affect development timing and phasing, and development of the Project site can be expected to extend over a 20-year time frame.[901] The characteristics of the Project are described consistently, accurately,

893 DRP 2017, page 4-6
894 *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal. App. 4th 1044 ("*CSTI*")
895 *Ibid.*
896 *Ibid.*
897 Treasure Island/Yerba Buena Island Redevelopment Project Final EIR, pages II.79 through II.82
898 *CSTI,* at 1047
899 *Id.,* at 1053, 1055
900 *CTSI,* at 1054 [citing *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 909–910 and *City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325, 1336–1337]
901 DRP 2017, pp. 4-91 and -92; *Id.,* Exhibit 4-20

and finitely throughout the Draft EIR and in the Specific Plan. The comment provides no support for the claim that unbalanced development (e.g., solely residential development) could reasonably occur under the applicable land use approval process, the MMRP requirements for the Project, and the extreme outcome referenced in the comment is highly unlikely and purely speculative. The Draft EIR is consistent with CEQA requirements and does not fail to inform decision-makers and the public of the true scope of the Project from which all interested parties could assess the direct and indirect environmental effects of the Project as asserted in the comment.

The opinions raised in the comment regarding the Project Description are also similar to those considered and rejected by the Court of Appeal in *Dry Creek Citizens Coal. v. Cty. of Tulare* (1999) 70 Cal. App. 4th 20, 27 (*"Dry Creek*"). In *Dry Creek,* petitioners challenged an EIR for a proposed expansion of a surface mining operation by arguing that the EIR's project description provided only a conceptual description of the bypass channel, cutoff walls, and in-stream diversion structures that would be used in the operation. As the *Dry Creek* court noted:

> [CEQA Guidelines § 15124(c)] requires a "general description" of the project's technical characteristics. "General" means involving only the main features of something rather than details or particulars. The "general description" requirement for the technical attributes of a project is consistent with other CEQA mandates to make the EIR a user-friendly document. For example, Guidelines section 15140 states the EIR's must be written in plain language so that decisionmakers and the public can rapidly understand them. The general description requirement also fosters the principle that EIRs should be prepared early enough in the planning stages of a project to enable environmental concerns to influence the project's design. A general description of a project element can be provided earlier in the process than a detailed engineering plan and is more amendable to modification to reflect environmental concerns.
>
> (*Dry Creek,* at 28)

The *Dry Creek* court affirmed the adequacy of the EIR project description, despite the use of conceptual descriptions of certain elements, and specifically held that the fact that the project "defers approval of final designs . . . until after project approval" did not violate CEQA.[902] As the *Dry Creek* court noted, "[c]ourts should not interpret CEQA to impose procedural or substantive requirements beyond those explicitly required in the statutes or CEQA Guidelines, and CEQA does not mandate the detail appellants urge this court to require."[903]

In May 2017, the Los Angeles Superior Court affirmed the validity of the Antelope Valley Area Plan EIR against a lawsuit by the Commenter. Similar to the Project Draft EIR, the AVAP EIR provided a project description that identified the attributes of the full buildout of the plan,

[902] *Dry Creek,* at 34
[903] *Id.,* at 36 [citing CEQA § 21083.1]

but also provided for flexibility in the development of specific phases of future development.[904] In upholding the AVAP EIR, and specifically affirming the adequacy of the AVAP EIR's Project Description, the Superior Court noted, citing *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 199, that "[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project."[905]

Consistent with *Dry Creek* and the Court's ruling in favor of the AVAP EIR, the Draft EIR Project's Description is accurate, stable, finite, and complies with CEQA in all respects.

Response to Comment F.8-13:

The Commenter's opinion that the absence of specificity in project phasing renders the Draft EIR analysis of traffic, greenhouse gas (GHG) and air pollution unreliable is noted for the record, and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

With respect to phasing, as discussed in responses to Comments F.8-11 and F.8-12, the Draft EIR Project Description in Section 4.0 complies with all applicable requirements of the CEQA Guidelines. Consistent with Section 15124 of the California Environmental Quality Act (CEQA) Guidelines,[906] the Project Description includes (1) the precise location and boundaries of a proposed project; (2) a statement of objectives sought by the proposed project including the underlying purpose of the project; (3) a general description of the project's technical, economic, and environmental characteristics; and (4) a statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of the permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, State, or local laws, regulations, or policies. An adequate project description need not be exhaustive, but should supply the detail necessary for project evaluation. An EIR is the most comprehensive form of environmental documentation identified in CEQA and the CEQA Guidelines. The Project Description in Draft EIR Section 4.0 provides the information needed to assess the environmental effects associated with the planning, construction, and operation of the Project. The mitigation measures for the Centennial Project are listed in the Mitigation Monitoring and Reporting Program (MMRP).[907]

The Draft EIR includes a Conceptual Phasing Plan implemented over a 20-year period.[908] As summarized in Draft EIR Table 4-1, Centennial Project Overview, and on Draft EIR page 4-6, at full buildout the Project would include approximately 12,323 acres and would allow up to 19,333 dwelling units (du) on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light

904 Ruling on Submitted Matter, *Ctr. For Biol. Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. May 22, 2017]
905 *Id.,* at 21
906 CCR, Title 14
907 Final EIR Appendix 2.0-C.Rev
908 DRP 2017, Exhibit 4-20; *Id.,* pp. 4-91 and -92

manufacturing uses) on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. Proposed sites for major utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass approximately 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on approximately 145 acres. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use.

Draft EIR page 4-91 states that although the phasing program may be revised by the Project Applicant/Developer, any such revision is subject to County approval during the tentative tract map process required by the Los Angeles County Subdivision Ordinance and the development requirements in the Centennial Specific Plan.[909] Development within the Project site will require the preparation and implementation of tentative tract maps (TTMs). As discussed on Draft EIR page 4-92, the TTMs serve as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[910] Chapter 4 of the Specific Plan describes the processes and procedures for implementing the Specific Plan, including the processes and procedures for subsequent Project approvals such as future TTMs. Chapter 4 of the Specific Plan also establishes mechanisms that allow for flexibility in the development of the Project to respond to market conditions over the anticipated buildout of the Project while ensuring consistency with the purpose and intent of the Specific Plan. Specific Plan Section, 4.5.2 Discretionary Conformance Review, provides that significant modifications of the Specific Plan, including land use adjustments under Specific Plan Section 4.6, (Specific Plan Adjustment, Transfer, and Conversion Regulations) are subject to discretionary review and approval, including additional CEQA analysis as applicable.[911]

Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[912] sets forth the conditions for approval of a subdivision map and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and

909 Final EIR Appendix 4.0-A.Rev
910 *Ibid.*
911 DRP 2017, Appendix 4.0-A, p. 4-8
912 Government Code § 66410, et seq.

the physical improvements to be installed. The primary objectives of the Act include the coordination of a subdivision's design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[913] The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted cumulative conditions, are implemented without resulting in undue burdens to County and other taxpayers.

As discussed in response to Comment F.8-11, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern consistent with the Draft EIR and Specific Plan. Project development may only proceed after subsequent County approval of future TTMs. The TTM review and approval process and the MMRP requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. As discussed in the response to Comment F.8-12, the Project description and analysis of future development is accurate, stable, finite, and complies with CEQA in all respects. As stated in the May 2017 Los Angeles Superior Court decision affirming the validity of the AVAP EIR against a lawsuit brought by the Commenter, "[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project."[914] The Draft EIR also fully analyzes Project impacts, both during the approximately 20 years of buildout and during foreseeable future operations. The comment provides no support for the claim that unbalanced development (e.g., solely residential development or abandoned commercial and non-residential development) could reasonably occur under the applicable land use approval process, the MMRP requirements for the Project. The extreme outcomes referenced in the comment are highly unlikely and purely speculative.

With respect to traffic, as discussed on pages 5.10-49 to 5.10-51 of the Draft EIR, the Project analysis includes a discussion of internal and external "tripends" and "trips." Each "trip" includes two "tripends", a starting tripend and an ending tripend. A "tripend" refers to a trip start or destination point. An internal trip is a trip that both starts and ends within the Project site, and therefore has two internal tripends. An external trip is a trip with either a starting or ending point outside of the Project site, and therefore has just one internal tripend. An internal tripend can be a trip that either starts or ends in the Project site, such as from a residence or at a place of employment.

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913 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.

914 Ruling on Submitted Matter, *Ctr. For Biol. Diversity v. Cty. of Los Angeles*, No. BS156932, page 21 [L.A. Cty. Sup. Ct. May 22, 2017] citing *County of Inyo v. City of Los Angeles* [1977] 71 Cal.App.3d 185, 199

As discussed on Draft EIR pages 5.10-2 to 5.10-5, the Project Draft EIR uses the most recent version of the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County, including the Project site. This version of the model was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[915] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. July 16, 2015]; Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Jan. 18, 2017]). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[916]

The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As discussed on Draft EIR page 5.10-50 the Project includes schools, parks, and retail shopping areas within the Project site located and sized to meet the Project's residential and workforce needs. The Project site is relatively isolated from other, similar amenities and most of the trips generated by travel to and from these locations will be internal to the Project area. In addition, at buildout, the Project will include approximately 10.1 million square feet (sf) of commercial office, shopping/retail, and industrial land uses that will provide approximately 23,675 jobs, many of which would be filled by future residents. In comparison, applicable traffic models for the Lancaster/Palmdale area, which is larger than the Project but also relatively isolated from other developed amenity and employment locations, project that 70 percent of all tripends are internal to the region.[917]

915 CEQA § 21167.2

916 Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. May 22, 2017], at p. 13

917 Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale

Similarly, traffic models indicate that 74 percent of the total tripends in the Santa Clarita Valley will be internal when the region is built out.[918]

The North County Sub-Area Model estimates of the Project's average daily internal and external trips and tripends at buildout is also consistent with available census bureau data of the percentage of residents who work within or outside of their places of residence for communities with similar locational characteristics as the Project. The table below summarizes the 2011-2015 American Community Survey (ACS) 5-Year Estimates of the percentage of all workers aged 16 or older working in their places of residence, or internal to 11 communities that are relatively isolated from other employment locations and that have approximately the same average total workforce as the Project at full buildout.

	Total Workforce Over 16 Years of Age	**Percent Working in Own Community**
Santa Maria California	43,861	60%
El Centro California	15,368	57%
Tehachapi California	3,343	54%
Porterville California	18,810	53%
Barstow California	7,927	51%
Paso Robles California	14,771	48%
Madera California	18,525	46%
Lancaster California	53,503	46%
Watsonville California	22,271	45%
Santa Clarita California	84,987	37%
Palmdale California	55,867	32%
AVERAGE	**30,839**	**48%**
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table S0810		

The ACS data indicates that the percentage of workers that are employed in their place of residence ranges from 60 percent in Santa Maria, California to 46 percent in Lancaster, California and 32 percent in Palmdale, California. The average percentage of work within the place of residence for the 11 communities is 48 percent. As discussed on Draft EIR page 5.10-50, most of the Project trips will be generated by residential land uses, and an average single-family residential unit generates approximately nine home-based trips per day. About two of these nine trips are home-based-work trips related to travel directly to and from work. The remaining trips are related to travel between residential units for a non- work activity such as school, shopping, or recreation, which may be trips that are entirely local or may represent one leg of a journey between home and the workplace. The percentage of internal trips and tripends for non-work activity in locations such as the Project which provide schools, recreational facilities and shopping opportunities that are relatively far from other options is generally higher than for work-related trips. Residents in relatively isolated

[918] Santa Clarita Valley Consolidated Traffic Model Version 4.1, City of Santa Clarita and the County of Los Angeles

locations are more willing to utilize local school, shopping, and recreational facilities than to modify or change employment even if the desired work requires a significant daily commute.

The internal trip rate for the Project that results from the North County Sub-Area Model is approximately the same as the average internal trip rate for work commutes in the 11 communities in California included in the ACS data (48 percent). Since more daily trips in a community are related to non-work purposes, and the percentage of non-work internal trips is typically higher than for employment purposes, these data indicate that the North County Sub-Area Model internal and external trip estimates for the Project are reasonable. A Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[919] This comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

The MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. MMs 10-25 and 10-26[920] require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation, and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, as the comment

919 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362

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suggests, the Project's residential development substantially outpaces the proposed onsite employment or commercial land uses, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the EIR. If these differences are found to generate new or more severe significant impacts, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

With respect to the Draft EIR GHG and air quality analysis, as discussed above the Draft EIR adequately describes the proposed Project buildout and meets CEQA requirements with regard to project description. CEQA Section 21166 requires the preparation of a subsequent or supplemental EIR if (a) substantial changes are proposed in the Project which would require major revisions of the EIR; (b) substantial changes occur with respect to the circumstances under which the Project is being undertaken which will require major revisions in the EIR; or (c) new information, which was not known and could not have been known at the time the EIR was certified as complete, becomes available. In the event that the review and approval process for subsequent Project TTM and related approvals determines that new or more severe significant GHG or air quality impacts than considered in the Draft EIR could occur, a new public review and comment process and County discretionary consideration of tract map applications with new or revised Project elements would be necessary before additional development could be approved.

As discussed above, the Project cannot result in excess GHG or air quality emissions or cause a "carbon debt" due to significantly unbalanced development as suggested in the comment without triggering additional review. If the extreme hypothetical included the comment were to occur, the Project would require a supplemental or subsequent EIR to address the significant deviation in GHG and air quality emissions considered in the Draft EIR. The Draft EIR acknowledges that any such major Project change would require further CEQA analysis.[921] Similarly, any change to Project design and components that would cause new or more significant adverse climate change or air quality impacts would trigger the requirement for supplemental or subsequent CEQA review. Any such further CEQA review would also require the contemplation of feasible mitigation measures to avoid or reduce impacts.

In summary, and as also discussed in responses to Comments F.8-11 and F.8-12, the EIR Project's Description, including the discussion of Project phasing, is accurate, stable, finite, and complies with CEQA in all respects. The analysis of Project internal and external trips and tripends utilizes the updated North County Sub-Area Model developed by the County for the 2015 AVAP update. The AVAP EIR, including the traffic analysis, were upheld in a lawsuit brought by the Commenter in May 2017 and are presumed valid under CEQA. The model results for Project internal and external trips and tripends are consistent with data from 11 similarly located communities provided in the most recent 5-year ACS estimates published by the U.S. Census Bureau. The analysis of potential traffic, GHG and air quality impacts

[921] DRP 2017, p. 4-91

properly analyzes the full buildout of the Project, incorporates the results of the North County Sub-Area Model and complies with CEQA requirements in all respects.

Response to Comment F.8-14:

With regard to the provision of school sites as part of the Project, the Project Applicant/Developer has consulted with the applicable school districts concerning the number and location of school sites required for the Project. Draft EIR Section 4.0, Project Description, includes multiple school sites based on the most current student generation rates for residential households when the Draft EIR was prepared. The one proposed K-5 and three proposed K-8 schools in the western section of the Project site, within the Gorman District boundaries, would have a total capacity for 4,980 students and would be adequate to accommodate the 4,708 Project-area students who would reside within the Gorman District service area.[922] The two K-8 schools included in the Westside Union Elementary School District (WUSD) portion of the Project site would have a total capacity for 2,760 students, which would accommodate the 2,551 Project-area students who would reside within the WUSD service area.[923] The planned high school site in the central portion of the Project site would have a minimum size of 60 acres and be capable of accommodating up to 3,350 students, which would accommodate the 2,885 Project-generated high school students.[924]

The ultimate sizing of school sites would depend on further consultation with the school districts with regard to necessary inter-district transfers, the grade breakdown for students attending the schools, the implementation of school size reduction efforts, building layout and configuration needs, and the outdoor facility needs for each school.[925] The final designation of school sites for the Project will be completed with each future tract map.[926] As required by MM 15-2 in the Mitigation Monitoring and Reporting Program (MMRP) for the Project,[927] the Applicant/Developer is required to enter into agreements with all school districts for the provision of school facilities to serve the Project prior to approval of a tentative map. The current agreements between the Project and local school districts,[928] provide that school sites would be conveyed to the school district for the exclusive use for a school and related education and recreational purposes.

However, the school district may decide that a site is not needed for a school. This is not a decision that is up to the discretion of the Applicant/Developer, but rather is subject to school district discretion. The current agreements between the Project and local school districts[929] provide that if a school site is subsequently determined to be surplus property by the school district, the Project Developer will have the right of first refusal to acquire the land. Also, if the school district is unwilling to acquire the land that has been reserved by the

922 *Id.,* p. 5.15-15
923 *Id.,* p. 5.15-17
924 *Id.,* p. 5.5-19
925 *Id.,* pp. 5.15-17 and -19
926 *Id.,* p. 5.5-18
927 Final EIR Appendix 2.0-C.Rev
928 DRP 2017, Appendices 5.15-B and 5.15-C
929 *Ibid.*

Project Applicant/Developer as a school site by the applicable acquisition deadline, the Applicant/Developer is no longer required to reserve the site and may develop it with overlying or alternative uses allowed by the Specific Plan.[930] However, the total number of permitted residential units on the Project site would not change from the maximum of 19,333 housing units analyzed in the Draft EIR.

Consequently, and contrary to the comment, the Project cannot reject school sites that are desired by the applicable school districts, the Draft EIR provides a description of how school site identification and rejection by a district could occur, and a school site rejection cannot result in the development of "more homes" as suggested in the comment. The comment provides no evidence of any kind supporting the plausibility of such an unlikely outcome. In fact, access to schools in close proximity with residential units is a highly valued amenity that increases the desirability of and demand for housing units. The relationship between property values and schools is the primary reason why communities with accessible schools have decisively approved significant school tax and bond measures in California notwithstanding the state's requirements that these measures be approved by a supermajority vote.[931] Consequently, residential developments have significant economic incentives to ensure that schools are implemented with housing in a balanced manner.

In addition, as discussed in responses to Comments F.8-11 and F.8-12, the MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each tentative tract map (TTM) application. Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, as the comment suggests, school sites are rejected by a district in accordance with the district's agreements

930 Final EIR Appendix 4.0-A.Rev

931 See https://ballotpedia.org/Culver_City_Unified_School_District_Bond_Issue,_Measure_CC_(June_2014).

with the Project[932] the potential environmental and traffic impacts that could be generated by this result would analyzed prior to TTM approval. If the analysis finds that Project-related traffic, or related air quality and climate change impacts exceed the levels considered in the EIR a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project the impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

In summary, Project development implemented through the TTM review and approval process and subject to the MMRP requirements will not allow for significant deviations from the traffic, GHG, air quality or other related impacts considered in the Draft EIR without additional CEQA review and approval. The Draft EIR analysis of school sites provides future flexibility about specific development details that is consistent with CEQA and does not render the Project Description unstable or incomplete.[933]

Response to Comment F.8-15:

The Project Description includes a summary of the Project's transportation management obligations in Section 4.5.5, Mobility Plan, and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[934] The Mitigation Monitoring and Reporting Program (MMRP)[935] requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26). The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

932 DRP 2017, Appendices 5.15-B and 5.15-C
933 *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* [2014] 227 Cal.App.4th 1036
934 DRP 2017, Appendix 5.10-A
935 Final EIR Appendix 2.0-C.Rev

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party in the columns applicable to Final EIR MMs 10-25 and 10-26[936]). MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Program implementation measures, which include verification to the County that, prior 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on- demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be

936 *Ibid.*

consistent with the Centennial Specific Plan.[937] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consequently, compliance with the requirements in accordance with the MMRP, which incorporates the Specific Plan Mobility Plan requirements, provides an enforceable, mandatory mechanism ensuring that the provisions of MMs 10-25 and 10-26, including the internal and peak hour external transit modes requirements, are achieved. The traffic studies required for each tentative tract map application will provide the County with traffic monitoring information sufficient to evaluate compliance with MMs 10-25 and 10-26. Excess single occupancy vehicle commuter trips or underutilized transit services, for example, could be documented by the required monitoring during early phases of the Project. These results would require the identification and implementation of TDM measures during the tentative map review and approval process that would increase the use of alternative transit modes over time. If the Project transportation conditions evaluated in each tentative map application indicate, for example, that total Project trips and the transit modes utilized for internal and peak hour external trips at buildout would not achieve the levels required in the MMRP, the County has the authority deny the approval of any new tentative maps and additional development until a means for comply with these requirements is demonstrated to the satisfaction of the County. Alternatively, a new project application, with new CEQA analysis, would be required for any additional development. Contrary to the comment, the Project mitigation measures, including the required internal and external trip transit mode requirements, are enforceable and feasible.

Response to Comment F.8-16:

This comment concerns the Transportation Management Association (apparently mis-cited as a "transmit management authority" in the comment) and transit facilities for the Project. The Project Description includes a summary of the Project's transportation management obligations in Section 4.5.5, Mobility Plan, and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[938] The Mitigation Monitoring and Reporting Program (MMRP)[939] requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26). The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs,

937 Final EIR Appendix 4.0-A.Rev
938 DRP 2017, Appendix 5.10-A
939 Final EIR Appendix 2.0-C.Rev

including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party in the columns applicable to Final EIR MM 10-25 and 10-26[940]). MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Program implementation measures, which include verification to the County that, prior 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on- demand car or van services, or other types of transit

940 *Ibid.*

to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[941] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

MM 10-25 specifically requires that the "Project Applicant/Developer" implement the Mobility Plan, including the provision of "two transit hubs to serve as alternative means of transportation on the Project site." As discussed above, these measures, and the creation and funding of the TMA, are obligations that the Project must fulfill prior to the approval of any tentative tract map. The amount of the funding provided for the TMA and to meet the mandatory transit facility obligations imposed on the Project by the MMRP, and verified by the County prior to the approval of each tract map, will be determined based on applicable costs and TMA implementation requirements, including TDM measures, determined in the traffic analysis required for each tract map. Page 4-37 of the Draft EIR states that, as in other unincorporated areas of Los Angeles County, funding for the local transit system would come from a combination of Proposition A and property taxes. Proposition A is a County measure enacted by the voters in 1980 that provides funding to increase the County's ability to respond to gridlock and mobility challenges. The Project would be eligible to apply for this funding subject to availability and the approval of County transit agencies. Property taxes are also a common means of funding transit improvements that benefit the regional community. As discussed on page 4-38 of the Draft EIR, the costs of existing fare revenues currently cover about 90 percent of the costs of commuter service in the Antelope Valley, and it may be possible to cover any fare-related funding shortfall for Project transit services by seeking approval for Proposition A and property taxes. The MMRP, however, does not reference either funding source for the Project transit facilities, and requires that the Project

941 Final EIR Appendix 4.0-A.Rev

fund and implement all transit and related improvements described in the Draft EIR and MMRP. If Proposition A or property tax revenues are not available the Project is required to provide full funding for all of these improvements.

Response to Comment F.8-17:

This comment concerns the preferred State Route (SR) 138 preferred alternative designated in June 2017. The Draft EIR discusses the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"), including SR-138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Project Draft EIR was filed by the County on May 15, 2017 and the 60-day comment period began on May 17, 2017.

As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements.

In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. As discussed on Draft EIR pages 5.10-2 to 5.10-5, both the Project Draft EIR and the NW SR-138 FEIR use the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County. The Project Draft EIR utilizes a more recent version of the model that was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. The STS also uses the traffic forecasts from the updated North County Sub-Area Model provided by the County to analyze potential Project and cumulative impacts to reflect the most current information available regarding traffic conditions in the North County region.

The Draft EIR considered potential Project impacts with improvements required to accommodate the full buildout of the Project under existing traffic plus Project buildout conditions, and cumulative traffic plus Project buildout conditions. The Draft EIR identified mitigation measures (MMs) that would maintain acceptable level of service (LOS) standards at all applicable highway segments, intersections and ramps. To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and

(c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR.[942] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[943]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[944]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[945]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards[946].

The STS compares the Project's potential impacts identified in the Draft EIR for Interstate (I) 5, SR-14, and SR-99 facilities using the volume to capacity methodology specified by the Congestion Management Plan for Los Angeles County and the Project's potential impacts using the Caltrans' recommended HCM methodology. HCM calculations were prepared for 62 locations within the Draft EIR study area consisting of freeway segments in advance of and after major system interchanges as well as representative locations between major system interchanges. The analyzed locations provide a comprehensive coverage of the Draft EIR study area because they include the freeway facilities with the greatest potential to be affected by congestion. Under existing plus Project conditions, the Draft EIR and the STS show that all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[947] Under cumulative plus Project conditions with mitigation, the Draft EIR and the STS show that almost all applicable highway segments, intersections and ramps

942 Final EIR, Appendix 5.10-C, Sections 2.5 and 3
943 *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
944 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2, and 3-9
945 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
946 *Id.,* Appendix 5.10-C, Tables 3-7, 3-8, and 3-9
947 *Id.,* Appendix 5.10-C, Table 4-1

would operate at acceptable LOS levels.[948] The STS indicates that certain study locations, such as the Grapevine grade segment of I-5, would not meet HCM-based LOS standards because topographic conditions, lane and speed controls and other localized conditions would result in higher traffic densities. As shown in STS Table A-5, however, LOS conditions would be worse under cumulative without Project conditions, and LOS conditions improve under cumulative with Project conditions with the implementation of the Project mitigation measures.[949] Consequently, the Project does not result in a significant impact at any location that does not meet HCM-based LOS standards under cumulative with Project conditions with mitigation.

As discussed above, the Draft EIR considered improvements to SR-138 that would be required to accommodate the full buildout of the Project under cumulative traffic conditions. The implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative conditions, and additional improvements consistent with the SR-138 facilities considered in the Project Draft EIR would be required to accommodate all of the Project's full buildout traffic under long-range cumulative conditions. The NW SR-138 FEIR also clarified certain aspects of the SR-138 design details that would be implemented with Alt 2, including the number and locations of intersections along SR-138 from I-5 to SR-14. The NW SR-138 FEIR addressed several types of intersection configurations for each location, but defers selection of the final configurations to the SR-138 design phase. Subject to minor adjustments for consistency with these Alt 2 design details, the SR-138 facilities that would result from the additional improvements to Alt 2 required for full Project buildout under long-range cumulative conditions as described in the STS are substantially similar to the full buildout SR-138 facilities discussed in the Draft EIR. The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[950]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[951]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[952]

As discussed in the STS, and as shown below, the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2.[953] As required by

948 *Id.,* Appendix 5.10-C, Table 4-2
949 *Id.,* Appendix 5.10-C, Section 5
950 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
951 *Id.,* Appendix 5.10-C, Section 2.1
952 *Id.,* Appendix 5.10-C, Section 2.4
953 *Id.,* Appendix 5.10-C, Section 5

MMs 10-3 and 10-4, the Project will contribute fair share funding or provide funding for SR-138 improvements in accordance with a mitigation agreement with Caltrans for the implementation of Alt 2, improvements required to connect the Project circulation system with the Alt 2 facilities, and, if confirmed in traffic studies submitted in conjunction with the review and approval process for future Project tract maps, additional SR-138 improvements that may be required to accommodate full Project buildout under cumulative traffic conditions.

As requested by Caltrans, the following revisions to the Draft EIR are provided to reflect the preferred Alternative 2 SR-138 improvements identified in the NW SR-138 FEIR.

The third full paragraph on Draft EIR page 4-41 is hereby revised as follows:

> The draft NW SR-138 EIR/EIS, TAR and ICE Report ~~do~~ did not identify a preferred alternative and Caltrans deferred the selection of a preferred alternative to the Final EIR/EIS. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 includes a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. Caltrans has also reserved the right to determine the specific preferred intersection control based on the traffic and safety data at the time the improvements occur. Thus, depending on the timing of the implementation of the realigned SR-138; and the timing of the implementation of the Project; the ultimate connection requirements for Project roads to SR-138 may need additional future design analysis in conjunction with future phases of development. All construction activities within Caltrans right-of-way would be closely coordinated with Caltrans, subject to their review and design standards, and subject to their approval. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The second full paragraph on Draft EIR page 5.10-36 is hereby revised as follows:

> There is no implementation schedule for the NW SR-138 Project; however, the draft EIR/EIS for the proposed improvements was made available for public review in July 2016. The draft NW SR-138 EIR/EIS, TAR and ICE Report ~~do~~ did not identify a preferred alternative and Caltrans deferred the selection of a preferred alternative to the Final EIR/EIS. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 would include a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. Caltrans has also reserved the right to determine the specific preferred intersection control based on the traffic and safety data at the time the improvements occur. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The carryover paragraph on Draft EIR page 7-9 is hereby revised as follows:

> existing alignment of SR-138. The portion of SR-138 between 300th Street West and Gorman Post Road, which is applicable to the Project site, is envisioned by Caltrans to be a six-lane expressway. This alternative would involve at-grade signalized intersections at Cement Plant Road and 300th Street West; a grade-separated overcrossing at the Gorman Post Road intersection (same as Build Alternative 1); and a new grade separate structure (standard box culvert) east of Quail Lake near the airport (same as Build Alterative 1). Same as Build Alternative 1, this alternative would include an extension of the existing RCB culvert at the Quail Lake Outlet into the west branch of the California Aqueduct. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 would include a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-

lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The two full paragraphs on Draft EIR page 5.10-130 are hereby revised as follows:

The on-site roadway network has been designed to accommodate projected traffic from proposed land uses. Impacts on the internal roadway system would be less than significant after mitigation. If improvements at Project access points on SR-138 are not constructed, impacts would be significant and unavoidable. Project buildout would result in significant traffic impacts on off-site roadways and freeways, including SR-138, I-5 mainline segments and interchange ramps, and arterial roadway intersections (see Table 5.10-~~30~~32 below). Mitigation measures have been identified to reduce all significant Project impacts, as listed in Table 5.10-~~31~~33, Mitigation Summary. In addition, MM 10-~~23~~20 would protect the right-of-way needed to widen and realign SR-138.

Although mitigation measures identified for Caltrans facilities would reduce Project impacts, it is outside the control of the County of Los Angeles to implement these measures. The ~~CTIP~~ Traffic Mitigation Agreement or the Project Applicant's fair share contribution requirements in MM 10-3 and MMs 10-6 through 10-~~28~~24 and MMs 10-~~31~~27 through 10-~~45~~41 will provide funding for the planning, design, and construction of certain improvements. MM 10-4 requires the Project Applicant to work to establish a funding program to collect fair share contributions from other projects for the required improvements. Compliance with these mitigation measures would reduce traffic impacts to a less than significant level. Potential Project impacts would be significant and unavoidable, however, if the improvements are not constructed by Caltrans because the County (as the Lead Agency) lacks

jurisdiction and control over State highway facilities and cannot mandate the construction of improvements to these facilities.

Table 5.10-33 on Draft EIR pages 5.10-132 to 5.10-134 is hereby revised as follows:

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation **SR-138**
Existing Plus Project Mitigation • Improve SR-138 to a four lane expressway from I-5 to 240th Street West and to a limited access conventional four-lane highway from 240th Street West to 190th Street West, with right-of-way reserved for a six-lane expressway between I-5 and 300th Street West or comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-6/Traffic Study MM-1) • Intersection improvements from the westerly access of the Centennial Specific Plan area to SR-14 ~~30th Street West or~~ comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o Specific Plan Westerly Access and SR-138 o Specific Plan Central Access and SR-138 o 300th Street West and SR-138 ~~o 290th Street West and SR-138~~ o Margalo Drive and SR-138 o Three Points and SR-138 o ~~245th~~ 250th Street West and SR-138 o ~~230th~~ 210th Street West and SR-138 ~~o 190th Street West and SR-138~~ o 170th Street West and SR-138 ~~o 110th Street West and SR-138~~ o 90th Street West and SR-138 o 60th Street West and SR-138 ~~o 30th Street West and SR-138~~ **Cumulative Conditions Mitigation** • Dedicate right-of-way within the Project site at each site access location to accommodate the ultimate intersection or interchange configuration as determined by the Northwest 138 Corridor Improvement project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~ (MM 10-20~~23~~/Supplemental Traffic Study MM-18) • To accommodate up to 75 percent of the Project and anticipated cumulative development, ~~C~~contribute fair share of adding one lane in both directions (six lanes total) on SR-138 from I-5 to 300th Street West and one lane in both directions (four lanes total) on SR-138 from 300th Street West to the SR-14 interchange (in addition to above), or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-22~~24~~/Supplemental Traffic Study MM-19) • To accommodate 100 percent of the Project and anticipated cumulative development, ~~C~~contribute fair share of adding a second additional ~~one auxiliary~~ lane in both directions (six lanes total) on SR-138 from 300th Street West to approximately ½ mile east of 250th~~245th~~ Street West (in addition to above), or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-23~~25~~/Supplemental Traffic Study MM-20) • Fair share participation and/or contribution to the Kern COG RTP/SCS improvement projects on SR-58 between I-5 in Kern County and I-15 in San Bernardino County, which could include development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors. (MM 10-24~~26~~/Traffic Study MM-21) • ~~Fair share participation and/or contribution to the SR-138 improvements to a limited access facility with grade-separated interchanges, consistent with the County's analysis of the AVAP, or fair share participation and/or contribution to the SR-138 improvements (freeway/ expressway or expressway/limited access conventional highway) being advanced by Caltrans in the Northwest 138 Corridor Improvement project (specific improvements pending Caltrans selection of a preferred alternative). (MM 10-27/Traffic Study MM-22)~~ • ~~Fair share participation and/or contribution to strengthening and widening the inside and outside shoulders of I-5 between the Fort Tejon and Grapevine Road interchanges and between the SR-138 and Lake Hughes Road interchanges. (MM 10-28/Traffic Study MM-23)~~
I-5
Cumulative Conditions Mitigation • On-Site Transportation Management Association (TMA) that would coordinate and manage the following programs: (MM 10-25~~29~~/Traffic Study MM-24) 1. Ride Share Program 2. Transit Program 3. Commuter Bus Program • Contribute fair share to planned freeway mainline improvements for the following segments: (MM 10-27~~31~~/Traffic Study MM-25) 1. Between Parker Road and SR-14 – add one HOV or HOT lane in each direction. 2. Between Lake Hughes and Parker – add one auxiliary lane in each direction. • Fair share participation and/or contribution to the development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors between I-5 in Kern County and I-15 in San Bernardino County. (MM 10-24~~26~~/Traffic Study MM-26)
I-5/SR-138 Interchange
Existing Plus Project Mitigation • To mitigate the westbound SR-138 to SB I-5 connector ramp, construct one auxiliary lane to the I-5 mainline, or contribute fair share to the SR-138/I-5 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-18~~21~~/Traffic Study MM-16) **Cumulative Conditions Mitigation** • To mitigate the westbound SR-138 to SB I-5 connector ramp, contribute fair-share to the construction of two auxiliary lanes to the I-5 mainline, or contribute fair share to the SR-138/I-5 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-28~~32~~/Traffic Study MM-27) • To mitigate the northbound I-5 to eastbound SR-138 connector ramp, contribute fair share to the construction of two auxiliary lanes to the I-5 mainline before the northbound I-5 to eastbound SR-138 connector ramp, or contribute fair share to the SR-138/I-5 connector ramps improvements being

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-29~~33~~/Traffic Study MM-28)
SR-14/SR-138 Interchange
Cumulative Conditions Mitigation • Contribute fair share to the construction of one mainline auxiliary lane and a second off-ramp lane for the SR-14 northbound off ramp to SR-138, or contribute fair share to the SR-138/SR-14 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-30~~34~~/Traffic Study MM-29) • Contribute fair share to the construction of a second lane on the SR-14 southbound on-ramp from SR-138, or contribute fair share to the SR-138/SR-14 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-31~~35~~/Traffic Study MM-30)
Off-Site Intersections
Existing Plus Project Mitigation • Contribute fair-share to recommended mitigation measures at the following intersections, or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o Intersection improvements from the westerly access of the Centennial Specific Plan area to the SR-14 interchange ~~30th Street West~~ (MMs 10-7 through 10-17~~20~~/Supplemental Traffic Study MM-2 through MM-15) o I-5 SB Ramps and Sedona/The Old Road (Intersection 26) (MM 10-19~~22~~/Traffic Study MM-17) **Cumulative Conditions Mitigation** • Contribute fair-share to recommended mitigation measures at the following intersections, or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o SR-14 SB Ramps and SR-138 (Caltrans Intersection) (MM 10-32~~36~~/Supplemental Traffic Study MM-31) o SR-14 NB Ramps and SR-138 (Caltrans Intersection) (MM 10-33~~37~~/Supplemental Traffic Study MM-32) o I-5 NB Ramps and Lake Hughes (LA County/Caltrans Intersection) (MM 10-34~~38~~/Supplemental Traffic Study MM-33) o I-5 SB Ramps and Sedona/The Old Road (LA County/Caltrans Intersection) (MM 10-19~~22~~/Traffic Study MM-34) o I-5 SB Ramps and Magic Mountain (LA County/Caltrans Intersection) (MM 10-35~~39~~/Traffic Study MM-35) o I-5 NB Ramps and Magic Mountain (City of Santa Clarita/Caltrans Intersection) (MM 10-36~~40~~/Traffic Study MM-36) o I-5 SB Ramps and Valencia (LA County/Caltrans Intersection) (MM 10-37~~41~~/Traffic Study MM-37) o I-5 NB Ramps and Valencia (City of Santa Clarita/Caltrans Intersection) (MM 10-38~~42~~/Traffic Study MM-38) o I-5 SB Ramps and McBean (LA County/Caltrans Intersection) (MM 10-39~~43~~/Traffic Study MM-39)

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
o I-5 SB Ramps and Calgrove (City of Santa Clarita/Caltrans Intersection) (MM 10-~~40~~44/Traffic Study MM-40) o I-5 NB Ramps and Calgrove (City of Santa Clarita/Caltrans Intersection) (MM 10-~~41~~45/Traffic Study MM-41)
393SR: State Route; I: Interstate; Kern COG: Kern Council of Governments; RTP/SCS: Regional Transportation Plan/Sustainable Communities Strategy; HOT: high-occupancy toll; Caltrans: California Department of Transportation.
Sources: ~~Stantec 2017 (Table 4-11).~~ Draft EIR Appendix 5.10-A (Traffic Study) and Final EIR Appendix 5.10-C (Supplemental Traffic Study)

The following mitigation measures and accompanying text beginning with the last paragraph on Draft EIR page 5.10-145 to the end of the first full paragraph on Draft EIR page 5.10-157 are hereby revised as follows:

MM 10-3 The Project Applicant/Developer shall seek to enter into a ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement for Land Development Impacts to California State Transportation Facilities with Caltrans and shall comply with the terms the ~~CTIP agreement~~ Traffic Mitigation Agreement if approved and implemented. Compliance with the ~~CTIP~~ Traffic Mitigation Agreement shall constitute compliance with the mitigation measures for the Project's traffic impacts on the State highway system. Any required improvements that result from direct Project impacts (i.e., not from cumulative impacts), and are required on Caltrans-owned facilities, shall be implemented through a ~~CTIP~~ Traffic Mitigation Agreement. Any required improvements that result from cumulative traffic impacts may be implemented through payment of fair share fees.

MM 10-6 *(Supplemental Traffic Study MM-1)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement to improve SR-138 to a four lane expressway from I-5 to 240th Street West and to a limited access four lane conventional highway from 240th Street West to 190th Street West, with right-of-way reserved for a six-lane expressway between ~~I-5~~ Gorman Post Road and 300th Street West, or comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-7 *(Supplemental Traffic Study MM-2)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall

comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the following intersection improvements at Specific Plan Westerly Access and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions.
- Construct intersection to include: two NB left-turn lanes, three NB through lanes and one NB right-turn lane.
- In the SB direction, construct two left turn lanes, three through lanes and ~~one free-flow~~ two right-turn lanes.
- In the EB direction, construct three left-turn lanes and one right-turn lane.
- In the WB direction, construct two left-turn lanes and ~~a~~ ~~free-flow~~ two right-turn lanes.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-8 *(Supplemental Traffic Study MM-3)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Specific Plan Central Access and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions.
- In the NB and SB directions, construct two left-turn lanes, three through lanes and one right-turn lane.
- In the EB direction, construct two left-turn lanes and one right-turn lane.
- In the WB direction, construct two left-turn lanes and ~~a~~ ~~free-flow~~ two right-turn lanes.

- Install traffic signal and include SB and NB right-turn overlap phasing.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-9 *(Supplemental Traffic Study MM-4)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 300th Street West and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions.
- Construct two left-turn lanes and one right-turn lane in the EB direction and two left-turn lanes and dual right-turn lanes in the WB direction.
- In the NB direction, construct two left-turn lanes, three through lanes, and one right-turn lane.
- In the SB direction, construct two left turn lanes, three through lanes and one ~~free-flow~~ right-turn lane.
- Install traffic signal and include WB right-turn overlap phasing.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-10** *(Traffic Study MM-5)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 290th Street West and SR-138:~~

- ~~Widen SR-138 to a four-lane highway from westerly project entrance to 290th Street West, with auxiliary lanes between intersections, resulting in three through lanes in the WB and EB directions.~~

~~• Additional intersection improvements include: two EB left turn lanes, one WB right turn lane, two SB left turn and two SB right-turn lanes.~~

~~• Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-1011 *(Supplemental Traffic Study MM-6)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Margalo Drive and SR-138:

- Widen SR-138 to a four-lane ~~highway~~ expressway from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions.~~
- Additional intersection improvements include: ~~one~~ two EB left turn lanes, ~~and~~ one WB right-turn lane, one SB left-turn lane, and two SB right-turn lanes.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-1112 *(Supplemental Traffic Study MM-7)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Three Points and SR-138:

- Widen SR-138 to a four-lane ~~highway~~ expressway from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs~~ resulting in ~~three~~ two through lanes in the WB and EB directions.
- Additional improvements include adding one NB left-turn lane, ~~and~~ one SB left turn lane and one SB right turn lane.

Or contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-12~~13~~ *(Supplemental Traffic Study MM-8)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 250~~245~~th Street West and SR-138:

- Widen SR-138 to a four-lane expressway ~~highway~~ from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs~~ resulting in ~~three~~ two through lanes in the WB and EB directions.
- Additional improvements include adding one ~~NB left-turn lane and one~~ SB left turn lane, one EB left-turn lane, one WB U-turn lane and one dedicated ~~EB~~ WB right-turn lane.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-13~~14~~ *(Supplemental Traffic Study MM-9)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 210th ~~230~~th Street West and SR-138:

- Widen SR-138 to a four-lane limited access conventional highway from 240th ~~290~~th Street West to 190th Street West.
- Additional improvements include one SB left-turn lane, one ~~SB~~ NB ~~right~~ left-turn lane, ~~and~~ one EB left-turn lane, one EB right-turn lane, and one WB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-15** *(Traffic Study MM-10)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 190th Street West and SR-138:~~

- ~~Widen SR-138 to a four-lane highway from 290th Street West to 190th Street West with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions.~~
- ~~Additional improvements include adding one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left turn lane and one dedicated EB right-turn lane.~~
- ~~Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-~~14~~16 *(Supplemental Traffic Study MM-11)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 170th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.
- Additional improvements include one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-17** *(Traffic Study MM-12)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 110th Street West and SR-138:~~

- ~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.~~
- ~~Additional improvements include: one EB left-turn lane, one WB left-turn lane, two NB left-turn lanes, one SB left-turn lane and two SB right-turn lanes.~~
- ~~Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-15~~18~~ *(Supplemental Traffic Study MM-13)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 90th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.
- Additional improvements include: ~~one~~ two EB left-turn lanes, one EB right-turn lane, one WB left-turn lane, one WB right-turn lane, one NB left-turn lane and one SB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-16~~19~~ *(Supplemental Traffic Study MM-14)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 60th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.

- Additional improvements include: one EB left-turn lane, one EB right-turn lane, one WB left-turn lane, one WB right-turn lane, one NB left-turn lane and one SB left-turn lane.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-17~~20~~ *(Supplemental Traffic Study MM-15)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at ~~30th Street West~~ the SR-14 and SR-138 interchange:

- ~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.~~
- ~~Additional improvements include adding one EB left-turn lane and one WB left-turn lane.~~
- Install traffic signals at the NB off-ramp and the SB off-ramp.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-18~~21~~ *(Traffic Study MM-16)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of one auxiliary lane at the connector ramp from westbound SR-138 to southbound I-5 for existing plus Project conditions

MM 10-19~~22~~ *(Traffic Study MM-17 and MM-34)* To provide adequate capacity at The Old Road at I-5 SB Ramps/Sedona intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute

fair share funding toward the addition of a second southbound left-turn lane from The Old Road to the I-5 Southbound On-Ramp.

MM 10-2023 *(Supplemental Traffic Study MM-18)* To mitigate the increase of side-street delay for the existing adjacent off-site areas and for planned on-site side streets along SR-138, the Project Applicant/Developer shall either (1) comply with the terms of the ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement or (2) dedicate right-of-way within the project site at each site access location to accommodate the ultimate intersection or interchange configuration to be determined by the Northwest Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~ at the following SR-138 intersections:

- Westerly Access
- Central Access
- 300th Street West
- ~~290th Street West~~

MM 10-21 *(Supplemental Traffic Study MM-22)* To provide adequate on- and off-site capacity to accommodate up to 10 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall comply with the terms of the Traffic Mitigation Agreement for the following SR-138 intersection improvements for site access:

- Westerly Access: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one shared NB through/right lane, one SB left-turn lane, and one shared SB through/right lane. Install traffic signal.
- Central Access: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one NB through lane, one NB right-turn lane, one SB left-turn lane, one SB through lane, and one SB right-turn lane. Install traffic signal.
- 300th Street West: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one

NB left-turn lane, one shared NB through/right lane, one SB left-turn lane, and one shared SB through/right lane. Install traffic signal.

- 190th Street West: Provide one EB left-turn lane, one EB through lane, one WB through lane, one WB right-turn lane, one SB left-turn lane, and one SB right lane.

MM 10-2224 *(Supplemental Traffic Study MM-19)* To provide adequate on- and off-site capacity to accommodate up to 75 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the widening of SR-138, including:

- Addition of ~~an auxiliary~~ one additional lane in each direction (six lane~~s total~~ freeway) from I-5 to Gorman Post Road
- Addition of two additional lanes in each direction (six lane expressway) from Gorman Post Road to 300th Street West
- Addition of one additional lane in each direction (four lane expressway) from 300th Street West to 240th Street West
- Addition of one additional lane in each direction (four lane limited access conventional highway) from 240th Street West to the SR-14 interchange

MM 10-2325 *(Supplemental Traffic Study MM-20)* To provide adequate on- and off-site capacity to accommodate 100 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the widening of SR-138, including:

- Addition of ~~an auxiliary~~ a second additional lane in each direction (six lanes total) from 300th Street West to approximately ½ mile east of 250th ~~245th~~ Street West
- Construct additional intersection turn lanes at the following SR-138 intersections:
    - Westerly Project Access
    - 300th Street West
    - Margalo Drive

- Three Points Road
- 60th Street West

MM 10-2426 *(Traffic Study MM-21 and MM-26)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards RTP/SCS improvement projects on SR-58 between I-5 in Kern County and I-15 in San Bernardino County, as verified by the County in consultation with the Kern COG and Caltrans. Improvements could include development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors.

~~**MM 10-27** *(Traffic Study MM-22)* To provide adequate capacity on SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for the SR-138 improvements to a limited access facility with grade-separated interchanges, consistent with the County's analysis of the AVAP, or fair share participation and/or contribution to the SR-138 improvements (freeway/expressway or expressway/limited access conventional highway) being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

~~**MM 10-28** *(Traffic Study MM-23)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the CTIP or (2) contribute fair share funding towards the following planned improvements to I-5:~~

- ~~I-5 between Fort Tejon and Grapevine Road and between SR-138 and Lake Hughes Road interchanges: Strengthening and widening the inside and outside shoulders of I-5.~~

MM 10-2529 *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs.

The Project Applicant/Developer, through the required implementation of the Mobility Plan, shall:

- Reinforce and serve the Land Use Plan;
- Provide future residents, visitors and employees with multiple modes of transit/non-single occupancy vehicle (non-SOV) accessibility for internal and external trips ~~by future residents and visitors~~;
- Provide options to reduce vehicle trips and emissions by linking effective travel demand management with transportation systems and parking policies;
- Provide residents and employees on the Project site with multiple modes of transportation options (i.e., walk, bike, public transit, private auto, car share, bike share, etc.);
- Provides for 80 percent on average, but no less than 50 percent of each Village's residential units to be located within one-half mile of a Village center that includes retail and service uses;
- Provide parks within a 5-minute walk (0.25 mile) of 80 percent of all residential units;
- Provide a transit route easement no less than 25 feet wide in the Centennial Commerce District connecting the Town Center, Business Park, and Industrial/Civic areas and also northerly connecting to the Village Five Core;
- Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than ~~single-occupancy automobile~~ SOV use ~~by 30 percent in relation to standard ITE-generation rates for the overall Project~~; ~~and~~
- Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs ~~single-occupancy automobiles by 20 percent~~.;
- Require TMA implementation of a program to coordinate with automotive dealers on the Project site to promote CNG, electric, and hybrid electric vehicles~~.~~;

- Require TMA oversight of requirement for service fleet vehicles for agencies or businesses located on-site to be alternative fuel vehicles to the maximum extent feasible, as determine by the Project Applicant/Developer.; and
- Require TMA implementation of a combination of measures to provide adequate temporary bike parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure.

The Circulation Plan sets forth requirements for roadway classifications; intersection controls; and traffic calming measures. Where approved by the California Department of Transportation (Caltrans) and the County and where maintenance and durability costs are comparable to traditional materials, use "cool" pavement materials, which reduce heat island effect.

MM 10-2630 *(Traffic Study MM-24)* Each component of the Mobility Plan incorporates Transportation Demand Management (TDM) features to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and thereby reduce pollutant emissions. Related to this is the creation and ongoing operation of a Transportation Management Association (TMA) to fund and manage the operation of ongoing transportation programs, including but not limited to transit and on-demand services.

The key TDM elements that are inherent in the overall Mobility Plan are:

- Sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas;
- Small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations;
- Pedestrian environments incorporated with public streets;

- Transit route easement connecting the residential and commerce areas;
- Parking behind buildings to encourage walking in retail areas along street frontage; and
- Parks within 0.25 mile of 80 percent of all residential units.

MM 10-27~~31~~ *(Traffic Study MM-25)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards the following planned improvements to I-5:

- I-5 between Lake Hughes and Parker: Addition of one auxiliary lane in each direction.
- I-5 between Parker Road and SR-14: Addition of one HOV or HOT lane in each direction.

MM 10-28~~32~~ *(Traffic Study MM-27)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of two auxiliary lanes at the connector ramp from westbound SR-138 to southbound I-5 for ~~Year 2035~~ cumulative buildout conditions.

MM 10-29~~33~~ *(Traffic Study MM-28)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of two auxiliary lanes at the connector ramp mainline before the northbound I-5 to eastbound SR-138 connector ramp.

MM 10-30~~34~~ *(Traffic Study MM-29)* To provide adequate capacity at the SR-14/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at SR-14/SR-138:

- Construction of one auxiliary lane and a second off-ramp lane for the SR-14 northbound off ramp to SR-138.

MM 10-31~~35~~ *(Traffic Study MM-30)* To provide adequate capacity at the SR-14/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at SR-14/SR-138:

- Construction of a second lane on the SR-14 southbound on-ramp from SR-138.

MM 10-32~~36~~ *(Supplemental Traffic Study MM-31)* To provide adequate capacity at the SR-14 SB Ramps and SR-138 interchange, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the reconfiguration of the interchange to include two eastbound through lanes and ~~three~~ two westbound through lanes~~. In the southbound direction, add a second right-turn lane;~~ and install a traffic signal ~~and include right-turn overlap phasing~~ or (2) contribute fair share funding for intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-33~~37~~ *(Supplemental Traffic Study MM-32)* To provide adequate capacity at SR-14 NB Ramps and SR-138 interchange, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the reconfiguration of the interchange to include two eastbound through lanes and two westbound through lanes ~~and, in the northbound direction, add two left-turn lanes~~ and a traffic signal or (2) contribute fair share funding for intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-34~~38~~ *(Traffic Study MM-33)* To provide adequate capacity at Lake Hughes Road at I-NB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the addition of one lane to the northbound off-ramp and restripe the configuration to include one left-turn, one shared left/right-turn lane, and one dedicated right-turn lane.

MM 10-35~~39~~ *(Traffic Study MM-35)* To provide adequate capacity at the Magic Mountain Parkway at I-5 SB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the restriping of the southbound off-ramp to provide two left-turn lanes, one shared left-turn/through lane, and one right-turn lane.

MM 10-36~~40~~ *(Traffic Study MM-36)* To provide adequate capacity at the Magic Mountain Parkway at I-5 NB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the conversion of the shared through/right-turn lane to a shared left/through/right-turn lane.

MM 10-37~~41~~ *(Traffic Study MM-37)* To provide adequate capacity at the Valencia Road at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the striping of a third westbound through lane.

MM 10-38~~42~~ *(Traffic Study MM-38)* To provide adequate capacity at the Valencia Road at I-5 NB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the traffic signal modification to add a northbound right-turn overlap phase.

MM 10-39~~43~~ *(Traffic Study MM-39)* To provide adequate capacity at the McBean Parkway at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the restriping of the dedicated westbound right-turn lane to a shared through/right-turn lane.

MM 10-40~~44~~ *(Traffic Study MM-40)* To provide adequate capacity at the Calgrove Road at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward adding a second eastbound through lane and a de-facto right-turn lane and a second through lane in the westbound direction.

MM 10-41~~45~~ *(Traffic Study MM-41)* To provide adequate capacity at the Calgrove Road at I-5 NB Ramps intersection, the Project

Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward restriping to add a westbound de facto right-turn lane.

Since Caltrans has ~~deferred the selection of a preferred build alternative for the Northwest 138 Corridor Improvement Project and has also~~ reserved the right to determine the specific types of intersection controls at the time the improvements occur ~~and MMs 10-6 through 10-27 and MMs 10-31 through 10-35 would mitigate the Project's impacts and cumulative impacts on the SR-138~~, ~~these~~ mitigation measures related to intersection controls on SR-138 are subject to change pending Caltrans determination of the specific types of intersection controls that will be implemented ~~preferred 138 Corridor alternative~~. T~~herefore, t~~he Centennial Project will contribute its fair share and/or contribute towards the cost of the Northwest 138 Corridor Improvement Project preferred Alternative 2. ~~for the alternative ultimately selected by Caltrans and Metro.~~ Refer to the Traffic Study (Draft EIR Appendix 5.10-A) and the Supplemental Traffic Study (Final EIR Appendix 5.10-C) for additional detail on the traffic mitigation.

Under MM 10-25~~29~~, the Project is required to reduce use of automobiles by implementing PDFs and TDM measures to be administered and monitored by a Transportation Management Association. These mandatory mitigation measures require ~~the reduction of single-occupancy automobile use for~~ that a minimum of 20 percent of total peak morning and afternoon off-site commute~~s~~ trips and a minimum of 30 percent of total on-site internal trips be completed by using transit modes other than ~~20 percent, and require the reduction of~~ single occupancy automobile use ~~within the Project site by 30 percent~~. The traffic analysis above conservatively assumes full trip (i.e., single occupancy automobile) volumes on- and off-site, and thus, is conservative and actual traffic volumes from the Project are anticipated to be lower.

5.10.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation measures have been established to reduce the Project's significant impacts on traffic access and circulation. However, these mitigation measures call for improvements to Caltrans facilities, which are outside the control of the County of Los Angeles and the Project Applicant. Implementation of the ~~CTIP~~ Traffic Mitigation Agreement or fair share contributions by the Project Applicant in accordance with MM 10-3, MMs 10-6 through 10-24~~28~~, and MMs 10-27~~31~~ through 10-41~~45~~ will ensure that the Project provides fair share funding required to mitigate potential Project impacts. Implementation of a traffic mitigation fee program (MM 10-4) would provide a mechanism for providing fair share contributions from other projects and future activity affecting State facilities.

Response to Comment F.8-17A:

Comment noted and the preferred alternative identified in the referenced document has been integrated into the Draft EIR as discussed in response to Comment F.8-17.

Response to Comment F.8-18:

The open space areas that fall into the Mitigation Preserve will remain preserved in perpetuity and managed long-term by Tejon Ranch Conservancy.[954] No development will be allowed to occur in the Mitigation Preserve. Outside of interstitial areas, conservation easements will be recorded.[955] Inside the development area in interstitial areas, development will not be allowed pursuant to the *Centennial Specific Plan*, but a conservation easement will not be recorded. CEQA does not require recordation of a conservation easement for lands not authorized for development as part of the Project, including interstitial Project open space areas.

In addition, to clarify the scope of permitted uses within the open space areas associated with the Project, four open space subdesignations (three on-site, one off-site) are hereby added to page 4-24 of Section 4.0, Project Description, of the Draft EIR, and conforming edits are made to the Specific Plan:

> CENTENNIAL OPEN SPACE DEFINITIONS
>
> Mitigation Preserve: The Mitigation Preserve encompasses 43,079 acres of land to be preserved and managed in perpetuity for biological resources values. The Preserve consists of an On-site Mitigation Preserve, comprised of approximately 3,866 acres within the Project boundaries, but outside of the development footprint, and an Off-site Mitigation Preserve made up of 39,213 acres within adjacent and nearby off-site lands. These mitigation lands provide sufficient land and biological resource values to implement mitigation strategies to fully mitigate for Project biological resource impacts.
>
> On-site Mitigation Preserve
>
> The On-site Mitigation Preserve is divided into two areas. The southern on-site mitigation area includes 968 acres located immediately south of the development footprint along south side of SR-138. The northern on-site mitigation area consists of 2,898 acres located to the north and west of the development footprint on the west side of the aqueduct. All of the lands within the on-site portion of the Mitigation Preserve are within Los Angeles County SEA No. 17.
>
> Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as

954 DRP 2017, PDF 7-10
955 *Id.,* PDF 7-11

hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Off-site Mitigation Preserve

The Off-site Mitigation Preserve is divided into six areas. Area 1 consists of 6,417 acres located adjacent to and immediately east of the southeastern corner of the Project site. Area 2 consists of 2,556 acres located adjacent and contiguous to the northwestern portions of the Project site. Nearly all of the land within these two preserve areas also occurs within SEA No. 17. Area 3 consists of 4,183 acres; this mitigation area is located in Kern County, immediately north of the Project site. Area 4 consists of 7,319 acres located on the northern slope of the Antelope Valley, northeast of both Area 3 and the Project site. Area 5 consists of 643 acres and is a square-shaped parcel located in Kern County on the northern slope of the Antelope Valley, immediately east of Area 4 and northeast of the Project site. Area 6 consists of 2,429 acres and is located in Kern County on the northern slope of the Antelope Valley, farthest to the northeast of the Centennial Project site. Area 7 consists of two distinct areas that comprise 15,668 acres total. Area 7 is in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and boarders Area 6 to the north. The combined off-site Mitigation Preserve area amounts to 39,213 acres of mitigation lands. Cumulatively, both on and off-site, the Mitigation Preserve encompasses 43,079 acres of Project mitigation lands. The majority of three of these areas, Areas 3 and, 4, and 5, are the subject of the Wildlife Conservation Board conservation easements that expressly allow for such mitigation use of these lands. These areas, although available for mitigation including enhancement, restoration, and enhancement, are not available for mitigation acreage value as preservation. Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have

a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Green Space

Disturbed Green Space consists of areas within the project boundary that are impacted and will need to be mitigated. Disturbed Green Space will be amenities for the Project and could include one or more of the following uses: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. No Mitigation credit has been taken into account for the Project impacts from the Green Spaces. While Green Spaces could be impacted initially, the concept of these areas is to restore it for community amenities and visual aesthetics between neighborhoods of development.

Undisturbed Green Space consists of areas within the project boundary that are not impacted and require no mitigation. There is no project mitigation credit taken for preserving these areas. To preserve these areas and to make sure there is no future mitigation needed, the uses are restricted to the following: Continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

Response to Comment F.8-19:

Comment noted. Specific responses to comment in the referenced document have been provided in responses to Comments F.8-354 to F.8-422.

Response to Comment F.8-20:

The Lead Agency disagrees with this comment's characterization of the Project as "classic sprawl". To the contrary, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of

Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's *Centennial Specific Plan* "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2). In making this determination, SCAQMD evaluated the Project from a "regional perspective" (see Comment D.4-1). When regional planning priorities are taken into consideration, it is clear that the Project cannot fairly be characterized as "classic sprawl," as explained below.

The Project Addresses Regional Housing Need

California's housing shortage has reached crisis levels.[956] Between 1980 and 2010, the construction of new housing units in the Los Angeles metro region fell far behind the national average.[957] During this period, new housing construction grew by 54 percent in the typical U.S. metro area, whereas new housing units in the Los Angeles metro area grew by just 20 percent.[958] The result has been skyrocketing housing prices. In 1970, California home prices exceeded the national average by 50 percent.[959] By 1980, the gap had widened to 80 percent.[960] As of 2015, the average home price in California exceeds the national average by 250 percent.[961] California rental prices are no better. Today, the average monthly rent in California exceeds the national average by 50 percent.[962]

Predictably, the impact of the housing crisis has been hardest on the region's most vulnerable populations. Between 1990 and 2012, poverty levels in the SCAG region have increased by 69 percent, with a quarter of all children living in poverty.[963] In the Los Angeles metro region, approximately 30 percent of the median household's total income is used to pay housing costs, 7 percent more than the national average.[964] However, the poorest 25 percent of Los Angeles metro area households spend, on average, 67 percent of their income on housing.[965] As a result, these low-income households are forced to spend less on other essentials. According to Harvard's Joint Center for Housing Studies, low-income households who spend more than 50 percent of their income on housing also spend 39 percent less on food than do households that spend less than 50 percent of income on

956 California, State of, Legislative Analyst's Office (LAO). 2015. California's High Housing Costs: Causes and Consequences (p. 28). Sacramento, CA: LAO. http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf.
957 *Id.,* p. 10
958 *Ibid.*
959 *Id.,* p. 12
960 *Id.,* p. 3
961 *Id.,* p. 7
962 *Id.,* p. 12
963 SCAG 2015, p. 3.14-13
964 LAO 2015, p. 25
965 *Id.,* p. 26

housing.[966] To seriously mitigate California's housing shortage and its disproportionate impact on low income households, California must construct 100,000 additional residential units on top of the 100,000 to 140,000 housing units the state is expected to build annually, and these units must be located almost exclusively in California's costal metro areas, including Los Angeles County.[967]

SCAG is the region's designated Metropolitan Planning Organization (MPO) and serves as a forum for regional agencies to engage in cooperative decision making and regional planning activities. Among other important functions, SCAG is required by law to prepare a Regional Housing Needs Assessment (RHNA) in consultation with the California Department of Housing and Community Development (HCD).[968] The RHNA quantifies the region's existing and future housing need for all income levels and allocates a fair share of that need to each city and county in the region.[969] The County is in turn required by law to periodically update its General Plan housing element to accommodate the County's fair share of the regional housing need by identifying sufficient land designated for residential use, subject to HCD approval.[970] HCD certified the County's current housing element in April 2014.[971]

SCAG projects that, through 2040, the regional population will grow by 20 percent, resulting in a net increase of approximately four million additional residents.[972] The entire North Los Angeles County Subregion, which includes Antelope Valley and the Project site, will have 245,473 households by 2020 and 331,399 households by 2040, an increase of 85,926 households over 20 years.[973] The unincorporated portion of this subregion is projected to have 69,982 households in 2020 and 116,546 households in 2040.[974] As explained in Draft EIR Section 5.9, Population and Housing, the County's housing element indicates that 30,145 new housing units are needed to meet future housing demand through 2021, a portion of which will be provided by the Project. It is anticipated that SCAG will adopt the next regional RHNA allocation in Fall 2020, with updated housing elements due by Fall 2021.

The Project is Consistent with the Region's Sustainable Communities Strategy

The RHNA also serves a key role in California's efforts to reduce statewide GHG emissions. The California Global Warming Solutions Act of 2006, adopted by Assembly Bill 32 (AB 32), identifies global warming as a serious threat to California's economy and environment, and directs the California Air Resources Board (CARB) to establish a comprehensive regulatory program to reduce the state's greenhouse gas (GHG) emissions to 1990 levels by 2020. To this end, AB 32 requires CARB to prepare a "Scoping Plan" for achieving the maximum

966 *Id.,* p. 27
967 *Id.,* pp. 34, 35
968 Government Code § 65584
969 *Id.,* §§ 65583(a)(1)
970 *Id.,* § 65580
971 California, State of, Department of Housing and Community Development, Division of Housing Policy Development (HCD). 2014. Letter from Glen A. Campora, HPD Assistant Deputy Director, to Richard J. Bruckner, Director of Los Angeles County Department of Regional Planning, dated April 20, 2014, RE: Los Angeles County's 5th Cycle (2013-2021) Adopted Housing Element. Sacramento, CA: HCD. http://www.hcd.ca.gov/community-development/housing-element/docs/lanlos_angeles_cou043014.pdf.
972 SCAG 2016a, p. 3
973 DRP 2017, Table 5.9-9
974 *Id.,* p. 5.9-16

technologically feasible and cost effective GHG emission reduction by 2020. The current Scoping Plan was adopted in 2014 and is expected to be updated in late 2017 or early 2018.[975,976] The 2017 update will include GHG reduction measures necessary to achieve a 40 percent reduction in GHG emissions below 1990 levels by 2030, as required by Senate Bill 32 (SB 32).

As explained in the Scoping Plan, the transportation sector is by far the largest source of California's GHG emissions, accounting for approximately 37 percent of total emissions.[977],[978] By way of comparison, the residential and commercial sectors account for just 6 percent and 5 percent of statewide GHG emissions, respectively, primarily attributable to the end use of natural gas and electricity.[979] Per the Scoping Plan, GHG emissions caused by electricity and natural gas use will be achieved through a variety of measures, including but not limited to de-carbonization (e.g., renewable energy portfolio standards; distributed solar and wind energy generation), carbon pricing (e.g., cap and trade), more stringent energy efficiency requirements (e.g., CALGreen building standards; pipeline efficiency improvements), demand response requirements (e.g., improved grid reliability), and waste management (e.g., recycling programs).[980]

The Scoping Plan also describes measures to achieve targeted GHG reductions of passenger vehicle emissions associated with the land use sector.[981] Key recommended actions include, but are not limited to, strengthening the state's Low Carbon Fuel Standard, putting 4.2 million zero-emission vehicles (ZEVs) on state roads, and increasing the use of ZEV buses and trucks. Finally, the Scoping Plan relies on implementation of so-called Sustainable Communities Strategies (SCS) prepared pursuant to Senate Bill 375 (SB 375) to reduce passenger vehicle miles traveled (VMT) and their associated GHG emissions through integrated land use and transportation planning.[982]

SB 375 tasks CARB with calculating per capita GHG emissions reduction targets for each of the regional MPOs.[983] Each MPO must then adopt an SCS that describes a regional development pattern and transportation network that, if implemented, will feasibly reduce VMT in an amount sufficient to achieve the regional GHG reduction target.[984] The SCS is adopted as a component of each MPO's federally mandated Regional Transportation Plan (RTP). By law, every SCS must accommodate the region's projected population growth over

975 California, State of, California Air Resources Board (CARB). 2014b (May). *First Update to the Climate Change Scoping Plan*. Sacramento, CA: CARB. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

976 California, State of, California Air Resources Board (CARB). 2016b (December 2). 2030 Target Scoping Plan Update, Discussion Draft. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/2030target_sp_dd120216.pdf.

977 California, State of, California Air Resources Board (CARB). 2014. AB 32 Scoping Plan. Sacramento, CA: CARB. http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm.

978 California, State of, California Air Resources Board (CARB). 2017b (January). The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

979 *Ibid.*

980 CARB 2014; CARB 2017b

981 *Ibid.*

982 *Ibid.*

983 Government Code § 65080

984 *Id.,* § 65080

a 20-year period, as well as an 8-year projection of the regional housing need, as determined through the RHNA process.[985]

In 2010, CARB set the current GHG reduction target for the SCAG region at 8 percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035.[986] Shortly thereafter, SCAG, its member agencies, and regional stakeholders engaged in a public process to prepare the region's first SCS. In order to weigh relative costs and benefits, the 2012 RTP/SCS working group evaluated four regional development patterns that would be capable of achieving the region's GHG reduction target while also accommodating future growth projections and housing needs.[987] The land use scenarios varied with respect to the mix of location (e.g., greenfield development vs. infill development), housing type (e.g., single-family versus multifamily), and transportation investments (e.g., roadway versus transit improvements).[988] These different land use scenarios were developed to explore their relative merits and they informed the project alternatives evaluated in the environmental impact report that SCAG prepared for the 2012 RTP/SCS (2012 RTP/SCS EIR).[989]

When it adopted the 2012 RTP/SCS, SCAG ultimately settled on a balanced land use plan that assumes a significant increase in multi-family housing to be constructed in urban infill areas and so-called High Quality Transit Areas (HQTA), but also targets some suburban and rural pockets of the region for additional housing and employment growth.[990] Under the SCAG's balanced land use plan, 68 percent of all new homes in the region would be constructed as multi-family units, and over 50 percent of new housing and employment growth would be located in urban infill areas and HQTAs.[991] The balanced land use plan also provides for approximately 33 percent of all new housing units to be constructed in suburban and rural residential areas of the region.[992] Over the County's initial objection, the 2012 RTP/SCS targets the Project site for significant growth, relying on socioeconomic projections at the level of individually mapped Traffic Analysis Zones (TAZs).[993,994,995] Indeed, SCAG's TAZ maps project that over 22,000 new households will be constructed in the Project area by 2035.[996]

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985 *Ibid.*

986 SCAG 2016a

987 Southern California Association of Governments (SCAG). 2012a. (April). 2012-2035 Regional Transportation Plan (p. 114). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf.

988 *Id.,* p. 117

989 *Ibid.*

990 SCAG 2012a, pp. 129, 130

991 Southern California Association of Governments (SCAG). 2011 (December). *Draft Environmental Impact Report for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* (SCH #2011051018) (p. 2-27). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/peir/2012/draft/2012dPEIR_Complete.pdf.

992 *Id.,* p. 2-30

993 SCAG 2012a, pp. 110, 111; DRP, p. 6-3

994 Southern California Association of Governments (SCAG). 2012f (April). *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy Comments and Responses* (p. 247). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/2012/final/2012fRTP_CommentsResponses.pdf.

995 Los Angeles, County of, Department of Regional Planning (LACDRP). 2012 (Feb. 14). Letter from Richard Bruckner, Director of Regional Planning, to Hasan Ikhrata, Southern California Association of Governments. Los Angeles, CA: LACDRP. http://rtpscs.scag.ca.gov/Documents/2012/pfinal/2012RTPSCScommentsGroup03.pdf.

996 *Ibid.*

SCAG's balanced land use plan provides significant environmental benefits over the "business as usual" land use plan analyzed as the "No Project" alternative in the 2012 RTP/SCS EIR. Under the No Project development pattern, approximately 742 square miles of undeveloped "greenfield" land would be converted to urban use, whereas the balanced land use plan would consume just 334 square miles of undeveloped land.[997] The No Project land use plan would thus result in far greater adverse impacts to aesthetic, biological, cultural, mineral, and water resources, as compared to the balanced land use plan.[998] The No Project land use plan would also generate 7 percent more VMT than the balanced land use plan, and would thus have significantly greater impacts related to the GHG and criteria pollutant emissions.[999] In addition, the No Project development pattern would have greater significant adverse impacts related to soil erosion, hazardous materials, and cumulative impacts than would SCAG's balanced land use plan.[1000]

The environmental advantages of SCAG's balanced land use plan are largely attributable its policy of significantly increasing the number of multi-family housing units constructed in urban infill areas. But the 2012 RTP/SCS EIR demonstrates that a land use policy focused on infill development risks going too far, as shown by its analysis of the so-called "Envision 2" alternative, which assumes significantly more aggressive infill development patterns than the balanced land use plan.[1001]

As acknowledged in the 2012 RTP/SCS, a regional development pattern that assumes a significant increase in small-lot single-family and multifamily housing located in infill locations near transit infrastructure is likely to result in the displacement of lower-income residents through so-called "gentrification".[1002] Increased transit accessibility in existing urban locations through public investment increases demand for housing near those transit amenities, which puts upward pressure on neighborhood land and housing prices.[1003] Moreover, multi-family housing units in structures that exceed two to three stories are significantly more expensive to construct than lower density structures and thus, to be profitable, must be priced to target higher income households.[1004] The resulting increase in housing costs often "price out" existing lower income residents from newly densified, transit accessible neighborhoods, forcing those households to relocate to less expensive neighborhoods with fewer transit options.[1005] According to the 2012 RTP/SCS EIR, the potential impacts related to household displacement would be significant and unavoidable under the balanced land use plan, but even more so under Envision 2's land use plan.[1006]

997 SCAG 2011, p. 4-16
998 *Id.,* p. 4-5
999 *Id.,* pp. 4-10, -14, -20
1000 *Id.,* p. 4-5
1001 *Id.,* p. 4-4
1002 SCAG 2012a, p. 129; SCAG 2011, p. 4-37
1003 Chapple, K. 2017 (April 26). *Developing a New Methodology for Analyzing Potential Displacement* (pp. 96, 97). University of California, Berkeley, CA. https://www.arb.ca.gov/research/apr/past/13-310.pdf.
1004 *Ibid.*
1005 *Ibid.*
1006 Southern California Association of Governments (SCAG). 2012d (March). *Final Environmental Impact Report for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* (SCH #2011051018) (p. 5-63). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf.

Since Envision 2 would substantially increase populations in urban infill areas, it would also have greater traffic congestion-related impacts in those communities than would occur under the balanced land use plan.[1007] In addition, Envision 2 would result in higher cancer and other health risks in areas proposed for high-density development adjacent to regional freeways – i.e. areas with the greatest concentration toxic air contaminants from vehicle emissions.[1008] Moreover, Envision 2 would put larger populations at risk of accidental hazardous materials exposure and seismic events than would otherwise occur under the balanced land use plan.[1009] Concentrating development within urban infill areas would also expose higher numbers of people to groundborne vibration and noise levels, and would have greater adverse impacts on education, recreation, fire, police protection, and emergency services.[1010] Finally, the capacity of existing water and wastewater pipelines and infrastructure systems would be exceeded at a disproportionately higher level in communities targeted for very high-density development pursuant to Envision 2.[1011]

Setting aside the significant adverse impacts of Envision 2, it is not clear that the region can realize GHG reductions through the SCS planning process much beyond the reductions anticipated by the 2016 RTP/SCS without significant changes in statewide transportation, regulatory and financing policy. Per SB 375, CARB is currently in the process of preparing its second round of regional GHG reduction targets.[1012] This next round of reduction targets is scheduled to take effect in 2018 and be indexed to years 2020 and 2035 to reflect SB 32's goal of achieving statewide GHG reductions of 40 percent below 1990 levels by 2030.[1013] As part of this target setting process, CARB solicited recommendations from the state's 18 MPOs, including its four largest MPOs, which collectively represent 82 percent of the state's total population – i.e., SCAG, the Bay Area's Metropolitan Transportation Commission (MTC), the San Diego Association of Governments (SANDAG), and the Sacramento Area Council of Governments (SACOG).[1014]

On May 1, 2017, the big four MPOs sent CARB a joint recommendation that the GHG reduction targets for their respective regions be set no higher than 18 percent below 2005 levels by 2035.[1015] As explained in that letter, the big four MPOs continue to push the envelope in terms of focused growth in land use, but feasible land use strategies cannot achieve deeper reductions in GHG emissions under the current state regulatory scheme.[1016] "Stress tests" performed by the big four MPOs demonstrate that increased fuel efficiency and lower fuel costs have combined to reduce auto operating costs.[1017] As a result, Californians drive more

1007 SCAG 2012d, p. 5-65
1008 *Id.,* p. 5-59
1009 *Id.,* pp. 5-60 and -61
1010 *Id.,* pp. 5-62 to-64
1011 *Id.,* p. 6-65
1012 California, State of, California Air Resources Board (CARB). 2017 (June). *California Air Resources Board Staff Report: Proposed Update to SB 375 Greenhouse Gas Emission Reduction Targets* (p. 1). Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/staff_report_sb375_target_update_june_full_report.pdf.
1013 *Id.,* p. 6
1014 *Id.,* p. A-1
1015 Metropolitan Transportation Commission et al. (MPO). 2017 (May 1) Letter from MTC, SACOG, SANDAG, and SCAG to Mary Nichols regarding MTC, SACOG, SANDAG and SCAG Joint Submittal SB 375 Target Recommendations. San Francisco, CA: MPO. https://www.arb.ca.gov/cc/sb375/appendix_b_mpo_scenario_and_data_submittals.pdf.
1016 *Ibid.*
1017 *Ibid.*

(the so-called "rebound effect"), making it more difficult to achieve GHG emission reductions though policies designed to incentivize fewer vehicle trips.[1018] This challenge is made more difficult by the success of CARB's Advanced Clean Cars Program and the emergence of a new fleet of zero emission vehicles (ZEV) on California roads.[1019] After all, transit improvements needed to take cars off the road are funded in large part by taxes on petroleum-based vehicle fuels, which ZEV drivers do not pay. In light of these realities, the big four MPOs have concluded that they cannot achieve per capita GHG reductions greater than 18 percent below 2005 levels by 2035 through the SCS planning process unless Sacramento implements significant regulatory reforms.[1020] Suggested reforms include new regulatory programs that authorize MPOs to implement road and parking pricing strategies and mileage-based user fees to offset declining gas tax revenues, as well as additional state funding of transit, ridesharing and non-motorized transportation programs.[1021]

The big four MPOs' conclusions regarding the limited ability of integrated transportation and land use planning to reduce GHG emissions is mirrored by recent research. The winter 2017 edition of the Journal of the American Planning Association includes a report by Associate Professor Mark Stevens of the University of British Colombia that uses meta-regression analysis to synthesize the findings of 46 different studies that include quantitative estimates of the influence of compact development patterns on driving behaviors.[1022] Based on this analysis, Dr. Stevens determined "that compact development does appear to reduce driving, but that the magnitude of that reduction is generally small".[1023] Other recent studies have found that per capita GHG emissions tend to be comparable as between suburban and urban core residents, or even decline with distance from the urban core out to the surrounding suburbs.[1024] Moreover, the ability to move people between their homes and jobs using public transit modes is particularly challenging in the Los Angeles metropolitan area, where only 7 percent of jobs are accessible by transit.[1025] In addition, the recent emergence of significant ZEV vehicle use, ride-sharing providers like Uber and Lyft, and flexible stay-at-home employment policies (e.g., telecommuting) are changing regional auto use in ways that

1018 *Ibid.*
1019 *Ibid.*
1020 *Ibid.*
1021 *Ibid.*
1022 Stevens, M.R. 2017. Does Compact Development Make People Drive Less? *Journal of the American Planning Association*. 83(1): 7-18. Chicago, IL: American Planning Association. https://www.researchgate.net/publication/309890412_Does_Compact_Development_Make_People_Drive_Less.
1023 Stevens 2017, p. 15
1024 Kotkin, J., Cox, W., Schill, M., Modarres, A (Kotkin et al.). 2015. Building Cities for People (p. 43). Chapman University Press. Orange, CA. https://www.chapman.edu/wilkinson/_files/citiesforpeople11116.pdf.
1025 Owen, A., Murphy, B., Levinson, D (Owen et al.). 2016. Access Across America: Transit 2015 (p. 4). Center for Transportation Studies, University of Minnesota. Minneapolis, MN. http://www.cts.umn.edu/Publications/ResearchReports/pdfdownload.pl?id=2740.

further limit the ability of, or are more effective than, relying on land use policy as a means of achieving GHG emission reductions from passenger vehicles.[1026,1027,1028,1029]

Given the adverse environmental and social impacts associated with Envision 2's high-density infill development pattern, it was expressly rejected by the SCAG Regional Council when it adopted the 2012 RTP/SCS in April 2012.[1030] In June 2012, CARB certified that implementation of the 2012 RTP/SCS would achieve and exceed the 2020 and 2035 GHG reduction targets applicable to the SCAG region.[1031,1032] That same month, the Federal Highway Administration and the Federal Transit Administration, in consultation with the U.S. Environmental Protection Agency, CARB and the regional air quality management districts, determined that the 2012 RTP/SCS was in conformance with the applicable State Implementation Plan (SIP) prepared in accordance with the Clean Air Act to establish control measures necessary to achieve attainment of National Ambient Air Quality Standards (NAAQS) in the SCAG region.[1033,1034] Accordingly, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG region have determined that, if implemented, the 2012 RTP/SCS would achieve targeted per capita GHG emissions reductions from passenger vehicles and will not impede or conflict with regional efforts to reduce criteria air pollutants to acceptable levels.

As required by SB 375, in April 2016, SCAG updated 2012 RTP/SCS with its adoption of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS).[1035] The 2016 RTP/SCS sets forth the same balanced land use plan described in the 2012 RTP/SCS, including its land use and transportation strategies, investments, and

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1026 Fitzsimmons, E. 2017 (February 23). Subway Ridership Declines in New York. Is Uber to Blame? *New York Times*. New York, NY. https://www.nytimes.com/2017/02/23/nyregion/new-york-city-subway-ridership.html?_r=0.

1027 Kotkin et al. 2015

1028 Rodier, C., Alemi, F., Smith, D (Rodier et al.). 2015. Synergistic Integration of Transportation Demand Management Strategies (Land Use, Transit, and Auto Pricing) with New Technologies and Services (Battery Electric Vehicles and Dynamic Ridesharing) to Enhance Reductions In VMT and GHG. Mineta Transportation Institute. San Jose, CA. http://transweb.sjsu.edu/PDFs/research/1207-combining-transportation-demand-with-ridesharing-and-BEVs-to-reduce-GHG.pdf.

1029 Shared-Use Mobility Center. (SUMC) 2016. Shared Mobility and the Transformation of Public Transit: Research Analysis. American Public Transportation Association. Chicago, IL: SUMC. https://www.apta.com/resources/reportsandpublications/Documents/APTA-Shared-Mobility.pdf.

1030 Southern California Association of Governments (SCAG). 2012e (April). *Resolution No. 12-538-1: A Resolution of the Southern California Association of Governments Certifying the Final Programmatic Environmental Impact Report Prepared for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (SCH# 2011051018); and Adopting Environmental Findings, a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program Pursuant to the California Environmental Quality Act.* Los Angeles, CA: SCAG.

1031 California, State of, California Air Resources Board (CARB). 2012. *Executive Order G-12-039 Southern California Association of Governments (SCAG) Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination.* Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/exec_order_scag_scs.pdf.

1032 California, State of, California Air Resources Board (CARB). 2012b (May). *Technical Evaluation of the Greenhouse Gas Emission Reduction Quantification for the Southern California Association of Governments' SB 375 Sustainable Communities Strategy.* Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/scag_scs_tech_eval0512.pdf.

1033 United States Department of Transportation, Federal Highway Administration (USDOT). 2012. Conformity Determination for SCAG's 2012 RTP/SCS and 2010/11 FTIP through Amendment No. 11-24. Sacramento, CA: USDOT. http://rtpscs.scag.ca.gov/Documents/2012/final/SCAGFF24_060412.pdf.

1034 United States Department of Transportation, Federal Highway Administration (USDOT). 2013. Conformity Determination for SCAG's 2012 RTP/SCS through Amendment 1 and the 2013 FTIP through Amendment No. 13-04. Sacramento, CA: USDOT. http://rtpscs.scag.ca.gov/Documents/2012/final/SCAGFF04_071513.pdf.

1035 SCAG 2016a

policies.[1036] The 2016 RTP/SCS also identifies new transportation investments to improve regional mobility, including new rail transit facilities, vehicle replacement programs, new funding for active transportation, bus system improvements, network maintenance projects, and highway and arterial improvement projects.[1037] Like its predecessor, and without opposition from the County, the 2016 RTP/SCS anticipates development of the Project site at densities consistent with the *Centennial Specific Plan.*.[1038,1039,1040] In addition, the 2016 RTP/SCS identifies the Northwest SR-138 Improvement Project (which is partially located within the Project's boundary and was recently approved by Caltrans) as a major regional highway project needed to improve regional access to opportunities such as jobs, education, recreation and healthcare.[1041,1042,1043] In June 2016, CARB determined that implementation of the 2016 RTP/SCS would achieve SCAG's per capita GHG reduction target of 8 percent by 2020 and would achieve an 18 percent per capita GHG reductions by 2035 (exceeding the SCAG 2035 target of 13 percent by five percentage points).[1044,1045] State and federal regulators also determined that the 2016 RTP/SCS conforms to the SIP and its control measures to reduce regional criteria pollutant emissions consistent with NAAQS.[1046,1047]

In *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 2004 ("*Newhall*"), the California Supreme Court identified various compliance options that lead agencies can use when evaluating the cumulative significance of a proposed land use project's GHG emissions in CEQA documents, including project consistency with an adopted SCS. According to the Court, a lead agency need not analyze GHG emissions from cars and light trucks in CEQA documents for residential, mixed-use and transit priority projects that are consistent with an applicable SCS adopted pursuant to SB 375.[1048] As discussed above,

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1036 *Id.,* p. 69

1037 *Id.,* pp. 89, 94, 101

1038 Southern California Association of Governments (SCAG). 2015b (December). *2016-2040 Sustainable Communities Strategy (SCS) Background Documentation Appendix* (pp. 6, 7, 10, 11)*.* Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf.

1039 Southern California Association of Governments (SCAG). 2016e (April). *2016-2040 RTP/SCS Public Participation and Consultation Sub Appendix Part 1 of 5 Comments and Responses Adopted April 2016* (p. 115). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/subAppendix01_2016fRTPSCS.pdf.

1040 DRP 2017, p. 6-8

1041 SCAG 2016a, p. 100

1042 Southern California Association of Governments (SCAG). 2017a (April). The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Amendment #1 (p. 35). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_amend01.pdf.

1043 Southern California Association of Governments (SCAG). 2017b (July). The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Amendment #2 (p. 2). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_amend02.pdf.

1044 CARB 2016

1045 California, State of, California Air Resources Board (CARB). 2016a (June). *Technical Evaluation of the Greenhouse Gas Emission Reduction Quantification for the Southern California Association of Governments' SB 375 Sustainable Communities Strategy.* Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/scag_final_staff_report_06_29_16.pdf.

1046 United States Department of Transportation, Federal Highway Administration (USDOT). 2016. Conformity Determination for SCAG's 2016 RTP/SCS. Sacramento, CA: USDOT. http://scagrtpscs.net/Documents/2016/notices/FHMW-FTA_2016RTPSCSConformityDetermination_2016-0601.pdf.

1047 United States Department of Transportation, Federal Highway Administration (USDOT). 2017. Conformity Determination for SCAG's 2016 RTP/SCS Amendment No. 1 and 2017 FTIP Consistency Amendment No. 17-03. Sacramento, CA: USDOT. http://www.scag.ca.gov/programs/Documents/16RTP_A1.pdf.

1048 *Newhall*, p. 230; *Cleveland National Forest Foundation v. San Diego Ass'n of Governments* (2017) 3 Cal.5th 497, 506-507

both the 2012 and 2016 RTP/SCS documents anticipate development of the Project to accommodate projected population and employment growth at levels consistent with the *Centennial Specific Plan*. Moreover, as discussed in Draft EIR Sections 5.8, Land Use, 5.9, Population and Housing, and 5.21, Climate Change, the Project is consistent with the 2016 RTP/SCS. Accordingly, the County is entitled to rely on such consistency as evidence that the Project will promote achievement of the region's per capita GHG emission reduction goals for passenger vehicle trips generated by the land use sector.

The General Plan and Antelope Valley Area Plan

As part of the RTP/SCS process, SCAG encourages its member cities and counties to ensure that their respective general plans consider and reflect RTP/SCS policies and land use strategies as appropriate. The current *Los Angeles County General Plan 2035* was adopted in October 2015.[1049] It was developed under five guiding principles: employ smart growth; ensure community services and infrastructure are sufficient to accommodate growth; provide the foundation for a strong and diverse economy; promote excellence in environmental resource management; and provide healthy, livable and equitable communities.[1050] These principles emphasize sustainability and help ensure that the needs of the existing and projected population are met without compromising economic, social, and environmental resources. In addition, to align with SCAG policies, the General Plan incorporates several key strategies, including the establishment of transit-oriented development areas coupled with multi-modal transportation systems.

The General Plan serves as the foundational document for community-based plans applicable to 11 unincorporated County planning areas, including the Antelope Valley Area Plan (AVAP) adopted in June 2015. The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[1051] The AVAP contains regional goals and policies pertaining to land use, housing, community design, circulation, pubic services and facilities, governmental services, environmental resource management, public safety, and energy conservation, among other topics. The AVAP updates and supersedes the 1986 Antelope Valley Areawide General Plan (AVAGP), the previous community plan applicable to the Antelope Valley planning area.[1052]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[1053] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[1054] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

[1049] DRP 2017, p. 5.8-7
[1050] *Ibid.*
[1051] *Id.,* p. 5.8-9
[1052] *Ibid.*
[1053] DRP 2015, p. I-5
[1054] *Ibid.*

As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals".[1055] At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1056]

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1057] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1058]

Per the AVAP, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[1059] Rural Town Areas serve as transition areas between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[1060] Rural Preserve Areas are located outside of Rural Town Centers and are largely undeveloped, unserved by existing or planned infrastructure and public facilities, and contain important environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[1061]

The Project site is located entirely within the AVAP's West EOA.[1062] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1063] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1064]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[1065] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new

1055 *Id.,* p. I-5
1056 *Id.,* p. I-6
1057 *Id.*, p. I-7; DRP 2014a, p. 7-7
1058 *Ibid.*
1059 DRP 2015, p. I-7
1060 *Ibid.*
1061 *Ibid.*
1062 DRP 2017, p. 4-4
1063 DRP 2015, p. I-8
1064 *Ibid.*
1065 *Id.,* p. I-8

infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[1066] To ensure that this strategy is implemented, the AVAP specifies that the interpretation of [AVAP] policy should be governed by the AVAP's Rural Preservation Strategy.[1067]

The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2012 and 2016 RTP/SCS documents. For example, the AVAP reduces the projected number of new residential housing units in the planning area by 62 percent and locates more housing units closer to jobs, as compared to the 1986 AVAGP it replaces.[1068] As a result, implementation of the AVAP would generate just 17,065,721 vehicle miles traveled (VMT), a 50 percent reduction below the 33,787,619 VMT generated by the 1986 AVAGP.[1069] Moreover, implementation of the AVAP would convert to urban use only 6,169 acres of undeveloped agricultural land, compared to the 24,433 acres of agricultural land that would be converted under the 1986 AVAGP.[1070] Finally, as compared to the 1986 AVAGP, the AVAP greatly expands the boundaries of Significant Ecological Areas within the planning area and specifically provides for greater protection of wildlife movement corridors.[1071] Thus, the AVAP substantially limits the potential for "urban sprawl" development patterns in the Antelope Valley by focusing new development into compact and sustainably designed mixed-use EOA communities that place houses in close proximity to jobs and commercial uses while expanding SEA boundaries and preserving wildlife movement corridors and agricultural land.[1072]

The Project is Consistent with the "Smart Growth" Strategies of the RTP/SCS and Antelope Valley Area Plan and is not "Sprawl" or "Leapfrog Development."

According to SCAG, "'smart growth' is a term that covers a range of development and conservation strategies that help protect the natural environment and make communities more attractive, economically stronger, and more socially diverse".[1073] The Commenter's claim that the Project represents "classic sprawl" because the average trip length for project-generated traffic will be 25.5 miles disregards the fact that the Project is consistent with, and implements, regional and County plans to strategically locate future growth in a manner that both achieves statewide GHG reduction goals and relieves the potential adverse and social effects of focusing too much future growth in both agricultural areas and in infill, transit oriented areas. As discussed below, the Project is specifically designed to protect the natural environment by implementing an attractive and compact development pattern that places homes near jobs and commercial uses, all connected by a multi-modal circulation system that will reduce VMT and, by extension, GHG emissions.

1066 *Ibid.*
1067 *Ibid.*
1068 DRP 2014a, p. 7-7
1069 *Ibid.*
1070 *Ibid.*
1071 *Id.,* p. 7-8
1072 *Id.,* p. 7-7
1073 SCAG 2015, p. 3.11-11

This comment's implied assumption is that the ideal regional development pattern is one that only permits new growth in urban infill locations. As discussed above, however, regional planners and decision makers have determined that the over-densification of the urban core will disproportionately burden affected urban communities with a variety of environmental and social ills and that a balanced development pattern best serves the region as whole. As explained in the 2012 RTP/SCS, under its balanced land use plan, "many people in the region will continue to live in suburban neighborhoods and drive alone to work, school, shopping and other destinations – rather than use public transit and other transportation options. The 2016 RTP/SCS will not change how everyone gets around, but the Plan is designed to offer residents more choices so that we can experience regionwide benefits".[1074] Indeed, the 2016 RTP/SCS assumes that, under its balanced land use plan, approximately 20 percent of regional trips will exceed 25 miles in length.[1075]

The terms "urban sprawl" and its cousin "leapfrog development" are ambiguous as they are frequently used to describe a variety of conditions, such as a specific type of land use pattern or the aesthetic quality of urban and suburban development forms. However, "leapfrog development" is often understood to refer to the development of land in a manner requiring the extension of public facilities from their existing terminal point through intervening undeveloped areas where such extension is not provided for in the existing plans of the local governing body.[1076] And "sprawl" is typically understood to mean "'uncoordinated growth': the expansion of community without concern for its consequences; in short, unplanned, incremental urban growth which is often regarded as unsustainable".[1077] Per these definitions, the Project is neither sprawl nor leapfrog development.

The Project site is situated near the junction of Interstate 5 and the Northwest SR-138 Improvement Project, which links western Los Angeles County and the major communities of Palmdale and Lancaster to the east.[1078] Thus, the Project site will not require major offsite roadway extensions to provide access to regional freeways. As shown on Draft EIR Exhibit 4-18, there are existing gas, power and telecom transmission facilities to serve the Project located on or immediately adjacent to the Project site. The Project will also construct two on-site wastewater treatment and recycled water distribution facilities to minimize potable water demand to treat Project wastewater and supply recycled water to the Project site.[1079] To ensure adequate potable water service, the Applicant/Developer will design, permit, finance, and construct an on-site water treatment plant adjacent to the West Branch of the California Aqueduct, which is located on-site.[1080] School, fire, police, emergency medical and library facilities needed to serve the Project will all be constructed on site, and in some cases will be available to also serve existing Mountain Communities in accordance with existing mutual aid agreements.[1081] Finally, none of the Project's backbone infrastructure will be sized to accommodate growth beyond that which is proposed by the

[1074] SCAG 2016a, p. 3
[1075] SCAG 2016a, p. 156
[1076] USLEGAL 2017
[1077] Batty et al. 2003, p. 1
[1078] DRP 2017, p. 4-2
[1079] *Id.,* p. 4-59
[1080] *Id.,* p. 4-55
[1081] *Id.,* p. 4-75

Project.[1082] Given its clustered development pattern and self-contained infrastructure improvements, the Project does not exhibit the characteristics of leapfrog development.

While there may be some intervening undeveloped land that separates the Project site from other urban areas in the Antelope Valley, the resulting development pattern is anticipated by, and is at the heart of, the AVAP's Rural Preservation Strategy. As explained in the AVAP, the Rural Preservation Strategy "creat[es] a pattern of rural town center areas, rural town areas, rural preserve areas, and economic opportunity areas. Each town in the Valley will flow outward from vibrant town centers that offer a range of housing and local-serving activities for day-to-day living. Lower density rural residences will surround these town centers, buffered by large contiguous open spaces that contain habitat areas, recreational spaces, and rural economic activities".[1083] This is precisely the "smart growth" clustered and mixed-use development pattern proposed by the *Centennial Specific Plan*, as demonstrated by its land use plan.[1084]

As discussed above, the 2016 RTP/SCS anticipates development of the Project site at densities commensurate with the *Centennial Specific Plan*. The *Specific Plan* is also consistent with "complete communities" land use policies described in the 2016 RTP/SCS. As envisioned by SCAG, "complete communities" are compact mixed-use districts that concentrate housing, employment, and a mix of retail and services located in close proximity to each other.[1085] As set forth in the *Centennial Specific Plan*, the Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers.[1086] The Project includes a mix of housing options within each Village, ranging from apartment homes close to the proposed Town Center to single-family homes in lower-density areas.[1087] A full range of light industrial, business, and other commercial uses are planned and will yield a broad range of employment opportunities, from retail services to large corporate employers.[1088] The opportunities for employment diversity increase the overall economic sustainability of the Project and the West EOA.

Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[1089] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[1090] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80

1082 *Id.,* p. 5.8-22
1083 DRP 2015, p. LU-2
1084 DRP 2017, Appendix 4.0-A, pp. 2-5, -16
1085 SCAG 2016a, p. 79
1086 DRP 2017, p. 4-10
1087 *Ibid.*
1088 *Ibid.*
1089 *Id.,* p. 4-16
1090 *Ibid.*

percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[1091] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[1092] The Town Center will have a public gathering space of 1 acre or more, with street frontage on at least two sides.[1093] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be within the Village Core.[1094] High-density residential uses will be located adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[1095] The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further reducing demand for SOV travel.[1096] All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[1097] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[1098] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[1099] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[1100]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[1101] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must

1091 *Id.,* p. 4-17
1092 *Ibid.*
1093 *Ibid.*
1094 *Ibid.*
1095 *Id.,* p. 4-20
1096 *Id.,* p. 4-35
1097 *Id.,* p. 4-30
1098 *Ibid.*
1099 *Id.,* p. 4-31
1100 *Ibid.*
1101 *Id.,* p. 4-30

be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[1102]

Consistent with the AVAP's Rural Preservation Strategy, the Project would ensure the preservation and management of natural resources and open space in and around the Project site. Specifically, no Project development would occur within the 3,866 acres of the San Andreas Significant Ecological Area (SEA 17) located on the Project site, which land would be permanently protected by a conservation easement provided by the Applicant/Developer.[1103] Additionally, approximately 39,213 acres of offsite open space and habitat, which includes 8,973 acres of SEA 17 land, would be permanently protected to mitigate the Project's onsite impacts to biological resources.[1104]

In addition, the Specific Plan's Green Development Program[1105] requires all development within the Specific Plan to incorporate environmentally sustainable development practices to conserve water, energy and natural resources, reduce and divert waste from landfills, and promote a healthier environment.[1106] In addition, to decrease the Project's dependence on carbon-based fuel consumption, a minimum of 50 percent of the anticipated electrical energy demand at build out (i.e. household, business, civic/institutional, recreational, and public facilities) shall be met by onsite renewable energy, and ZEV charging stations will be provided throughout the Project area.[1107]

Moreover, all buildings within the Specific Plan will be required to comply with state, regional, and local laws applicable to their design and construction including, without limitation, Pavley Motor Vehicle Standards (AB 1493); Low Carbon Fuel Standard;[1108] Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations; Renewable Portfolio Standard (SB X1 2 and SB 350); Natural Gas Cooking Stoves and Fireplaces (SCAQMD Rule 445); Solid Waste Diversion (AB 939, AB 341, AB 1826, SB 1383); statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15); Model Water Efficient Landscape Ordinance (MWELO);[1109] California Water Code;[1110] EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles[1111] and for medium- and heavy-duty vehicles;[1112] Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels;[1113] Advanced Clean Cars Program;[1114] Under Inflated Vehicle Tires;[1115] Heavy-Duty Vehicle

1102 *Ibid.*
1103 *Id.,* p. 4-43
1104 *Id.,* p. 4-44
1105 *Id.,* Appendix 2-A to Appendix 4.0-A
1106 *Id.,* p. 4-70
1107 *Id.,* p. 4-73
1108 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.
1109 *Id.,* Title 23, Division 2, Chapter 2.7
1110 *Id.,* Division 6, Part 2.10, Sections 10910–10915
1111 75 Federal Register (FR) 25324–25728 and 77 FR 62624–63200
1112 76 FR 57106–57513
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1114 *Id.,* Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts), Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts), Chapter 4.4 (parts), Chapter 8 (parts)
1115 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.

Greenhouse Gas Emission Reduction Regulation;[1116] Management of High Global Warming Potential Refrigerants for Stationary Sources;[1117] Small Containers of Automotive Refrigerant;[1118] High-Global Warming Potential Greenhouse Gases in Consumer Products;[1119] Los Angeles Tree Planting Ordinance;[1120] Los Angeles Green Building Standards Code;[1121] and Los Angeles County Community Climate Action Plan.

In addition, the Project would be subject to Title 24 and CALGreen Code energy efficiency standards. However, as discussed in the Specific Plan and Section 5.21, Climate Change, the Project has committed to compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings, resulting in buildings that would exceed 2016 Title 24 requirements by 15 percent (see PDF 11-3 in Section 5.11, Air Resources), and with CALGreen voluntary measure A5.203.1.2.1 for non-residential buildings and residential buildings taller than four stories, resulting in buildings that would exceed 2016 Title 24 requirements by 10 percent (PDF 11-2). Renewable energy produced on the Project site will be primarily rooftop solar, and a minimum of 50 percent of the Project's anticipated electricity demand must be satisfied from on-site renewable energy generation (PDF 21-3). With this approach, development within the Specific Plan will meet and exceed the standards of 2016 CALGreen Tier 1 as well as the requirements of the County's Green Building Ordinances.

Since all development within the new Centennial community is required to comply with the Green Development Program, as well as increasingly-stringent and innovative laws and regulations designed to conserve natural resources (such as water and preserved open space areas), and reduce GHG emissions and other pollutants, the Project presents the opportunity to create an innovative and environmentally sustainable community development from the beginning, and to incorporate green infrastructure measures throughout the community and in each of its Villages. As explained by the *Newhall* court, the County is entitled to rely on a showing of Project compliance with regulatory programs described above, which are all designed to reduce GHG emissions, as a CEQA "pathway to compliance" that demonstrates consistency with AB 32.[1122] This is particularly true here, since the Project will exceed regulatory requirements to further reduce associated GHG emissions, as discussed above.

Finally, the Project's carbon footprint is likely to decline over time. Technological advances and emerging practices and services related to sustainable community development and green building are rapidly advancing; as is the legal framework for removing barriers to innovation (e.g., with clear standards for recycled water), creating incentives for green practices and facilities (e.g., with continued federal and state support for distributed energy generation models such as rooftop solar), and changing public and private sector practices influencing longstanding transportation and employment behaviors (e.g., with on-demand car services and telecommuting). Continued technology innovations such as autonomous

[1116] *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.
[1117] *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.
[1118] *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.
[1119] *Id.,* Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 2
[1120] Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.
[1121] *Id.,* Title 31, Chapter 1, Sections 100 et seq.
[1122] *Newhall*, 62 Cal.4th at 229

vehicles and battery-assisted bicycles and scooters, as well as continued public sector support for green practices that reduce greenhouse gas emissions and conserve water, and new private sector service models including flexible work hours and locations, are expected to continue. According to recent polling, 68 percent of Californians, including majorities across age and income groups, said they support the SB 32's ambitious GHG reduction goals, and 56 percent said they are willing to pay more for energy generated by renewable sources.[1123,1124] Given this political support, it is likely that state and local governments will continue to innovate with respect to GHG emission regulatory controls, and the Project will be required to comply with any applicable new laws as they are adopted.[1125]

For the reasons discussed above, the Project cannot fairly be described as "classic sprawl." As clearly demonstrated by its long planning history at the regional and County level, the Project is anything but "uncoordinated growth" undertaken without regard for its environmental consequences. The Project has been carefully designed to promote regional "smart growth" planning principles established by the 2016 RTP/SCS and the AVAP's Rural Preservation Strategy and will aid the County in its effort to accommodate its fair share of the regional housing need in a manner that reduces reliance on the automobile, reduces per capita GHG emissions, and promotes public health. The Project will also be required to implement an extensive list of Green Development design measures and to comply with and, in some cases exceed, applicable laws mandating efficient building design and construction. Finally, it will permanently preserve thousands of acres of sensitive habitat. By any measure, the Project is not "classic sprawl," particularly when viewed from a perspective that includes full consideration of regional planning priorities.

In response to this comment, the following documents are added to the administrative record:

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Response to Comment F.8-21:

This comment inaccurately describes the existing baseline used to analyze Project traffic impacts. First, the references in the comment to the approved Tejon Mountain Village and Grapevine Specific Plan projects in Kern County on page 5.10-34 of Draft EIR are included in a Draft EIR section entitled "Future Setting." As indicated by this title, the "Future Setting" section discusses the long-range cumulative setting used to analyze potential project impacts under future cumulative conditions, not the "traffic baseline" as suggested in the comment. The Draft EIR describes existing traffic conditions for the Project on pages 5.10-25 to 5.10-33. The approved Tejon Mountain Village and Grapevine Specific Plan projects are not included in the description of existing conditions because neither has been built. As required by CEQA, the Draft EIR includes an analysis of existing conditions plus the Project to focus on the specific impacts to existing traffic facilities that are attributable solely to the Project. As discussed in a recent California Supreme Court decision, *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, existing conditions normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The existing plus Project analysis is included in Draft EIR Section 5.10-33 to 5.10-88 and does not include the approved Tejon Mountain Village and Grapevine Specific Plan projects because neither has been built.

Potential Project impacts under future, cumulative conditions are discussed in the Draft EIR and in a Supplemental Traffic Study (STS) prepared in response to a request from Caltrans. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans identified the Alternative 2 ("Alt 2") improvements as the preferred improvements for SR-138 in the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

The Draft EIR and the STS analyze cumulative, future conditions with and without the Project to assess impacts to local and state highways from projected growth due to planned and reasonably likely developments in the region, plus the Project's full buildout traffic. These cumulative scenarios include the Tejon Mountain Village and Grapevine Specific Plan projects because they have been approved by Kern County, the CEQA lead agency, and have been included in applicable regional transportation plans. Both the Tejon Mountain Village and Grapevine Specific Plan projects are also included in the historic Tejon Ranch Conservation and Land Use Agreement (TRCRWA) between the Tejon Ranch Company (TRC) and Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy). The TRCRWA allows TRC and its development partners to pursue approvals for development of portions of the Tejon Ranch (Ranch), including the Project, the Tejon Mountain Village project and the Grapevine Specific Plan project, without opposition from the Resource Groups. The TRCRWA was executed in June 2008 and provides for the designation of Project open spaces and the dedication or sale

of conservation easements over approximately 240,000 acres, or approximately 90 percent, of the 270,000-acre Ranch.

The Commenter filed a lawsuit challenging the Tejon Mountain Village EIR that was denied in its entirely by the California Superior Court and Court of Appeals. There is no legal action pending against this project. The Commenter has filed a lawsuit challenging the Grapevine Specific Plan EIR, which was certified by Kern County in December 2016, and that action remains pending in the Superior Court. Under CEQA, an approved EIR is presumed valid after it has been certified.

There is no reasonable basis for assuming that the Tejon Mountain Village project and the Grapevine Specific Plan project, will not be built within the 20-year time frame of the Project's cumulative traffic analysis. The projects are both currently approved, are expressly allowed under the TRCRWA, and have been integrated with applicable Kern County land use and transportation plans, both of these projects have presumed buildout periods of approximately 20 years, during which time multiple additional agency approvals will need to be obtained. It is not reasonably foreseeable that these approved projects will not be built, and it would have been legal error for the Project cumulative traffic analysis to ignore these projects.

In summary, the baseline traffic analysis for the Project accurately reflects existing conditions and does not include the approved Tejon Mountain Village project and the Grapevine Specific Plan project because these projects have not been built and are not a component of the existing traffic setting. The cumulative, long-term traffic analysis for the Project accurately reflects reasonably foreseeable projects, and properly includes the approved Tejon Mountain Village project and the Grapevine Specific Plan project. An EIR for each of these projects has been certified, and the Commenter's legal challenges to the Tejon Mountain Village project were denied by the Superior Court and the California Court of Appeals. The Commenter's lawsuit challenging the Grapevine project EIR is pending and the certified EIR is presumed to be valid under CEQA. Both of the projects have been included in regional land use and transportation plans and are expressly allowed under the TRCRWA.

Response to Comment F.8-22:

This comment addresses growth projections used in the analysis of traffic impacts. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans identified the Alternative 2 ("Alt 2") improvements as the preferred improvements for SR-138 in the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

As discussed on Draft EIR pages 5.10-2 to 5.10-5, both the Project Draft EIR and the NW SR-138 FEIR use the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County. The Project Draft EIR utilizes a more recent version of the model that was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by

the County in June 2015. The STS also uses the traffic forecasts from the updated North County Sub-Area Model provided by the County to analyze potential Project and cumulative impacts. The updated model includes growth projections consistent with the AVAP designation of a Central Economic Opportunity Area (EOA) and an East EOA in addition to the West EOA in which the Project is located. Consequently, the updated North County Sub-Area Model reflects the most current information regarding potential future growth and related traffic conditions in the North County region.

As discussed in Section 1.2.4 of the Project traffic study (Draft EIR Appendix 5.10-A), growth assumptions in the updated North County Sub-Area Model were validated with respect to both the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2016-2040 RTP/SCS. The validation analysis confirmed that the updated North County Sub-Area Model assumptions are consistent with the 2012-2035 RTP/SCS for the Project area. As shown in the table below, the 2016-2040 RTP/SCS includes substantially similar housing and slightly higher employment growth projections for the Project area than the updated North County Sub-Area Model. The higher employment growth in the 2016-2040 RTP/SCS for the project area reflects the fact that the 2016-2040 RTP/SCS planning horizon extends to 2040 and the the updated North County Sub-Area Model planning horizon extends to 2035.

	Housing		**Employment**	
	2035	**2040**	**2035**	**2040**
North County Sub-Area Model	23,197	--	20,361	--
SCAG 2016-2040 RTP/SCS Model	--	23,138	--	24,240
Note: the above totals are for SCAG TAZs 2028000 and 20281000, which represents a geographical area larger than the Centennial project boundary. The North County Sub-Area Model is based on a 2035 horizon year, and the SCAG 2016-2040 RTP/SCS model is based on a 2040 horizon year.				

In addition, the validation analysis determined that the updated North County Sub-Area Model includes higher growth projections for the Central and East EOAs as contemplated by the approved AVAP. The lower level of Project-area employment and the higher level of growth in the Central and East EOAs in the the updated North County Sub-Area Model generally results in a higher volume traffic in the North County Area and therefore generates a more conservative analysis of potential Projects impacts than the 2016-2040 RTP/SCS model.

Finally, is it notable that, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1126] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis. (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 [L.A. Cty. Sup. Ct. July 16, 2015]; Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No.

[1126] CEQA § 21167.2

BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Jan. 18, 2017]). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1127]

Consequently, the growth assumptions incorporated in the updated North County Sub-Area Model provide the current and applicable basis for analyzing potential Project traffic impacts.

Response to Comment F.8-23:

This comment inaccurately describes the distribution of internal and external trips and average trip lengths for internal, external and total trips in the traffic analysis. The referenced excerpt from Draft EIR page 5.10-49 is included in a paragraph discussing the Project's balanced land use plan, which will generate a range of housing options, onsite amenities, and a range of employment-generating land uses consistent with well-established planning goals encouraging the concurrent development of residential with non-residential uses. The Draft EIR also notes that sufficient facilities for non-work activities such as schools, parks, library facilities, and retail have been planned on the Project site in an effort to meet the needs of residents at buildout, reducing the need to access such services by making trips external to the Project. The purpose of this discussion is to demonstrate that, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the project for work, shopping and other activities. The Draft EIR does not in any way state, and the Project traffic analysis does not assume, that all onsite employment opportunities will be filled by local residents.

The immediately following paragraph on Draft EIR page 5.10-91 explains that the traffic analysis in fact assumes that a portion of the Project workforce and resident population will live or work outside the Project area and will commute to jobs outside or within the Centennial Specific Plan area. The analysis also assumes that on-site residents and workers will travel for services and amenities outside of the Project. The porportion of internal and external Project area trips was derived from the North County Sub-area Traffic Model updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The North County Sub-area Traffic Model used for the Project analysis is the same model used by the County and other public agencies for transportation planning studies in the region, including the 2015 AVAP and County General Plan update EIRs. The model was also used by Caltrans in the preparation of the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR").

As discussed on pages 5.10-49 to 5.10-51 of the Draft EIR, the Project analysis includes a discussion of internal and external "tripends" and "trips." Each "trip" includes two "tripends", a starting tripend and an ending tripend. A "tripend" refers to a trip start or destination point.

[1127] Ruling on Submitted Matter, Ctr. For *Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. May 22, 2017], at p. 13

An internal trip is a trip that both starts and ends within the Project site, and therefore has two internal tripends. An external trip is a trip with either a starting or ending point outside of the Project site, and therefore has just one internal tripend. An internal tripend can be a trip that either starts or ends in the Project site, such as from a residence or at a place of employment.

As discussed on Draft EIR pages 5.10-2 to 5.10-5, the Project Draft EIR uses the most recent version of the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County, including the Project site. This version of the model was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1128] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. July 16, 2015]; Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Reply Brief, C*tr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Jan. 18, 2017]). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1129]

The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As discussed on Draft EIR page 5.10-50 the Project includes schools, parks, and retail shopping areas within the Project site located and sized to meet the Project's residential and workforce needs. The Project site is relatively isolated from other, similar amenities and most of the trips generated by travel to and from these locations will be internal to the Project area. In addition, at buildout, the Project will include approximately 10.1 million square feet (sf) of commercial office, shopping/retail, and industrial land uses

[1128] CEQA § 21167.2

[1129] Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. May 22, 2017], at p. 13

that will provide approximately 23,675 jobs, many of which would be filled by future residents. In comparison, applicable traffic models for the Lancaster/Palmdale area, which is larger than the Project but also relatively isolated from other developed amenity and employment locations, project that 70 percent of all tripends are internal to the region.[1130] Similarly, traffic models indicate that 74 percent of the total tripends in the Santa Clarita Valley will be internal when the region is built out.[1131]

The North County Sub-Area Model estimates of the Project's average daily internal and external trips and tripends at buildout is also consistent with available census bureau data of the percentage of residents who work within or outside of their places of residence for communities with similar locational characteristics as the Project. The table below summarizes the 2011-2015 American Community Survey (ACS) 5-Year Estimates of the percentage of all workers aged 16 or older working in their places of residence, or internal to 11 communities that are relatively isolated from other employment locations and that have approximately the same average total workforce as the Project at full buildout.

	Total Workforce Over 16 Years of Age	**Percent Working in Own Community**
Santa Maria California	43,861	60%
El Centro California	15,368	57%
Tehachapi California	3,343	54%
Porterville California	18,810	53%
Barstow California	7,927	51%
Paso Robles California	14,771	48%
Madera California	18,525	46%
Lancaster California	53,503	46%
Watsonville California	22,271	45%
Santa Clarita California	84,987	37%
Palmdale California	55,867	32%
AVERAGE	**30,839**	**48%**
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table S0810		

The ACS data indicates that the percentage of workers that are employed in their place of residence ranges from 60 percent in Santa Maria, California to 46 percent in Lancaster, California and 32 percent in Palmdale, California. The average percentage of work within the place of residence for the 11 communities is 48 percent. As discussed on Draft EIR page 5.10-50, most of the Project trips will be generated by residential land uses, and an average single-family residential unit generates approximately nine home-based trips per day. About two of these nine trips are home-based-work trips related to travel directly to and from work. The remaining trips are related to travel between residential units for a non- work activity such as school, shopping, or recreation, which may be trips that are entirely local or may represent one leg of a journey between home and the workplace. The percentage of internal

[1130] Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale
[1131] Santa Clarita Valley Consolidated Traffic Model Version 4.1, City of Santa Clarita and the County of Los Angeles

trips and tripends for non-work activity in locations such as the Project which provide schools, recreational facilities and shopping opportunities that are relatively far from other options is generally higher than for work-related trips. Residents in relatively isolated locations are more willing to utilize local school, shopping, and recreational facilities than to modify or change employment even if the desired work requires a significant daily commute.

The internal trip rate for the Project that results from the North County Sub-Area Model is approximately the same as the average internal trip rate for work commutes in the 11 communities in California included in the ACS data (48 percent). Since more daily trips in a community are related to non-work purposes, and the percentage of non-work internal trips is typically higher than for employment purposes, these data indicate that the North County Sub-Area Model internal and external trip estimates for the Project are reasonable.

The comment also incorrectly suggests that each Project trip will be 45.9 miles. As discussed on Draft EIR page 5.10-51, the North County Sub-Area Model results show that 40 percent of the trips made on-site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. As shown in Table 3.8 of the traffic study,[1132] the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. The model estimates that an average external trip will be 45.9 miles in length. Finally, the North County Sub-Area Model estimates that 48 percent of all trips will be internal and 52 percent of all trips will be external to the Project. Consequently, the average Project trip is estimated to be 25.5 miles in length. As discussed on page 3-9 of Draft EIR Appendix 5.10-A, these estimated trip lengths are conservative because they do not reflect the trip reduction measures to be implemented by the Project that will encourage trips by walking, biking, and transit. The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[1133] The comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

The length of external trips estimated by the North County Sub-Area Model is not atypical of communities that are relatively far from other locations that provide comparable amenities, services and employment. In these instances, local work trips and non-work-related trips generally are shorter and internal to the community and non-local work trips are relatively longer to access external employment opportunities. The table below summarizes the 2011-2015 American Community Survey (ACS) 5-Year Estimates of the time of travel to employment for all workers aged 16 or older in 11 communities that are relatively far from other locations and that have approximately the same average total workforce as the Project at full buildout.

[1132] DRP 2017, Appendix 5.10-A

[1133] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* [1988] 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* [1999] 71 Cal.App.4th 1341, 1362

	Total Workforce Over 16 Years of Age	Time of Travel to Work (minutes)	Percent Work Trips External to Place of Residence
Palmdale California	55,867	40.7	68%
Lancaster California	53,503	31.1	54%
Santa Clarita California	84,987	32.6	63%
Santa Maria California	43,861	20.6	40%
Barstow California	7,927	24.4	49%
Porterville California	18,810	22.5	47%
Madera California	18,525	23.6	54%
El Centro California	15,368	19.2	43%
Watsonville California	22,271	22.7	56%
Paso Robles California	14,771	21.5	52%
Tehachapi California	3,343	18.9	46%
Average	**30,839**	**25.3**	**52%**
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table S0810			

The ACS time of travel to work data for the 11 communities is generally consistent with the North County Sub-Area Model results for Project internal, external and average trips. The data show that, in locations such as Palmdale with a relatively high percentage of external work trips, trip times are comparatively high because a greater percentage of the residents in these communities commute to employment in other, relatively distant locations. The ACS data for Palmdale, for example, show daily work trips (32 percent internal and 60 percent external) average nearly 41 minutes. This result is consistent with the North County Sub-Area Model estimate that external Project trips, without accounting for the proportion of work trips that would be internal to the project, would average about 45.9 miles (e.g., about 45 minutes at an average of 60 miles per hour). The ACS data also indicate that, on average, a relatively isolated community in which 52 percent of work trips are external and 48 percent of work trip are internal would have an average commute time of about 25.3 minutes. This is consistent with the North County Sub-Area Model estimate that external Project trips would account for 52 percent of all trips, internal trips would comprise 48 percent of all trips, and that the average distance of all Project trips (internal and external) would be 25.5 miles (e.g., about 25 minutes at an average of 60 miles per hour).

The ACS data does not report the number of miles traveled to work within (internal to) and outside of (external to) a community. The ACS also does not report average trip to work travel speeds. The length of external trips to work for the 11 communities can be approximated using reported ACS data, however, by estimating the average internal trip length and the average work trip speeds. For example, if the average internal trip to work is assumed to be 8 miles (more than double the average Project internal trip length of 3.4 miles) and the average trip to work speed is assumed to be 55 miles per hour, the average external trip to work would be approximately 51 miles for Palmdale, 46 miles for Lancaster, and 43 miles for Santa Clarita. The average external trip to work for the 11 communities discussed above would be about 36.5 miles, and the average distance for all trips to work (internal and external) would be about 23.2 miles. If the average trip to work speed is

assumed to be 45 mph, the average external trip to work would be approximately 41 miles for Palmdale, 36 miles for Lancaster, and 34 miles for Santa Clarita. The average external trip to work for the 11 communities would be about 28.4 miles, and the average distance for all trips to work (internal and external) would be about 19 miles. These approximations are generally consistent with the North County Sub-Area Model estimated average trip lengths for the Project, including 45.9 miles for external trips and 25.5 miles for all trips.

In summary, the Project traffic analysis does not assume in any way as suggested in the comment that all onsite employment opportunities would be filled by Project residents. The average Project trip length is derived from the updated North County Sub-Area Model and is about 25.5 miles. The model indicates that internal trips, which account for 48 percent of the Project's total trips, will average about 3.4 miles in length. External trips, which account for 52 percent of the Project's total trips, will average about 45.9 miles in length. These estimates are consistent with internal tripend projections from applicable traffic models for the Lancaster/Palmdale and Santa Clarita Valley areas. The model results are also consistent with available information regarding internal, external and travel time to work from the 2011-2015 ACS 5-Year Estimates for 11 communities that with similar geographic characteristics and a comparable average workforce as the Project.

Response to Comment F.8-24:

This comment concerns potential future development that may substantially deviate from the balanced development described in the Draft EIR. As discussed in responses to Comments F.8-11 and F.8-12, The Draft EIR includes a Conceptual Phasing Plan implemented over a 20-year period.[1134] As summarized in Draft EIR Table 4-1, Centennial Project Overview, and on Draft EIR page 4-6, at full buildout the Project would include approximately 12,323 acres and would allow up to 19,333 dwelling units (du) on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light manufacturing uses) on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. Proposed sites for major utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass approximately 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on approximately 145 acres. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use.

Development within the Project site will require the preparation and implementation of TTMs for each phase and component of the Project. As discussed on Draft EIR page 4-92, the

[1134] DRP 2017, Exhibit 4-20; *Id.,* pp. 4-91 and -92

TTMs serve as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[1135] Chapter 4 of the Specific Plan describes the processes and procedures for implementing the Specific Plan, including the processes and procedures for subsequent Project approvals such as future TTMs. Chapter 4 of the Specific Plan also establishes mechanisms that allow for flexibility in the development of the Project to respond to market conditions over the anticipated buildout of the Project while ensuring consistency with the purpose and intent of the Specific Plan. Specific Plan Section, 4.5.2 Discretionary Conformance Review, provides that significant modifications of the Specific Plan, including land use adjustments under Specific Plan Section 4.6, (Specific Plan Adjustment, Transfer, and Conversion Regulations) are subject to discretionary review and approval, including additional CEQA analysis as applicable.[1136]

Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to the Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[1137] sets forth the conditions for approval of subdivision maps and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and the physical improvements to be installed. The primary objectives of the Act include the coordination of subdivision design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[1138] The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted cumulative conditions, are implemented without resulting in undue burdens to County and other taxpayers.

The MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. MMs 25 and 26[1139] require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation,

1135 Final EIR Appendix 4.0-A.Rev
1136 DRP 2017, Appendix 4.0-A, p. 4-8
1137 Government Code § 66410, et seq.
1138 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.
1139 Final EIR, Appendix 2.0-C.Rev

and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, in the extreme hypothetical suggested by the comment, no employment generating uses occur with Project residential development, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the Draft EIR. If these differences are found to generate new or more severe significant impacts, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

The Specific Plan and the MMRP require that project infrastructure be in place prior to residential, employment-generating and commercial development. As discussed on pages 4-92 to 4-96 of the Draft EIR, the first phase of development will include permanent and temporary uses, major infrastructure, public services, and roadway/circulation improvements to ensure that all services and infrastructure components are of sufficient size and capacity to serve early residents and occupants (e.g., schools, roadways, public park maintenance, and utilities). The MMRP requires that sufficient services and infrastructure, such as water, wastewater, utilities, roadways, be confirmed during the review and approval process for each TTM (see references to a "Tentative Tract Map" in the column titled, "When Monitoring to Occur" in Draft EIR Appendix 2.0-C). The Draft EIR states that if future development phases are delayed or do not occur these facilities will continue to provide permanent services and infrastructure. As a result, the Project will have incentives to develop residential, commercial and employment-generating uses in accordance with the balanced pattern discussed in the Draft EIR and required by the Specific Plan to ensure that early-phase infrastructure investments are efficiently utilized over time.

The notion that a large, mixed-use development with over 19,000 residential units could be developed without generating a single onsite job, as suggested in the comment, is highly unrealistic and purely speculative. The comment provides no evidence of any kind supporting the plausibility of such an outcome. Access to shopping, recreation, commercial activities and opportunities to work in close proximity with residential units are highly valued amenities that increase the desirability of and demand for housing units. In turn, these amenities require and stimulate demand for onsite employment. Consequently, residential developments have significant economic incentives to ensure that commercial and employment-generating land uses are implemented with housing in a balanced manner.

As discussed in responses to Comments F.8-11 and F.8-12, the fact that a project description and proposed phasing plan includes flexibility that may affect the timing of certain improvements is fully consistent with CEQA. The project description provides a stable and accurate summary of the proposed development, and the analysis of traffic impacts based on Project buildout is not unreliable because of Project phasing flexibility.

Response to Comment F.8-25:

This comment addresses the discussion of Project bicycle use. Contrary to the comment, the Project transporation analysis does not assume that any portion of the projected trips will occur by using bicycles. To provide a conservative analysis of potential Project impacts, all trips are assumed to occur by using automobiles.

The proposed Project bikeways are discussed on Draft EIR pages 4-35 to 4-36 and shown on Draft EIR Exhibit 4-8. The bikeways are part of the community trail system and include Class I Multi-use trails, Class II bikelanes, and Class IV protected bikeways. This network has been designed to allow the entire community to be accessible by bicycle. Pedestrian amenities throughout the community include trails that provide the shortest distance to goods and services within a ½ and ¼ mile of Village Core areas, slopes of 6 percent or less making it enjoyable and easy to walk, and the highest densities are located within ½ mile walk to Town Center and ¼ mile walk to Village Cores. The Project includes three grade-separated crossings over SR-138 to facilitiate access between the neighborhoods north of SR-138 and the. employment centers south of SR-138.

The Project analysis does not assume that any specific volume or percentage of trip will occur by bicycle. Instead, the Draft EIR provides information about the length and number of internal site trips that could be reasonably made by using bicycles or other non-automotive forms of transportation. The length of Project internal trips was estimated by the North County Sub-Area Model, which was updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. As shown in Table 3.8 of the traffic study[1140], the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. Draft EIR page 5.10-51 states that 40 percent of total Project internal trips would be 3 miles or less in length, and that 70 percent of the Project's internal trips would be 4 miles or less. Four percent of the internal trips would be less than one mile. The Draft EIR indicates that trips of 3 miles or are a comfortable biking

[1140] DRP 2017, Appendix 5.10-A

distance that most people can make in less than 15 to 20 minutes. Although the Project will encourage the use of bicycles and other non-autmotive forms of transportation, and is required to ensure that 30 percent of internal trips are completed by alternative transit modes from single occupancy automobiles (see MM 10-25[1141]), the analysis of traffic and transporation impacts does not require or assume that a specific percentage of Project trips occur using bicycles.

With respect to the comment's references to hills and other potential bicycling deterrents, the development of electric bicycles has significantly increased the feasibility of bike commuting, even in hilly areas such as San Francisco. Electrical assist technology, which makes cycling and commuting easier, is expected to increase the demand for and use of bicycles as an option to single occupancy vehicles in the state over time.[1142] As discussed above, the Project includes a substantial network of bikeways that would allow for and encourage the use of conventional and electrical powered bicycles throughout the site.

Response to Comment F.8-25A:

The comment and cited document noted. As discussed in response to Comment F.8-25, the Project analysis does not assume that a specific proportion of trips will occur via bicycle.

Response to Comment F.8-26:

This comment does not accurately describe the reasons for and methodologies used in the analysis of (a) existing conditions plus Project traffic and (b) cumulative conditions plus Project traffic in accordance with CEQA requirements.

The text cited to Draft EIR page 5.10-53 in the comment is included in a paragraph that discusses the analysis of potential Project impacts under existing traffic conditions plus the full buildout traffic generated by the Project. As discussed in a recent California Supreme Court decision, *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, existing conditions normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The existing plus Project analysis of traffic impacts is utilized in EIRs prepared in accordance with CEQA to address the legal requirement for identifying how a proposed project will affect baseline physical conditions, including existing roadways and traffic loads, at applicable roadway segments, freeway ramps and segments, and at queuing points.

Consistent with these well-established CEQA principles and practice, the text on Draft EIR page 5.10-53 states that, the purpose of the existing plus Project analysis is to differentiate the significant impacts due only to the Project from the significant impacts that would occur from other traffic sources. The Draft EIR explains that, to conduct this analysis, the traffic that would be generated by the Project was directly added to existing traffic conditions. The Draft EIR further explains that, to provide a conservative analysis, the Project traffic

[1141] Final EIR, Appendix 2.0-C.Rev

[1142] See https://www.forbes.com/sites/bradauerbach/2017/01/16/electric-bikes-will-shape-the-future-here-is-a-company-already-underway/#57d5b2e87749.

forecasts do not assume that any Project trip reduction measures are implemented. In addition, the Draft EIR states that the existing plus Project analysis does not assume that any existing background traffic, including the implementation of any approved, planned or anticipated projects could increase roadway capacity and potential Project impacts. The statement cited in the comment refers to an assumption—the maintenance of existing facilities and traffic with no changes, such as new construction or redirected traffic patterns that—that increases the probability that the existing plus Project analysis will identify significant Project-related impacts. This assumption commonly utilized in EIRs and is appropriate for the analysis of existing plus Project impacts.

The text cited to Draft EIR page 5.10-88 in the comment occurs in a discussion of the analysis of potential Project impacts combined with cumulative traffic growth from non-Project sources, applicable regional transportation plans, and plus Project-related traffic growth. This analysis commonly referred to in EIRs as a "cumulative plus Project scenario" identifies how a proposed project, in combination with other non-project growth (typically forecasted by regional transportation agencies) will affect roadways and traffic loads at applicable roadway segments, freeway ramps and segments, and at queuing points. Page 5.10-88 of the Draft EIR states that the amount of traffic that would be generated under future conditions in developed areas outside the Project—the amount of forecasted non-Project cumulative traffic growth—would not change with or without the Project. Contrary to the comment, this statement means that the cumulative non-Project traffic growth forecasted in regional transportation plans will occur with or without Project development. It does not in any manner mean that cumulative traffic conditions are assumed to stay the same over time. The immediately subsequent text on Draft EIR page 5.10-88 discusses how the distribution, but not the amount, of future vehicle trips generated by non-Project growth would be affected without and with Project development. The cumulative plus Project analysis properly assumes that forecasted non-Project traffic growth will occur irrespective of Project development, and that the distribution of the non-Project cumulative growth will be affected if the Project is developed.

The same existing plus project and cumulative place project traffic analysis methodologies were used in the Antelope Valley Area Plan EIR certified by the County in June 2015. As noted on page 5.16-26 of the AVAP EIR, the existing plus project (AVAP buildout) scenario was prepared by "using the base year sub-area model. Increases in traffic volumes resulting from the [AVAP buildout] are compared to the existing roadway network capacity. No changes to land uses or the roadway network outside of the Project Area are included in this scenario." The AVAP EIR cumulative plus project (AVAP buildout) scenario "reflect[s] anticipated growth resulting from the [AVAP buildout]. Outside of the Project Area, land use and roadway network assumptions are consistent with Future Baseline Conditions" which means the cumulative non-AVAP-related traffic growth forecasted in regional transportation plans. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1143] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic

[1143] CEQA § 21167.2

analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017)). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1144]

The portions of the comment that cite to the discussion of impacts to SR-138 on page 5.10-88 occur in the Draft EIR discussion of cumulative plus Project impacts to existing SR-138 facilities. Consistent with the Caltrans analysis of the need to improve SR-138 referenced in the comment, the Draft EIR analysis also shows that traffic on the existing two-lane SR-138 highway will exceed available capacity in several locations under cumulative conditions with and without the proposed Project. Pages 5.10-90 to 5.10-134 of the Draft EIR also discuss potential impacts to I-5, SR-14, and SR-99 that would occur and identify improvements that would avoid Project impacts to these facilities and SR-138 under cumulative plus Project conditions.

There is no inconsistency in the Draft EIR discussion of existing conditions in the existing plus Project analysis and cumulative conditions, including forecasted non-Project traffic growth, in the cumulative plus Project analysis. In the existing plus Project analysis, Project buildout traffic is added to existing roadway facilities and traffic in accordance with CEQA requirements. The existing plus Project analysis conservatively assumes no additional roadway construction or changes in existing traffic patterns that could increase the capacity to accommodate Project traffic. The cumulative plus Project analysis assumes forecasted non-Project cumulative traffic growth will occur (i.e., the forecasted growth will not be affected and will remain the same) with or without the Project. The Draft EIR correctly states that Project development would affect the distribution of the forecasted non-Project cumulative traffic growth because the Project would generate a new destination for inbound and outbound traffic.

The Draft EIR is also fully consistent with Caltrans' analysis of the need to improve SR-138 under forecasted cumulative conditions with or without the Project, including in the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"). The Draft EIR discusses the NW SR-138 project, including SR-138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Project Draft EIR was filed by the County on May 15, 2017 and the 60-day

[1144] Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

comment period began on May 17, 2017. As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR.[1145] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1146]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1147]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1148]

In summary, the analysis of existing plus Project and cumulative plus Project conditions in the Draft EIR and the STS conforms with all CEQA requirements. The Draft EIR analysis of the need for SR-138 improvements under future, cumulative conditions, is consistent with

[1145] Final EIR, Appendix 5.10-C, Sections 2.5 and 3
[1146] *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
[1147] *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
[1148] *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6

the Caltrans analysis of the need for these improvements, including in the NW SR-138 FEIR. The preferred alternative in the NW SR-138 FEIR has been incorporated into the Project traffic analysis in the STS. The Draft EIR and the STS do not include inconsistent assumptions about existing traffic conditions or cumulative traffic conditions in any traffic analysis scenario.

Response to Comment F.8-27:

This comment asserts that the Draft EIR traffic analysis uses improper thresholds of significance. Consistent with the current CEQA Guidelines, the Draft EIR uses traffic significance thresholds based on Level of Service (LOS) based on volume to capacity ratios. These LOS criteria are consistent with the thresholds used in Congestion Management Plan for Los Angeles County and correspond with performance criteria ranging from LOS A (highest level of performance) to LOS F (lowest level of performance). At the request of Caltrans, the analysis of existing plus Project conditions in the Draft EIR uses the Highway Capacity Manual (HCM) methodology, which identifies LOS levels on the basis of traffic density. The existing CEQA Guidelines specifically reference LOS criteria as thresholds for determining impact significance.

As discussed in the response to Comment F.8-17, Caltrans selected SR-138 improvement Alternative 2 (Alt 2") as the preferred alternative for implementing the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project") in the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR was issued in June 2017 during the comment period for the Draft EIR. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. The NW SR-138 FEIR evaluated impacts with reference to LOS thresholds using the HCM methodology. To be consistent with the NW SR-138 FEIR methodology, the STS also evaluates potential impacts using the same LOS thresholds and the HCM methodology.

The comment refers to potential revisions to the CEQA Guidelines concerning traffic impact thresholds that were proposed in discussion drafts by the California Governor's Office of Planning and Research (OPR) in August 2014 and revised in January 2016 to implement portions of Senate Bill (SB) 743 (Steinberg). SB 743 was signed into law in September 2013 to address transit-oriented infill projects, judicial review streamlining for environmental leadership development projects, and an entertainment and sports center in the City of Sacramento. The bill added *Public Resources Code* Section 21099(b)(1), which requires that OPR propose amendments to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas (TPAs). The statute provides that these criteria may include vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. SB 743 did not mandate which metric or methodology OPR should propose to use instead of LOS in or outside TPAs.

The OPR discussion drafts proposed to replace CEQA's current LOS significance thresholds with two new thresholds based on VMT and traffic inducement (i.e., the construction of any new capacity on existing highways or major roadways). The OPR proposal remains extremely controversial, especially outside major cities already served by transit, and with the goods movement industry and related manufacturing and agricultural producers in California who rely on adequate roadway capacity. The OPR proposal has not proceeded to the next administrative step required by SB 743, which is the commencement of formal rulemaking with a proposed new amendment to the CEQA Guidelines. The rulemaking process, once commenced, generally takes approximately one year to complete. CEQA Guideline revisions are also subject to challenge in CEQA lawsuits. For example, in *California Bldg. Indus. Assn. v. Bay Area Air Quality Mgmt. Dist.,* 62 Cal. 4th 369, 390 (2015) the court vacated portions of CEQA Guideline 15126.2(a) several years after it had been adopted. Contrary to the comment, the OPR discussion drafts currently remain as unimplemented and nonbinding policy proposals, not mandatory guidance. The 2016 OPR document is not, as stated in the comment an "Updated Guidance Document." As shown in the Commenter's own reference to the online version of the document (see Comment F.8-27A) the OPR clearly delineates the document as a "proposal." Section II page 7 of the document unambiguously states that "this document includes proposed additions to the CEQA Guidelines, which are found in Title 14 of the California Code of Regulations. Note, these additions, must undergo a formal administrative rulemaking process, and once adopted by the Natural Resources Agency, be reviewed by the Office of Administrative Law. [sic]"

For an approximately four-month period in 2016, Caltrans unexpectedly – with no public notice – advised its district offices to implement the OPR discussion draft proposal as though it was already required by law. Following significant controversy, including a critical hearing by the California Transportation Commission, Caltrans revised its guidance and removed directives to begin implementing the OPR Discussion Draft. At present, no state agency mandate exists to ignore CEQA's current LOS threshold of significance or to impose a new or alternative threshold of significance, including the VMT thresholds that have been discussed by the OPR. Notably, the NW SR-138 FEIR, which was issued by Caltrans in June 2017, evaluates impacts on the basis of the LOS thresholds in the existing CEQA Guidelines.

It should also be noted that local agencies may adopt their own thresholds of significance, provided these lead agency thresholds are supported by substantial evidence in the record. Los Angeles County has not adopted changes to the existing LOS-based CEQA significance thresholds. Consequently, the Draft EIR and the STS properly utilize the LOS thresholds in the CEQA Guidelines.

Response to Comment F.8-27A:

Comment noted. As discussed in response to Comment F.8-27, the referenced document is a discussion draft that has not been implemented through a formal rulemaking and has not modified in any manner the existing CEQA Guidelines thresholds for traffic impacts based on level of service (LOS) standards.

Response to Comment F.8-28:

As discussed on Draft EIR page 5.10-35 Caltrans considered widening SR-138 from I-5 to SR-1 in the 2004 North County Combined Highway Corridors Study. The study was not an EIR and was not a "project" subject to CEQA. The Draft EIR further explains that Caltrans initiated the Northwest 138 Corridor Improvement Project to expand on the North County Combined Highway Corridors Study and evaluate specific operational improvements for SR-138 from I-5 to SR-14. In July 2016, Caltrans released the Northwest State Route 138 Corridor Improvement Project Draft EIR/EIS (NW SR-138 Draft EIR). As noted by the Commenter in Comment F.8-17, in June 2017, during the comment period for the Project Draft EIR Caltrans released the NW SR-138 project Final EIR/EIS (FEIR) and identified Alternative 2 ("Alt 2") as the preferred improvement alternative for SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

The NW SR-138 Draft EIR and FEIR comply with CEQA and the National Environmental Policy Act (NEPA) and address potential air quality and climate change/greenhouse gas impacts associated with the improvements to SR-138. The Draft EIR accurately describes the North County Combined Highway Corridors Study referenced in the comment as a predicate study of SR-138 conditions subsequently pursued under the Northwest 138 Corridor Improvement Project. The NW SR-138 project was fully analyzed under CEQA and NEPA in the NW SR-138 Draft EIR and FEIR. As discussed in response to Comment F.8-22, the Project was included in the North County Sub-Area Model used in the NW SR-138 Draft EIR and FEIR. Contrary to the comment, the assertion that the 2004 North County Combined Highway Corridors Study did not address CEQA (and NEPA) topics that have been fully reviewed in the 2016 NW SR-138 Draft EIR and 2017 NW SR-138 FEIR is irrelevant to the Draft EIR discussion and the County's review and approval of the Project.

Response to Comment F.8-28A:

Comment noted. As discussed in response to Comment F.8-28, the referenced document is correctly described in the Draft EIR as an early study of SR-138 improvements by Caltrans. Caltrans subsequently initiated The Northwest 138 Corridor Improvement Project to expand on the referenced document and a full environmental analysis of the Northwest 138 Corridor Improvement Project, including traffic associated with the Project, has been prepared and certified.

Response to Comment F.8-29:

The portions of the Draft EIR that are referenced in the comment are part of a discussion of the lead agency's ability to ensure that improvements that are subject to the jurisdiction and control of another agency will occur. As discussed on page 5.10-30, the Draft EIR found that the Project mitigation measures would reduce traffic impacts to a less than significant level. The Draft EIR also discussed the fact that potential Project impacts would be significant and unavoidable if mitigation measures that reference state highway improvements are not

constructed by Caltrans because the County (as the Lead Agency) lacks jurisdiction and control and cannot mandate the construction of improvements to these facilities. Based on the County's lack of jurisdiction and control over State highway facilities, the Draft EIR determined that potential Project impacts that would be reduced to less than significant levels by state highway facility improvements would remain significant and unavoidable.

The finding that the need for mitigation that involves improvements to state highway improvements outside the jurisdiction and control of a lead agency results in significant and unavoidable impacts is common in EIRs prepared by cities and counties. Substantially the same finding was made by the County for the same CEQA impact in the Antelope Valley Area Plan Update EIR, which was certified in June 2015. With respect to state highway improvements identified in the AVAP EIR as mitigation for significant impacts, page 5.16-50 of the AVAP Draft EIR states that "inasmuch as the primary responsibility for approving and/or completing certain improvements lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control (e.g., the County cannot undertake or require improvements outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans' approval). Therefore, Impact 5.16-1 would remain significant and unavoidable."

Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1149] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017)). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1150]

Contrary to the comment, the Draft EIR in no way concludes that potential traffic impacts would be significant and unavoidable because they are physically infeasible or cannot be implemented. The EIR, including the Supplemental Traffic Study incorporating the preferred alternative for SR-138 improvements identified by Caltrans in the Northwest 138 Corridor Improvement Project Final EIR,[1151] detail improvements that are incorporated into the mitigation measures for the Project that reduce all potential Project significant impacts to less than significant levels. The sole basis for finding that certain Project impacts would

[1149] CEQA § 21167.2

[1150] Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

[1151] Final EIR Appendix 5.10-C

remain significant and unavoidable is, as determined by the County in the AVAP EIR, that the County lacks jurisdiction and control over State highway facilities sufficient to directly implement improvements to these facilities.

The Project mitigation measures require that applicable roadway improvements be implemented for Project development. MMs 10-3 and 10-4 require that the Project either fund these improvements by entering into an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. As discussed in response to Comment F.8-11, and on Draft EIR page 4-92, the tentative tract map (TTM) review and approval process serves as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[1152] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[1153] sets forth the conditions for approval of a subdivision map and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and the physical improvements to be installed. The primary objectives of the Act include the coordination of a subdivision's design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[1154] The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted conditions, are implemented and funded without resulting in undue burdens to County and other taxpayers.

The Mitigation Monitoring and Reporting Program (MMRP)[1155] requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. Consequently, the need for the implementation of applicable mitigation measures in the MMRP regarding improvements to local and state highway facilities, and the construction of measures required to address traffic conditions identified in each TTM traffic study, will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the state highway facilities required to

1152 Final EIR Appendix 4.0-A.Rev
1153 Government Code § 66410, et seq.
1154 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.
1155 Final EIR Appendix 2.0-C.Rev

accommodate traffic conditions evaluated in a TTM application have not been funded and constructed as required by the MMRP, the County has the authority deny the approval of any new TTMs and additional development until these facilities are built, or a new project application, with new CEQA analysis, is reviewed and approved.

Contrary to the comment, the Draft EIR mitigation measures require that the Project provide applicable funding for all traffic facility improvements necessary to accommodate Project traffic over time. These improvements are feasible and have been identified in the Draft EIR, in the STS, in the NW SR-138 FEIR, and in the AVAP EIR. Consistent with well-established CEQA principles and practice, and with the findings in the AVAP EIR, the sole basis for determining that Project traffic impacts would remain significant and unavoidable is that Caltrans, and not the lead agency, has jurisdiction and control over the implementation of mitigation measures that reference state highway improvements. This finding is fully consistent with all applicable CEQA requirements.

Response to Comment F.8-30:

This comment does not accurately describe the Mitigation Monitoring and Reporting Program (MMRP) requirements for the Project.[1156] As discussed in more detail in response to Comment F.8-11, the tentative tract map (TTM) approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[1157] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consistent with these requirements, the MMRP specifically links the evaluation of traffic and transit conditions, and the implementation of required improvements and other transportation-related measures, with the approval of each tentative map, As stated in the MMRP, for example, MM 10-2 requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. As discussed in more detail in response to Comment F.8-15, MMs 10-25 and 10-26[1158] require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation, and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will

[1156] Final EIR Appendix 2.0-C.Rev
[1157] DRP 2017, Appendix 4.0-A.Rev
[1158] Final EIR Appendix 2.0-C.Rev

be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved. MM 10-2, as cited in the comment, is fully enforceable and provides the necessary linkage between the TTM process and the evaluation and implementation of all transportation facility improvements that will meet the Project's transit and transportation demand and objectives during the buildout process.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS (NW SR-138 FEIR) and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR (see Final EIR Appendix 5.10-C, Section 2.5 and Section 3). The STS also demonstrates that, using the Highway Capacity Manual methodology for consistency with the NW SR-138 FEIR, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR. The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1159]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1160]

[1159] Final EIR Appendix 5.10-C, Tables 3-3 and 3-4
[1160] *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9

- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1161]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1162]

The Draft EIR considered improvements to SR-138 that would be required to accommodate the full buildout of the Project under cumulative traffic conditions. The implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative conditions, and additional improvements consistent with the SR-138 facilities considered in the Project Draft EIR would be required to accommodate all of the Project's full buildout traffic under long-range cumulative conditions. The NW SR-138 FEIR also clarified certain aspects of the SR-138 design details that would be implemented with Alt 2, including the number and locations of intersections along SR-138 from I-5 to SR-14. The NW SR-138 FEIR addressed several types of intersection configurations for each location, but defers selection of the final configurations to the SR-138 design phase. Subject to minor adjustments for consistency with these Alt 2 design details, the SR-138 facilities that would result from the additional improvements to Alt 2 required for full Project buildout under long-range cumulative conditions as described in the STS are substantially similar to the full buildout SR-138 facilities discussed in the Project Draft EIR. The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[1163]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[1164]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[1165]

As discussed in the STS,[1166] and as included in response to Comment F.8-17, the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2.

1161 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
1162 *Id.,* Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9
1163 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
1164 *Id.,* Appendix 5.10-C, Section 2.1
1165 *Id.,* Appendix 5.10-C, Section 2.4
1166 *Id.,* Appendix 5.10-C, Section 5

In accordance with the MMRP, the Project must provide the required funding for the implementation of all roadway and highway improvements, including the Project's fair share of the costs of implementing Alt 2, and additional improvements as confirmed in subsequent TTM traffic studies that may be required for cumulative conditions with full project buildout, prior to the approval of development that would utilize these facilities. MMs 10-3 and 10-4 require that the Project either fund these improvements by entering into an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. If the Project and Caltrans implement an improvement agreement, the required improvement funding must occur in accordance with the agreement and the funds must be paid to Caltrans prior to final map recordation for the Project (see references to "Prior to Final Map recordation" and "In accordance with the Traffic Mitigation Agreement" in the column titled, "When Monitoring to Occur" for MM 10-3[1167]). Alternatively, the Project is required to pay the fair share costs of each improvement prior to final map recordation (see reference to a "Prior to Final Map recordation" in the column titled, "When Monitoring to Occur" for MM 10-4[1168]).

These requirements are carried forward for each specific improvement to state highway systems, including to SR-138 and I-5, for the implementation of Alt 2 and additional improvements as confirmed in subsequent TTM traffic studies that may be required for cumulative conditions with full project buildout. As discussed in the STS and in more detail in response to Comment F.8-17, for example, MMs 10-6 to 10-23 address SR-138 improvements and MMs 10-34 to 10-41 address improvements to I-5 facilities. These and other MMRP improvements would, as discussed in Draft EIR Section 5.10 and the STS, fully mitigate all potential Project significant impacts to SR-138 other state highways. In each case the MMRP specifically requires that Project funding be provided either in accordance with the agreement with Caltrans and in accordance with the timing set forth in that agreement, or prior to final map recordation. The Project Applicant/Developer is the responsible agency or party identified in the MMRP for completing these requirements (see references to "Prior to Final Map recordation" and "In accordance with the Traffic Mitigation Agreement" in the column titled, "When Monitoring to Occur", "Comply with the terms of the Traffic Mitigation Agreement" and "pay fair share fees" in the column titled, "Action Required," and reference to "Project Applicant/Developer" in the column titled, "Responsible Agency or Party"[1169]). Consequently, all of the MMRP highway facility improvements required to address potential Project significant impacts are fully enforceable and must be completed before each phase of development may occur.

An analysis of the Project's fair share of the state highway facility improvements required by the MMRP is provided in Section 5.3 of the Draft EIR traffic study.[1170] The analysis uses the methodology for determining fair share funding set forth the Caltrans guidelines for the preparation of traffic impact studies of State facilities. As noted on page 5.8 of Draft EIR Appendix 5.10-A, the Caltrans guide specifically states that "The methodology [fair share calculation] is neither intended as, nor does it establish a legal standard for determining

1167 *Id.,* Appendix 2.0-C.Rev
1168 *Ibid.*
1169 *Ibid.*
1170 DRP 2017, Appendix 5.10-A

equitable responsibility and cost of a project's traffic impact…." Also, as discussed above, the NW SR-138 FEIR addressed several types of intersection configurations for each location, but defers selection of the final configurations to the SR-138 design phase. The precise amount that the Project will be required to pay as the fair share contributions to regional improvements is speculative and subject to change until the final design phase of SR-138 improvements are determined. The MMRP requires that the Project fund all applicable fair share highway improvements either in accordance with an agreement with Caltrans, which would identify the precise Project funding for each improvement in the agreement, or prior to the approval of final maps, which will require documentation of the final state highway system design costs and the Project's fair share of these costs, to the satisfaction of the County. The Project Applicant/Developer is solely responsible for funding the required improvements prior to subsequent approvals necessary to develop the Project irrespective of the applicable costs determined in accordance with MM 10-3 or MM 10-4.

Response to Comment F.8-31:

This comment does not accurately describe the Mitigation Monitoring and Reporting Program (MMRP) requirements for the Project,[1171] which obligate the Project Applicant/Developer to fund all required state highway improvements in accordance with MM 10-3 or MM 10-4 prior to subsequent approvals necessary to develop the Project. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS (NW SR-138 FEIR) and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR.[1172] The STS also demonstrates that, using the Highway Capacity Manual methodology for consistency with the NW SR-138 FEIR, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR. The STS findings include the following:

[1171] Final EIR Appendix 2.0-C.Rev
[1172] *Id.,* Appendix 5.10-C, Sections 2.5 and 3

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1173]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1174]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1175]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1176]

The Draft EIR considered improvements to SR-138 that would be required to accommodate the full buildout of the Project under cumulative traffic conditions. The implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative conditions, and additional improvements consistent with the SR-138 facilities considered in the Project Draft EIR would be required to accommodate all of the Project's full buildout traffic under long-range cumulative conditions. The NW SR-138 FEIR also clarified certain aspects of the SR-138 design details that would be implemented with Alt 2, including the number and locations of intersections along SR-138 from I-5 to SR-14. The NW SR-138 FEIR addressed several types of intersection configurations for each location, but defers selection of the final configurations to the SR-138 design phase. Subject to minor adjustments for consistency with these Alt 2 design details, the SR-138 facilities that would result from the additional improvements to Alt 2 required for full Project buildout under long-range cumulative conditions as described in the STS are substantially similar to the full buildout SR-138 facilities discussed in the Project Draft EIR. The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[1177]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[1178]

[1173] *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
[1174] *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
[1175] *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
[1176] *Id.,* Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9
[1177] *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
[1178] *Id.,* Appendix 5.10-C, Section 2.1

- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[1179]

As discussed in the STS,[1180] and as included in response to Comment F.8-17, the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2.

In accordance with the MMRP, the Project must provide the required funding for the implementation of all roadway and highway improvements, including the Project's fair share of the costs of implementing Alt 2, and additional improvements as confirmed in subsequent TTM traffic studies that may be required for cumulative conditions with full project buildout, prior to the approval of development that would utilize these facilities. MMs 10-3 and 10-4 require that the Project either fund these improvements by entering into an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. If the Project and Caltrans implement an improvement agreement, the required improvement funding must occur in accordance with the agreement and the funds must be paid to Caltrans prior to final map recordation for the Project (see references to "Prior to Final Map recordation" and "In accordance with the Traffic Mitigation Agreement" in the column titled, "When Monitoring to Occur" for MM 10-3[1181]). Alternatively, the Project is required to pay the fair share costs of each improvement prior to final map recordation (see reference to a "Prior to Final Map recordation" in the column titled, "When Monitoring to Occur" for MM 10-4[1182]).

These requirements are carried forward for each specific improvement to state highway systems, including to SR-138 and I-5, for the implementation of Alt 2 and additional improvements as confirmed in subsequent TTM traffic studies that may be required for cumulative conditions with full project buildout. As discussed in the STS and in more detail in response to Comment F.8-17, for example, MMs 10-6 to 10-23 address SR-138 improvements and MMs 10-34 to 10-41 address improvements to I-5 facilities. These and other MMRP improvements would, as discussed in Draft EIR Section 5.10 and the STS, fully mitigate all potential Project significant impacts to SR-138 other state highways. In each case the MMRP specifically requires that Project funding be provided either in accordance with the agreement with Caltrans and in accordance with the timing set forth in that agreement, or prior to final map recordation. The Project Applicant/Developer is the responsible agency or party identified in the MMRP for completing these requirements (see references to "Prior to Final Map recordation" and "In accordance with the Traffic Mitigation Agreement" in the column titled, "When Monitoring to Occur", "Comply with the terms of the Traffic Mitigation Agreement" and "pay fair share fees" in the column titled, "Action Required," and reference to "Project Applicant/Developer" in the column titled, "Responsible Agency or Party"[1183]). Consequently, all of the MMRP highway facility improvements required to address potential

1179 *Id.,* Appendix 5.10-C, Section 2.4
1180 *Id.,* Appendix 5.10-C, Section 5
1181 *Id.,* Appendix 2.0-C.Rev
1182 *Ibid.*
1183 *Ibid.*

Project significant impacts are fully enforceable and must be completed before each phase of development may occur.

An analysis of the Project's fair share of the state highway facility improvements required by the MMRP is provided in Section 5.3 of the Draft EIR traffic study.[1184] The analysis uses the methodology for determining fair share funding set forth the Caltrans guidelines for the preparation of traffic impact studies of State facilities. As noted on page 5.8 of Draft EIR Appendix 5.10-A, the Caltrans guide specifically states that "The methodology [fair share calculation] is neither intended as, nor does it establish a legal standard for determining equitable responsibility and cost of a project's traffic impact…." Also, as discussed above, the NW SR-138 FEIR addressed several types of intersection configurations for each location, but defers selection of the final configurations to the SR-138 design phase. The precise amount that the Project will be required to pay as the fair share contributions to regional improvements is speculative and subject to change until the final design phase of SR-138 improvements are determined. The MMRP requires that the Project fund all applicable fair share highway improvements either in accordance with an agreement with Caltrans, which would identify the precise Project funding for each improvement in the agreement, or prior to the approval of final maps, which will require documentation of the final state highway system design costs and the Project's fair share of these costs, to the satisfaction of the County. The Project Applicant/Developer is solely responsible for funding the required improvements prior to subsequent approvals necessary to develop the Project irrespective of the applicable costs determined in accordance with MM 10-3 or MM 10-4.

Response to Comment F.8-32:

As discussed in more detail in the responses to Comments F.8-30 and F.8-31, the Mitigation Monitoring and Reporting Program (MMRP)[1185] requires that the Project fund all applicable fair share highway improvements either in accordance with an agreement with Caltrans, which would identify the precise Project funding for each improvement in the agreement, or prior to the approval of final maps, which will require documentation of the final state highway system design costs and the Project's fair share of these costs, to the satisfaction of the County. The Project Applicant/Developer is solely responsible for funding the required improvements as a condition of subsequent approvals necessary to develop the Project irrespective of the applicable costs determined in accordance with MM 10-3 or MM 10-4. The Project's state highway funding and improvement obligations are fully enforceable under the MMRP, and no development could occur until these obligations have been met. Nothing in the Draft EIR or MMRP would permit in any manner an outcome, as the comment appears to suggest, that the Project would not fund its fair share of all required state highway improvements identified in the Draft EIR, the supplemental traffic study[1186] and in the MMRP.

1184 DRP 2017, Appendix 5.10-A
1185 Final EIR Appendix 2.0-C.Rev
1186 *Id.,* Appendix 5.10-C

Response to Comment F.8-33:

The Commenter's opinion that environmental impacts related to SR-138 improvements discussed in the Draft EIR have not been evaluated is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Traffic growth and facility improvements, including the expansion of SR-138 in the North County region under future conditions with the Project, have been evaluated in the Antelope Valley Area Plan Update EIR, which was certified by the County in June 2015 and in the Caltrans Northwest State Route 138 Corridor Improvement Project Final EIR/EIS (NW SR-138 FEIR) issued in June 2017. Both the AVAP EIR and the NW SR-138 FEIR used the North County Sub-Area Model to evaluate traffic impacts and to identify mitigation for traffic impacts, including the widening of SR-138, to accommodate future traffic growth with the buildout of the AVAP and North County area. As discussed in response to Comment F.8-22, the North County Sub-Area Model includes Project-related development and traffic growth. The Project is also included in and implements the AVAP for the West Economic Opportunity Area considered in the AVAP EIR.

Both the AVAP EIR and the NW SR-138 FEIR consider environmental impacts in accordance with CEQA Guidelines Appendix G. The AVAP EIR considered potential impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, recreation, utilities and service systems, growth inducing impacts and alternatives to the proposed project in addition to transportation and traffic. The AVAP EIR found that all potentially significant impacts of the AVAP buildout would be mitigated to less than significant levels except for certain impacts to agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, and utilities and service systems. As discussed in response to Comment F.8-29, transportation and traffic impacts were also determined to be significant and unavoidable due to the County's lack of jurisdiction over mitigation that requires a combination of regional programs that are the responsibility of other agencies such as cities and Caltrans, The AVAP EIR also found that case-by-case mitigation would be required to determine specific physical, program and policy-level mitigation measures that would reduce the level of impacts below a significant level for specific development projects in the AVAP region.[1187]

Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1188] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los*

[1187] DRP 2014a, Section 6, p. 6-5
[1188] CEQA § 21167.2

Angeles, No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017)). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1189]

The NW SR-138 FEIR considered potential impacts to land use, growth, farmlands and timberlands, community impacts, utilities and emergency services, pedestrian and bicycle facilities, visual and aesthetics, cultural resources, hydrology and floodplain, water quality and storm water runoff, geology, soils, seismic and topography, paleontology, hazardous waste and materials, air quality, noise and vibration, energy, biological environment, climate change, growth inducing impacts and construction impacts as well transportation and traffic impacts. The NW SR-138 FEIR considered a no-build alternative, Build Alternative 1 (a freeway expressway facility for SR-138 between I-5 and SR-14) and Build Alternative 2 (an expressway – conventional highway facility for SR-138 between I-5 and SR-14). As noted above, the NW SR-138 FEIR identified Alternative 2 ("Alt 2") as the preferred improvements to SR-138. With mitigation, the NW SR-138 FEIR found that all potentially significant impacts would be reduced to less than significant levels except for impacts related to farmland conversion (NW SR-138 FEIR, Section 4). No lawsuits challenging the NW SR-138 FEIR were filed within the applicable statute of limitations, and therefore the FEIR is now "conclusively presumed to comply" with CEQA.[1190]

As discussed on page 5.10-35 of the Draft EIR, in July 2016, Caltrans released the draft Northwest State Route 138 Corridor Improvement Project EIR/EIS (NW SR-138 Draft EIR). Both the NW SR-138 Draft EIR and the Project Draft EIR analysis and traffic study[1191] considered the improvement of similar mainline segments and intersections along the SR-138 corridor. As discussed above and noted in Comment F.8-17, in June 2017, during the comment period for the Project Draft EIR, Caltrans released the NW SR-138 FEIR and identified Alternative 2 ("Alt 2") as the preferred improvement alternative for SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1192]

[1189] Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

[1190] CEQA § 21167.2

[1191] DRP 2017, Appendix 5.10-A

[1192] Final EIR Appendix 5.10-C, Tables 3-3 and 3-4

- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1193]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1194]

The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[1195]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[1196]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[1197]

The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities.[1198] The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR.[1199] For example, Alt 2 includes a 6-lane Expressway from Gorman Post Road to 300th Street West and a 4-lane expressway from 300th Street West to 240th Street West. Under long-range cumulative condition traffic conditions with Project buildout, the Draft EIR and STS indicate that a 6-lane expressway may be required from 300th Street West to approximately 1/2 mile east of 250th Street West. The STS compared the impact area cross sections for the SR-138 6-lane and 4-lane expressway configurations considered in the NW SR-138 FEIR, and determined that the primary difference between these configurations is the presence of a third lane within the median area. The total area of impact and right-of-way requirement considered in the NW SR-138 FEIR is the same for both the 6-lane and 4-lane configurations on the applicable SR-138 segments. Based on the comparison of the NW SR-138 FEIR impact areas with the potential improvements in addition to Alt 2 that may be required to accommodate cumulative plus full buildout Project traffic, the STS confirms that, no new or

1193 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
1194 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
1195 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
1196 *Id.,* Appendix 5.10-C, Section 2.1
1197 *Id.,* Appendix 5.10-C, Section 2.4
1198 *Id.,* Appendix 5.10-C, Section 5
1199 *Id.,* Appendix 5.10-C, Sections 2.5 and 3

more severe significant impacts than considered in the Draft EIR, the NW SR-138 FEIR and the AVAP EIR would occur.

The Commenter's summary conclusion that the Draft EIR does not consider the effects of traffic mitigation, specifically with respect to habitat destruction, growth-inducing impacts, and impaired wildlife connectivity, are noted. The transportation improvements needed to serve the project, including the access points and potential Caltrans SR-138 right-of-way, were fully assessed in Section 5.7, Biological Resources, of the Draft EIR. The description of off-site areas studied[1200] includes "utilities and intersection improvements along SR-138" and refers to Exhibit 4-25. Close review of Exhibit 5.7-1 also reveals a baseline vegetation mapping layer for the SR-138 corridor as it moves throughout the Project area. The methodology within the wildlife movement discussion on page 5.7-55 similarly discusses the analysis of linkages through the area including "along SR-138." Page 5.7-78 of the Draft EIR goes on to discuss existing condition of wildlife movement with regarding to the hindrance of SR-18 specifically. The impact footprint reflecting SR-138 right-of-way is depicted in Exhibit 5.7-11a, 5.7-11b, 5.7-12, 5.7-13, 5.7-14, 5.7-15, and 5.7-16. Furthermore, Section 5.7.6 of the Draft EIR, Environmental Impacts (of biological resources), describes off-site impacts within each impact threshold discussion and indicates inclusion of SR-138. Consequently, the potential environmental impacts associated with mitigation measures that require improvements to SR-138 have been fully considered and meet all applicable CEQA requirements.

Response to Comment F.8-34:

The Draft EIR thoroughly analyzes the Project's potential to cause significant impacts from noise and vibration, and imposes a comprehensive suite of mitigation measures to ensure that any noise and vibration impacts are mitigated in compliance with CEQA. The Draft EIR's analysis is based on the Centennial Noise Study ("Noise Study"), conducted by noise experts Wieland Acoustics,[1201] noise monitoring data collected by BonTerra Psomas to establish baseline noise levels,[1202] the Centennial Specific Plan Traffic Study ("Traffic Study"), prepared by traffic experts Stantec Consulting Services, Inc.,[1203] and previously adopted analyses including but not limited to the County's 2015 EIR for its General Plan Update[1204] and the County's EIR for the Antelope Valley Area Plan EIR.[1205] On the basis of these technical studies and other evidence in the record, the EIR analyzes and mitigates the Project's potential noise and vibration impacts in compliance with CEQA.

Like many lead agencies, the County of Los Angeles has adopted specific thresholds of significance to analyze projects' potential noise impacts, adapted from Appendix G to the State CEQA Guidelines.[1206] CEQA vests the lead agency with substantial discretion in determining the appropriate threshold of significance to evaluate the severity of a particular

[1200] DRP 2017, p. 5.7-27
[1201] *Id.,* Appendix 5.12-A
[1202] *Id.,* Appendix 5.12-B
[1203] *Id.,* Appendix 5.10-A
[1204] DRP 2015
[1205] DRP 2014a
[1206] DRP 2017, pp. 5.12-20 and -21

impact.[1207] (See also *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068 [explaining agency discretion to fashion significance thresholds].) As explained in the State CEQA Guidelines, "[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area."[1208] Accordingly, the Draft EIR analyzes the potential for the Project to cause any of six project-level impacts as established under the County's adopted criteria.

First, under Threshold 12-1, the Draft EIR analyzes the potential for the Project to "result in exposure of persons to, or generation of, noise in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies".[1209] The County General Plan and County Code establish a land use compatibility exterior noise standard of 65 dBA CNEL and an indoor noise standard of 45 dBA, based on the State General Plan Guidelines.[1210] These are common standards adopted by numerous other jurisdictions.[1211,1212] The County Code also establishes a set of noise regulations – one set for non-construction stationary noise sources, and a different set for construction activities – which impose time-of-day limitations on noise-producing activities, and a set of noise standards that vary based on time, day, activity and affected noise receptor.[1213] Lead agencies may rely on general plans and noise ordinances to develop and apply CEQA thresholds of significance for noise. (See *Nat'l Parks & Conservation Assn v. Cty. Of Riverside*, 71 Cal.App.4th 1341, 1353 (1999) [upholding EIR's use of county noise ordinance standard of 65 dB for assessing significance of project's noise impacts]; and *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098, 1146-1151 (E.D.Cal. 2013) [upholding significance threshold that limited hours during which construction could occur, but did not otherwise impose limit on construction noise because county's approach was consistent with noise ordinance]). More generally, it is well established that a lead agency may rely on existing applicable regulatory standards in assessing significance. (See, e.g., *North Coast Rivers Alliance v. Marin Mun. Water Dist.* (2013) 216 Cal.App.4th 614, 651 [upholding analysis of greenhouse gas emission based on consistency with county's emissions reduction goals]; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492-493 [upholding thresholds of significance for aesthetic impacts derived from city's local coastal program policies]; *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 932-934 [upholding determination that energy impact of project was less than significant because the project achieved energy efficiencies greater than those required by California Energy Efficiency Standards]; *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 106 [upholding finding that incremental impacts of criteria pollutants on sensitive crops would be less than significant based on National Ambient Air

[1207] CEQA Guidelines, § 15064(b)
[1208] *Ibid*.
[1209] DRP 2017, p. 5.12-21
[1210] *Id.,* pp. 5.12-4, -5, -12, -13
[1211] *Id.,* p. 5.12-5, Table 5.12-1; *Id.,* Exhibit 5.12-1
[1212] *Id.,* Appendix 5.12-A pp. 8-14
[1213] *Id.,* pp. 5.12-6 to -9

Quality Standards promulgated to protect public health and welfare from adverse effects of a pollutant]; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 932-934 [upholding use of thresholds of significance recommended by SCAQMD to assess air quality impacts]; and *Oakland Heritage All. v. City of Oakland* (2011) 195 Cal.App.4th 884, 896 [agency has discretion to rely on adopted standards to serve as significance thresholds for a particular project]).

Accordingly, impacts are considered significant under Threshold 12-1 if the exterior CNEL at proposed noise-sensitive land uses would exceed 65 dBA; if the interior CNEL would exceed 45 dBA in habitable rooms at proposed residences, hotels, schools, or places of worship (specified in the California State Building Code and County Building Code); if the noise levels generated by non-transportation (i.e., stationary) sources on the Project site would exceed the exterior limits specified in the County Code; or if construction activities would generate noise levels in excess of the County Code's construction noise standards.[1214] On the basis of the Noise Study, among other evidence, the Draft EIR concluded that compliance with the County Code would reduce these impacts to a less than significant level, and CEQA specifically permits a lead agency to rely on compliance with existing regulatory and enforcement measures when concluding that impacts can be mitigation to a less than significant level.[1215] In this case, the County has gone further by adopting significant additional mitigation to ensure that the Project will not create noise levels in excess of applicable standards. Specifically, MMs 4.12-1 and 4.12-2 require the Project Applicant/Developer to submit an Acoustical Study by an acoustical engineering expert, demonstrating that the Project has been designed to comply with applicable County standards, and where necessary to ensure compliance, has included design elements such as setbacks and noise barriers that are sufficient to meet the objective, fixed performance standard articulated in the County's noise standards. MM 12-3 also requires that the Project's construction activities comply with the County Code's construction noise requirements, and requires specific best management practices to minimize construction noise. Additionally, with implementation of MM 12-6, the Project Applicant/Developer shall provide prospective purchasers or tenants on the Project site a notice and statement of acknowledgment that the Centennial property will be undergoing continuing development which could result in noise impacts. Collectively, these measures would reduce potential impacts to a less than significant level.

Second, under Threshold 12-2, the Draft EIR analyzes the potential for the Project to "[r]esult in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels."[1216] The County Code prohibits vibration activities that exceed that exceed the vibration perception threshold (annoyance) of 0.01 particle velocity (ppv) inch per second (in/sec). Again, rather than merely rely on enforcement of this Code requirement, MMs 12-4 and 12-5 require the Applicant/Developer to proactively demonstrate that activities have been designed to comply with this standard, by submitting a vibration analysis to the County before vibration-causing activities can commence. MMs 12-4 and 12-5 specific alternative measures such as pile driving cushions or jetting that could be imposed to meet this

[1214] *Id.,* p. 5.12-21
[1215] *Oakland Heritage All.*, 195 Cal.App.4th at 896
[1216] DRP 2017, p. 5.12-34

performance standard if necessary. Although it is anticipated that any blasting would be limited and would occur at large distances from existing or future receptors, MM 12-7 also requires a blasting plan if blasting is anticipated within 1,000 feet of a residence or similar sensitive land use, which would require that the Blasting Plan be approved by appropriate County authorities and affected residents be notified.

Third, under Threshold 12-3, the Draft EIR considers the potential for the Project to "[r]esult in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project, including noise from parking area."[1217] The primary permanent noise increases associated with the Project are from increased traffic. CEQA does not define what constitutes a "substantial permanent increase in ambient noise levels," and the County Code also does not establish any specific requirement in this regard. Therefore, the County has substantial discretion in establishing criteria for this threshold.[1218,1219] In this case, the County has established a very conservative standard, classifying any permanent noise increase as "substantial" if Project-related traffic noise increases the ambient noise level at noise-sensitive locations by 5 dBA or more, *or* if traffic noise would increase the ambient noise level at noise-sensitive locations by 3 dBA or in areas where the ambient noise levels under With-Project conditions fall within the "Normally Unacceptable" or "Clearly Unacceptable" categories under the California's Noise/Land Use Compatibility State CEQA Guidelines. The County used this same standard in the County's EIR for its 2035 General Plan Update and its EIR for the Antelope Valley Area Plan.[1220,1221] This standard is much more conservative than the standard used by numerous other jurisdictions, including Caltrans.[1222]

Applying the County's significance criteria standard, again based on the expert technical analyses, the Draft EIR concludes that the Project would not cause any significant impacts under the 2035 Plus Project scenario at any location, with one exception. On SR-138 between Gorman Post Road and Old Ridge Route Road, where there is currently only a single adjacent residence, the Project would cause a 3.3 dBA increase in noise levels. The Draft EIR identifies specific feasible measures that are available to reduce this impact to a less than significant level: construction of a noise barrier at affected receptors or resurfacing the roadway with rubberized asphalt pavement.[1223] However, these mitigations would involve alterations to private property and/or within Caltrans' right-of-way, which are not in the County's or the Project Applicant's control. Since there are no feasible measures to reduce the significance of this impact that are within the County's jurisdiction to adopt, this impact is characterized as significant and unavoidable. CEQA explicitly authorizes a lead agency to find that the

1217 *Id.*, p. 5.12-21
1218 CEQA Guidelines, § 15064
1219 *Save Cuyama Valley*, 213 Cal.App.4th at 1068
1220 DRP 2014a
1221 LACDRP 2015
1222 See Caltrans 2017b, p. 283 ("According to the [California] Department [of Transportation]'s Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects, May 2011," an impact "substantially exceeds the existing noise level" when it causes a "12 dBA or more increase") (emphasis added); see also Noise Study, p. 14 (Kern County only requires achievement of the 65 dB outdoor/45 dB indoor General Plan standard).)
1223 DRP 2017, p. 5.12-45 and -46

appropriate mitigation measures for a particular impact "are within the responsibility and jurisdiction of another public agency and not the agency making the finding."[1224]

Fourth, under Threshold 12-4, the Draft EIR considers the potential for the Project to "[r]esult in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from amplified sound systems."[1225] CEQA does not define what constitutes a "substantial temporary or periodic increase in ambient noise levels," and the County General Plan and County Code also do not specifically define the threshold for a "substantial" increase, so the County has used its discretion as lead agency to consider impacts significant under this criterion if construction or other temporary noise would exceed the construction noise standards in the County Code or General Plan. To mitigate this impact, the Draft EIR imposes MM 12-3, which requires compliance with the County Code's provisions regarding construction noise, and also requires best practices such as equipping construction with noise-reducing features and imposing noise abatement enclosures and equipment on stationary equipment.

Fifth, the Draft EIR considers Threshold 12-5 ("[f]or a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels"), but this threshold is not applicable because the Project is neither within an airport land use plan nor within two miles of any public or public use airport.[1226]

Sixth, under Threshold 12-6, the Draft EIR considers whether the Project would expose people residing or working in the Project area to excessive noise levels from a private airstrip. The Project is adjacent to the privately-owned Quail Lake Skypark, but this airport has only six locally based aircraft, and the Draft EIR concludes on the basis of reports from the Caltrans Division of Aeronautics, and analysis in the Noise Study, that the airstrip would not expose Project residents or workers to excessive noise levels.[1227]

Finally, the Draft EIR also analyzes the potential for the Project to cause cumulative noise impacts or growth-inducing noise impacts.[1228] For more information on cumulative noise impacts, please see responses to Comments F.8-40 through F.8-43.

It should be noted that many of the impact analyses and mitigation requirements contained in the Noise Section of the Draft EIR go beyond CEQA's requirements, since many of the analyzed impacts relate to the impacts of the environment on the Project's users and residents, rather than the Project's impact on the environment.[1229] However, to ensure a conservative analysis, the Draft EIR fully analyzes and mitigates all impacts identified in the County's adopted thresholds, even those impact thresholds that were adopted before the *CBIA v. BAAQMD* decision and are now beyond CEQA's scope.

1224 CEQA Guidelines § 15091(a)(2); *Id.,* CEQA Guidelines § 21081(a)(2)
1225 DRP 2017, p. 5.12-21
1226 *Id.,* p. 5.12-47
1227 *Id.,* pp. 5.12-47 and -48; *Id.,* Appendix 5.12-A, pp. 17, 38, 51
1228 *Id.,* pp. 6-1 to -9; 7-20 to -22
1229 *CBIA v. BAAQMD* at 369, 386

The Commenters' citations to the State CEQA Guidelines and to case law are noted. The Commenters correctly cite the State CEQA Guidelines' requirement that "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments"[1230] and correctly quote *Fed'n of Hillside & Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261, as explaining that "[t]he purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." However, contrary to the Commenters' suggestion, all of the Draft EIR's mitigation measures, including the noise mitigation measures, meet this requirement. In *Fed'n of Hillside & Canyon Assns.*, the city identified mitigation measures but then "did not require that they be implemented as a condition of the development . . . and made no provision to ensure that they will actually be implemented . . .."[1231] Here, if the Board of Supervisors approves the Project and certifies the Draft EIR, it will incorporate the Draft EIR's mitigation measures as conditions of Project approval, and will incorporate the measures into a Mitigation, Monitoring, and Reporting Program, as provided for in CEQA.[1232] Incorporating mitigation measures into conditions of approval is legally sufficient to meet that the State CEQA Guidelines' requirement that mitigation measures be fully enforceable.[1233,1234]

The Commenters cite State CEQA Guidelines § 15126.4(a)(1)(B), which provides that "[f]ormulation of mitigation measures should not be deferred until some future time." The same Guideline goes on to state: "However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way."[1235] Applying this standard, courts have developed legal principles regarding the extent to which an agency, in concluding that a significant impact will be mitigated to a less than significant level, can rely on a mitigation measure that defers some amount of environmental problem-solving until after project approval. Such deferral is permissible where the adopted mitigation measure both (1) commits the agency to a realistic performance standard or criterion that will ensure the mitigation of the significant effect; and (2) disallows the occurrence of physical changes to the environment unless the performance standard is or will be satisfied. (See, e.g., *N. Coast Rivers All. v. Marin Mun. Water Dist.* (2013) 216 Cal.App.4th 614, 629-30 [reversing trial court finding that mitigation was impermissibly deferred, because "'when a public agency has evaluated the potentially significant impacts of a project and has identified measures that will mitigate those impacts,' and has committed to mitigating those impacts, the agency may defer precisely how mitigation will be achieved under the identified measures pending further study"] (internal quotation omitted)]; *Citizens for a Sustainable Treasure Island v City & Cty. of S. F.* (2014) 227 Cal.App.4th 1036, 1059 [mitigation performance standard is sufficient if it identifies the criteria the agency will apply in determining that the impact will be mitigated]; *Riverwatch v. City of San Diego* (1999) 76 Cal. App. 4th 1428, 1147-1448 ["the fact the entire extent and precise detail of the mitigation that may be required is not known does not undermine the

1230 CEQA Guidelines § 15126.4(a)(2)
1231 *Fed'n of Hillside & Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261
1232 CEQA Guidelines § 21081.6
1233 *Id.,* § 21081.6(b)
1234 *Gray v. Cty. of Madera* (2008) 167 Cal.App.4th 1099, 1116
1235 State CEQA Guidelines § 15126.4(a)(1)(B)

Final EIR's conclusion that the impact can in fact be successfully mitigated;" such analysis was appropriately deferred where there was "nothing in the record which suggests that the impact cannot be mitigated in the manner described in the Final EIR."]; *Rio Vista Farm Bureau Ctr. v. Cty. of Solano* (1992) 5 Cal. App. 4th. 371, 375-77 [in EIR for hazardous waste plan, specific mitigation measures could validly be proposed when individual projects were proposed in the future]; cf. *Communities for a Better Env't v City of Richmond* ("*CBE*") (2010) 184 Cal.App.4th 70, 95 [rejecting mitigation measure because, unlike the measures affirmed in numerous other cases, the measure in question "created no objective criteria for measuring success"]).

The Draft EIR's noise mitigation measures comply with these legal requirements. The mitigation measures defer the formulation of some specific measures that will be implemented at each site, but the mitigation measures "specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way," as CEQA expressly permits.[1236] The measures commit the County to specific and "objective criteria for measuring success",[1237] namely achievement of the numeric noise and vibration criteria established in the County Code. MMs 12-1 and 12-2 also identify specific alternatives to achieve the performance standard: building setbacks; noise barriers; building and interior living space orientation; sound-rated windows; upgraded exterior wall and/or roof construction; insulation batts; and forced air ventilation. The Noise Study provides expert opinion that these measures are feasible and effective in achieving the designated performance standard.[1238] Similarly, MMs 12-4 and 12-5 require specific measures sufficient to meet the specific County Code standard for vibration.

"[F]or [the] kinds of impacts for which mitigation is known to be feasible, but where practical considerations prohibit devising such measures early in the planning process ..., the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval."[1239] "Where future action to carry a project forward is contingent on devising means to satisfy such criteria, the agency should be able to rely on its commitment as evidence that significant impacts will in fact be mitigated."[1240] Here, as the Draft EIR explains, "specific noise-reduction measures that would be applied at each potentially impacted land use cannot be defined until future tract maps have been prepared and the site-specific acoustical analysis (i.e., MM 12-1) is performed."[1241] In this situation, since "practical considerations prohibit devising . . . [more specific] measures early in the planning process," deferred formulation of specific measures is not only permissible but is also the most appropriate approach.[1242]

The Commenters cite two "deferred mitigation" cases, both of which support the Draft EIR's approach. In the first case, the Commenter Center for Biological Diversity was the plaintiff,

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1236 *Ibid*.
1237 *Communities for a Better Env't v City of Richmond* ("CBE") (2010) 184 Cal.App.4th at 95
1238 DRP 2017, Appendix 5.12-A, pp. 51-54
1239 *N. Coast Rivers All.*, 216 Cal.App.4th at 629 [quoting *Sacramento Old City Assn. v. City Council* ("*SOCA*") (1991) 229 Cal.App.3d 1011, 1028-29]
1240 *Ibid*.
1241 DRP 2017, p. 5.12-22
1242 *N. Coast Rivers All.*, 216 Cal.App.4th at 629

and in that case, "[t]he Center acknowledge[d] CEQA allows . . . deferral if the EIR specifies performance standards that future mitigation must meet . . .."[1243] CBD argued, however, that DFW had failed to adopt performance standards to guide the development of future aquatic biodiversity management plans and hatchery genetic management plans.[1244] The Court of Appeal disagreed, because DFW relied upon relevant federal regulations, and "[t]hese regulations provide sufficient performance standards to satisfy CEQA."[1245] Here, the County can similarly rely on its adopted General Plan and County noise standards in formulating specific measures to mitigate impacts.

The Commenters also cite *Endangered Habitats League v. Cty. of Orange* ("*EHL*") (2005) 131 Cal. App. 4th 777, 793 (quoting *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275), where the court noted that "an agency goes too far when it simply requires a project applicant to obtain a biological report and then comply with any recommendations that may be made in the report." But *EHL* noted that, on the other hand, "[d]eferral of the specifics of mitigation is permissible where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan," and specifically recognized that "[i]f mitigation is feasible but impractical at the time of a general plan or zoning amendment, it is sufficient to articulate specific performance criteria and make further approvals contingent on finding a way to meet them."[1246] Applying this standard, the *EHL* court affirmed numerous mitigation measures as sufficient, even though those measures bound the lead agency only to meet such standards as developing a construction traffic plan sufficient to "assure public safety," developing a fuel modification plan in compliance with county guidelines, and developing a water quality plan that incorporated "best management practices."[1247] *EHL* only invalidated a single mitigation measure, because that measure had multiple faults: (1) it permitted grading to begin after the applicant submitted an "acoustical analysis describing the 'exterior noise environment' and 'preliminary mitigation measures, if required,' with no commitment to achieve any standard of any kind, and (2) it permitted building permits to issue after submission of another acoustical analysis, for which "no criteria or alternatives to be considered are set out."[1248] Here, in contrast, no environmentally impactful activities can begin until measures are in place to achieve the specific performance standard, and MMs 12-1, 12-2, 12-4, and 12-6 outline specific, feasible, alternative measures that are available to achieve the performance standard.

For the foregoing reasons, the Draft EIR's noise analysis and mitigation complies with CEQA. However, to be responsive to the Commenters' concerns and to ensure that mitigation measures are as effective as possible, pages 5.12-48 through 5.12-49 of Section 5.12, *Noise*, of the Draft EIR, have been revised as follows:

1243 *Ctr. for Biol. Diversity v. Dep't of Fish & Wildlife* ("CBD v. DFW") (2015) 234 Cal.App.4th 214, 240

1244 *Ibid*.

1245 *Id.,* at 246 (citing *Oakland Heritage All.*, 195 Cal.App.4th at 906)

1246 *Endangered Habitats League v. Cty. of Orange* ("*EHL*") (2005) 131 Cal. App. 4th 777, 793 (quoting *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275)

1247 *Id.,* at 794-96

1248 *Id.,* at 793-94

MM 12-1 For residences, hotels and motels, schools, and places of worship ~~adjacent to~~ within 500 feet from the centerline of a collector road with a buildout forecast of 10,000 average daily trips (ADT) or greater, a limited secondary road with a buildout forecast of 6,500 ADT or greater, or any higher classification road, the Project Applicant/Developer shall submit to the County an Acoustical Study prepared in accordance with Section 1207.12 of the County Building Code. The Acoustical Study shall demonstrate that exterior noise levels at areas where residents would reasonably be expected to spend more than one hour (e.g., backyards) would not exceed 65 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL). The Acoustical Study shall also verify, including during construction and before Certificate of Occupancy (CofO) issuance, that the buildings have been properly designed to comply with a CNEL requirement of 45 dBA for habitable interior living areas, classrooms, and rooms used for patient care and worship. The design features required to achieve the noise standard shall include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the roadway; noise barriers; building orientation relative to the roadway; interior living space (bedroom, common area) orientation; sound-rated windows; upgraded exterior wall and/or roof construction; insulation batts; and forced air ventilation.

MM 12-2 For each business park use, school, community use area, park and recreation area, animal control facility, utility, County maintenance facility, commercial development, or manufacturing/industrial development, the Project Applicant/Developer shall submit an Acoustical Study verify that the Project has been properly designed to comply with the County of Los Angeles's Noise Ordinance standards at the nearby sensitive properties (both on and off site). The design features required to achieve the noise standard shall include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the sensitive receptors; noise barriers; building orientation relative to the sensitive receptor; sound-rated windows; and upgraded exterior wall and/or roof construction. All stationary and point sources of noise shall adhere to the requirements of the County Code, including but not limited to Section 12.08.390, Exterior Noise Standards, Section 12.08.460, Loading and Unloading Operations, and Section 12.08.530, Residential Air-Conditioning or Refrigeration Equipment.

MM 12-3 To ensure that construction noise is minimized, in addition to meeting all requirements of Section 12.08 of the *County of Los Angeles Code,* the following measures shall be implemented during construction:

- All construction equipment, including internal combustion engines and stationary equipment (used for construction purposes) shall be equipped with noise-reducing features such as, but not limited to improved mufflers, intake silencers, ducts, engine enclosures, and acoustical shields or shrouds. All equipment items must have the manufacturers' recommended noise abatement measures, such as mufflers, engine enclosures, and engine vibration isolators, intact and operational.
- Stationary equipment (e.g., generators, air compressors, concrete pumps) located within 450 feet of residences or schools shall have noise abatement (e.g., engine enclosures or equipment placed behind barriers) to limit the noise level at the sensitive receptor to an average sound level (L_{eq}) of 60 dBA or less. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors, to the greatest extent feasible. The construction contractor shall locate pile drivers, or other machinery capable of causing strong vibrations or load noises, such that the rear of the vibratory pile driver or machinery faces toward the noise sensitive receptor when the machine is being utilized, to the greatest extent feasible.
- Equipment and material staging areas and equipment maintenance areas shall be located at least 500 feet from sensitive noise receivers, if feasible.
- Construction activities should be timed to minimize noise impact on exposed areas, by sequencing the use of equipment with relatively low noise levels versus during noise sensitive periods, routing truck traffic and controlling construction traffic activity to minimize vehicle idling, gear shifting, and accelerating under load, to the greatest extent feasible.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction should be hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of

pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

- Construction contracts shall specify that notices shall be sent out to all residences located within 1,000 feet of the Project site at least 15 days prior to commencements of construction. The notices shall include the construction schedule and a telephone number where complaints can be registered with the noise disturbance coordinator. A sign, legible at a distance of 50 feet, shall also be posted at the construction sites throughout construction which includes the same details as the notices.
- A "noise disturbance coordinator" shall be established at all construction sites. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved.
- The construction contractor shall establish a training program for equipment operators to instruct them in methods of operating their equipment to minimize environmental noise, and to inform them of all applicable State and County noise regulations, including the requirements contained in these mitigation measures.

To clarify the analysis used in the Draft EIR, the third paragraph of page 5.12-46 Section 5.12, Noise, of the Draft EIR, has been revised as follows:

> Increases in the ambient noise environment adjacent to SR-138 between Gorman Post Road and Old Ridge Route Road would exceed the applicable significance criterion at identified receptors. There are no mitigation measures available to reduce the significance of this impact that are within the County's jurisdiction to adopt. There are ~~f~~Feasible mitigation measures available - construction of a noise barrier at affected receptors or resurfacing the roadway with rubberized asphalt pavement - that would reduce these impacts to a less than significant level, but these measures are not within the jurisdiction of the County. Impacts would be significant and unavoidable.

Response to Comment F.8-35:

Please see response to Comment F.8-34.

The Commenters are not correct that the Draft EIR generally "states that methods for reducing traffic related noise are out of the control are out of the control of the project proponent and require alterations to private property." As described in response to Comment F.8-34, the Draft EIR imposes a comprehensive set of mitigation measures, all of which are within the County's authority to adopt and enforce, and which are sufficient to reduce all but one potentially significant impact to a level of insignificance. For a single impact – a 3.3 dBA increase along a single highway segment that currently has only one adjacent residence – the only available and feasible measures to reduce the impact to a level of insignificance are to construct a noise barrier at affected receptors or to resurface the roadway with rubberized asphalt pavement, which would require alterations to private property or to Caltrans' right-of-way.[1249] Only at this single location are the feasible measures to mitigate this impact outside of the control of the Project proponent and Lead Agency. Under this circumstance, CEQA explicitly authorizes a lead agency to find that the appropriate mitigation measures for a particular impact "are within the responsibility and jurisdiction of another public agency and not the agency making the finding."[1250]

The Commenters are not correct that the noise assessment required by MM 12-1 "may or may not be used to formulate mitigation," or that MM 12-1 fails to provide standards for effectiveness. As described in response to Comment F.8-34, MM 12-1 commits the County to the achievement of a specific, objective and defined performance standard, namely the numeric outdoor and indoor dBA standards in the County's General Plan and County Code. MM 12-1 then details the specific alternative measures which are known to be feasible in achieving the defined performance standard.[1251] This measure meets CEQA's requirements.

Response to Comment F.8-36:

The comment appears to confuse the traffic noise analysis with the analysis of noise from mobile equipment used in Project construction activities. The Draft EIR uses the term "traffic noise" to describe traffic noise generated by the operations phase of the Project. The term "mobile equipment" refers to mobile equipment used for construction activities, which create temporary noise increases that end when construction at a specific location is complete. The County Code establishes specific noise limits for mobile and stationary construction equipment, as described in Draft EIR Table 5.12-3, Los Angeles County Construction Noise Limits.[1252] With implementation of appropriate mitigation, construction noise from mobile equipment and other sources would comply with these standards and would not result in a significant noise impact.[1253] The Draft EIR separately analyzes the potential for Project-related traffic noise to result in potentially significant noise

[1249] DRP 2017, p. 5.12-45 and -46
[1250] CEQA Guidelines § 15091(a)(2); *Id.*, § 21081(a)(2)
[1251] CEQA Guidelines § 15126.4(a)(1)(B) ("measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.")
[1252] DRP 2017, p. 5.12-8
[1253] *Id.,* pp. 5.12-34, -47

increases.[1254] As described in response to Comment F.8-34, the Lead Agency has substantial discretion to develop thresholds of significance and specifically may set a threshold of significance for noise impacts that is based on an adopted county ordinance.[1255,1256,1257] In this case, the Lead Agency has properly set a threshold to measure construction noise, and a different threshold for permanent noise increases from Project operations from traffic and other sources, based on Appendix G to the State CEQA Guidelines, which specifically differentiates between permanent and temporary noise increases, and based on the County Code, which likewise differentiate between permanent noise increases and inherently temporary construction noise.

It is well established that a lead agency may establish significance criteria with reference to established regulations such as the County Code's construction noise standards, and these standards can validly take into account the fact that construction is inherently noisy, but more acceptable than operational noise impacts because of construction noise's temporary and periodic nature. Specifically, in *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098, 1146-1151 (E.D.Cal. 2013), the court affirmed the lead agencies' determination that noise impacts were less than significant because the project would comply with the applicable noise ordinances, even though the ordinances imposed *no upper noise limit* on construction noise, but merely limited the hours during which construction could occur. The court held that the adopted "noise ordinances embody a reasonable policy determination . . . with respect to regulating noise," and permissibly "reflect the conclusion that . . . construction noise occurring during daytime hours, even in a residential locale, is intermittent and temporary and thus not so disruptive as to give rise to a need for specific limits on it."[1258] Los Angeles County's construction noise limits are more restrictive than the ordinances affirmed in *Sierra Club*: the County Code prohibits any construction noise that creates a noise disturbance during certain times and days, and additionally establishes an upper noise limit, which varies based on the time of day of construction.[1259] CEQA authorizes the County to analyze potential construction noise impacts with reference to this established County standard.

The Lead Agency disagrees with Commenters' assertion that noise generated by mobile construction equipment cannot be distinguished from traffic noise. The noise experts who prepared the Noise Study capably differentiated noise from construction activities and traffic noise, separately quantified each, and assessed each type of noise against the specific thresholds established for each of those noise sources.[1260] Noise from the same type of noise source can also be differentiated. For example, Project-related vehicle trips that contribute toward combined background and project traffic noise can be differentiated by calculating noise levels based on different quantities of vehicle trips. Moreover, as explained in Section

1254 *Id.,* pp. 5.12-22, -37 to -46
1255 CEQA Guidelines, § 15064
1256 *Nat'l Parks & Conservation Assn v. Cty. Of Riverside*, 71 Cal.App.4th 1341, 1353 (1999)
1257 *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098, 1146-1151 (E.D.Cal. 2013)
1258 *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d at 1150 (E.D.Cal. 2013)
1259 DRP 2017, p. 5.12-7 and -8
1260 *Id.,* Appendix 5.12-A pp. 22-25, 28-37, 40-47, 51

7.0, *Cumulative Impacts*, of the Draft EIR, the Draft EIR also analyzed the potential for cumulative noise impacts from mobile construction equipment and traffic noise. Specifically:

> In addition to construction and stationary source noise, the Project would generate mobile source noise from traffic. The noise analyses in Section 5.12 of this EIR identifies the future traffic noise exposures that would occur in the Project traffic noise study area both with and without the Project. The analysis of traffic noise is inherently a cumulative analysis because the calculation of buildout traffic noise exposures considers the anticipated future traffic volumes based on regional growth models as described in the Project traffic impact analysis, Appendix 5.11-A of this EIR (Stantec 2017). In other words, the cumulative analysis of traffic volumes includes noise generated by the Project and other projects in the traffic noise study area (as described in Section 5.12). The noise study determines that there would be less than significant traffic noise impacts to proposed on-site land uses with implementation of the mitigation program; therefore, there would not be cumulative traffic noise impacts at future on-site receptors (Wieland Acoustics 2011).
>
> (DRP 2017, p. 7-21)

Please also see responses to Comments F.8-38 and F.8-42.

Response to Comment F.8-37:

The Draft EIR states that a noise increase of 3 dBA is "barely perceptible to most people."[1261] The Commenters are incorrect that this statement is unsupported by substantial evidence. According to the Federal Highway Administration's *Highway Traffic Noise: Analysis and Abatement Guidance*, "[c]hanges that are less than 3 dB(A) may be considered negligible or unimportant under NEPA because they are barely perceptible."[1262] Table 4 of the same document also states that -3 dB(A) is a barely perceptible change in relative loudness.[1263]

Regardless, the County has conservatively characterized even a 3 dBA increase to be a "substantial permanent increase in ambient noise levels," and hence a significant impact under CEQA, in any area where the ambient noise levels under With-Project conditions fall within the "Normally Unacceptable" or "Clearly Unacceptable" categories under the California's Noise/Land Use Compatibility State CEQA Guidelines. The County previously used this same criteria to analyze substantial permanent noise increases in the EIR for the County's General Plan Update and in the EIR for Antelope Valley Area Plan.[1264,1265] No action was commenced to challenge the EIR for the General Plan Update, and therefore the EIR's

[1261] *Id.,* p. 5.12-1
[1262] Federal Highway Administration (FHA). 2011 (December). *Highway Traffic Noise: Analysis and Abatement Guidance* (p. 16). FHA: Washington, D.C.
[1263] *Id.,* p. 10.
[1264] DRP 2014a
[1265] LACDRP 2015

methods and conclusions are now conclusively valid.[1266] Commenter CBD attempted to challenge the EIR for the AVAP, but did not challenge this noise threshold or bring any claim related to noise impacts.[1267] On May 22, 2017, the Los Angeles County Superior Court rejected all of the CEQA claims CBD did bring against the AVAP EIR.[1268]

The Draft EIR states that a noise increase of 3 dBA is "barely perceptible to most people," not that it is barely perceptible to wildlife.[1269] Different wildlife species have a range of capacities to perceive noise. The Draft EIR analyzed the Project's potential noise impacts on wildlife in Section 5.7, *Biological Resources*. Potential impacts to biological resources from construction activities are addressed by MM 7-7, which limits construction noise to beyond 400 feet or outside of the breeding season for birds.[1270] Section 5.7 of the Draft EIR also analyzes potential traffic and stationary noise impacts related to the operational phase of the Project by considering potential effects on the proposed preserve system as well as open spaces and wildlife proximate to the Project site. As discussed in Section 5.7:

> In an effort to minimize operational noise impacts, the Conceptual Land Use Plan (see Exhibit 4-1) has been designed to maximize the distance between areas of high noise and preserved open space. Higher density housing and higher volume traffic roadways are near the center of developed areas, while the lower density housing and lower traffic roadways occur at the edge of the Project near open space areas. In addition, industrial and business park land uses are located adjacent to the roadway with the highest noise level (SR-138). As a result, potential wildlife impacts due to potential Project related noise are reduced to a level considered less than significant.
>
> (DRP 2017, p. 5.7-170)

Please also see responses to Comments F.8-38 and F.8-42.

Response to Comment F.8-38:

The Draft EIR states that "the land uses proposed as part of the Project are routinely constructed in Southern California and are able to meet the applicable noise standards through use of common, feasible methods and materials, including utilizing design features such as building setbacks from the sensitive receptors; noise barriers; building orientation relative to the sensitive receptor; sound-rated windows; upgraded exterior wall and/or roof construction."[1271] The Lead Agency disagrees with the Commenters' assertion that this factual finding is irrelevant to the Project. As described in response to Comment F.8-34, the fact that the above-listed methods and materials are known to be common and effective in mitigating noise impacts is among the substantial evidence in the record supporting the Lead

[1266] CEQA Guidelines, § 21167.2
[1267] Petition for Writ of Mandate, Ctr for Biol. Diversity v. Cty. of L.A., No. BS156932 (L.A. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, Ctr. for Biol. Diversity v. Cty. of L.A., No. BS156932 (L.A. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, Ctr. for Biol. Diversity v. Cty. of L.A., No. BS156932 (L.A. Sup. Ct. Oct. 24, 2016).
[1268] Ruling on Submitted Matter, Ctr. for Biol. Diversity v. Cty. of L.A., No. BS156932 (L.A. Sup. Ct. May 22, 2017)
[1269] DRP 2017, p. 5.12-1
[1270] *Id.,* p. 5.7-150
[1271] *Id.,* pp. 5.12-1 and -2

Agency's conclusion that the Draft EIR's mitigation measures will be feasible and effective.[1272] Moreover, as also described in responses to Comments F.8-34 and F.8-35, CEQA authorizes a lead agency to measure the significance of a noise impact relative to generally applicable, adopted standards, and so the County's generally applicable General Plan and County Code standards are relevant to the Draft EIR's analysis of the Project's potential impacts.

The Commenters mischaracterize the Draft EIR to imply that there is a contradiction between the Project's 20-year buildout timeline and the Draft EIR's statement that construction noise is relatively short-term and temporary. The Draft EIR states that "while the total construction period is approximately 20 years, an audible increase in the ambient noise level due to construction experienced *at any individual receptor* would be relatively short-term and temporary" (emphasis added).[1273] The Project site is 12,323 acres.[1274] As such, development of specific portions of the Project site will cease to generate construction noise once construction of that portion of the Project is complete. Any individual receptor will only perceive construction noise during the specific time that nearby portions of the Project site are under construction. Moreover, as construction activities occur further and further from an individual receptor, noise from construction activities will be attenuated by intervening structures that would be developed, in addition to the increasing distance from which construction activities would occur.

Response to Comment F.8-39:

MM 12-3 states specifically that stationary equipment must set back 450 feet from "residences or schools," or else incorporate sufficient noise abatement to limit the noise level at the sensitive receptor to 60 dBA or less.[1275] In response to this comment, to clarify the sentence cited by the Commenters, page 5.12-2 of Section 5.12, *Noise*, of the Draft EIR has been revised as follows:

> MM 12-3 would be incorporated into the Project and require stationary equipment to operate at a distance of greater than 450 feet from residences or schools or to provide an enclosure or similar noise attenuation to limit the average hourly daytime noise level to 60 dBA or less.

MM 12-3 requires, among other measures, that equipment staging and maintenance areas be located 500 feet or greater distance from sensitive receptors, if feasible. The Lead Agency disagrees with the Commenters' statement that this measure creates "no binding requirement on the project proponent." This requirement is binding as long as it is technically feasible to provide a buffer distance of at least 500 feet. The Project site is 12,323 acres. For the majority of the construction phases, there will be sufficient area available to site staging and maintenance areas 500 feet from noise sensitive uses. In those areas, this measure will provide noise protections for sensitive receptors that would not exist without

[1272] *Id.,* Appendix 5.12-A pp. 51-54 (noise expert conclusion that these methods are feasible and effective in reducing significant noise impacts to a less than significant level)
[1273] DRP 2017, p. 5.12-2
[1274] *Id.,* p. 4-2
[1275] *Id.,* p. 5.12-49

MM 12-3. However, as the Project site is constructed, areas that satisfy this requirement will diminish, such that meeting this mitigation measure may no longer be feasible at certain locations. But even in locations where a 500-foot setback is infeasible, MM 12-3 still requires construction activities to comply with the construction noise limits and other requirements in the County Code. As discussed in responses to Comments F.8-34, F.8-36, and F.8-38, the Draft EIR properly concludes that construction noise impacts would be less than significant, because the Project would comply with these adopted noise standards.[1276,1277]

There is no inconsistency between Drat EIR Table 5.12-2 and MM 12-3. The former describes the County's standards for permanent operational noise, while the latter deals specifically with construction noise. Draft EIR Table 5.12-2 describes the County Code's standards for noise from non-construction stationary sources. MM 12-3 specifically addresses noise generated during construction, and requires construction activities and equipment to comply with the County Code's construction noise requirements. As described in response to Comments F.8-34, F.8-36, and F.8-38, the County Code's construction noise regulations set different noise levels for different equipment, different noise receptors, and different days and times.[1278] The Draft EIR concludes that MM 12-3 would reduce construction noise impacts to a less than significant level, since MM 12-3 requires compliance with the County Code's construction noise standards. One section of MM 12-3 also requires an additional measure, requiring any stationary construction equipment within 450 feet from schools or residences to impose noise abatement sufficient to ensure a 60 dBA or less noise exposure at the sensitive receptor. This measure provides an additional level of assurance that construction noise impacts will be less than significant, but it does not undermine the Draft EIR's valid conclusion that requiring compliance with the County Code's adopted noise standards is sufficient to mitigate significant impacts.[1279] As described in responses to Comments F.8-34, F.8-36, and F.8-38, it is well established that a lead agency may establish significance criteria with reference to regulations such as the County Code's construction noise standards, and that these standards can validly take into account the fact that construction is inherently noisy, but more acceptable than operational noise because of its temporary and periodic nature.[1280]

Similarly, Draft EIR Tables 5.12-2 and 5.12-3 are reconcilable because the County Code sets one set of standards for stationary sources used in construction, and a different set of standards for stationary source noise from non-construction activities. (See, e.g., County Code §§ 12.08.090 ["'Construction' means any site preparation, assembly, erection, substantial repair, alteration, or similar action, for or of public or private rights-of-way, structures, utilities, or similar property"], 12.08.440(B) [setting standards specific to "construction activities"]; 12.08.440(D) ["In case of a conflict between this chapter and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities shall control"].)

1276 *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098, 1146-1151 (E.D.Cal. 2013)

1277 *Oakland Heritage All. v. City of Oakland* (2011) 195 Cal.App.4th 884, 896

1278 DRP 2017, p. 5.12-8, Table 5.12-3

1279 *Oakland Heritage All.*, 195 Cal.App.4th at 896 (compliance with regulations can mitigate impacts to less than significant)

1280 See, e.g., *Sierra Club*, 916 F.Supp.2d at 1146-51

Response to Comment F.8-40:

The Commenters' citations to the State CEQA Guidelines, and to case law, are noted. In *Communities for a Better Env't v. City of Richmond* (2010) 184 Cal. App. 4th 70, 95, the court rejected an EIR's mitigation measures because they failed to meet the necessary requirements for a valid deferred mitigation regime: to "[undertake] a complete analysis of the significance of the environmental impact," to develop "proposed potential mitigation measures early in the planning process," and to "articulate[] specific performance criteria that would ensure that adequate mitigation measures were eventually implemented." Here, as described in response to Comment F.8-34, the Draft EIR's mitigation measures meet all of these requirements and conform to the measures affirmed in numerous deferred mitigation cases.

The Commenters also cite a portion of *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 428, in which the court quotes CEQA Guidelines § 15144 as stating that while "foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can." *Vineyard* involved entirely distinguishable facts – the agency failed to disclose and mitigate foreseeably potential impacts on long-term water supplies – that the Commenters do not relate to the Project's analysis of cumulative noise impacts.[1281] As described in response to Comment F.8-42, the Draft EIR's cumulative noise impacts analysis complies with CEQA's requirement to "find out and disclose all that . . . [the County] reasonably can" regarding the Project's reasonably foreseeable cumulative noise impacts, without resorting to speculation.[1282] For a response to the Commenters' comments on the Draft EIR's analysis of water supply impacts, please see responses to Comments F.8-212 through F.8-226.

Response to Comment F.8-41:

The Commenters' citations to case law are noted. In *Envtl. Prot. Info. Ctr., Inc. v. Johnson* (1985), 170 Cal. App. 3d 604, 624, the lead agency did not conduct *any* cumulative impacts analysis, an obvious legal error that the County did not commit here.[1283] In *Kings Cty. Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 720, the court rejected a lead agency's contention that "whenever an agency determines impacts specific to a particular project are not significant, corresponding cumulative impacts cannot be considered significant . . ." Here, the Draft EIR's analysis specifically considers not just whether impacts specific to the Project are significant, but also whether the that "the incremental effects of . . . [the] [P]roject are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[1284,1285]

Please see response to Comment F.8-42.

[1281] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th at 444-45
[1282] CEQA Guidelines, § 15145
[1283] DRP 2017, pp. 7-1 to -36
[1284] CEQA Guidelines, § 15065(a)(3)
[1285] DRP 2017, pp. 7-1 to -9

Response to Comment F.8-42:

As described in response to Comment F.8-34, the Draft EIR's noise mitigation measures are legally valid under CEQA, and substantial evidence supports the Draft EIR's conclusion that the measures would reduce project-level impacts to a less than significant level. Therefore, the Draft EIR's cumulative impacts analysis properly takes these mitigation measures into account when considering whether the Project's incremental contribution to cumulative impacts would be considerable.[1286]

The Draft EIR's cumulative impacts analysis considers the potential for the Project to contribute to cumulative noise impacts, in light of reasonably foreseeable development in the Project vicinity, including (1) regional growth projections in the *Los Angeles County General Plan*, the *Antelope Valley Area Pan*, the *Kern County General Plan*, the Southern California Association of Governments' 2012 and 2016 RTP/SCS, and the Kern Council of Governments' 2014 RTP/SCS; (2) summaries of anticipated development, as reported by the County of Los Angeles Department of Regional Planning; the Kern County Planning and Community Development Department; the City of Lancaster Planning Department; the City of Palmdale Planning Division; and the City of Santa Clarita Planning Division; and (3) specific anticipated projects in the Project vicinity at the Burrows property, Gorman Post Ranch, Tejon Mountain Village, the Tejon Ranch Commerce Center, Grapevine, and the Northwest 138 Corridor Improvement Project ("NW SR-138 Project").[1287] This thorough investigation of reasonably foreseeable development in the Project vicinity complies with CEQA's requirements that a lead agency "use its best efforts to find out and disclose all that it reasonably can,"[1288]while recognizing that "foreseeing the unforeseeable is not possible"[1289] and that an EIR should not resort to speculation[1290].

With respect to the NW SR-138 Project, the Draft EIR concludes that there is a low possibility that Project construction would overlap with SR-138 activities because of the "mobile nature of construction activities (moving from area to area on a site or alignment)."[1291] The Draft EIR acknowledges that both projects may occur concurrently, but is unlikely that construction activities for both projects would occur adjacent to same noise-sensitive receptors at the same time. The Project site is 12,323 acres. The linear extent of the NW SR-138 project is 36.8 miles.[1292] Because of the size of both these projects, it is unlikely that construction activities for both of these projects would occur simultaneously near the same sensitive receptor for a sustained period of time. Due to the large size of the Project site, the Project will be constructed in phases, with specific portions of the site developed at different times.[1293] This is also expected with the NW SR-138 Project.[1294] It is unlikely that the entirety of the 36.8-mile stretch of SR-138 will be reconstructed simultaneously, due to impacts on

1286 *Id.,* p. 7-21
1287 *Id.,* p. 7-3 to -9; *Id.,* Appendix 7.0-A, *Development Summaries*
1288 CEQA Guidelines, § 15144
1289 *Ibid*.
1290 CEQA Guidelines, §15145
1291 DRP 2017, p. 7-21
1292 Caltrans 2017b, p. 1
1293 DRP 2017, pp. 4-91 to -96
1294 Caltrans 2017b, p. 24

traffic congestion and the large requirements in manpower and equipment. It is likely that construction would occur in phases, and once one phase is complete, construction noise at that particular location will end or dissipate as construction moves to a different location along the Project route. Moreover, Caltrans projects are subject to Caltrans' Standard Specifications and Standard Special Provisions for Noise Control, and Caltrans' NW SR-138 Final EIS/EIR requires additional mitigation measures on the NW SR-138 Project, such as requiring construction equipment to use improved noise muffling, engine enclosures, and engine vibration isolators.[1295] The Draft EIR's analysis of traffic noise is an inherently cumulative analysis because the calculation of buildout traffic noise exposures considers the anticipated future traffic volumes based on regional growth models.[1296] The Draft EIR's analysis demonstrates that the Project's incremental contribution to traffic noise would not be cumulatively considerable.

Response to Comment F.8-43:

As discussed on Draft EIR page 5.9-29, the Project is anticipated to create approximately 23,675 jobs at the on-site commercial uses, business parks, commercial recreation uses, and public facilities. It is understood that a person's place of residence and employment are choices affected by a number of personal and economic factors, and that community members who live outside the Project may apply for and obtain some of the permanent positions the Project creates. However, providing opportunities to work and shop near residences allows people to reduce vehicle use, reduces travel times, and encourages walking and biking to work. While the Draft EIR notes that many on-site jobs could be filled by Project residents, it does not guarantee this or rely on this assumption for its impact conclusions. Rather, at the page the Commenter cites for this assertion,[1297] the Draft EIR discusses the Project's role in assisting to meet the State-mandated Regional Housing Needs Assessment housing production goals for the unincorporated areas of the County. As noted in Draft EIR pages 5.9-2 and 5.9-3, the Project is consistent with this regional effort because it implements a key AVAP strategy to designate areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs, and provides an estimated jobs/housing ratio of 1.22, through the development of commercial and business park uses on the site for use by high-tech manufacturing, transportation, and logistics companies. The Project also meets the AVAP strategy of providing a complete, mixed use community within the West EOA. This is an appropriate discussion of the Project's role in helping to meet AVAP goals and regional housing needs, not a guarantee that Project residents will fill all on-site jobs, or a reliance on such an assumption. While the jobs that would be available at the Project site may not match the skills of the residents who ultimately decide to live at the Project site, the range of development densities and housing types that are allowed by the Specific Plan would make available a range of housing at various costs. At the same time, the variety of non-residential land uses that are allowed would also provide a wide variety of jobs and a range of salaries. As such, there is likely going to be a subset of housing types and costs that would be affordable to the on-site employees.

1295 *Id.,* pp. 304, 435-37
1296 DRP 2017, p. 7-21
1297 *Id.,* p. 5.9-3

Further, the reduction of vehicle trips and emissions will be continually monitored to ensure achievement of a specific performance standard. The Mobility Plan requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the first occupancy permit. The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Draft EIR pages 4-30 through 4-31 discuss the TMA and the Mobility Performance Standards of the Project and Draft EIR pages 4-36 through 4-39 discuss the Transportation Demand Management (TDM) measures to be implemented by the Project. As stated on page 4-36 of the Draft EIR and page 3-25 of the Centennial Specific Plan, the TMA would manage compliance with the internal and external mobility performance standards of the Specific Plan by conducting transit mode surveys and other appropriate monitoring activities to verify the effectiveness of TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA. See further discussion in response to Comment F.8-204.

With regard to Kern County, the Draft EIR acknowledged that it has historically experienced higher unemployment rates than the State as a whole.[1298] However, as indicated in Draft EIR Table 5.9-22, Caltrans projections indicate that employment in Kern County will increase 55.6 percent over the next three decades.[1299]

Response to Comment F.8-44:

In Section 4.9, Population, Housing, and Employment, the Draft EIR properly and conservatively evaluates Project impacts against the existing baseline to determine the significance of population and housing growth. Under Threshold 9-1, the Draft EIR asks "Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?"[1300] The Draft EIR properly concludes that while the Project's impact would be less than significant in relation to planned population, housing, and employment growth in the region under threshold 9-4, because the Project would substantially increase population and housing relative to the existing Project site conditions, it would have a significant and unavoidable impact under Threshold 9-1.[1301] While the Draft EIR discusses Thresholds 9-1 and 9-4 together because they are related, the Draft EIR does not "override" the finding of significance under Threshold 9-1 by reference to Threshold 9-4. Rather, in light of Project Objectives discussed in Draft EIR Section 4.0, Project Description, which include to meet regional planning goals and help accommodate anticipated regional growth in an appropriate location, there is no feasible mitigation for the significant impact under Threshold 9-1.

CEQA Guidelines specify that an EIR shall include "feasible" mitigation measures which could minimize significant adverse project impacts.[1302] The feasibility of mitigation measures must be considered in light of Project objectives, which "should include the underlying purpose of

1298 *Id.,* p. 5.9-22
1299 *Ibid.*
1300 *Id.,* p. 5.9-23
1301 *Id.,* pp. 5.9-23 to -32
1302 CCR §15126.4(a)(1)

the project."[1303] The underlying purpose of the Project stems from the need for a sustainable community in the greater Los Angeles County region that creates a balance among residential, commercial, and other employment-generating uses and institutional/public uses, while being sensitive to the environment.[1304] This is consistent with the growth projections, visions, assumptions, goals, and policies of the AVAP and 2012-2035 and 2016-2040 SCAG RTP/SCS. The AVAP sets forth a vision that includes the creation of opportunities for the Antelope Valley area to change and grow, while preserving the rural lifestyle enjoyed by current residents and supporting a vibrant economy.[1305] The AVAP was prepared to achieve this vision using four types of environments that would facilitate the preservation of rural areas of the Antelope Valley and focus development in appropriate areas, including Rural Preserve Areas, Rural Town Areas, Rural Town Centers, and Economic Opportunity Areas (EOAs). An EOA is defined as a cluster of land with higher development densities along the routes of two proposed major infrastructure projects in the Antelope Valley – the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1306] The Project site is located entirely within the West EOA.[1307] Pursuant to the above, Project objectives expressed in Draft EIR Section 4.0, *Project Description* are as follows:

- Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA.
- Design the Project to maximize efficient utilization of regional infrastructure while preserving hundreds of thousands of acres of contiguous natural open space and important biological resources.
- Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips.
- Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers.
- Integrate a multi-modal transportation network, renewable energy, water conservation, community wellness, and other green development features into the Project's design, build out, and ongoing operations.[1308]

During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural

[1303] CCR §15124(b)
[1304] DRP 2017, p. 4-3
[1305] *Ibid.*
[1306] DRP 2015, p. I-8
[1307] *Id.,* pp. 4-3 and -4
[1308] DRP 2017, p. 4-4

uses".[1309] Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[1310] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[1311]

The Project has been designed to achieve the above-described AVAP goals, as the Draft EIR explains in its Project Objectives. While the Project would substantially increase population and housing relative to the existing Project site conditions, which is a significant impact under Draft EIR Threshold 9-1, this impact is appropriately considered significant and unavoidable because any potential mitigation such as a significant reduction in the Project's proposed unit count and commercial square footage would result in a development proposal that is not consistent with the goals and policies of the AVAP related to the development within the West EOA, and therefore would not support Project Objectives. Please also see F.8-66 with regard to the Lead Agency's appropriate formulation of Project Objectives.

As noted above, the Draft EIR also evaluates the Project's impacts under Threshold 9-4, which asks "Would the project cumulatively exceed official regional or local population projections?," and under this threshold appropriately concludes that the Project would have a less than significant impact.[1312] This is because implementation of the Project would accommodate the growth anticipated in the AVAP and by SCAG projections in the 2012-2035 RTP/SCS and 2016-2040 RTP/SCS, and would create employment opportunities on the site at a ratio of 1.22 at buildout, helping the County to attain its targeted jobs/housing ratio of 1.3 jobs per dwelling unit.[1313] The Project would contribute to meeting the RHNA housing production goals for the County and would be consistent with the regional effort to boost housing production in unincorporated areas of Los Angeles County to meet regional housing needs, and would achieve the economic development objectives for the Antelope Valley through development of a balanced urban development located adjacent to critical transportation and water infrastructure.[1314] Under Threshold 9-4, Project impacts would be less than significant because it implements and is consistent with the AVAP and SCAG RTP/SCS, and no mitigation is required.

Response to Comment F.8-45:

This comment inaccurately summarizes the growth projections for Los Angeles County, cities and towns located in the northern portion of the County, and the North Los Angeles County region. Contrary to the suggestion in the comment, the Southern California Association of Governments (SCAG), the state Department of Finance (DOF) and Los Angeles County do project that Los Angeles County will experience substantial growth between 2012

1309 DRP 2015, p. I-8
1310 *Id.,* p. I-8
1311 *Ibid.*
1312 *Id.,* p. 5.9-31
1313 *Ibid.*
1314 *Id.,* pp. 5.9-28 and -31

and 2040. As discussed on Draft EIR page 5.9-7 and in Draft EIR Table 5.9-1, the 2012 and 2016 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) projects that the SCAG regional population will increase by approximately 1,073,000 residents between 2012 and 2020 and by 2.743 million between 2020 and 2040. The 2040 net increase of 2.743 million residents is larger than the 2016 population of 15 states reported by the U.S. Census Bureau and the District of Columbia, or the equivalent of adding the entire population of New Hampshire (1.334 million population) and Hawaii (1.428 million population) to the SCAG region. As discussed on Draft EIR page 5.9-8 and Draft EIR Table 5.9-2, in 2012 SCAG projected that, in 2035, Los Angeles County's population would increase by approximately 1.11 million by 2035 people from the DOF 2016 population estimate for the County (10,241,335 residents). In 2016, SCAG projected that, in 2040, the County's population would increase by 1.27 million people from the 2016 DOF County population estimate. The net increase in the County's 2035 and 2040 population estimated by SCAG would be larger than the 2016 populations of nine states and the District of Columbia. Growth of this magnitude is correctly and accurately characterized as "substantial" in the Draft EIR.

The Draft EIR also accurately states that a disproportionate share of the County's projected growth will occur in the North Los Angeles County region that includes the Project site. As discussed on Draft EIR pages 5.9-9 to 5.9-10, in 2016 SCAG projected that from 2016 to 2040 the resident population in Santa Clarita would increase by 19.4 percent, by 33.6 percent in Lancaster, and by 25.9 percent in Palmdale (25.9 percent). SCAG also projected that the population of North Los Angeles County would increase by 49.86 percent from 2012 to 2040, and that the resident population in unincorporated North Los Angeles County would more than double from 143,325 in 2012 to 312,240 in 2040. The County and SCAG further projected that the Antelope Valley resident population would increase from 406,126 to 784,310 by 2035 in conjunction with the Antelope Valley Area Plan (AVAP) update and EIR, which was certified in June 2015. Notably, no party, including the Commenter, challenged the AVAP EIR's population and growth analysis within the applicable statute of limitations, and therefore this analysis is now "conclusively presumed to comply" with CEQA.[1315] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the AVAP EIR's population and growth analysis (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 [L.A. Cty. Sup. Ct. July 16, 2015]; Petitioner's Opening Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Statement of Issues, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Reply Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 [L.A. Cty. Sup. Ct. Jan. 18, 2017]). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1316] The comment provides

[1315] CEQA Guidelines § 21167.2

[1316] Ruling on Submitted Matter, Ctr. For Biol. Diversity v. Cty. of Los Angeles, No. BS156932 ([L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

no evidence suggesting that that the population and growth estimates used in the AVAP EIR and in the Draft EIR are inaccurate in any manner.

Contrary to the comment, nothing in the SCAG 2016 RTP/SCS suggests that substantial growth will not occur in Los Angeles County or that regional-scale growth trends will affect the Project's capacity to develop residential, commercial and employment land uses in a balanced manner over time. On page 49, the 2016 RTP/SCS states, consistent with the Draft EIR, that by 2040 the SCAG region's population is expected to grow by more than 20 percent to 22 million people, an increase of 3.8 million people. Consistent with the Draft EIR, 2016 RTP/SCS Table 3-1 shows that Los Angeles County will grow from 9,923,000 residents to 11,514,000 residents between 2012 and 2040, a population increase of about 16 percent and 1,591,000. Since the Draft EIR accurately summarizes growth projections for the SCAG region, the County, and the North County, the comment does not identify any factual information that would affect the Draft EIR analysis and conclusions.

As in many parts of the country, the 2016 RTP/SCS[1317] notes that the SCAG regional population is aging and the percentage share of younger people of working age is expected to fall. The plan further notes that, due to these demographic trends, the SCAG region could face a labor shortage and a subsequent reduction in tax revenues. The comment does not provide a compelling explanation for why the regional demographic trends discussed in the 2016 RTP/SCS could affect the number of Project residents commuting to other locations. The final sentence suggests that these trends mean "that few residents are of peak employment age living in the city, meaning the regional ability to fill employment (likely retail) of the Project are limited [*sic*]." This statement does not provide any support for the speculation that Project employment land uses, which include commercial and industrial uses, will be "mainly retail." In addition, the 2016 RTP/SCS indicates that younger residents may prefer to live in denser, mixed-use urban areas, or the precise opposite of the comment's apparent assertion that "few residents are of peak employment age living in the city *[sic]*." The comment does not explain why the potential labor shortage discussed in the 2016 RTP/SCS could affect the Project's ability to generate employment uses. A labor shortage would increase wages throughout the region, including within the Antelope Valley portion of Los Angeles County where the Project is located. Wage increases would increase the ability of prospective buyers, including buyers employed within the site, to purchase new homes in the Project. Project area employers would also be required to increase wages to attract workers if a regional labor shortage materializes which would increase the ability of onsite workers to purchase homes in the Project area.

As discussed in more detail in response to Comment F.8-23, the estimates of Project internal trips and tripends utilized in the Draft EIR is derived directly from the updated North County Sub-Area Model used by the County in the AVAP EIR. The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily

[1317] SCAG 2016a, p. 50

trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1318] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1319] The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[1320] The comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

In summary, the Draft EIR accurately and consistently summarizes published SCAG, DOF and County growth projections, including the 2016 RTP/SCS. The analysis of Project internal and external trips is derived from the most recent version of the North County Sub-Area Traffic Model developed by the County for the AVAP EIR that was certified in 2015. No party, including the Commenter, challenged the AVAP EIR analysis of growth and population or the reliability of the North County Sub-Area Traffic Model. The Project implements the AVAP for the Project area, and the Project traffic analysis is consistent with, and is based on the same traffic model used in the certified AVAP EIR. The demographic trends discussed in the 2016 RTP/SCS do not support and are the opposite of the apparent assertions made in portions of the comment. Finally, the comment does not explain why the potential labor shortage discussed in the 2016 RTP/SCS could affect the Project's ability to generate employment uses. The comment does not explain why the potential labor shortage discussed in the 2016 RTP/SCS could affect the Project's ability to generate employment uses when such a shortage would increase wages, including for employment within the site, and thus increase the ability of onsite workers to purchase homes within the Project.

Response to Comment F.8-46:

The Commenter's opinion that the Draft EIR's discussion of cumulative population, housing, and employment impacts is insufficient is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Lead Agency disagrees, and notes that the Draft EIR adequately addressed cumulative population,

[1318] CEQA § 21167.2

[1319] Ruling on Submitted Matter, Ctr. For Biol. Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

[1320] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362

housing, and employment impacts. Rather, it discloses that while the Project would result in substantial growth, it would be consistent with local and regional growth assumptions.[1321] As such, with regard to its consistency with County and regional plans, cumulative population, housing, and employment impacts would be less than significant.[1322] This is consistent with Draft EIR analysis and conclusion under Threshold 9-4 in Section 4.9, *Population, Housing, and Employment*, at Draft EIR pages 5.9-23 through 5.9-31. However, with regard to Project-related growth on site relative to existing Project site conditions, the cumulative impact discussion concludes that impacts would be significant and unavoidable.[1323] This is consistent with Draft EIR analysis and conclusion under Threshold 9-1 in Draft EIR Section 4.9, at pages 5.9-23 through 5.9-31. While the Draft EIR discusses Project impacts and appropriate mitigation strategies for Thresholds 9-1 and 9-4 together because they are related, the Draft EIR clearly concludes that impacts are less than significant with regard to consistency with regional plans, but significant and unavoidable with regard to overall growth on the site in comparison to existing conditions. The Draft EIR also explains that there is no appropriate and feasible mitigation to reduce the significant impact under Threshold 9-1.[1324] In light of Project Objectives discussed in Draft EIR Section 4.0, *Project Description*, which include meeting regional planning goals and helping accommodate anticipated regional growth in an appropriate location, there is no feasible mitigation for the significant impact under Threshold 9-1. Any potential mitigation such as a significant reduction in the Project's proposed unit count and commercial square footage would result in a development proposal that is not consistent with the goals and policies of the AVAP related to the development within the West EOA or with SCAG's regional growth projections, and therefore would not support Project Objectives. Please see responses to Comments F.8-44 for further discussion.

Similarly, with regard to growth-inducing impacts, the Draft EIR comes to differing conclusions when analyzing the Project in relation to regional planning and anticipated regional growth projections versus in relation to existing Project site conditions. In relation to regional planning, the Draft EIR concludes that because the Project is consistent with growth projections, allowable land uses, and development densities/intensities in the AVAP and because the EIR for the AVAP adequately analyzed the growth-inducing impacts of the AVAP, the Project would not have any growth-inducing impacts that were not previously analyzed in that certified EIR, and would not be considered growth-inducing in relation to planned-for and foreseeably anticipated regional growth.[1325] However, the Commenter is correct that with regard to the proposed Project's impacts in comparison to existing Project site conditions, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments could be made outside the West EOA, which is considered a significant, adverse indirect growth-inducing impact.[1326] Please see responses to Comments F.8-47, F.8-48, and

[1321] DRP 2017, pp. 7-18 and -19
[1322] *Id.,* p. 7-19
[1323] *Ibid.*
[1324] *Id.,* pp. 7-19, 5.9-31
[1325] *Id.,* p. 6-2
[1326] *Id.,* pp. 7-19, 6-6 to -9

F.8-49 regarding the Draft EIR's appropriate discussion of potential growth-inducing impacts.

Response to Comment F.8-47:

The Commenter's summary of CEQA requirements for analysis of growth-inducing impacts is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors, but the Lead Agency notes that it is incomplete and overstates the depth of analysis required for the Draft EIR. As noted by the Commenter, CEQA indicates that an EIR shall include "a detailed statement setting forth…the growth-inducing impacts of the proposed project."[1327] The CEQA Guidelines elaborate, and explain that an EIR should "discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth…"[1328] Further, an EIR's discussion of growth-inducing effects should not assume that growth is necessarily either beneficial or detrimental.[1329] Interpreting the above-described standards, courts have held that an EIR is not required to provide a detailed analysis of a project's effect on growth. Rather, a general analysis based on foreseeable impacts is sufficient. As the court explained in *Napa Citizens for Honest Government v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342 ("*Napa Citizens*"), "Nothing in the Guidelines, or in the cases, requires more than a general analysis of projected growth. The detail required in any particular case necessarily depends on a multitude of factors, including, but not limited to, the nature of the project, the directness or indirectness of the contemplated impact and the ability to forecast the actual effects the project will have on the physical environment."[1330] An EIR need not evaluate speculative growth-inducing impacts of a project.[1331]

Consistent with CEQA requirements as described above, the Draft EIR analysis of growth-inducing impacts uses the AVAP EIR as a forecasting tool to independently evaluate reasonably foreseeable regional growth patterns and population trends. The potential implementation of the Project was known at the time of the development of the AVAP and was accounted for in the AVAP's land use and population/employment growth assumptions. The Draft EIR determined that the Project is consistent with allowable land use and development densities and intensities in the AVAP. Draft EIR discussion of prior analysis in the AVAP EIR is reasonably understood as an incorporation of the evidentiary value of that analysis into the Draft EIR, which independently determined that the Project would not result in significant growth-inducing impacts related to approved County and regional plans after reaching the same conclusions as the AVAP EIR regarding foreseeable growth patterns and population trends.

The Draft EIR therefore appropriately focuses the remaining analysis in Section 6.0, Growth-Inducing Impacts, on potential, reasonably foreseeable growth-inducing impacts that are

[1327] PRC §21100
[1328] CCR §15126.2(d)(2)
[1329] *Id.,* §15126.2(d)
[1330] *Napa Citizens* at 369
[1331] *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 CA4th 1252, 1265

peculiar and specific to the Project and its exact location. To focus the analysis, the Draft EIR first discusses growth constraints near the Project site that limit the ability of the Project to influence growth, including a 2008 Conservation and Land Use Agreement between Tejon Ranch Company and Resource Groups that precludes development in approximately 240,000 acres of open space set aside in the agreement, the San Gabriel Mountains and Angeles National Forest south of the Project site, the Los Padres National Forest and Hungry Valley State Vehicular Recreation Area to the west of the Project site, legally limited water supply in the Antelope Valley, and related provisions in the County General Plan which require focusing new development in designated locations including the West EOA in which the Project site is located.[1332] As a result of the above constraints, the Draft EIR identifies the limited locations near the Project site where the only foreseeable induced growth could occur – these include areas west of the Project site from Quail Lake along SR-138 to the I-5 and northward along the eastern side to Gorman, areas east of the Project site along the SR-138 corridor and inside the West EOA, and areas east of the Project site that are outside of the West EOA near Neenach and toward the cities of Lancaster and Palmdale.[1333]

Taking the above context into account, the Draft EIR evaluates the Project's potential to cause significant growth-inducing impacts under four criteria, including whether the Project would remove obstacles to growth, whether the Project would result in the need to expand one or more public services to maintain desired levels of services, whether the Project would encourage or facilitate economic effects that could result in other activities significantly impacting the environment, or if approval would involve precedent-setting actions that could encourage and facilitate other activities that could significantly affect the environment.[1334] Under the first and second criteria, the Draft EIR notes that project infrastructure and services would be sized to accommodate the Project population only, and as such would not directly lead to growth in surrounding areas.[1335] No new electrical production plants or natural gas facilities are part of the proposed Project, and renewable energy generated onsite would be used only by the Project.[1336] The Project would not generate extra potable water that could be used to support additional development, and the Project's wastewater reclamation facilities would only treat Project-related water.[1337] Internal Project roads would not be sized to support regional traffic flows and would not provide access to other areas outside of Project boundaries.[1338] The Project will add fire and police stations, libraries, and schools to support the anticipated population associated with the Project, but these service facilities will be scaled to serve the Project only.[1339] However, the Draft EIR recognizes the possibility that future nearby landowners could propose to connect to or build upon the Project's infrastructure to serve future development, and could recognize the benefits of Project services and propose further services and development.[1340] The Draft EIR appropriately discloses these possibilities, and further discussion would be

[1332] DRP 2017, pp. 6-4 and -5
[1333] *Id.,* pp. 6-5 and -6
[1334] *Id.,* pp. 6-6 to -9
[1335] *Id.,* pp. 6-7 and -8
[1336] *Ibid.*
[1337] *Id.,* p. 6-7
[1338] *Ibid.*
[1339] *Ibid.*
[1340] *Id.,* pp. 6-6 to -8

unduly speculative because they are uncertain events, are not part of the Project, and are outside of the Project Applicant's control. Further, the potential for these impacts to occur is limited by the growth constraints near the Project site, and as noted in the Draft EIR, any such proposals would be subject to environmental analysis under CEQA and a discretionary approval process by the lead agency.[1341]

With regard to economic and population expansion and growth, the Draft EIR appropriately first considers impacts in relation to regional planning efforts and growth projections. This is consistent with CEQA requirements as discussed above in this response. The Project accommodates a projected demand for residential development in the North Los Angeles County Subregion and in the West EOA. It is consistent with population and housing projections included in the AVAP, demographic projections in the 2012-2035 RTP/SCS at the TAZ level, and household and employment projections in the 2016-2040 RTP/SCS at the TAZ level.[1342] The resident population of the Project at buildout is 82.46 percent of the projected resident population of TAZ 20280000 and TAZ 20281000 by 2035, but exceeds SCAG projections for 2040.[1343] The 2016 RTP/SCS states that TAZ level data or any data at a geography smaller than the jurisdictional level is included in the draft growth forecasts for regional modeling purposes only, and is advisory and nonbinding. Overall, the Project is consistent with the 2016-2040 RTP/SCS. Population, housing, and economic growth relative to the SCAG RTP/SCS would be less than significant as it relates to the exceedance of regional population projections.[1344]

The Draft EIR next considers impacts specific to the Project as proposed. It would include shopping, entertainment, recreation, institutional, and health care uses, which would serve residential development on the site but which the EIR concludes could also foreseeably induce growth locally and/or regionally by supporting visitors to the area that are not residents of the Project.[1345] Long-term growth, should it occur, would primarily be in the form of an economic responses to the presence of an increased resident population and employment opportunities that would occur on the Project site and that could, in turn, incrementally increase the area's demand for local goods and services, while increased Project-related employment opportunities could induce regional economic growth.[1346] Taking all of the above into account, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments, which could result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant, adverse, indirect growth-inducing impact.[1347]

The Commenter's opinion that Draft EIR Section 6.0, *Growth-Inducing Impacts* should be longer and include more in-depth analysis of the potential induced growth described in the Draft EIR is noted for the record and will be provided to the Regional Planning Commission

1341 *Ibid.*
1342 *Id.,* p. 6-8
1343 *Ibid.*
1344 *Ibid.*
1345 *Ibid.*
1346 *Id.,* p. 6-9
1347 *Ibid.*

and Board of Supervisors. However, the Lead Agency disagrees. The Draft EIR discussion of reasonably foreseeable growth impacts is consistent with courts' interpretations of the test articulated in *Napa Citizens*, and further analysis would be unduly speculative. As noted above, the court in *Napa Citizens* articulated criteria to determine the depth of growth-inducing analysis required in an EIR, and explained that they include "the nature of the project, the directness or indirectness of the contemplated impact and the ability to forecast the actual effects the project will have on the physical environment. In addition, it is relevant, although by no means determinative, that future effects will themselves require analysis under CEQA."[1348]

In *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200 ("*Clover Valley*"), the City of Rocklin approved a 622-acre development including 558 homes, a 5.3-acre park, 5.0-acre commercial site, 1.0-acre site for a future fire station, 366 acres of open space, and related infrastructure and streets.[1349] Challengers alleged the EIR failed to adequately analyze the growth-inducing impacts of a proposed sewer pipeline which was part of the project, but the court disagreed.[1350] The EIR and responses to comments received on it recognized that the sewer improvements would provide part of the infrastructure required later to undertake construction of additional housing to north and south of the project, thereby removing an obstacle to development.[1351] The court held that under the *Napa Citizens* criteria, "no further detail or analysis was required of the potential impacts the additional planned development could cause," for three reasons.[1352] With regard to the first *Napa Citizens* criteria, the "nature of the project", the court explained that no further detail was required because the nature of the sewer improvement element of the project was "not to facilitate additional development after the project is completed," but rather was intended "first to meet the needs of the current project."[1353] Under the second criteria, the court concluded that no further detail was required because the anticipated impact would be *indirect,* since the sewer line would provide essential capacity for additional housing, but would remove only one of potentially numerous obstacles and approval requirements for developing additional housing that may arise when and if any such applications are submitted.[1354] Finally, the court explained that no further analysis was required in the EIR for this project because "any future effects of that additional development will undergo CEQA analysis" and the "growth has already been analyzed in the City's general plan EIR and was contemplated in the general plan and the SPMUD Master Plan."[1355] Because "the possible development's general impacts had already been considered and approved on a program level…CEQA did not require the City to redo that analysis in this project EIR as part of the growth-inducing impacts analysis."[1356]

[1348] *Napa Citizens* at 369
[1349] *Clover Valley* at 207
[1350] *Id.,* at 210, 227
[1351] *Id.,* at 227
[1352] *Ibid.*
[1353] *Ibid.*
[1354] *Id.,* at 228
[1355] *Ibid.*
[1356] *Ibid.*

The Draft EIR recognizes that although the limited size of Project infrastructure and service facilities would not directly cause growth beyond the Project, it is possible that indirectly caused growth could occur because nearby landowners could propose connections to these facilities in the future.[1357] Likewise, it recognizes that while Project uses including shopping, entertainment, recreation, institutional, and health care facilities are intended to serve on-site residential uses, the increased services and employment opportunities could cause the indirect impact of inducing local and regional growth by attracting visitors and creating a desire for goods and services nearby.[1358] The Draft EIR therefore concludes that the existence of the Project could foreseeably result in proposals for additional development outside the West EOA, which would be a significant, adverse indirect growth-inducing impact.

This depth of analysis is appropriate under *Napa Citizens* and *Clover Valley*. First, Project development, infrastructure, and services will be sized only to accommodate Project demand, and there is no intention for Project development to facilitate or support further development. As explained in the Draft EIR, infrastructure will not be sized to accommodate growth beyond that proposed for the Project, onsite renewable energy will only be supplied to Project structures, the Project will not create extra potable water for use outside of Project boundaries, the Project wastewater reclamation facilities would only treat Project water rather than any outside water, and Project roads are internal and not sized to support regional traffic.[1359] Like in *Clover Valley*, the purpose of Project development, infrastructure, and services "is first to meet the needs of the current project. And the nature of the project is not to facilitate additional development."[1360]

Second, like in *Clover Valley*, although reasonably foreseeable, potentially significant growth impacts in the surrounding area would be indirect. Further, the potential impacts are out of Project Applicant control, are uncertain, and would be constrained by several legal and practical impediments. Constraints on development include County policies directing development within EOAs, which would make it more difficult and unlikely for an applicant to obtain approval for development outside an EOA; the 2008 Conservation and Land Use Agreement (see response to Comment F.8-50 for further discussion of the agreement); an adjudication judgment that strictly limits withdrawals from the Antelope Valley Groundwater Basin; the existence of the San Gabriel Mountains and Angeles National Forest south of the Project site, both of which are constrained by physical limitations and government ownership; and the existence of the Los Padres National Forest and the Hungry Valley State Vehicular Recreation Area to the west of the Site, which are similarly expected to remain undeveloped.[1361] Third, as noted in *Clover Valley*, any future effects of additional development will undergo CEQA analysis. For all of the above reasons, the impact analysis contained in Draft EIR Section 6.0, Growth-Inducing Impacts is consistent with CEQA requirements, and no additional analysis is required.

[1357] DRP 2017, pp. 6-7, 6-8
[1358] *Id.,* pp. 6-8 and -9
[1359] *Id.,* pp. 6-6 and -7
[1360] *Clover Valley* at 227
[1361] DRP 2017, pp. 6-4 to -6

Response to Comment F.8-48:

The Commenter's opinion that Draft EIR Section 6.0, Growth-Inducing Impacts, should be longer and include more in-depth analysis of the potential induced growth described in the Draft EIR is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Lead Agency disagrees. The Draft EIR discussion of reasonably foreseeable growth impacts is consistent with courts' interpretations of the test articulated in *Napa Citizens*, and further analysis would be unduly speculative.

As is addressed more fully in response to Comment F.8-47, the impact analysis contained in Draft EIR Section 6.0, Growth-Inducing Impacts, is consistent with CEQA requirements, and no additional analysis is required.

Response to Comment F.8-49:

The Draft EIR appropriately references analysis included in the AVAP EIR. The Draft EIR analysis of growth-inducing impacts uses the AVAP EIR as a forecasting tool to independently evaluate reasonably foreseeable regional growth patterns and population trends. The potential implementation of the Project was known at the time of the development of the AVAP and was accounted for in the AVAP's land use and population/employment growth assumptions. The Draft EIR determined that the Project is consistent with allowable land use and development densities and intensities in the AVAP. Draft EIR discussion of prior analysis in the AVAP EIR is reasonably understood as an incorporation of the evidentiary value of that analysis into the Draft EIR, which independently determined that the Project would not result in significant growth-inducing impacts related to approved County and regional plans after reaching the same conclusions as the AVAP EIR regarding foreseeable growth patterns and population trends.

The Draft EIR does not avoid Project-specific discussion of growth-inducing impacts. Rather, after its independent evaluation of the reasonably foreseeable regional growth patterns and population trends described in the AVAP EIR, the Draft EIR appropriately focuses the remaining analysis in Section 6.0, *Growth-Inducing Impacts* on potential, reasonably foreseeable growth-inducing impacts that are peculiar and specific to the Project and its exact location. To focus the analysis, the Draft EIR first discusses growth constraints near the Project site that limit the ability of the Project to influence growth, including a 2008 Conservation and Land Use Agreement between Tejon Ranch Company and Resource Groups that precludes development in approximately 240,000 acres of open space set aside in the agreement, the San Gabriel Mountains and Angeles National Forest south of the Project site, the Los Padres National Forest and Hungry Valley State Vehicular Recreation Area to the west of the Project site, legally limited water supply in the Antelope Valley, and related provisions in the County General Plan which require focusing new development in designated locations including the West EOA in which the Project site is located.[1362] As a result of the above constraints, the Draft EIR identifies the limited locations near the Project site where the only foreseeable induced growth could occur – these include areas west of the Project site from Quail Lake along SR-138 to the I-5 and northward along the eastern side to

[1362] *Id.,* pp. 6-4 and -5

Gorman, areas east of the Project site along the SR-138 corridor and inside the West EOA, and areas east of the Project site that are outside of the West EOA near Neenach and toward the cities of Lancaster and Palmdale.[1363]

Taking the above context into account, the Draft EIR evaluates the Project's potential to cause significant growth-inducing impacts under four criteria, including whether the Project would remove obstacles to growth, whether the Project would result in the need to expand one or more public services to maintain desired levels of services, whether the Project would encourage or facilitate economic effects that could result in other activities significantly impacting the environment, or if approval would involve precedent-setting actions that could encourage and facilitate other activities that could significantly affect the environment.[1364] Under the first and second criteria, the Draft EIR notes that project infrastructure and services would be sized to accommodate the Project population only, and as such would not directly lead to growth in surrounding areas.[1365] No new electrical production plants or natural gas facilities are part of the proposed Project, and renewable energy generated onsite would be used only by the Project.[1366] The Project would not generate extra potable water that could be used to support additional development, and the Project's wastewater reclamation facilities would only treat Project-related water.[1367] Internal Project roads would not be sized to support regional traffic flows and would not provide access to other areas outside of Project boundaries.[1368] The Project will add fire and police stations, libraries, and schools to support the anticipated population associated with the Project, but these service facilities will be scaled to serve the Project only.[1369] However, the Draft EIR recognizes the possibility that future nearby landowners could propose to connect to or build upon the Project's infrastructure to serve future development, and could recognize the benefits of Project services and propose further services and development.[1370] The Draft EIR appropriately discloses these possibilities, and further discussion would be unduly speculative because they are uncertain events, are not part of the Project, and are outside of the Project Applicant's control. Further, the potential for these impacts to occur is limited by the growth constraints near the Project site, and as noted in the Draft EIR, any such proposals would be subject to environmental analysis under CEQA and a discretionary approval process by the lead agency.[1371]

With regard to economic and population expansion and growth, the Draft EIR appropriately first considers impacts in relation to regional planning efforts and growth projections. This is consistent with CEQA requirements as discussed above in this response. The Project accommodates a projected demand for residential development in the North Los Angele County Subregion and in the West EOA. It is consistent with population and housing projections included in the AVAP, demographic projections in the 2012-2035 RTP/SCS at the

1363 *Id.,* pp. 6-5 and -6
1364 *Id.,* pp. 6-6 to -9
1365 *Id.,* pp. 6-7 and -8
1366 *Ibid.*
1367 *Id.,* p. 6-7
1368 *Ibid.*
1369 *Ibid.*
1370 *Id.,* pages 6-6 to -8
1371 *Ibid.*

TAZ level, and household and employment projections in the 2016-2040 RTP/SCS at the TAZ level.[1372] The resident population of the Project at buildout is 82.46 percent of the projected resident population of TAZ 20280000 and TAZ 20281000 by 2035, but exceeds SCAG projections for 2040.[1373] The 2016 RTP/SCS states that TAZ level data or any data at a geography smaller than the jurisdictional level is included in the draft growth forecasts for regional modeling purposes only, and is advisory and nonbinding. Overall, the Project is consistent with the 2016-20140 RTP/SCS. Population, housing, and economic growth relative to the SCAG RTP/SCS would be less than significant as it relates to the exceedance of regional population projections.[1374] The Draft EIR next considers impacts specific to the Project as proposed. It would include shopping, entertainment, recreation, institutional, and health care uses, which would serve residential development on the site but which the EIR concludes could also foreseeably induce growth locally and/or regionally by supporting visitors to the area that are not residents of the Project.[1375] Long-term growth, should it occur, would primarily be in the form of an economic responses to the presence of an increased resident population and employment opportunities that would occur on the Project site and that could, in turn, incrementally increase the area's demand for local goods and services, while increased Project-related employment opportunities could induce regional economic growth.[1376] Taking all of the above into account, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals, which could result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant, adverse, indirect growth-inducing impact.[1377]

Draft EIR analysis is consistent with CEQA requirements, and no further analysis is required. For further discussion regarding appropriate analysis in Draft EIR Section 6.0, Growth-Inducing Impacts, see responses to Comments F.8-47 and F.8-48.

Response to Comment F.8-50:

As noted by the Commenter, Draft EIR Section 6.0, Growth-Inducing Impacts, discusses the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA). On June 17, 2008, the Tejon Ranch Company entered into the TRCRWA with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, the Planning and Conservation League, and the Sierra Club ("Resource Groups").[1378] It covers the Project site and allows Tejon Ranch Company and its partners to pursue development approvals on the Project site, while providing for the designation of permanent open spaces and the dedication or sale of conservation easements over approximately 240,000 acres (or 90 percent) of the Ranch, without challenge from the Resource Groups.[1379] The agreement provides for permanent preservation through a combination of donated conservation

[1372] *Id.,* p. 6-8
[1373] *Ibid.*
[1374] *Ibid.*
[1375] *Ibid.*
[1376] *Id.,* p. 6-9
[1377] *Ibid.*
[1378] *Id.,* p. 6-4
[1379] *Ibid.*

easements, conservation easement acquisition areas, and designated open space areas within future development areas.

The TRCRWA is relevant to a discussion of growth-inducing Project impacts because it is one of several factors that constrains development in the areas immediately surrounding the Project site, limiting the Project's potential for growth inducement in covered areas. The Draft EIR accurately describes the areas constrained by the Conservation Agreement as the 240,000 acres set aside in the agreement, and includes Exhibit 3-2, Project Vicinity Map, which depicts the boundaries of Ranch-owned lands constrained by the agreement.[1380] The Commenter has in fact previously challenged discussion of the TRCRWA in the Grapevine Specific and Community Plan EIR (SCH# 2014041005) with regard to biological impacts related to the California condor, but the reviewing court ruled that such discussion in EIR analysis was entirely appropriate.[1381]

Further, the Draft EIR does not limit discussion of growth-inducing impacts to Ranch-owned property. Rather, it takes development constraints on other surrounding lands to the west, northwest, and south into account[1382] and acknowledges that there are limited areas adjacent to the Project site that could experience growth, which are 1) areas to the west of the Project site from Quail Lake, along SR-138 to the I-5, and northward along the eastern side of I-5 to Gorman; 2) areas east of the Project site along the SR-138 corridor, which are also included in the West EOA; and 3) areas east of the Project site near Neenach and toward the cities of Lancaster and Palmdale, which are outside the West EOA.[1383] Neither does the Draft EIR avoid considering growth-inducing impacts for the Project. Rather, potential growth-inducing impacts are appropriately analyzed, as discussed further in responses to Comments F.8-47, F.8-48, and F.8-49.

With regard to availability of the TRCRWA, the Lead Agency notes that it is publicly available online[1384], as filed with the SEC. The Commenter has also had access to the TRCRWA on several prior occasions, including as Appendix D to the Tehachapi Uplands Multiple Species Conservation Plan on which the Commenter provided comments, as cited in the Grapevine Specific and Community Plan Project EIR (SCH# 2014041005) on which the Commenter provided comments, and as summarized in Appendix J-1 to the Tejon Mountain Village EIR (SCH# 2005101018) on which the Commenter provided comments. For informational purposes, in response to the Commenter's request, the TRCRWA is hereby added as Appendix 5.7-D to the Final EIR.

With regard to the effect of and enforceable nature of the TRCRWA, see response to Comment F.8-51.

1380 *Ibid.*; *Id.,* Exhibit 3-2

1381 Order Denying Petition for Writ of Mandate and Judgment in Favor of Respondents and Real Parties in Interest, *Ctr. for Biological Diversity v. Kern Cty.*, No. S-1500-CV-286902 KCT (Kern Cnty. Sup. Ct. Dec. 8, 2010) at pages 23-24, 26

1382 DRP 2017, pp. 6-4 and -5

1383 *Id.,* page 6-5

1384 Available at http://www.secinfo.com/d14D5a.t46Xm.c.htm#1stPage.

Response to Comment F.8-51:

The TRCRWA is described for informational purposes in the Draft EIR but is not a part of the Project and is not a mitigation measure for the Project. The Draft EIR does not rely upon the TRCRWA to mitigate growth-inducing impacts, nor would it be appropriate to do so, considering that as noted by the court in *Napa Citizens*, "Neither CEQA itself, nor the cases that have interpreted it, require an EIR to anticipate and mitigate the effects of a particular project on growth in other areas."[1385] Nor does the Draft EIR rely on the TRCRWA to mitigate biological resource impacts, as addressed further in response to Comment F.8-180. Rather, it is particularly relevant to a discussion of growth-inducing Project impacts because it is one of several factors that constrains development in the areas immediately surrounding the Project site, limiting the Project's potential for growth inducement in covered areas. The Draft EIR accurately describes the areas constrained by the TRCRWA as the 240,000 acres set aside in the agreement, and includes Exhibit 3-2, Project Vicinity Map, which depicts the boundaries of Ranch-owned lands constrained by the agreement.[1386]

The TRCRWA created a new, independent, nonprofit conservancy, the Tejon Ranch Conservancy. The mission of the Conservancy is to administer the Ranch-wide Management Plan (RWMP) to preserve and enhance the native biodiversity and ecosystem values of designated open space areas of Tejon Ranch and to implement best management practices for ongoing historical uses of Tejon Ranch for the benefit of future generations. In June 2013, the Conservancy Board of Directors adopted the first, Conservancy-prepared RWMP for Tejon Ranch, and it will continue to be updated every 5 years. Where applicable, the Tejon Ranch Conservancy holds all conservation easements over conserved lands.

With regard to TRCRWA enforceability, the Commenter is incorrect. The agreement is fully enforceable by all parties and includes remedies that compel specific performance of the obligations set forth in the agreement, as set forth in TRCRWA Section 12, Remedies.

Response to Comment F.8-52:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Draft EIR conclusion that sizing infrastructure to serve only the Project would not lead to a direct, growth-inducing impact is consistent with CEQA requirements. Growth-inducing impacts typically result if a project provides new infrastructure that is oversized and can be used to serve other projects. Per CEQA Guidelines Section 15126.2(d), "a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas" and therefore cause a potentially significant impact by removing an impediment to growth. Courts have agreed that project construction of oversized infrastructure that can serve homes or business in addition to those planned for the project removes an impediment to growth, causing a potential growth-inducing impact. In *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, an EIR evaluating a 558-home project concluded that an off-site sewer pipeline constructed as part of the project, which would serve the project homes plus a

[1385] *Napa Citizens* at 371)
[1386] DRP 2017, p. 6-4; *Id.,* Exhibit 3-2

possible additional 524 homes, removed an obstacle to future growth and therefore caused a growth-inducing impact.[1387] The court found this appropriate under CEQA Guidelines Section 15126.2(d).[1388] However, growth-inducing impacts can be precluded where the infrastructure is sized to serve only the project, particularly if there are further physical or legal constraints on development in surrounding areas.[1389]

As such, in its discussion of potential growth-inducing impact by removing obstacles to growth, the Draft EIR appropriately notes that the potential for such impacts are limited because Project infrastructure facilities are not sized to accommodate growth beyond that which is proposed for the Project.[1390] Renewable energy generated on-site would only be used for Project uses; the Project would not generate extra, potable water and proposed wastewater reclamation facilities would only be large enough to treat Project-related water; and new Project roads would be internal, are limited to the boundaries of the Project, and are not sized to accommodate regional traffic.[1391] However, the Draft EIR acknowledges that future development proposals are out of its control, and therefore concludes that future nearby landowners could propose to connect to or build upon the Project's infrastructure.[1392] As further discussed in responses to Comments F.8-47 and F.8-48, the above-described discussion of the potential complies with CEQA requirements.

Response to Comment F.8-53:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Lead Agency disagrees. The Commenter provides incomplete citations to Draft EIR Sections 5.9, *Population, Housing, and Employment* and 6.0, Growth-Inducing Impacts, which appear to reveal inconsistences. However, when considered in context, the Draft EIR's analyses and conclusions in Sections 5.9, and 6.0 are consistent, the Draft EIR adequately analyzes impacts, and explains that there is no feasible mitigation for the significant impact identified in Section 5.9.

First, in Section 5.9, the Draft EIR properly and conservatively evaluates Project impacts against the existing baseline to determine the significance of population and housing growth. Under Threshold 9-1, the Draft EIR asks "Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?"[1393] The Draft EIR properly concludes that because the Project would substantially increase population and housing relative to the existing Project site conditions, it would have a significant and unavoidable impact under Threshold 9-1.[1394] The Draft EIR also evaluates the Project's impacts under Threshold 9-4, which asks "Would the project cumulatively exceed official regional or local population projections?," and under this threshold appropriately concludes

1387 *Clover Valley Foundation* at 225-2256
1388 *Id.,* at 227
1389 Stephen Kostka and Michael Zischke, Practice Under the Environmental Quality Act, 2d ed Cal CEB §13.55
1390 DRP 2017, p. 6-6
1391 *Id.,* pp. 6-6 and -7
1392 *Id.,* p. 6-7
1393 *Id.,* p. 5.9-23
1394 *Id.,* pp. 5.9-23 to -32

that the Project would have a less than significant impact.[1395] This is because implementation of the Project would accommodate the growth anticipated by the reasonably foreseeable projections described in the AVAP and by SCAG projections in the 2012-2035 RTP/SCS and 2016-2040 RTP/SCS, and would create employment opportunities on the site at a ratio of 1.22 at buildout, helping the County to attain its targeted jobs/housing ratio of 1.3 jobs per dwelling unit.[1396] The Project would contribute to meeting the RHNA housing production goals for the County and would be consistent with the regional effort to boost housing production in unincorporated areas of Los Angeles County to meet regional housing needs, and would achieve the economic development objectives for the Antelope Valley through development of a balanced urban development located adjacent to critical transportation and water infrastructure.[1397] Under Threshold 9-4, Project impacts would be less than significant because the Project implements and is consistent with the AVAP and SCAG RTP/SCS, and no mitigation is required. While the Draft EIR discusses Thresholds 9-1 and 9-4 together because they are related, its conclusions are not inconsistent. The Draft EIR clearly concludes that impacts are less than significant with regard to consistency with regional plans (Threshold 9-4), but significant and unavoidable with regard to overall growth on the site in comparison to existing conditions (Threshold 9-5).

Similarly, with regard to growth-inducing impacts, the Draft EIR comes to differing conclusions when analyzing direct Project growth in relation to regional planning and anticipated regional growth projections, versus reasonably foreseeable indirect growth-related impacts in the areas around the Project site that are out of the Applicant's control. In Section 6.0, an appropriate first step in the Draft EIR analysis is to consider Project consistency with household and employment growth trends anticipated for the region, and with regional policies to sustainably accommodate said anticipated growth. The Draft EIR therefore appropriately considers Project consistency with growth projections and population trends in the 2012-2035 SCAG RTP/SCS and 2016-2040 SCAG RTP/SCS, and the AVAP.[1398] The potential implementation of the Project was known at the time of the development of the AVAP, and it was accounted for in the AVAP's land use and population/employment growth assumptions, as well as implementation program. As noted in the Draft EIR, the AVAP EIR fully evaluated the growth-inducing impacts of buildout of the unincorporated areas of the Antelope Valley under AVAP policies that focus dense development in EOAS such as the West EOA, within which the Project site is located. The Draft EIR determined that the Project is consistent with allowable land use and development densities and intensities in the AVAP. Draft EIR discussion of prior analysis in the AVAP EIR is reasonably understood as an incorporation of the evidentiary value of that analysis into the Draft EIR, which independently determined that the Project would not result in significant growth-inducing impacts related to the approved County and regional plans after reaching the same conclusions as the AVAP EIR regarding foreseeable growth patterns and population trends. The Draft EIR also notes that the Project is consistent with demographic projections in the 2012-2035 RTP/SCS at the TAZ level, and household and employment projections in the 2016-2040 RTP/SCS at the TAZ level. As such, the full citation from the

1395 *Id.,* p. 5.9-31
1396 *Ibid.*
1397 *Id.,* pp. 5.9-28 and -31
1398 *Id.,* pp. 6-3 to -5, -8 to -9

Draft EIR is as follows: "Therefore, the Project, as planned, *would not result in significant growth-inducing impacts related to approved County and regional plans*" (emphasis added).[1399]

The Draft EIR next conducts a Project-specific analysis of potential growth-inducing impacts on areas surrounding Project site. The Project would include shopping, entertainment, recreation, institutional, and health care uses, which would serve residential development on the site but which the EIR concludes could also foreseeably induce growth locally and/or regionally by supporting visitors to the area that are not residents of the Project.[1400] Long-term growth, should it occur, would primarily be in the form of an economic responses to the presence of an increased resident population and employment opportunities that would occur on the Project site and that could, in turn, incrementally increase the area's demand for local goods and services, while increased Project-related employment opportunities could induce regional economic growth.[1401] Taking all of the above into account, the Draft EIR conservatively concludes that "*the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments, which could result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant, adverse, indirect growth-inducing impact*.[1402] This conclusion is not inconsistent with an independent observation that the Project itself is consistent with growth projections and assumptions in the AVAP, AVAP EIR, 2012-2035 SAG RTP/SCS, and 2016-2040 SCAG RTP/SCS, but rather is an acknowledgement that potential indirect Project impacts cannot be measured by consistency with regional plans alone, and the Project Applicant cannot ensure future development proposals will also be consistent with County and regional plans.

The Commenter also points out that the Draft EIR at page 5.9-27 says "the Project would not lead to substantial growth on the Project site." This statement appears in the context of a discussion regarding planned regional growth as evaluated in the AVAP.[1403] The statement was intended to convey that the Project would not create substantial unplanned growth, because it does not represent a large portion of the future growth planned for the Project site and surrounding area. In response to this comment, the following clarifying correction is made to Draft EIR page 5.9-27, as shown in double underline:

> Since the Project's estimated population of 57,150 residents would represent 14.1 percent of the buildout population of the Antelope Valley's unincorporated area, the Project would not be taking up a large portion of future growth planned for the area. Rather, it would result in a population increase that would be in accordance with County projections and, within the context of County planning, would not lead to substantial unanticipated growth on the Project site or in the Antelope Valley.

1399 *Id.,* p. 6-9
1400 *Ibid.*
1401 *Id.,* p. 6-9
1402 *Ibid.*
1403 *Id.,* pp. 5.9-26 and -27

With regard to mitigation of the significant impact identified in Draft EIR Section 5.9, in light of Project Objectives discussed in Draft EIR Section 4.0, Project Description, there is no appropriate and feasible mitigation to reduce the significant impact under Threshold 9-1.[1404] CEQA Guidelines specify that an EIR shall include "feasible" mitigation measures which could minimize significant adverse project impacts.[1405] The feasibility of mitigation measures must be considered in light of Project objectives, which "should include the underlying purpose of the project."[1406] The underlying purpose of the Project stems from the need for a sustainable community in the greater Los Angeles County region that creates a balance among residential, commercial, and other employment-generating uses and institutional/public uses, while being sensitive to the environment.[1407] This is consistent with the growth projections, visions, assumptions, goals, and policies of the AVAP and 2012-2035 and 2016-2040 SCAG RTP/SCS, as noted above. The AVAP uses four types of environments to facilitate the preservation of rural areas of the Antelope Valley and focus development in appropriate areas, including Rural Preserve Areas, Rural Town Areas, Rural Town Centers, and Economic Opportunity Areas (EOAs). An EOA is defined as a cluster of land with higher development densities along the routes of two proposed major infrastructure projects in the Antelope Valley – the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1408] The Project site is located entirely within the West EOA.[1409]

Pursuant to the above, the first Project Objective expressed in Draft EIR Section 4.0, Project Description, is "Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA."[1410] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1411] Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[1412] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[1413] The Project has been designed to achieve the above-described AVAP goals, as the Draft EIR explains in its Project Objectives. Therefore, while the Project would substantially increase population and housing relative to the existing Project site conditions, which is a significant impact under Draft EIR Threshold 9-1,

1404 *Id.,* pp. 7-19, 5.9-31
1405 CCR §15126.4(a)(1)
1406 *Id.,* §15124(b)
1407 DRP 2017, p. 4-3
1408 DRP 2015, p. I-8
1409 *Id.,* pp. 4-3 and -4
1410 DRP 2017, p. 4-4
1411 DRP 2015, p. I-8
1412 *Ibid.*
1413 *Ibid.*

this impact is appropriately considered significant and unavoidable. Any potential mitigation such as a significant reduction in the Project's proposed unit count and commercial square footage would result in a development proposal that is not consistent with the goals and policies of the AVAP related to the development within the West EOA, and therefore would not support Project Objectives.

With regard to the analysis of and mitigation of foreseeable indirect potential growth-inducing impacts discussed in Draft EIR Section 6.0, as noted by the court in *Napa Citizens*, "Neither CEQA itself, nor the cases that have interpreted it, require an EIR to anticipate and mitigate the effects of a particular project on growth in other areas."[1414] As such, Draft EIR Section 6.0, Growth-Inducing Impacts, appropriately discloses and analyzes potential indirect growth-inducing impacts, specifically the potential for the Project to lead to further proposals for development, but it does not include a discussion of mitigation for the impacts of such reasonably foreseeable development. This does not frustrate "CEQA's fundamental goal" of "fostering informed decision making," and ensuring that "the public be fully informed as to the environmental consequences of action by their public officials," as expressed in *Laurel Heights Improvement Assn v. Regents of University of California* (1986) 47 Cal.3d 376, 402, 404 ("*Laurel Heights*"). The Project Draft EIR is consistent with this fundamental CEQA goal, whereas the EIR in *Laurel Heights* was not. In *Laurel Heights*, challengers alleged that an EIR prepared for a project moving a school of pharmacy from one campus to another building was insufficient, because it only evaluated the impacts of using the immediately available 100,000 square feet in the new building, and did not evaluate foreseeable future impacts when the remainder of the building eventually became available for use.[1415] The court agreed, explaining that the future use was a foreseeable element of the project whose impacts should have properly been evaluated in the EIR, and articulating a test that an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects."[1416]

By comparison, the Draft EIR fully and consistently defines the scope of development, which is a maximum of 19,333 dwelling units, approximately 7,363,818 square feet of Business Park uses, 1,034,550 square feet of Commercial uses, 1,568,160 square feet of Institutional/Civic uses, 130,680 of Recreation/Entertainment uses, and 5,624 acres of Open Space.[1417] The Draft EIR includes proposed infrastructure and service use locations, and sufficiently describes the process for future Tract Map approval for Project refinement. The Draft EIR fully analyzes Project impacts, both during the approximately 20 years of buildout and during foreseeable future operations. It also appropriately discloses and analyzes growth-inducing impacts, as discussed more fully in responses to Comments F.8-47, F.8-48, and F.8-49. The Draft EIR and Specific Plan do not make conflicting representations regarding the scope, impact of or any other aspect of the Project and do not obscure the Project's purpose and planned development components. The Draft EIR does not make, and

1414 *Napa Citizens* at 371
1415 *Laurel Heights* at 393, 394
1416 *Id.,* at 394-396
1417 DRP 2017, p. 4-6

the comment does not provide a citation to any inconsistent statement about the scope of the development in any way comparable with the findings in *Laurel Heights*.

Response to Comment F.8-54:

The Commenter's opinion regarding inconsistent analysis is noted and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Lead Agency disagrees, and Draft EIR Project description and impact analysis are consistent and comply with CEQA, as also discussed in response to Comment F.8-53.

Specifically, with regard to traffic impacts, Draft EIR Section 5.10, Traffic Access and Circulation, as supplemented and updated in this Final EIR, fully and accurately discloses foreseeable impacts due to Project construction and operations, and identifies mitigation measures to reduce impacts to the extent feasible. As noted by the Commenter, with mitigation incorporated, the Draft EIR concludes that traffic-related Project impacts would be less than significant.[1418] It is recognized that, if Caltrans does not implement the improvements outlined in the mitigation measures in the manner or within the timeframe needed to serve the Project, significant and unavoidable direct impacts to traffic circulation may result.[1419]

However, this is limited to Project-related impacts. The potentially significant impact identified in Draft EIR Section 6.0, Growth-Inducing Impacts, is related to foreseeable future development that could be proposed by others. These potential future development projects are not part of the Project, and cannot reasonably be evaluated with more detail than they are in Section 6.0. Further, CEQA does not require such analysis, and the Draft EIR contains an appropriate depth of analysis of these potential impacts, as is more fully discussed in responses to Comments F.8-47, F.8-48, and F.8-49. The Lead Agency acknowledges that such potential impacts could include traffic-related impacts associated with future, unrelated development proposals. However, an EIR need not evaluate speculative growth-inducing impacts of a project.[1420] Further, mitigation of such potential impacts is not required. As noted by the court in *Napa Citizens*, "Neither CEQA itself, nor the cases that have interpreted it, require an EIR to anticipate and mitigate the effects of a particular project on growth in other areas."[1421] As such, Draft EIR Section 6.0, *Growth-Inducing Impacts* appropriately discloses and analyzes potential indirect growth-inducing impacts, specifically the potential for the Project to lead to further proposals for development, but it does not include a discussion of mitigation for the impacts of such reasonably foreseeable development. The Draft EIR is consistent, the Commenter does not provide evidence disputing this conclusion, and no further analysis is required.

Response to Comment F.8-55:

The term "growth-accommodating" is used in the Draft EIR as a common sense term to describe the Project's relationship to reasonably foreseeable growth projections and

1418 *Id.,* p. 9-4
1419 *Ibid.*
1420 *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 CA4th 1252, 1265
1421 *Napa Citizens* at 371

population trends described in regional planning documents, including the Antelope Valley Area Plan (AVAP), 2012-2035 SCAG RTP/SCS, and 2016-2040 SCAG RTP/SCS. As discussed below, it is both appropriate for the Draft EIR to analyze and discuss the Project's consistency with and ability to accommodate growth anticipated in the AVAP and SCAG plans, and for the Draft EIR to include impact analyses regarding said consistency and growth accommodation in Section 5.9, Population, Housing, and Employment, and Section 6.0, Growth-Inducing Impacts.

The County adopted the AVAP in 2015 as a component of its General Plan in order to establish a comprehensive land use plan for the Antelope Valley, and the AVAP expressly states that it was prepared "[i]n anticipation of future growth" and is thus "focused on ways to manage this growth".[1422] To achieve this, the AVAP incorporates a "Rural Preservation Strategy." At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1423]The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1424] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1425] The Project site is located entirely within the AVAP's West EOA.[1426] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1427] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses"[1428] Indeed, the very first policy described in the AVAP - Land Use Policy LU 1.1 – requires that the County "[d]irect the majority of the unincorporated Antelope Valley's future growth to … identified economic opportunity areas".[1429]

Accordingly, the AVAP Land Use Policy Map establishes land use designations for the Project site that correspond to the land use densities and intensities proposed by the Centennial Specific Plan, as shown on Exhibit 4-2a and as discussed in Section 5.8, Land Use, Entitlements, and Planning.[1430] Moreover, the AVAP expressly states its expectation that the Project site will be developed as a "master-planned community" pursuant to a "specific plan." The Project has accordingly been designed as a Specific Plan, and will comply with the vision,

[1422] DRP 2015, p. I-6
[1423] *Id.,* p. I-6
[1424] *Id.,* p. I-7; DRP 2014a, p. 7-7
[1425] *Ibid.*
[1426] DRP 2017, p. 4-4
[1427] DRP 2015, p. I-8
[1428] *Ibid.*
[1429] *Id.,* LU-3
[1430] DRP 2017, pp. 5.8-19 to -71

assumptions, goals, and policies of the AVAP. It is a Project objective to "Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA".[1431] It is therefore appropriate for the Draft EIR to discuss consistency with the AVAP and with the stated Project Objective of accommodating growth anticipated in the AVAP.

It is also appropriate to analyze potential Project-related impacts in relation to anticipated and planned-for regional growth, as discussed more fully in responses to Comments F.8-47 and F.8-48. The Draft EIR analysis of growth-inducing impacts uses the AVAP EIR as a forecasting tool to independently evaluate reasonably foreseeable growth patterns and population trends. The potential implementation of the Project was known at the time of the development of the AVAP and was accounted for in the AVAP's land use and population/employment growth assumptions. The Draft EIR determined that the Project is consistent with allowable land use and development densities and intensities in the AVAP. Draft EIR discussion of prior analysis in the AVAP EIR is reasonably understood as an incorporation of the evidentiary value of that analysis into the Draft EIR, which independently determined that the Project would not result in significant growth-inducing impacts related to approved County and regional plans after reaching the same conclusions as the AVAP EIR regarding foreseeable growth patterns and population trends.[1432]

The Draft EIR appropriately explains that the Project would accommodate growth that has already been anticipated and planned for in the AVAP and in both the 2012-2035 SCAG RTP/SCS and 2016-2040 SCAG RTP/SCS, and would not have a significant impact with regard to increased growth above that anticipated in said regional plans. Therefore, impacts would be less than significant in relation to planned growth in the region, and the Draft EIR explains this in detail in both Section 4.9, Population, Housing, and Employment, and Section 6.0, Growth-Inducing Impacts.[1433] The Draft EIR does not avoid an analysis of growth-inducing impacts, and its analysis of such potential impacts is consistent with CEQA requirements, as discussed in responses to Comments F.8-47, F.8-48, and F.8-49.

Response to Comment F.8-56:

The Northwest State Route 138 Corridor Improvement Project ("NW SR-138 Project") will widen SR-138 to provide operational and safety improvements and accommodate foreseeable increases in travel and goods movement in northern Los Angeles County due to anticipated regional growth. The Draft EIR discusses the NW SR-138 Project, including State Route (SR)-138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 Project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Project Draft EIR was filed by the County on

1431 *Id.,* p. 4-4
1432 DRP 2017, p. 6-9
1433 *Id.,* pp. 5.9-23 to -33; 6-1 to -2; 6-6 to -9

May 15, 2017 and the 60-day comment period began on May 17, 2017. Please note that some updates have been made to the Draft EIR discussion of the NW SR-138 Project, as discussed in responses to Comments F.8-26 and F.8-28.

The proposal and future implementation of the NW SR-138 Project is not a potential growth-inducing impact arising from the Project, and is therefore appropriately not discussed in the Draft EIR as a growth-inducing impact. The NW SR-138 Project is an entirely separate project from the Centennial Specific Plan Project, and has undergone its own environmental review process under CEQA. The NW SR-138 project was fully analyzed under CEQA and NEPA in the NW SR-138 Draft EIR and FEIR. The NW SR-138 Project has long been planned to accommodate anticipated regional growth that would occur with or without the Project, and was not induced by the Project. Caltrans considered widening SR-138 from I-5 to SR-14 in its 2004 North County Combined Highway Corridors Study, and Caltrans initiated the NW SR-138 Project to expand upon the 2004 study and evaluate specific operational improvements for SR-138 from I-5 to SR-14.[1434] The 2015 Federal Transportation Improvement Program (FTIP) lists federally funded projects and regionally significant projects for the period of 2014-2020, and it includes completion of the Project Approval and Environmental Documentation for alternative improvements to SR-138 from I-5 to SR-14. The 2016 RTP/SCS identifies new transportation investments to improve regional mobility and identifies the Northwest SR-138 Improvement Project as a major regional highway project needed to improve regional access to opportunities such as jobs, education, recreation and healthcare.[1435]

Moreover, anticipated regional growth was addressed in the Final SR-138 EIR.[1436] The EIR assumes growth projections included in the SCAG 2012 RTP/SCS.[1437] As discussed in response to Comment F.8-20, the growth projections described in the SCAG 2012 RTP/SCS include growth associated with the Project. As explained in the SR-138 EIR, "[widening SR-138] would not provide access to areas previously inaccessible or improve access in ways that would foster local development beyond that which is already planned, and would not affect the rate, amount, or type of growth envisioned in the Antelope Valley Area Plan. …. With or without [widening SR 138], residential growth within the regional area would continue to be limited by natural resource constraints (e.g., water availability/supply), as well as geographic and regulatory factors (e.g., Rural Preserve Areas) that would guide future development to rural town centers, rural town areas, and economic opportunity areas".[1438] Consistent with this EIR, the SR-138 determined that widening SR-138 would have negligible influence on regional growth and would not result in growth-related impacts.[1439]

1434 *Id.,* p. 5.10-34
1435 SCAG 2016a, pp. 100, 102
1436 Caltrans 2017b, p. 4-10
1437 California Department of Transportation (Caltrans). 2016 (July). Northwest State Route 138 Corridor Improvement Project: Draft Environmental Impact Report/Environmental Impact Statement and Section 4(F) Evaluation. Los Angeles, CA: Caltrans. https://www.metro.net/projects/nw138/nw138-DEIR-DEIS/.
1438 Caltrans 2017b, p. 446
1439 *Ibid.*

Response to Comment F.8-56A:

The Northwest State Route 138 Corridor Improvement Project Final EIR/EIS is noted and already included in the record, and its relationship to the Project is addressed in the Draft EIR and in response to Comment F.8-56.

Response to Comment F.8-57:

With regard to the proposed Pacific Crest Trail (PCT) realignment, specifically, the Forest Service, the PCTA, the Conservancy, and the Tejon Ranch Company are discussing the relocation of the existing segment of the PCT that currently crosses Lancaster Road at 270th Street West, approximately two miles east-southeast of the Project site, so that it is generally aligned along 300th Street West between SR-138 and the northeastern corner of the Project site, as shown on Draft EIR Exhibit 5.14-2.[1440] A portion of the western right-of-way of 300th Street West has been reserved for the conceptual PCT realignment where this conceptual realignment is contiguous with a portion the Project site and where it bisects the northeastern corner of the site.[1441] To facilitate the PCT realignment described in the Draft EIR, TRC has granted to the Conservancy two conservation easements that would preserve in perpetuity the conservation values of those portions of Tejon Ranch land located outside of the Project boundary and through which the proposed PCT alignment would extend.[1442] Both conservation easements expressly acknowledge that the Forest Service, the Conservancy, and TRC are in ongoing discussions regarding an alternative realignment for the PCT, and that TRC intends to convey to the Forest Service a perpetual trail easement for the construction, maintenance, and use of the PCT on the property covered by the conservation easements.[1443] Moreover, the Conservation Easements both expressly authorize public recreational use of the PCT on the conservation easement property and permit TRC to grant the trail easement to the Forest Service.[1444] Both Conservation Easements further acknowledge that, in October 2009, PCTA and Forest Service, among other parties, entered into a Memorandum of Understanding that delegates to PCTA certain responsibilities for the construction, maintenance and use of that segment of the PCT alignment to be located on the Conservation Easement property.[1445]

As explained in the Draft EIR, however, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project.[1446] Nevertheless, the proposed PCT realignment is assumed to be the future alignment for evaluation purposes in the Draft EIR and is depicted on the Project's Recreation and Trails Plan.[1447] Moreover, the Draft EIR analysis includes consideration of the Project's potential impacts on the PCT and its users.[1448] The Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043) (AVAP EIR) also considered the environmental effects on the PCT associated

[1440] DRP 2017, p. 5.14-14
[1441] *Ibid.*
[1442] See Kern County Official Records Document Nos. 214047995, 20140445960 ("Conservation Easements")
[1443] Conservation Easements, Recital G
[1444] *Id.,* Sections 6(b)(2)(O)
[1445] *Id.,* Recital G
[1446] DRP 2017, 4-19
[1447] *Id.,* Exhibit 4-10a
[1448] *Id.,* pp. 5.7-138; 5.8-73; 5.12-20; 5.13-1, -8, -10 to -30; 5.14-3, -8, -10 to -22; 5.21-77

with buildout of the Project site in accordance with the Antelope Valley Area Plan.[1449] Further, when and if implemented, the PCT alignment would be a separate project with a separate environmental permitting process.[1450]

With regard to visual impacts, first, the proposed alignment is not final. It is expected that discussion among the stakeholders for the PCT realignment will continue, and further design considerations will be acknowledged and contemplated. Second, the Project's potential visual impact on the PCT and its uses were analyzed in Draft EIR Section 5.13, Visual Resources. Distant views of portions of the Project site are intermittently visible from segments of an approximate two-mile stretch of the trails that passes through the Three Points area.[1451] Due to distance and intervening topography, views of the Project site from the existing PCT alignment are very limited and do not substantially contribute to the visual experience of users of the existing PCT alignment.[1452] Users of the currently conceptual future PCT realignment along 300th Street West would have some direct views of portions of the Project site, the foothills, and the Tehachapi Mountains, as depicted in Draft EIR Exhibit 5.13-5. The Draft EIR acknowledges that views of the local foothills and/or Tehachapi Mountains would be partly obstructed by proposed structures.[1453] Development on the eastern section of the site would present trail users with views of residential, commercial, and business park structures along 300th Street West for a distance of approximately 1½ miles.[1454] Therefore, MM 13-4 requires that structures proposed along the PCT alignment be screened by a block wall along the rear of the structures and a wide, landscaped setback that would contain the conceptual PCT realignment. These features would ensure that the on-site urban uses in the foreground of views from the trail, as it passes through the site, would have limited visibility.[1455] The location and design of the conceptual PCT realignment is intended to be a similar (i.e., some rural/agricultural uses and some land development) to comparatively better than views from the existing alignment. Therefore, views from the conceptual future realignment of the portion of the PCT along 300th Street West would be reduced to a less than significant level.[1456]

Response to Comment F.8-58:

As disclosed in the Draft EIR, "There are no State-designated scenic highways within 20 miles of the Project boundaries; SR-138 is not a State scenic highway, nor is it eligible for listing.[1457] Thus, while there are features on and around the Project site that would be considered scenic by many, because these components of the overall visual character are not within the viewshed of a State-designated scenic highway, the proposed changes to the Project site

[1449] DRP 2014a, pp. 3-2; 4-15; 5.15-6, -11 to -16; 5.16-5; Figure 5.15-1
[1450] DRP 2017, p. 5.14-14
[1451] *Id.,* p. 5.13-10
[1452] *Ibid.*
[1453] *Id.,* p. 5.13-17
[1454] *Id.,* p. 5.13-21
[1455] *Ibid.*
[1456] *Ibid.*
[1457] California Department of Transportation (Caltrans). 2011 (September 7). California Scenic Highway Mapping System: Scenic Route (Los Angeles County). Sacramento, CA: Caltrans. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

would not result in impacts related to damaging scenic resources along a scenic highway."[1458]

While SR-138 is not a State-designated scenic highway, the Draft EIR analyzes and clearly acknowledges that the Project would cause substantive change in views from SR-138, which the AVAP identifies as a "Scenic Drive". The Antelope Valley Area Plan (AVAP) is the primary, underlying County planning document for the Project site. AVAP Goal COS 5 is to ensure that scenic resources, including Scenic Drives, can be enjoyed by future generations. To that end, Policy COS 5.2 indicates that the amount of potential development in Scenic Resource Areas should be very limited, and should instead be focused within Economic Opportunity Areas (EOAs). Focusing development in EOAs allows for expected growth and development in the AVAP area while also achieving AVAP Goal COS 5 by preserving scenic resources in areas outside the EOAs. The Project site is located within the Western EOA and is not within a Scenic Resource Area. Focusing development on the Project site is therefore consistent with AVAP Goal COS 5 and specifically with Policy COS 5.2. Further, AVAP Policy COS 5.7 ensures that development standards and guidelines are established for development within the viewsheds of Scenic Drives, and the Project will comply with such standards and guidelines. Impacts on SR-138 with regard to its status as a Scenic Drive in the AVAP would therefore be less than significant.[1459] Nonetheless, the Draft EIR acknowledges that the Project would result in significant and unavoidable impacts related to a change in visual character experienced from public vantage points, including SR-138, for which there is no feasible mitigation.[1460]

Response to Comment F.8-59:

With regard to light and glare, the Draft EIR discloses that the Project would cause new sources of light and glare during construction activities and during Project operation. With regard to construction activity impacts, motorists on SR-138 could be affected by light and glare from construction of new structures adjacent to it, which would be a significant impact absent mitigation.[1461] MM 13-5 requires that security lighting at the construction equipment and building material staging areas be directed away from roadways and existing residences, and that it be screened and directed away from on-site residences that have been occupied as each development phase is built.[1462] This security lighting would also be limited and temporary in nature. With MM 13-5 incorporated, impacts would be less than significant.[1463] With regard to long-term, operational light and glare, the Commenter is correct that the Project would introduce new light and glare sources into the Project site that would result in nighttime lighting and glare, and nighttime sky glow.[1464] Nighttime sources of light would include streetlights, vehicle headlights, and lights used in an around buildings, parking lots,

1458 DRP 2017, p. 5.13-2
1459 *Id.,* p. 5.13-24
1460 *Id.,* p. 5.13-20
1461 *Id.,* p. 5.13-26
1462 *Ibid.*
1463 *Ibid.*
1464 *Ibid.*

parks, and walking paths located on the Project site.[1465] These outdoor lighting sources would also cause increased sky glow in the area.[1466]

To reduce the above-identified impacts, PDF 13-3 has been incorporated into the Project, and all feasible mitigation has been identified and is required in MMs 13-2 and 13-6. PDF 13-3, and MM 13-2 require the implementation of detailed components of the Green Development Program listed on Draft EIR pages 5.13-29 and 5.13-30. MM 13-6 requires the preparation of an Exterior Lighting Plan in coordination with a qualified Biologist to minimize impacts to wildlife, review by an Electrical Engineer, and approval by the County prior to the submittal of each building permit.[1467] It would apply to all proposed structures and to all development areas that border natural open space resources, and must include, at a minimum, the elements listed on Draft EIR page 5.13-31.

The requirements of MMs 13-2 and 13-6 are consistent with Los Angeles County's Rural Outdoor Lighting District Ordinance, enacted in 2012.[1468] In developing the ordinance, the County considered community input, reviewed the requirements of other successful jurisdictions, and incorporated relevant parts of the Model Lighting Ordinance created over the course of seven years by the International Dark Sky Association and the Illuminating Engineering Society of North America.[1469] The ordinance was established to permit the reasonable use of outdoor lighting for nighttime safety, utility, security, productivity, and enjoyment while promoting dark skies for the enjoyment and health of humans and wildlife.[1470] The County duly conducted an environmental review of the ordinance under CEQA, concluding that its implementation would not have a significant impact on the environment, but rather would reduce existing impacts because outdoor light was not being consistently regulated in much of the County. Despite the incorporation of these measures, the Project site is currently an undeveloped area with few existing light sources, and it is not possible to fully mitigate the impacts of introducing new sources of nighttime light and glare from the Project. The Draft EIR therefore concludes that the impact would be significant and unavoidable.[1471]

Regarding the last sentence of this comment referring to wildlife impacts due to lighting, this is fully addressed in Section 5.7, Biological Resources, of the EIR. Specifically, Draft EIR page 5.7-141 recognizes that indirect impacts on biological resources as a result of Project implementation may include "increased lighting and glare effects on wildlife species in the remaining and adjacent open space areas…" Implementation of MMs 13-2 and 13-6 from Section 5.13, Visual Resources, which require the Project Applicant to develop a Lighting

1465 *Id.,* p. 5.13-27
1466 *Id.,* pp. 5.13-27 and -28
1467 *Id.,* p. 5.13-31
1468 Los Angeles County Department of Regional Planning (LACDRP). 2017 (accessed October 2). Rural Outdoor Lighting District Ordinance. Los Angeles, CA: LACDRP. http://planning.lacounty.gov/view/rural_outdoor_lighting_district_ordinance/.
1469 Los Angeles County Department of Regional Planning (LACDRP). 2011. Staff Report to the Regional Planning Commission re: Project No. R2011-004-25-(1-5) Case No. RADVT20100006/ENV Case No. T201100135, Amendment to Title 22 (Zoning Ordinance) Regarding Proposed Rural Outdoor Lighting District Ordinance (pp. 3, 8). September 8, 2011. http://planning.lacounty.gov/assets/upl/data/ord_outdoor-lighting-rpc-package.pdf (accessed 10/2/2017).
1470 *Id.,* p. 8
1471 DRP 2017, p. 5.13-29

Plan to reduce potential impacts to biological resources caused by light and glare, would reduce the level of the impact. The Lighting Plan, also referred to as the Dark Sky Plan, shall be consistent with County lighting standards and shall provide guidelines for outdoor lighting that will be used throughout the Project site. Final lighting orientation and design shall be approved by the County of Los Angeles Department of Building and Safety. This measure will reduce the impact of light and glare to a level considered less than significant.[1472]

The analysis of biological resources, including indirect impacts such as nighttime light and glare, is based on intensive investigation of the site, as described beginning on page 5.7-17 under the heading "Methodology to Document Biological Resources" as well as numerous site-specific studies and scientific resource documents; the primary technical references are cited on page 5.7-3 with all references provided in Section 5.7.9, References, of the Draft EIR. The findings of the biological resources analysis are based on expert interpretation of all biological resource data collected for the site and surrounding region. As stated in Section 21082.2(a) of the *Public Resources Code*, the determination of a significant environmental impact shall be based on "substantial evidence in light of the whole record". Section 21082.2(c) states that "Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous…is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." This comment does not provide expert or other factual evidence disputing the findings of Section 5.7 regarding nighttime light and glare impacts to wildlife.

In response to this comment, the following documents are added to the administrative record:

Los Angeles County Department of Regional Planning (LACDRP). 2011. Staff Report to the Regional Planning Commission re: Project No. R2011-004-25-(1-5) Case No. RADVT20100006/ENV Case No. T201100135, Amendment to Title 22 (Zoning Ordinance) Regarding Proposed Rural Outdoor Lighting District Ordinance. September 8, 2011. http://planning.lacounty.gov/assets/upl/data/ord_outdoor-lighting-rpc-package.pdf (accessed 10/2/2017).

Response to Comment F.8-60:

The Commenter is correct that with regard to Thresholds 13-1 and 13-4, the Draft EIR concludes that because the Project will unavoidably result in a transition from open space to developed land uses, and will change the topography of the site due to grading and development, it will have significant and unavoidable impacts to the visual character and quality of the site and its surroundings.[1473] PDFs and MMs have been identified to reduce impacts to the extent feasible. Visual character impacts related to grading and development of the Project would be reduced through the implementation of PDFs 13-4 and 13-5, and MMs 7-13, 13-1, 13-2, and 13-3.[1474] However, the change from a rural to urban conditions

[1472] *Id.,* p. 5.7-167
[1473] *Id.,* p. 5.13-14
[1474] *Id.,* p. 5.13-20

and the varying degrees of obstruction of existing views of local foothills and the Tehachapi Mountains would be considered a significant and unavoidable impacts, for which no other feasible mitigation exists.[1475] Further mitigation is infeasible because it would not allow the achievement of the Project Objectives identified in Draft EIR Section 4.0, Project Description, particularly with regard to Objectives 1 (Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA) and 3 (Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips).[1476] The Draft EIR therefore appropriately concludes that Project-related impacts would be significant and unavoidable despite the incorporation of PDFs into the Project and the imposition of feasible mitigation measures.

Response to Comment F.8-61:

With regard to Thresholds 13-1 and 13-4, the mitigation measures that have been identified will reduce impacts, but the Draft EIR concludes that even with all feasible mitigation incorporated, the Project would result in significant and unavoidable impacts to the visual character of the Project site and the surrounding area.[1477] With regard to the efficacy and binding nature of the mitigation that has been identified, it is first noted that Section 21081.6 of the *Public Resources Code* requires a public agency to adopt a program for assessing and ensuring the implementation of required mitigation measures applied to proposed developments, and these specific reporting and/or monitoring requirements shall be adopted coincidental to final approval of the project by the responsible decision maker. Accordingly, the Lead Agency has prepared a Mitigation Monitoring and Reporting Program (MMRP) for the Project, and it is included in the Final EIR as Appendix 2.0-C.Rev, Mitigation Monitoring and Reporting Program. To ensure compliance with the Project mitigation measures, the Applicant will be required to retain the services and incur all associated costs of a qualified environmental/mitigation monitoring consultant who must be approved by the Director of planning, and the applicant must submit annual mitigation monitoring reports to Regional Planning for approval until such reports are no longer required.[1478]

Per PDF 13-1, implemented by MM 7-13 in Draft EIR Section 5.7, Biological Resources, the Applicant is required to develop a Landscaping Plan and plant palette subject to review and approval by the County Biologist.[1479] The palette would be composed of non-invasive species that do not require high irrigation rates, which would minimize the adverse visual impacts of altering the landscape through the use of invasive and non-native species unsuited to the Project site and would avoid the use of unattractive irrigation infrastructure. MM 7-13 uses mandatory "shall" language and will be binding upon the Applicant under the MMRP. With regard to impacts to rock outcroppings visible to the public from SR-138, MM 13-1 requires

1475 *Ibid.*
1476 *Id.,* p. 4-4
1477 *Id.,* pp. 5.13-19 and -20
1478 Final EIR Appendix 2.0-C.Rev, p. C-1
1479 DRP 2017, p. 5.7-190

that during grading and development of the Project, rock outcroppings be preserved to the maximum extent feasible, by requiring the Project plans and specifications to demonstrate the implementation of measures to preserve existing rock outcroppings, subject to the review and approval of the County.[1480] County review and approval will ensure that development standards have been implemented that minimize the visual alteration of the site and to create an aesthetically pleasing environment while still allowing for the achievement of Project Objectives identified in Draft EIR Section 4.0, Project Description. The Project has also been designed to cluster development in the flattest parts of the Project site in order to minimize alterations to site character by preserving areas with dense stands of oak trees, steep slopes, and existing natural drainages.[1481] While this design element has been built into the Project, it is also a binding requirement under MM 13-2 to "Preserve oak woodlands, savannahs, and other sensitive habitat areas near Oso Canyon and at the foot of the San Gabriel Mountains southerly of SR-138.[1482] With regard to potential off-site visual impacts, off-site Project features would be individually small in scale and most would be located underground or at grade, such that impacts would be less than significant.[1483] With regard to the utility lines along SR-138, they would need to be relocated to accommodate the Project. While these are an existing feature and are thus already part of the visual landscape, they are a necessary feature of the Project and could cause visual impacts.[1484] As such, MM 13-3 requires that they are either relocated to the south of the Business Park area or placed underground.[1485] This mitigation measure requires the choice of one option or the other, but the undergrounding cannot be guaranteed as a feasible option, and the impact is therefore conservatively considered significant and unavoidable even with this measure incorporated. The Draft EIR appropriately considers and incorporates all feasible mitigation. Please see the response to Comment F.8-60 with regard to the infeasibility of further mitigation while still meeting Project Objectives.

Response to Comment F.8-61A:

Based on this comment, the following addition has been made to page Draft EIR 5.3-18:

> However, MM 13-1 would require that, during grading and development of the Project, rock outcroppings that are visible from SR-138 would be preserved to the extent feasible.[2]
>
> [2] Section 21061.1 of CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors".

Because this is a mitigation measure, the Project Applicant/Developer would be required to provide the County with substantial evidence that there are economic, environmental, social, and/or technological factors that make preservation of a rock outcropping visible from

[1480] *Id.,* pp. 5.13-18 and -29
[1481] *Id.,* p. 5.13-9
[1482] *Id.,* p. 5.13-29
[1483] *Id.,* p. 5.13-19
[1484] *Id.,* p. 5.13-20
[1485] *Id.,* p. 5.13-30

SR-138 infeasible if the rock outcropping is not preserved. Therefore, with the above addition to the Draft EIR, which cites the CEQA statute, there is a clear and enforceable performance standard. Please see response to Comment F.8-61 regarding enforcement of the MMs with the MMRP.

Response to Comment F.8-62:

The Commenter is correct that the exact size and location of proposed, new fire stations to serve the Project would be determined by the Los Angeles County Fire Department (LACFD) at the time of Project development. However, the Draft EIR analyzes the provision of up to four new fire stations at a level of detail appropriate for a Specific Plan, and with sufficient specificity to evaluate potential environmental impacts. Per state law, a specific plan may be prepared for the systematic implementation of the general plan, is programmatic in nature, typically deals with major infrastructure, development, and conservation standards, and includes an implementation program.[1486] It must include information about the proposed distribution, location, and extent and intensity of major components of public and private, essential facilities proposed to be located in the area covered by the plan.[1487] Accordingly, the Draft EIR appropriately analyzes the future provision of up to four new fire stations within the Project area, and provides conceptual site locations for three and general size proposals for each station.[1488] In Village 1, one fire station is proposed east of the National Cement Plant Road. The second fire station is proposed in Village 4, and the third fire station is proposed in Village 7, with the location of a potential fourth station to be determined. The stations proposed consist of three medium and one large station.[1489] A medium station would consist of an approximately 10,000-square-foot building on an approximate 1.25-acre lot, and a large station would consist of an approximate 15,500-square-foot building on an approximately 4.00-acre lot.[1490]

The number of proposed on-site fire stations and their general locations were determined through consultation with the LACFD and were based upon the projected increase in population to be served, types of development proposed, geographic distribution of proposed land uses, circulation system, and projected response times to calls from the Project site.[1491] Based on the current, conceptual land use plan for the Project, the new fire station locations would provide 5-minute response times to 90 percent of fire calls from the Project site, which is consistent with the LACFD's stated goal and the Insurance Service Office's Fire Suppression Rating Schedule standard for appropriate fire service.[1492] MM 16-1 requires the Project to meet this standard.[1493] To maintain this goal and ensure that the LACFD can provide optimal service to all future Project residents and employees, the LACFD

1486 California Government Code §§ 65450, 65453
1487 *Id.,* § 656451(a)(2)
1488 DRP 2017, Exhibit 4-1
1489 *Id.,* pp. 4-76, 5.16-12
1490 *Ibid.; Id.,* Appendix 4.0-A, Section 3.10.5
1491 DRP 2017, p. 4-76
1492 *Ibid*.
1493 *Id.,* p. 5.16-16

would ultimately approve the final station site locations, and precise locations for all fire stations would be established when future tract maps are processed.[1494]

The Specific Plan's implementation program specifies that future subdivision maps will require discretionary review.[1495] Per the Specific Plan, prior to submission of an application for a Tentative Map, the applicant may submit a "Conceptual Plan," which would be reviewed and commented upon as necessary by the LACFD.[1496] The Applicant would then apply for a Tentative Map, whereupon infrastructure requirements for that subdivision would be set, and would substantially conform to the conceptual plans laid out in Specific Plan Section 3.0, Plan Elements, or otherwise be provided as determined to be appropriate by the Subdivision Committee and either the Hearing Officer or Regional Planning Commission.[1497] Specific Plan Figure 3-30, Conceptual Public Services Plan, depicts the proposed conceptual locations of three of the fire stations, and the plan text discusses the general sizes proposed for each station, as well as the LACFD's ultimate ability to determine the appropriate, final locations to meet response time standards.[1498] This is consistent with the programmatic nature of the Specific Plan, and provides sufficient detail to analyze potential environmental impacts in the project-level EIR.

The Draft EIR also appropriately considers the potential environmental impact of building the new fire stations. The Draft EIR addresses potential environmental impacts of development of the entire Conceptual Land Use Plan, including the proposed new fire stations. The stations were included within the assumed 1,568,160 square feet of proposed Institutional/Civic uses on approximately 110 acres, all contained within the assumed disturbed portion of the Project site.[1499] Development in this assumed disturbed area is evaluated throughout the Draft EIR. Draft EIR Section 5.16 also specifically considers the potential environmental impacts of building the stations with regard to increased fire hazards during construction, the use and handling of hazardous materials, available water supply, and impacts to traffic and circulation.[1500] Finally, as discretionary actions, applications for tentative maps are subject to further environmental review under CEQA.[1501] This would ensure that the impacts specific to the exact size and location of proposed fire stations would be analyzed and reduced to a less than significant level.

Fire flows are considered to be intermittent water uses that are accounted for in a project's water system losses or non-revenue water. As shown in Draft EIR Table 5.18-7, the Project demand includes a potable water system loss of 327 acre-feet per year at buildout, or just under 105 million gallons per year. The volume of fire flows for the Project is discussed on pages 5.3-35 and 5.3-36 of Section 5.3, Hazards and Fire Safety, in the Draft EIR. The Project's water system will provide water supplies to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of

1494 *Id.,* pp. 4-76, 5.16-16
1495 *Id.,* Appendix 4.0-A, Section 4.5.2.1
1496 *Id.,* Appendix 4.0-A, Section 4.5.3.1
1497 *Id.,* Appendix 4.0-A, Section 4.7.2
1498 Id., Appendix 4.0-A, Section 3.10.5
1499 *Id.,* p 4-6, Table 4-1
1500 *Id.,* pp. 5.16-11 to -15
1501 PRC § 21080(a)

wildland or structural fires. The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and the Los Angeles County Fire Department's fire-suppression standards for improved property and development. These requirements must be met prior to the approval of building permits by the County. The fire flow demand for the Project is conservatively assumed to be 4,000 gallons per minute for a duration of 4 hours (approximately 1.0 million gallons) in each of the four water system pressure zones within the site. The system losses shown in Draft EIR Table 5.18-7 are several times greater in magnitude than the required fire flow volumes for the Project. In addition, water reserves to ensure that supplies are available to meet fire suppression demand when needed will be maintained in the onsite water bank and the offsite existing, adjacent water bank that will serve the Project.[1502] The Draft EIR found that the Project's water supplies would sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet, or more than 25.6 billion gallons. This level of reserve water supplies significantly exceeds the maximum fire flow demands for the Project area. Consequently, the Draft EIR accounts for the amount of, access to and impacts associated with potential fire suppression water demand in the analysis of Project water supplies and related infrastructure, including the onsite and offsite water banking facilities.

Response to Comment F.8-63:

The Commenter is correct that, as discussed in the Draft EIR, the Project site is located in an area designated as a Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE).[1503] In response to this comment, Exhibit 5.3-2, Fire Hazard Severity Zones, has been added to the Draft EIR. This figure was unintentionally omitted from the Draft EIR. It depicts the portions of the Project site that have been designated Very High Fire Hazard Severity Zones (VHFHSZ), High Fire Hazard Severity Zones (HFHSZ), and Moderate Fire Hazard Severity Zones. The first sentence of the second paragraph under "Environmental Setting" on Draft EIR page 5.3-33 has been revised as follows:

> The western and southeastern edges and eastern p~~P~~ortions of the Project site are designated as a VHFHSZ and the western and central portions are designated as a HFHSV, with the eastern edge designated as Moderate Fire Hazard Severity Zone (see Exhibit 5.3-2, Fire Hazard Severity Zones).

The second sentence of the first paragraph under "On-Site Impacts" on Draft EIR page 5.3-35 has been revised as follows:

> The majority of the Project area is within a VHFHSV and an HFHSV, which are subject to high fire hazards due to the presence of high brush, woodlands, and steep slopes. Areas within the Moderate Fire Hazard Severity Zone include the eastern edge of the Project site and areas farther east.

[1502] DRP 2017, Appendix 5.19-A, p. 8-2
[1503] *Id.,* p. 5.3-30

The Draft EIR adequately analyzes the impact of introducing urban development into an area subject to wildfires, and the Project would comply with regulatory requirements and incorporates mitigation measures that would reduce impacts to a less than significant level. The Draft EIR evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a VHFHSZ, (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[1504] CAL FIRE classifies a zone as having a moderate, high, or very high fire hazard based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. As explained in the Draft EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. These characteristics would be addressed as the Project site is developed.[1505] The Draft EIR determines that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance. This determination, however, does not rely solely upon implementation of MM 3-9 or other mitigation measures. Rather, the Draft EIR concludes that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protections services, including but not limited to MM 3-9. For further discussion, see Draft EIR Section 5.3, pages 5.3-35 to 5.3-39.

Contrary to the Commenter's assertion, the Draft EIR and Specific Plan,[1506] provide sufficient detail regarding the preparation and approval of a Fuel Modification Plan. The Fire Code contains minimum standards to safeguard the public's safety and welfare, including a requirement for fuel modification plans. Fuel modification plans must be submitted and have preliminary approval prior to any subdivision of land, or have final approval prior to the issuance of a permit for any permanent structure used for habitation, and must be reviewed by the Forestry Division of the LACFD for defensible space, fire safety, and compliance with Section 325.2.1, 325.2.2, 325.10, and 503.2.1 of the Fire Code, LACFD's fuel modification guidelines, and California Code of Regulations, Title 14, Division 1.5, Chapter 7,

1504 *Id.,* pp. 5.2-35 and -36
1505 *Id.,* p. 5.2-35
1506 Final EIR Appendix 4.0-A.Rev

subchapter 2.[1507] The Draft EIR describes the components of the Fuel Modification Plan as follows:

> "A fuel modification plan consists of three sequential zones where combustible native or ornamental vegetation has been modified and/or partially or totally replaced with drought-tolerant, low-fuel-volume plant species. Fuel modification zones are designed to protect homes from wildfire by limiting and reducing the amount of fuel available for a wildfire. The reduction in available fuel affects the flame lengths and amount of heat produced by the fire and eliminates landscape areas where embers can ignite vegetation. Each zone should be designed so that the amount of fuel is reduced and the moisture in the plants is increased the closer to a structure. The details of fuel modification plans vary in complexity and reflect the fire history; the amount and type of vegetation; the arrangement of the fuels; the topography; the local weather patterns; and the construction, design, and placement of structures (LACFD 2015). The following is a generalized fuel modification plan and associated zones (LACFD 2011):
>
> **Zone A** is a minimum 20-foot setback zone from the edge of any structures; it is adjacent to structures and should offer protection from intense flames through either properly maintained, irrigated plants with high moisture content, or through walkways, gravel, stone, paved surfaces, or water features to create breaks in the fire's path.
>
> **Zone B** is the irrigation zone/transition zone that extends from the edge of Zone A up to 100 feet from structures; a large percentage of existing vegetation may be removed and replaced with irrigated, fire- and drought-resistant plants. It may have detached structures and may contain some native vegetation if spaced according to the planting guidelines that create a transition to the native brush and thinning zone (Zone C).
>
> **Zone C** is the native brush thinning zone and, if applicable, extends from the edge of Zone B up to 200 feet from structures. Vegetation will consist mainly of native plants with appropriate thinning and spacing; adequately spaced ornamental shrubs and trees are allowed (if approved by LACFD) but generally not recommended due to water conservation goals. The objective of this zone is to slow the rate of fire spread, reduce flame lengths, and minimize the intensity of the fires prior to reaching irrigated zones (i.e., Zones A and B) or the structure."
>
> (DRP 2017, pp. 5.3-31 and -32)

The characteristics of each zone and the landscaping elements appropriate in and prohibited in each is further described in the Specific Plan. For example, in Zones A and B, irrigation by automatic or manual systems shall be provided, and landscaping shall consist largely of

[1507] DRP 2017, pp. 5.3-30 and -31

green lawns, ground covers and adequately spaced shrubs and trees.[1508] All plants shall be inherently fire resistant and spaced appropriately, most trees are generally not recommended and some species are expressly prohibited within 10 feet of combustible structures, and vines and climbing plants are prohibited on any combustible structure.[1509] In Zone C, irrigation systems are not required, and landscaping and vegetation may consist of existing, native plants, adequately spaced ornamental shrubs and trees, or both.[1510] There may also be replacement landscape planting in Zone C, with ornamental or less flammable native species, to meet minimum slope coverage requirements of County Public Works or Parks and Recreation Landscape or Hillside Design Guidelines.[1511] Existing, native vegetation in Zone C will be controlled by thinning and removal of species constituting a high fire risk, and fuel loads shall be reduced by pruning up the lower 1/3 of remaining trees and shrubs and removing dead wood.[1512] Trees should be limbed up to at least 6 feet above bare earth and a minimum of 3 times the height of underlying plant material, and general spacing for existing, native shrubs is 15 feet between the edge of canopies.[1513]

With regard to the location of fuel modification zones, the Draft EIR indicates that the Fuel Modification Zone for the Project currently extends 200 feet from all structures, and the three fuel modification Zones A-C would comply with the above detailed descriptions.[1514] Preliminary discussions with the LACFD indicate that, due to a variety of variables such as topography and nearby vegetation, it may be appropriate to utilize a fuel-modification buffer that is less than 200 feet, and the extent and location of the fuel zone clearance area, along with conditions under which the setback may be reduced, would be finalized with LACFD review and approval of the Fuel Modification Plan.[1515] Based on conversations between the Applicant and the LACFD, the buffer from structures for the majority of the Project site would be 100 feet because the Project site is predominantly characterized by annual grassland, which is low combustible vegetation.[1516] The 100-foot setback from structures is likely more appropriate for the majority of the property, while in some instances, an alternative compliance of a 150-foot setback from the structure may be appropriate, especially in cases where a number of trees are in the immediate vicinity of lots but are at a grade uphill from the lots.[1517] Figure 3-21 of the Specific Plan depicts landscape zones, including the Transition Zone in which many fuel modification zones are located.[1518] Figure 3-22, Typical Transition Zone, depicts the typical composition of Fuel Modification Plan Zones A-C.[1519] The Specific Plan also describes the relative sizes and extents of each zone where the setback is 200 feet, 150 feet, and/or 100 feet.[1520]

[1508] *Id.,* Appendix 4.0-A, pp. 3-98 and -99
[1509] *Ibid*.
[1510] *Id.,* Appendix 4.0-A, p. 3-99
[1511] *Ibid*.
[1512] *Ibid*.
[1513] *Ibid*.
[1514] *Id.,* p. 5.3-37
[1515] *Ibid*.
[1516] *Ibid*.
[1517] *Ibid*.
[1518] *Id.,* Appendix 4.0-A, p. 3-33; DRP 2017, p. 4-82
[1519] *Id.,* Appendix 4.0-A, p. 3-34
[1520] *Id.,* Appendix 4.0-A, p. 3-99

With regard to plant composition in the fuel modification zones, in accordance with the Landscape Plan for the Project (see MM 7-13 in Section 5.7, Biological Resources), the Fuel Modification Plan (see MM 3-9) will utilize a plant palette that is tailored to the unique environmental conditions of the Project site and that borrows extensively from the existing landscape.[1521] This will allow for both native and adopted species of oaks, willows, cottonwoods, and grasses. The design of this plan would take the Project site's topographical features into consideration. Transitional slopes and some greenways would be enhanced with regionally appropriate species that relate to the historic background of this region such as stone fruits (i.e., peaches, plums, avocadoes) and orchards (i.e., citrus and nuts). Furthermore, species selected for modification would be adapted to the conditions found on the Project site by surviving hot, dry summers without high irrigation demands. A partial species list includes evergreens and deciduous trees that may be modified by the Community Forester in consultation with County staff biologists.[1522] Specific Plan Table 3-8, Plant List, provides the botanical name, common name, water requirements, native status, inherent fire resistance, height, and potential for use in Fuel Modification Plan Zones A-C for all plants being considered as part of the Project plant palette.[1523] There is also a list of prohibited plants.[1524] The final plant palette for fuel modification zones will be approved by the LACFD. The LACFD also provides a pre-approved plant list and plant selection guidelines by zone on its website, which provides further information to the public regarding expected components of the Fuel Modification Plan. While fuel modification plans are ultimately site specific and the required Fuel Modification Plan is subject to further review and approval, as discussed above, the Draft EIR and Specific Plan provide the public with an appropriate amount of information regarding composition of the required plan to evaluate potential environmental impacts.

The impacts of fuel modification zones have been accounted for in the analysis of Project impacts on biological resources in Section 5.7, Biological Resources. MM 7-21 on Draft EIR page 5.7-194 prohibits fuel modification zones from encroaching on the adjacent SEA. MM 7-1 on Draft EIR pages 5.7-171 through 5.7-174 prohibits fuel modification in areas occupied by special status plant species (i.e., crownscale and Mojave spineflower). As such, fuel modification zones would be located away from open spaces where sensitive biological resources are present and would be confined to areas that are proposed for disturbance.

Response to Comment F.8-64:

The Project's fuel modification zone is included within the 7,751-acre development footprint/impact boundary, as depicted on Exhibits 5.7-11a and 5.7-11b. No Project-related fuel modification actions, such as vegetation clearing, will occur outside the development footprint. As stated on page 5.7-172 in Section 5.7.6, Environmental Impacts, "MM 7-22 is included to ensure that fuel modification zones are contained within the current Project impact boundary and would not intrude into the adjacent SEA 17." Regarding invasive species within fuel modification zones, a list of invasive plant species that will be prohibited

1521 *Id.,* p. 5.3-37
1522 *Ibid*.
1523 *Id.,* Appendix 4.0-A, pp. 3-43 to -49
1524 *Id.,* p. 3-50

from being used in landscaping, and this would include fuel modification zones, is part of the Specific Plan (PDF 7-8).[1525]

Response to Comment F.8-65:

As the Commenter correctly notes, CEQA and the CEQA Guidelines require the EIR to identify feasible MMs and alternatives that can reduce or avoid the Project's potential significant environmental impacts. The Commenter is also correct that CEQA is not required to consider every conceivable alternative to the Project.[1526] Rather, to promote informed decision-making and public participation, the EIR need only analyze a reasonable range of feasible alternatives that meet most of the Project objectives while avoiding or reducing any of the Project's significant environmental effects.[1527] However, the Commenter's claim that the EIR is required to include a "rigorous analysis of reasonable alternatives" must be read in the context of the CEQA Guidelines. Per CEQA Guidelines §15126.6(d), "[t]he EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project," but the significant effects of each alternative shall be discussed "in less detail than the significant effects of the project as proposed."

The County disagrees with this comment's assertion that the Draft EIR fails to analyze a reasonable range of feasible alternatives to the proposed Project. For purposes of CEQA, "feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors."[1528] The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1529] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1530] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1531] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1532]

The Draft EIR analyzes four on-site alternatives and one off-site Project alternative, in addition to the statutorily required "No Project" alternative (designated by the Draft EIR as "Alternative A"). All of the alternatives would be consistent with, and are designed to promote the policies of the Antelope Valley Area Plan (AVAP) and its Rural Preservation Strategy, with the exception of Alternative B.

Alternative B, the Previously Proposed Project alternative, is larger than the proposed Project and is based on the original Centennial Project application submitted by the Project

1525 DRP 2017, p. 5.7-140
1526 CEQA Guidelines §15126.6(a)
1527 *Id.,* §15126.6
1528 *Id.,* §15364
1529 *Goleta,* at 553, 566
1530 *Id.,* at 562
1531 *Id*., at 566
1532 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487

in 2002, prior to the County's adoption of the AVAP. Alternative B covers approximately 11,676 acres and would permit development of 7,847 acres with a maximum of 22,998 dwelling units, approximately 12.2 million square feet (sf) of employment-generating uses, approximately 2 million sf of retail-serving centers, and approximately 943 acres of civic and institutional uses. Alternative B would exceed the approved population, housing, and employment projections included in the AVAP for the area.[1533]

Alternative C, the Additional Drainage Avoidance alternative, would reduce significant biological resource impacts by reducing the Project's development footprint so as to avoid approximately 37 acres that would otherwise be impacted by the Project and preserve it as open space. The primary environmental benefit of Alternative C is that it would reduce impacts to jurisdictional drainages that indirectly function as wildlife movement corridors and serve important ecological functions.[1534] Alternative C would reduce the number of residential units to 19,241, as compared to the Project's proposed 19,333 dwelling units.[1535] Alternative C would also provide 200,000 fewer square feet of commercial uses as compared to the Project.[1536]

Alternative D, the Infrastructure Relocation alternative, would relocate two of the Project's proposed water tanks and its proposed water treatment plant (WTP) to other areas on the Project site. This relocation would reduce the WTP's potential impacts within the Oso Creek drainage, a sensitive habitat, would reduce the Project energy demand and would reduce certain visual and air quality impacts. No change in development capacity would occur under this alternative.[1537]

Alternative E, the Density Clustering/East of Aqueduct alternative, would relocate proposed land use development from the east and west portions of the Project site to the central portion of the site, while maintaining the same number of dwelling units, employment generating uses, and other land uses, in a higher density cluster development pattern.[1538] Alternative E would disturb approximately 656 fewer acres than the proposed Project, and would increase the ratio of acreage of open space and preserved lands to total site acreage by approximately 4 percent compared to the Project.[1539] The reduced impact area would result in a comparable reduction in impacts to various biological resources, including vegetation types, habitat for special status plant and wildlife species, and jurisdictional drainages.[1540]

Finally, Alternative F, the Central Economic Opportunity Area Development alternative, would relocate the Project from the AVAP's West Economic Opportunity Area (EOA) to its Central EOA. This alternative assumes the same types of land uses, amount of development, public facilities, and other amenities as the proposed Project.[1541] As compared to the Project,

1533 DRP 2017, p. 8-16
1534 *Id.,* p. 8-17
1535 *Id.,* p. 8-15
1536 *Ibid*.
1537 *Id.,* p. 8-17
1538 *Id.,* p. 8-18
1539 *Id.,* p. 8-54
1540 *Ibid*.
1541 *Id.,* p. 8-18

this alternative would likely have reduced biological impacts because the off-site location is expected to contain fewer jurisdictional drainages due to flatter terrain with fewer topographical variations, and fewer oak woodland resources.[1542] This alternative is also expected to have a reduced impact on wildlife movement, and a reduced cumulative impact on special status vegetation types, compared to the Project.[1543]

Thus, in accordance with CEQA, the Draft EIR presents a reasonable range of potentially feasible on-site and off-site alternatives to the Project that would reduce and/or avoid some of the Project's potentially significant environmental effects. The selected alternatives promote informed decision making and public participation by providing for consideration a range of alternative land use patterns and siting options that will reduce and/or avoid some of the Project's significant environmental effects and attain most of the Project objectives. Accordingly, the alternatives analysis complies with the requirements of *Public Resources Code* §§ 21002, 21002.1(a).

Response to Comment F.8-66:

As discussed on page 8-3 of the Draft EIR, one of the Project objectives is to "implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA." The Lead Agency disagrees with this comment's assertion that this project objective impermissibly restricts the alternatives analysis because it too narrowly frames the goal of the Project as somehow flowing from a need to respond to the existence of the AVAP.

The County has broad legal authority to formulate project objectives. "CEQA does not restrict an agency's direction to identify and pursue a particular project designed to meet a particular set of objectives."[1544] A project objective to implement the AVAP falls well within the County's discretion and in no way violates CEQA. As discussed in response to Comment F.8-65, CEQA only requires that the EIR consider *feasible* alternatives to the proposed Project. *CEQA Guidelines* §15126.6(f)(1) expressly states that "factors that may be taken into account when addressing the feasibility of alternatives" include, but are not limited to, "general plan consistency." Since the AVAP is a component of the County's general plan, and since CEQA expressly allows the EIR to wholly reject as infeasible *any* alternative that it is inconsistent with the AVAP, it necessarily follows that the County has broad authority to identify implementation of the AVAP as a legitimate project objective. Indeed, the general plan is such a fundamental statement of a county's land use policy that CEQA expressly mandates that all EIRs carefully analyze a project's consistency with the general plan.[1545] Moreover, the Environmental Checklist set forth in CEQA Guidelines Appendix G expressly identifies general plan inconsistencies as a potentially significant impact of a project that triggers environmental review. Given CEQA's emphasis on general plan consistency, the notion that

[1542] *Id.,* p. 8-63
[1543] *Ibid*.
[1544] *California Oak Found. v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 276
[1545] CEQA Guidelines §15125(d)

this EIR is legally prohibited from including *implementation* of the County's General Plan in its statement of project objectives is misguided and turns CEQA on its head.

In any case, implementation of the AVAP is only one of several Project objectives identified in the Draft EIR. As set forth on Draft EIR page 8-3, the other identified Project objectives are as follows:

1. Design the Project to maximize efficient utilization of regional infrastructure while preserving hundreds of thousands of acres of contiguous natural open space and important biological resources;
2. Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips;
3. Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers; and
4. Integrate a multi-modal transportation network, renewable energy, water conservation, community wellness, and other green development features into the Project's design, build out, and ongoing operations.

Given the breadth and diversity of the many project objectives identified in the Draft EIR, the single Project objective to implement the AVAP in no way artificially narrows the Project purpose such that it impermissibly restricts the EIR's alternatives analysis. After all, CEQA requires that alternatives analyzed in the EIR be capable of attaining most, not all, of the project objectives.[1546] In fact, the Draft EIR analyzes multiple alternatives that would not implement the AVAP as adopted, including Alternative A, the No Project alternative, and Alternative B, the Previously Proposed Project alternative.[1547]

Although the Draft EIR's statement of Project objectives is in full compliance with CEQA, this comment is nevertheless noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-67:

This comment incorrectly claims that the Draft EIR "impermissibly rejected" Alternative A, the No Project alternative. In fact, Alternative A was not rejected in the Draft EIR. Rather, Alternative A was carried forward for full analysis in Section 8.0, Alternatives to the Proposed Project, as required by CEQA Guidelines §15126.6(e). Alternative A, along with all other Project alternatives analyzed in Section 8.0, will be considered for approval by the Regional Planning Commission and Board of Supervisors concurrently with their consideration of the proposed Project. The only alternatives that were not carried forward for analysis in Section 8.0, and were thus "rejected" by the Draft EIR, are the Alternative Site

[1546] *Id.,* §15126.6(a)
[1547] DRP 2017, pp. 8-30 and -33

Location Within or Near Tejon Ranch alternative and the Public Input Alternative, as discussed on Draft EIR pages 8-12 and 8-13.

This comment correctly notes that Draft EIR page 8-30 states that Alternative A "is not consistent with the AVAP and the development anticipated on the site for the West EOA." However, this comment's speculation that this Draft EIR determination is "intend[ed] to argue that the existing of the AVAP somehow *mandates* development" is not accurate, as discussed in response to Comment F.8-66. Rather, the cited statement merely reflects the fact that the No Project alternative is not consistent with the intent of the AVAP and its Rural Preservation Strategy. As described in greater detail in response to Comment F.8-20, the AVAP's Rural Preservation Strategy proposes to locate most of the future growth projected for the Antelope Valley within economic opportunity areas (EOAs) designated by the AVAP. Indeed, AVAP Policy LU 1.1 expressly states its intent to "[d]irect the majority of the unincorporated Antelope Valley's future growth to … economic opportunity areas, though appropriate land use designations, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan." As discussed in response to Comment F.8-20, the Project site is located within the AVAP's designated West EOA. Since no development would occur on the Project site under the No Project alternative (Alternative A), it follows that such an alternative would not be consistent with the intent of AVAP Policy LU 1.1 or the plan's Rural Preservation Strategy, which calls for future development to occur on the Project site. Accordingly, the Draft EIR's analysis of Alternative A's land use impacts[1548] accurately concludes that the No Project alternative "would not be consistent with the intent of the AVAP or the West EOA within the Project's development footprint."

Response to Comment F.8-68:

This comment expresses confusion regarding the impetus of the Public Input Alternative and the reasons for its rejection. As explained in Section 4.0, Project Description, on June 17, 2008, Tejon Ranch Company (TRC) entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy). Known as the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA), the Agreement allows TRC and its development partners to pursue approvals for development of portions of the Tejon Ranch (Ranch) without opposition from the Resource Groups, while providing for the designation of Project open spaces and the dedication or sale of conservation easements over approximately 240,000 acres, or approximately 90 percent, of the 270,000-acre Ranch. The TRCRWA permanently protects an approximately 145,000-acre reserve area through a series of phased dedications of conservation or other open space easements. The TRCRWA also designates three portions of the Ranch for future development, which areas include the Project site, as well as the sites of the Grapevine and Tejon Mountain Village projects previously approved by Kern County.

At the time the TRCRWA was being negotiated, the Conservation Biology Institute and South Coast Wildlands prepared the *Proposed Reserve Design for Tejon Ranch: A Threatened*

[1548] *Id.,* p. 8-28

California Legacy (2006) (Proposed Reserve Design), which proposes a Ranch-wide conservation plan that would serve as an alternative to the conservation plan ultimately agreed to under the TRCRWA. Like the TRCRWA, the Proposed Reserve Design proposes to permanently preserve the vast majority of the Ranch acreage. Also, like the TRCRWA, the Proposed Reserve Design designates three portions of the Ranch for future development, though the footprints and locations of such development areas are not identical to those ultimately agreed to under the TRCRWA. Moreover, the Proposed Reserve Design explains that its proposed Ranch development areas were selected without "consider[ing] whether these areas are appropriate for development from a regional development planning perspective, potential development constraints or the development suitability of portions of these areas, environmental compliance or endangered species implications of development in these areas, other constraints such as military flight corridors, or economic considerations".[1549]

The footprint of the Public Input Alternative, which is depicted on Draft EIR Exhibit 8-3, is identical to the footprint of the of the development area that the Proposed Reserve Design suggests as an alternative to the Centennial Project site, as depicted on Figure 8d of the Proposed Reserve Design. Thus, the Proposed Reserve Design's alternative Centennial project site is the source of the Public Input Alternative considered, but rejected for analysis in the Draft EIR.

The County's reasons for rejecting the so-called Public Input Alternative are set forth on Draft EIR page 8-13. First, this proposed alternative was recommended by the Conservation Biology Institute and South Coast Wildlands in 2006, well before the County's 2015 adoption of the AVAP. Second, this proposed alternative would include the development of approximately 4,990 acres of land located east and northeast of the Project site within 5 separate and noncontiguous areas (much in Kern County) and would not be consistent with the Land Use Policy Map of the AVAP (e.g., the majority of the Public Input Alternative site is located outside of the AVAP-designated West EOA and portions of the alternative site are designated by the AVAP as Open Space Conservation, which does not support urban development). Third, this alternative would reflect an approximate 33 percent decrease in developable acreage and does not provide enough acreage to include both Project-proposed urban land use and Project-proposed on-site natural open space areas. Fourth, this alternative would lead to the unavoidable loss of agricultural land, similar to the Project.

In addition to the reasons for rejecting the Public Input Alternative cited in Section 8.0 of the Draft EIR, the majority of that alternative's proposed development footprint is located in Kern County, as shown on Draft EIR Exhibit 8-3. As such, the Lead Agency has no legal authority to approve the Public Input Alternative, at least with respect to those portions of the alternative located in Kern County. With respect to those portions of the Public Input Alternative footprint that are located within the County, much of the area is designated by the AVAP as Open Space Conservation and is thus precluded from urban development, as discussed above. Since the Public Input Alternative is inconsistent with the AVAP's land use

[1549] Proposed Reserve Design, p. 1

designation and falls outside of the County's regulatory authority, it is infeasible under *CEQA Guidelines* §15126.6(f)(1) and was thus not analyzed in the Draft EIR.

Response to Comment F.8-69:

This comment mischaracterizes the Draft EIR's descriptions of both the Project and Alternative B by ignoring the Draft EIR's distinction between the area of the Project's boundary and the area of the Project's development footprint within that boundary.

As explained on Draft EIR page 8-9, an application for the Centennial project was formally submitted to the County in 2002 and over time the Project applicant changed the Project design in response to concerns expressed by the County, other agencies, and members of the public regarding the potential impacts associated with the conceptual land use plan described in the 2002 application. The Draft EIR's Alternative B, the Previously Proposed Project alternative, is based on the 2002 land use plan and is depicted in Draft EIR Exhibit 8-1.

The proposed Project's land use plan is depicted on Draft EIR Exhibit 4-1 and it reflects the applicant's revisions to the 2002 land use plan. As explained on Draft EIR page 8-9, the Project's land use plan expands the Project site boundary, as compared to the 2002 land use plan, by including additional property on the east side of the Project site. This boundary expansion thus increases the overall acreage of the Project site from 11,676 acres (Alternative B) to 12,323 acres (proposed Project), as shown on Draft EIR Table 8-1.[1550]

However, the proposed Project also reduces the land use plan's overall development footprint (i.e., developed hardscape and graded open space) within the site boundary as compared to the 2002 land use plan (Alternative B), as shown on Draft EIR Table 8-1, revised for clarification below in response to this comment. First, land designated for development of public rights of way (e.g., roads, greenways, internal slopes) is reduced from 627.8 acres (Alternative B) to 327 acres (proposed Project). Second, land designated for development of civic and institutional uses (e.g., schools, golf courses, parks, and utilities) is reduced from 943.3 acres (Alternative B) to 686 acres (proposed Project). Third, land designated for development of non-residential uses (e.g., commercial uses, business parks, employment uses) is reduced from 884.5 acres (Alternative B) to 699 acres (proposed Project). Fourth, open spaces uses are increased from 3,829 acres (Alternative B) to 5,624 acres (proposed Project). As compared to the 2002 land use plan, the proposed Project would increase the amount of land designated for development of residential uses from 3,982.5 acres (Alternative B) to 4,987 acres (proposed Project), but the proposed Project would reduce the number of residential units by 3,665, as compared to Alternative B.[1551] Taken together, the proposed Project would have a total development footprint of 7,207 acres, whereas as Alternative B would have a total development footprint of 7,847 acres, as shown on revised Table 8-1. Thus, the proposed Project would reduce the overall development footprint on the Project site by approximately 640 acres, as compared to Alternative B.

[1550] DRP 2017, p. 8-15
[1551] *Id.,* p. 8-9

In response to this comment, Draft EIR Table 8-1 is hereby revised as follows:

TABLE 8-1
CENTENNIAL SPECIFIC PLAN ALTERNATIVES COMPARISON

	Centennial Project	Alternative A No Project	Alternative B Previously Proposed Project	Alternative C Additional Drainage Avoidance	Alternative D Infrastructure Relocation	Alternative E Density Clustering/East of Aqueduct	Alternative F Central EOA Development
Project Site	12,323 ac	12,323 ac	11,676 ac	12,323 ac	12,323 ac	12,323 ac	12,323 ac (within 23,930-ac EOA)
Open Space	5,624 ac	12,323 ac [a]	3,829 ac	5,661 ac	5,612 ac	6,280 ac	5,624 ac
Residential Area	4,987 ac	0 ac	3,982.5 ac	4,952 ac	4,984 ac	4,519 ac	4,987 ac
Dwelling Units	19,333 du	0 du	22,998 du	19,241 du	19,333 du	19,333 du	19,333 du
Non-Residential Area [a]	699 ac	0 ac	884.5 ac	678 ac	699 ac	650 ac	699 ac
Non-Residential Floor Area (msf)	10.10 msf	0 msf	14.22 msf	9.90 msf	10.10 msf	10.10 msf	10.10 msf
Civic and Institutional Uses [b]	~~684~~685 ac	0 ac	943.3 ac	699 ac	720 ac	632 ac	~~684~~685 ac
Public Rights-of-Way [c]	327 ac	0 ac	~~2,036.7~~ 627.8 ac [c]	327 ac	327 ac	303 ac	327 ac
Developed Land Use	7,207 ac [d]	Existing	7,847 ac	7,170 ac [e]	7,223 ac [f]	6,551 ac [g]	7,207 ac [d]
Open Space: Natural/Unimpacted	5,116 ac	Existing	3,829 ac	5,153 ac	5,100 ac	5,772 ac	5,116 ac

EOA: Economic Opportunity Area; ac: acres; du: dwelling unit; msf: million square feet

[a] includes Commercial, Business Park, and Employment areas
[b] includes Schools, Golf Course, Parks, and Utilities
[c] includes roads, greenways, internal slopes
[d] includes 6,698 acres of developed hardspace and 509 acres of graded open space within the grading footprint
[e] includes 6,656 acres of developed hardspace and 509 acres of graded open space within the grading footprint
[f] includes 6,730 acres of developed hardspace and 496 acres of graded open space within the grading footprint
[g] includes 6,104 acres of developed hardspace and 1,164 acres of graded open space within the grading footprint

Note: Acreage for all categories is conceptual gross acreage and does not include transitional slopes and/or internal slopes. Actual totals may vary with future detailed planning. Total for Project site may not add due to rounding.

Response to Comment F.8-70:

With regards to this comment's claim that the Draft EIR fails to explain why Alternatives C and E were not considered as the "preferred alternatives", CEQA does not require the EIR to

identify a so-called "preferred alternative." However, *CEQA Guidelines* §1512636(e)(2) does require the EIR to identify the "environmentally superior" alternative among the other alternatives. As the Commenter correctly notes, the Draft EIR identifies Alternative E, the Density Clustering/East of Aqueduct alternative, as the "environmentally superior" alternative.[1552]

As explained in the Draft EIR, Alternative E would result in a reduced grading footprint of approximately 656 acres[1553], as compared to the Project and other alternatives. Due to this grading reduction, Alternative E would have significantly reduced impacts related to sensitive habitat, wildlife corridors, water supplies, visual resources, and light and glare, as compared to the Project and other alternatives, though this alternative would not completely avoid any of the Project's significant and unavoidable impacts.[1554] The Commenter also correctly notes that the Draft EIR concluded that Alternative E could attain most of the Project objectives.[1555]

This comment questions the Draft EIR's failure to explain why the Project Applicant proposed the Project instead of the environmentally superior Alternative E. CEQA does not obligate the Project Applicant to propose the most environmentally protective project design that can also attain the project objectives, nor does CEQA require the EIR to explain why the project proponent might prefer the proposed project over the environmentally superior alternative. CEQA only requires that the EIR analyze a reasonable range of feasible alternatives to the proposed project that can also attain most of the project objectives, to briefly compare the environmental effects of each alternative to the proposed project and other alternatives, and to identify the environmentally superior alternative among the alternatives considered in the EIR.[1556] As the Commenter correctly states, it is the Lead Agency's obligation to demonstrate that it has complied with these CEQA requirements and to consider project alternatives and mitigation measures. However, this comment's reliance on *Mountain Lion v. Fish and Game Commission* is misplaced because in that case, the environmental review document at issue completely failed to consider the required "No Project" alternative[1557], whereas this EIR fully analyzes the No Project alternative, as discussed on Draft EIR pages 8-27 through 8-30.

Response to Comment F.8-71:

The primary purpose of the Draft EIR's alternatives analysis is to provide the public and County decision makers with adequate information about a reasonable range of options available to reduce some of the proposed Project's environmental impacts.[1558] As explained in the Draft EIR, Alternative D, the Infrastructure Relocation alternative, would relocate two water tanks and the water treatment plan (WTP) proposed by the Project to other areas of

1552 DRP 2017, p. 8-72
1553 *Ibid*.
1554 *Id.,* pp. 8-19 to -26, -52 to -60, -71 to -72
1555 *Id.,* p. 8-72
1556 CEQA Guidelines §15126.6
1557 16 Cal.4th at 105, 137
1558 *Laurel Heights Improvement Assn's v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 403

the Project site.[1559] By relocating the water tanks, Alternative D would eliminate the need to grade the Project's proposed water tank site and avoid the need for hydro-pneumatic pumping systems and lift stations, thereby reducing the Project's grading-driven adverse impacts and reducing the Project's overall energy demand and operational emissions of GHG and criteria pollutants.[1560] Since the Project proposes to locate the WTP within the Oso Creek Drainage, its relocation under Alternative D would eliminate the Project's proposed disturbance of this sensitive riparian habitat.[1561] Alternative D would also reduce the Project's overall impact on visual resources because it would relocate the water tanks behind ridgelines on the Project site.[1562] Thus, Alternative D offers a number of environmental benefits as compared to the Project and is thus appropriately included in the Draft EIR's range of alternatives.

Response to Comment F.8-72:

Contrary to this comment's claim, the Draft EIR does discuss the need for the Project and whether it can be accommodated in existing areas. Indeed, the Draft EIR clearly explains that the Project represents the culmination of a long-term, comprehensive regional and local planning process designed to accommodate projected growth in the Antelope Valley while also protecting the Antelope Valley's valuable open space and agricultural resources. Specifically, the Draft EIR explains that the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* and the County's *Antelope Valley Area Plan* (a component of the General Plan) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and promotes public health.[1563]

As discussed in response to Comment F.8-20, SCAG is required by law to prepare a Regional Housing Needs Assessment (RHNA) based on regional growth projections and the County is in turn required to periodically update its General Plan to accommodate the County's fair share of the regional housing need by identifying sufficient land designated for residential use. SCAG's latest growth forecasts were adopted in 2016 and included forecasts at the regional, county, city, subregional, and TAZ levels.[1564]

SCAG projects that, through 2040, the regional population will grow by 20 percent, resulting in a net increase of approximately 4 million additional residents. The entire North Los Angeles County Subregion, which includes the Antelope Valley and the Project site, will have 245,473 households by 2020 and 331,399 households by 2040, an increase of 85,926 households over 20 years. The unincorporated portion of this subregion is projected to have 69,982 households in 2020 and 116,546 households in 2040. As explained in Draft EIR Section 5.9, Population and Housing, the County's housing element indicates that 30,145 new

1559 DRP 2017, p. 8-17
1560 *Id.,* pp. 8-45, -48, -51
1561 *Id.,* p. 8-47
1562 *Id.,* p. 8-49
1563 *Id.,* pp. 4-3 to -15; 5.8-1 to -11, -19 to -74; 5.9-1 to -21, -23 to -31; 8-4
1564 *Id.,* p. 5.9-4

housing units are needed to meet future housing demand through 2021, a portion of which will be provided by the Project. SCAG's growth projections also included a breakdown at the TAZ level.[1565] The Project site is located in portions of two TAZs and population projections for these TAZs are provided in Draft EIR Table 5.9-5, reprinted below. TAZ 20280000 includes the area north of SR-138 and east of I-5, while TAZ 20281000 includes the area south of SR-138.[1566] As shown in Draft EIR Table 5.9-5, significant population growth is anticipated in TAZ 20280000, which covers the portion of the Project site north of SR-138.

TABLE 5.9-5
POPULATION PROJECTIONS FOR TAZS

	2008[a]	**2012[b]**	**2020[a]**	**2035[a]**	**2040[b]**
TAZ 20280000	372	311	27,575	65,264	50,505
TAZ 20281000	1,041	350	2,079	4,038	1,367
Total	**1,413**	**661**	**29,654**	**69,302**	**51,872**

a – from 2012 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
b – from 2016 RTP/SCS
Source: [a] SCAG, 2012e, [b] 2015d.

SCAG projects this growth to occur in the North Los Angeles Sub-Region, generally, and in the Project site TAZs, in particular, whether or not the Project is approved. Thus, the Draft EIR explains that the Project is considered growth accommodating rather than growth inducing at a regional level based on SCAG projections.[1567]

Both SCAG and the County have long been engaged in comprehensive, long-term land use and transportation planning to evaluate various development patterns to sustainably accommodate projected growth and regional and sub-regional scale, as discussed in the Draft EIR and in response to Comment F.8-20. At the regional level, SCAG, its member agencies, and regional stakeholders engaged in a public process to prepare the region's first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) pursuant to SB 375. In order to weigh relative costs and benefits, the 2012 RTP/SCS working group evaluated four regional development patterns that would be capable of achieving the region's CARB-established greenhouse gas (GHG) reduction target while also accommodating future growth projections and housing needs. The land use scenarios under consideration varied with respect to the mix of location (e.g., greenfield development vs. infill development), housing type (e.g., single-family versus multi-family), and transportation investments (e.g., roadway versus transit improvements). These different land use scenarios were developed to explore their relative merits and they informed the project alternatives, evaluated in the environmental impact report, that SCAG prepared for the 2012 RTP/SCS (2012 RTP/SCS EIR).

When it adopted the 2012 RTP/SCS, SCAG ultimately settled on a balanced land use plan that assumes a significant increase in multi-family housing to be constructed in urban infill areas

1565 *Id.,* p. 5.9-10
1566 *Id.,* Exhibit 5.9-1
1567 *Id.,* pp. 1-7; 5.9-3, -31, -33; 8-4

and so-called High Quality Transit Areas (HQTA), but also targets some suburban and rural pockets of the region for additional housing and employment growth, including the Project site, as shown in Draft EIR Table 5.9-5, above. Under the SCAG's balanced land use plan, 68 percent of all new homes in the region would be constructed as multi-family units, and over 50 percent of new housing and employment growth would be located in urban infill areas and HQTAs. The balanced land use plan also provides for approximately 33 percent of all new housing units to be constructed in suburban and rural residential areas of the region.

As discussed in response to Comment F.8-20, SCAG's balanced land use plan provides significant environmental benefits over the "business as usual" land use plan analyzed as the "No Project" alternative in the 2012 RTP/SCS EIR because it would consume less undeveloped land and significantly increases the number of multi-family housing units constructed in urban infill areas. Accordingly, SCAG's balanced land use results in fewer impacts to aesthetic, biological, cultural, mineral, soil erosion, hazardous materials, and water resources, as compared to No Project conditions. The No Project land use plan would also generate 7 percent more VMT than the balanced land use plan, and would thus have significantly greater impacts related to the GHG and criteria pollutant emissions. However, the 2012 RTP/SCS EIR demonstrates that a land use policy focused on infill development risks going too far, as shown by its analysis of the so-called "Envision 2" alternative, which assumes significantly more aggressive infill development patterns than the balanced land use plan. Among other adverse effects, SCAG determined that the Envision 2 land use plan would unreasonably expose lower income populations living in existing infill areas to exacerbated impacts related to gentrification, as well as increased congestion-related impacts (including higher incidents of cancer and other health effects), noise impacts, vibration impacts, infrastructure capacity impacts, among other adverse effects that would be reduced by adoption of a more balanced land use plan that relies on significant, but not overly aggressive, infill development. As discussed in response to Comment F.8-20, SCAG's balanced land use plan was also incorporated in its 2016 RTP/SCS update.

As part of the RTP/SCS process, SCAG encourages its member cities and counties to ensure that their respective general plans consider and reflect RTP/SCS policies and land use strategies as appropriate. The current *Los Angeles County General Plan 2035* was adopted in October 2015 and it serves as the foundational document for community-based plans applicable to 11 unincorporated County planning areas, including the *Antelope Valley Area Plan* (AVAP) adopted in June 2015. The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[1568] The AVAP contains regional goals and policies pertaining to land use, housing, community design, circulation, public services and facilities, governmental services, environmental resource management, public safety, and energy conservation, among other topics. The AVAP updates and supersedes the 1986 Antelope Valley Areawide General Plan (AVAGP), the previous community plan applicable to the Antelope Valley planning area.[1569]

[1568] *Id.,* p. 5.8-10
[1569] *Id.,* p. 5.8-3

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[1570] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations, forming the foundation of the AVAP.[1571] This community vision is embodied in the AVAP's "Rural Preservation Strategy." At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1572]

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1573,1574] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1575] Per the AVAP, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[1576] Rural Town Areas serve as transition areas between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[1577] Rural Preserve Areas are located outside of Rural Town Centers and are largely undeveloped, unserved by existing or planned infrastructure and public facilities, and contain important environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[1578]

The Project site is located entirely within the AVAP's West EOA.[1579] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1580] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1581]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[1582] As stated by the

1570 DRP 2015, p. I-5
1571 *Ibid*.
1572 *Id.,* p. I-6
1573 *Id.,* p. I-7
1574 DRP 2014a, p. 7-7
1575 *Ibid*.
1576 DRP 2015, p. I-7
1577 *Ibid*.
1578 *Ibid*.
1579 DRP 2017, p. 4-4
1580 DRP 2015, p. I-8
1581 *Ibid*.
1582 *Ibid*.

AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[1583] To ensure that this strategy is implemented, the AVAP specifies that the interpretation of [AVAP] policy should be governed by the AVAP's Rural Preservation Strategy.[1584]

The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2012 and 2016 RTP/SCS documents. For example, the AVAP reduces the projected number of new residential housing units in the planning area by 62 percent, locates housing units closer to jobs, and increases the AVAP's jobs/housing ratio from 0.18 to 1.3 at buildout, as compared to the 1986 AVAGP it replaces.[1585] As a result, implementation of the AVAP would generate just 17,065,721 vehicle miles traveled (VMT), a 50 percent reduction below the 33,787,619 VMT generated by the 1986 AVAGP.[1586] Moreover, implementation of the AVAP would convert to urban use only 6,169 acres of undeveloped agricultural land, compared to the 24,433 acres of agricultural land that would be converted under the 1986 AVAGP.[1587] Finally, as compared to the 1986 AVAGP, the AVAP greatly expands the boundaries of Significant Ecological Areas within the planning area and specifically provides for greater protection of wildlife movement corridors.[1588] Thus the AVAP substantially limits the potential for "urban sprawl" development patterns in the Antelope Valley by focusing new development into compact and sustainably designed mixed-use EOA communities that place houses in close proximity to jobs and commercial uses while expanding SEA boundaries and preserving wildlife movement corridors and agricultural land.[1589]

The County developed the AVAP in a manner similar to the process that SCAG undertook when it developed the RTP/SCS balanced land use plan. Specifically, the County environmental impact report prepared for the AVAP (AVAP EIR) evaluated multiple alternative land uses that had the potential of achieving the following project objectives:

- Preserve and enhance each unique town's rural character, allowing for continued growth and development without compromising the rural lifestyle;
- Preserve open space around existing towns in order to preserve hillside areas and significant ridgelines, conserve biological resources, provide opportunities for recreation, and make more efficient use of existing infrastructure in the core areas;
- Plan for integrated circulation systems, including bikeways, walkways, and multi-purpose trails;

1583 *Ibid*.
1584 *Ibid*.
1585 DRP 2014a, p. 7-7
1586 *Id.,* p. 7-8
1587 *Id.,* p. 7-7
1588 *Id.,* p. 7-8
1589 *Ibid*.

- Conserve significant resources, including agricultural lands, mineral resources, water supply, and scenic areas;
- Preserve public health, safety, and welfare through identification of natural and environmental hazards, including noise, seismic, fire, and airborne emissions, and designation of land uses in an appropriate manner to mitigate these impacts; and
- Provide a balance of jobs and housing consistent with AB 32, SB 375, and SCAG's RTP/SCS.

With these objectives in mind, the AVAP EIR analyzed, in addition to the AVAP project, impacts associated with various land use plans that would further reduce development intensity within the planning area as compared to the 1986 AVAGP, specifically the "Reduced Density" and "Alternative Land Use Plan" alternatives. The AVAP EIR also analyzed the impacts associated with continuation of the 1986 AVAGP as the required "No Project" alternative.

The following table compares the buildout projections that would occur under the land use policies assumed for each AVAP project alternative analyzed in the AVAP EIR.

AVAP PROJECT ALTERNATIVES – BUILDOUT PROJECTIONS

	AVAP EIR Proposed Project	AVAP EIR "No Project" Alternative (AVAGP)	AVAP EIR "Reduced Density" Alternative	AVAP EIR "Alternative Land Use Plan" Alternative
Dwelling Units	106,180	278,158	81,784	67,463
Population	405,410	1,070,571	311,834	248,323
Employment	134,351	51,219	103,597	46,225
Jobs/Housing Ratio	1.3	0.18	1.3	0.69
Source: AVAP EIR, Table 7-2				

The AVAP EIR determined that, as compared to the AVAP land use plan, the No Project alternative would have far greater impacts with respect to agricultural and forestry resources, air quality, biological resources, cultural resources, GHG emission, mineral resources, noise, transportation/traffic, and utilities and service systems (water supply).1590 This is largely due to the fact that the AVAP EIR's No Project alternative assumes future buildout of the Antelope Valley in accordance with the 1986 AVAGP, which would accommodate substantially more housing and a far larger population than does the AVAP. The No Project alternative also designates considerably smaller SEA than does the AVAP and thus does not emphasize the conservation of sensitive biological resources and open space areas to the same degree as the AVAP.1591 The AVAP EIR also determined that development of the Antelope Valley in accordance with the 1986 AVAGP would not concentrate future development near regional employment and activity centers, would not

1590 *Id.,* pp. 7-7 to -13
1591 *Id.,* p. 7-8

maintain a health jobs/housing balance, and would thus be inconsistent with SCAG RTP/SCS.[1592]

Since the Reduced Density and Alternative Land Use Plan alternatives would significantly reduce the number of allowable dwelling units, population, and employment growth within the Antelope Valley, the AVAP EIR determined that these alternatives would generally have reduced environmental impacts, as compared to the AVAP.[1593] However, the AVAP also determined that the Reduced Density and Alternative Land Use Plan alternatives would not avoid the AVAP significant and unavoidable impacts, would not accommodate projected growth to the same extent as the AVAP, and that the Alternative Land Use Plan alternative would result in a very low jobs/housing ratio and thus would have greater impacts than the AVAP with respect to population and housing.[1594] Accordingly, the County adopted the AVAP's more balanced land use plan with the primary objective of directing future development within three separate EOAs, while reducing allowable densities elsewhere within the planning area and allowing for the expansion of the existing SEAs.

In adopting the AVAP, the County has established its preferred land use pattern for the overall Antelope Valley. As discussed above, the heart of the AVAP is its Rural Preservation Strategy, which focuses the majority of project growth within three designated EOAs in order to preserve the rural character of the balance of the Antelope Valley. Having determined where future growth is best suited to occur within the Antelope Valley, the Draft EIR describes a set of project objectives for the Centennial project that would ensure implementation of the AVAP's broader planning vision for the West EOA, as follows:

- Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA;
- Design the Project to maximize efficient utilization of regional infrastructure while preserving thousands of acres of contiguous natural open space and important biological resources;
- Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips;
- Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers; and
- Integrate a multi-modal transportation network, renewable energy, water conservation, community wellness, and other green development features into the Project's designs, buildout, and ongoing operations.

1592 *Id.,* p. 7-13
1593 *Id.,* pp. 7-13 to -25
1594 *Id.,* pp. 7-18, -22, -23

As explained in more detail in response to Comment F.8-65, the Draft EIR presents a reasonable range of potentially feasible on-site and off-site alternatives to the Project that would reduce and/or avoid some of the Project's potentially significant environmental effects while achieving most of the project objectives listed above. The selected alternatives promote informed decision making and public participation by providing for consideration a range of alternative land use patterns and siting options that will reduce and/or avoid some of the Project's significant environmental effects and attain most of the Project objectives. Accordingly, the alternatives analysis complies with the requirements of *Public Resources Code* §§ 21002, 21002.1(a).

This comment recommends that the Draft EIR analyze an "alternative that relies more on high-density mixed commercial/residential development projects on existing disturbed lands in order to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and encourage the efficient delivery of services and goods." Setting aside the fact that the Project is already designed to promote the various "smart growth" design principles recommended by CAPCOA and the Office of the Attorney General (as discussed in responses to Comments F.8-20, F.8-83, F.8-101, F.8-202, and F.8-204), the environmental setting of the AVAP planning area does not provide opportunities for high-density mixed use development on previously disturbed areas located outside of designated EOAs in a manner that would also be consistent with the AVAP's planning vision and Rural Preservation Strategy described above.

As explained in the Project Draft EIR and in the AVAP EIR, the AVAP planning area covers 1,800 square miles of predominately rural land that is either undeveloped or occupied by government uses, such as National Forests.[1595,1596] A smaller portion of the AVAP planning is occupied by single-family uses, military facilities, farmland and regional parks, and the remaining 1 percent of the total land area is occupied by multi-family residential, commercial, office, industrial, golf courses, schools and miscellaneous uses.[1597] The only truly urban areas within the boundaries of the AVAP planning area are the incorporated cities of Lancaster and Palmdale, which are outside of the County's land use jurisdiction.[1598] There are a few scattered communities in the AVAP planning area within the County's land use jurisdiction, but these are small rural communities that cannot accommodate projected future growth without significantly comprising their existing rural character.[1599] Given the rural qualities of the AVAP planning area, there are no "existing disturbed lands" that could feasibly accommodate future growth projected for the Project site's TAZs in high-density mixed use commercial/residential development projects, as this comment suggests. Certainly not without seriously compromising the rural character of the AVAP planning area outside of designated EOAs and completely undermining the AVAP project objectives described above.

1595 DRP 2015, pp. 4-8 to -10
1596 DRP 2014a, p. 5.10-4
1597 *Ibid*.
1598 *Ibid*.
1599 *Ibid*.

Indeed, the AVAP planning area's limited ability to accommodate projected growth while maintaining its rural character is precisely the reason why the Draft EIR does not analyze any reduced density alternatives other than Alternative C. As explained in the Draft EIR, such alternatives were rejected for consideration because substantial reductions in the Project's proposed unit count and commercial square footage below levels assumed by Alternative C would result in a development proposal that is not consistent with the goals and policies of the AVAP related to development within the West EOA, or supportive of the Project's objectives.[1600]

As discussed above, to promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to designated EOAs, which were specifically selected due to their proximity to large existing and planned transportation infrastructure projects (i.e., the High Desert Corridor and NW SR-138 Corridor Improvement Project).[1601] Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (*see* AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude designated EOAs, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP (*see* AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7). All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within EOAs so as to preserve the rural character of Antelope Valley outside of the EOAs.

Thus, contrary to the Commenter's claims in this and other related comments, the Draft EIR's decision to reject alternatives that would not support the AVAP's recommended distribution of population density and building intensity within the West EOA is not improper. Rather, it is a reasonable and appropriate criterion when considered in the context of the AVAP's planning vision and Rural Preservation Strategy.

In *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566 (*Goleta*), the California Supreme Court discussed the importance of long-term comprehensive land use planning in the context of an EIR's alternatives analysis. In that case, the Court explained that land use plans like the AVAP "embody fundamental policy decisions that guide future growth and development" and that, when preparing such plans, "[l]ocal governments must confront, evaluate and resolve competing environmental, social and economic interests".[1602] According to the Court, such comprehensive planning processes "necessarily compels cities and counties to consider *alternate* land-use goals, policies and implementation measures" (emphasis in original).[1603] "The process, moreover, is structured to transcend the provincial. Public participation and hearings are required at every stage, in order to obtain an array of viewpoints."[1604] Because of this, the Court held, a project-level EIR, such as the Draft EIR in

[1600] DRP 2017, pp. 8-10, -69
[1601] DRP 2015, p. I-8
[1602] *Goleta,* at 571
[1603] *Ibid*.
[1604] *Ibid*.

this case, "is not ordinarily an occasion for the reconsideration or overhaul of fundamental land use policy."[1605]

As discussed above, the AVAP is the product of 23 public meetings conducted over the course of eight years to "develop a shared vision for the future, identify community issues, draft proposals for the future, and prioritize their recommendations, forming the foundation of the Area Plan".[1606] In addition, County planners "partnered with other County departments to explore the recommendations, refine the proposed goals and policies, plan for program implementation, and gather support to ensure success".[1607] Indeed, development of the AVAP was "an iterative process, and in this case, the communities were included in the earliest steps of development and subsequent rounds of review".[1608]

Not only were alternative land use visions for the AVAP planning area debated and refined by the public and County over the course of the AVAP's eight-year planning process, they were also subject to environmental review in accordance with CEQA. As discussed above, the AVAP EIR analyzed a Reduced Intensity Alternative that would have reduced the number of dwelling units, population, and employment permitted under the AVAP by 23 percent.[1609] The AVAP EIR also analyzed an Alternative Land Use Policy Map alternative that would have reduced the number of dwelling units permitted under the AVAP by 36 percent, the population by 39 percent and employment by 66 percent.[1610] Thus, the public and County decision makers have had ample opportunity to review and comment on the proposed use of the Project site with a building density and intensity comparable to the proposed Project, as well as alternative development visions for the site. The fact that the applicant has proposed a Project that is consistent with the AVAP's Rural Preservation Policy should not prompt reconsideration of the AVAP's planning policies in the Draft EIR.

In the words of the *Goleta* court:

> Informed and enlightened regional planning [does] not demand a project EIR dedicated to defining optimal alternative[s] … without regard to feasibility. Indeed, such ad hoc reconsideration of basic planning policy [is] not only unnecessary, but would [be] in contravention of the legislative goal of long-term comprehensive planning. … [T]he keystone of regional planning is consistency – between the general plan, its internal elements, subordinate ordinances, and all derivative land use decisions. Case-by-case reconsideration of regional land-use policies, in the context of a project-specific EIR, is the very antithesis of that goal. … [A]n EIR is not ordinarily an occasion for the reconsideration or overhaul of fundamental land use policy.
>
> (*Goleta,* at 572-573)

1605 *Id.,* at 573
1606 DRP 2015, p. I-5
1607 *Ibid*.
1608 *Ibid*.
1609 DRP 2014a, p. 7-6
1610 *Ibid*.

Therefore, it is appropriate for the Draft EIR to reject Project alternatives that would require substantial reductions in the Project's proposed unit count and/or commercial square footage below levels assumed by Alternative C because such alternatives would result in a development proposal that is not consistent with the goals and policies of the AVAP and its Rural Preservation Strategy.

Response to Comment F.8-73:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1611] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1612] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1613] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1614] Please see responses to Comments F.8-65, F.8-66, and F.8-74 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-74:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1615] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1616] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1617] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1618] Please see responses to Comments F.8-65 and F.8-66 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

1611 *Goleta,* at 553, 566
1612 *Id.,* at 562
1613 *Id*., at 566
1614 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487
1615 *Goleta,* at 553, 566
1616 *Id.,* at 562
1617 *Id*., at 566
1618 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487

Response to Comment F.8-75:

Contrary to this comment's claim, the Draft EIR does not assert that the Project is "required" by the AVAP or that its approval is mandatory. Indeed, Section 4.8.1 of the Project Description clearly explains that the Project's proposed specific plan, zoning ordinance amendment, General Plan amendment, vesting tentative map, development agreement and conditional use permits are all *discretionary* approvals that would be *considered* for adoption by the Lead Agency. This comment's assertions that the proposed Project approvals are subject to CEQA review, and that the Project must comply with the state and federal Endangered Species Acts, are correct. This comment also accurately states that the Project would require adoption of a specific plan and approval of an AVAP Highway Plan amendment, as discussed in Section 4.8.1. However, this comment's assertion that the Draft EIR is misleading because it purportedly claims that the Project is "required" by the AVAP is not supported by the facts and is itself misleading. The Draft EIR makes no such claim.

Response to Comment F.8-76:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project, as well as this comment's assertion that the Draft EIR does not provide any evidence indicating that a smaller version of the Project is not feasible. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1619] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1620] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1621] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1622] Please see responses to Comments F.8-65, F.8-66, and F.8-74 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-77:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project, and the assertion that the Draft EIR sets up a false "all or nothing" decision for County decision makers. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1623] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of

[1619] *Goleta,* at 553, 566
[1620] *Id.,* at 562
[1621] *Id.,* at 566
[1622] *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487
[1623] *Goleta,* at 553, 566

reason" (internal citations omitted).[1624] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1625] Thus, the adequacy of the EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1626] Please see responses to Comments F.8-65, F.8-66, and F.8-74 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-78:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project, as well as this comment's assertion that the Draft EIR does not provide any evidence indicating that a smaller version of the Project is not feasible. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1627] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1628] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1629] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, other pertinent facts.[1630] Please see responses to Comments F.8-65, F.8-66, and F.8-74 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. Finally, it should be noted that the Draft EIR does not assert that a significantly reduced density alternative would be economically infeasible, but rather that such an alternative is infeasible when considered in light of the nature of the Project and relevant County policies, such as the RTP/SCS and the AVAP.[1631]

Response to Comment F.8-79:

This comment's statement that climate change and the finite nature of fossil fuel energy sources require the increased development of renewable sources of energy is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Project has been specifically designed to significantly reduce its reliance on fossil fuel and to promote energy efficiency and the use of renewable energy sources, as discussed in response to Comment F.8-204. Specifically, regarding renewable energy production, MM 21-1 requires the Project Applicant/Developer to provide the County with

1624 *Id*., at 562
1625 *Id*., at 566
1626 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487
1627 *Goleta,* at 553, 566
1628 *Id.,* at 562
1629 *Id*., at 566
1630 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487
1631 DRP 2017, pp. 8-9 to -11

plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation.

Energy providers associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350. SB X1-2 requires IOUs, POUs, and ESPs to increase purchases of renewable energy such that at least 33 percent of retail sales are procured from renewable energy resources by December 31, 2020. In the interim each entity was required to procure an average of 20 percent of renewable energy for the period of January 1, 2011 through December 31, 2013; and will be required to procure an average of 25 percent by December 31, 2016, and 33 percent by 2020. Senate Bill 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030.

In addition, MM 21-5 requires the Project to equip a minimum of 70 percent of public and community pools and spas with active solar water hearing systems where heating is necessary or desired, and MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. Also, the Specific Plan's Green Development Program requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations.

This comment cites several articles and studies (i.e., Cameron 2010; Subramanian 2012; Lovich 2011; Walston 2016) that support this comment's claim that the development of utility-scale renewable energy facilities has the potential to adversely affect local species and their habitats, including avian species. However, the Project does not propose construction of a utility-scale renewable energy facility. Indeed, Policy COS 13.9 of the Antelope Valley Area Plan expressly prohibits ground-mounted utility-scale renewable energy production facilities within the West EOA, where the Project site is located. This comment also cites articles and studies (i.e., McDonald 2009; Elkind 2009) that support this comment's claim that reliance of distributed solar energy collection systems is one way to promote renewable energy production while reducing or avoid some of the biological impacts associated with utility-scale renewable energy facilities. As discussed above, the Project would install roof-mounted distributed solar energy collection systems, and not construct utility-scale renewable energy facilities, to satisfy its renewable energy production obligations under MM 21-1, and is thus consistent with this comment.

Response to Comment F.8-80:

This comment correctly explains that the generation and consumption of electricity is a source of adverse environmental impacts, as disclosed in the Draft EIR. As discussed on Draft EIR page 5.11-8, for example, the combustion of fossil fuels for the generation of electric power is the primary contributor of sulfur dioxide (SO_2) emissions, which at peak levels can cause breathing difficulty, respiratory illness and aggravate existing heart disease. The Draft EIR also discloses that the generation of electricity is a significant source of greenhouse gas (GHG) emissions.[1632]

The County agrees with this comment's concern for the need to reduce energy consumption and the need for California to increase the availability of renewable sources of electric power and to reduce our reliance on fossil fuel generated electricity. Accordingly, the Project includes a Green Development Program, which is intended to meet or exceed state, regional, and local requirements for energy efficiency and green building ordinances.[1633] Sustainable and resiliency features will be incorporated in the design from the earliest stages through the final buildout.[1634] The Green Development Program will be adopted by resolution and incorporates the County's Green Building Ordinances with respect to development for the Project Site.[1635] Moreover, per the Green Development Program, MMs 21-1 and 21-3, prior to any tentative tract map approval, the project proponent is required to provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will *exceed* the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. The Energy Plan must also confirm that a menu of energy efficiency design elements, along with other design considerations and options, has been made available by the project proponent to builders, developers, and property owners as part of the internal design review process. In addition, each developer, builder, or property owner will be required to incorporate the design elements required to comply with 2016 Title 24 requirements, and select from the menu or implement other available technologies as may be needed to reduce energy consumption by 15 percent below 2016 Title 24 requirements for residential developments and 10 percent for nonresidential developments. All provisions outlined in the approved Energy Plan shall be either conditions of approval for any commercial/industrial site plan or included as notes on all final subdivision maps.

This comment's observation that electricity generation accounts for approximately 20 percent of California's total GHG emissions inventory is generally consistent with the determination of the California Air Resources Board's 2017 California GHG Emission Inventory, which reports that electric power generation accounts for 19 percent of the state's total GHG emissions.[1636] This comment also accurately cites the California Energy

1632 *Id.*, p. 5.21-56
1633 *Id.,* Appendix 4.0-A, p. M-6
1634 *Ibid*.
1635 *Id.,* p. 2-60
1636 California Air Resources Board (CARB). 2017. 2017 Edition California GHG Emission Inventory: California Greenhouse Gas Emissions for 2000 to 2015 – Trends of Emissions and Other Indicators. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf.

Commission's August 2011 Preliminary California Energy Demand Forecast to support the proposition that, without implementation of energy efficiency, the State's peak electricity demand is projected to grow by 1.14 percent between 2010 and 2020, assuming relatively high economic and demographic growth. The same CEC forecast projects that the State's peak electricity demand will grow by just 0.91 between 2010 and 2020 with more stringent energy efficiency requirements, as this comment notes, but this CEC projection assumes lower economic and demographic growth and high electricity rates, as compared to CEC's 1.4 percent "high energy demand" projection.

This comment cites a 2015 report by Matthew Heberger and Kristina Donnelly, titled *Oil, Food, and Water: Challenges and Opportunities for California*, to support the proposition that electricity generated from fossil fuels contributed to air pollution from carbon dioxide and fine particulate matter, and water pollution from direct spills or impacts to groundwater from drilling, mining, and injection activities. While the County does not dispute the fact that fossil-fuel-fired electricity generation contributes to adverse impacts to air and water resources (which impacts are disclosed and analyzed in Draft EIR Sections 5.4, Water Quality, 5.11, Air Resources, and 5.21, Climate Change), the cited report does not directly support the Commenter's claim, as the report is focused on the statewide adverse impacts of oil production on the agriculture industry, rather than the adverse impacts of fossil-fuel-fired electricity generation. Nevertheless, this comment is consistent with the Draft EIR's disclosure that fossil-fuel-fired electricity generation contributes to adverse impacts to air and water resources.

The Commenter's observation that electricity generation is water intensive is generally supported by the cited 2007 Larson report, which determined that some forms of electrical generation are highly water dependent, such as bioenergy (which requires water for crop production), hydropower, and coal fired one-through cooling power plants. This comment's observation that water and energy utilities should work together to develop more efficient systems that would benefit both resources is noted for the record and is generally supported by the cited 2016 Tarroja report.

The Project has been designed to be highly water efficient. For example, per the Centennial Green Development Program, the Project will implement the Residential Mandatory Measures and Nonresidential Mandatory Measures for water efficiency and conservation set forth in Divisions 4.3 and 5.3 of the CALGreen Code or the County CALGreen Code, whichever are more stringent, and including applicable emergency regulations and subsequent amendments.[1637] The Project will also install, maintain and monitor all non-construction potable and non-potable water use using appropriate metering equipment, such as smart meter or dual meter, throughout the site, and will install, maintain, and operate onsite wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from onsite wastewater.[1638] The Project also requires the preparation and submittal to the Los Angeles County Department of Regional Planning of a water use report to verify that applicable indoor and outdoor water use performance standards are being achieved and that available supplies will be sufficient to

[1637] DRP 2017, Appendix 2.0-A to Appendix 4.0-A, p. 22
[1638] *Ibid*.

meet future demand. Response measures may include, without limitation, tiered water service rate enhancements, surcharges, additional enforcement, water system repairs or upgrades and securing supplemental water from sources such as inter-basin groundwater transfers or new imported water supplies. The Project will provide real-time water consumption data to residents and businesses from service provider to monitor usage.[1639] The Project is also subject to many other mitigation measures and design requirements to ensure its efficient use water during construction and operation, as discussed in response to Comment F.8-204.

This comment's observation that the development of electricity generation facilities and transmission lines may impact wildlife is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. In support of this observation, the Commenter cites a 2012 article by the Nature Conservancy's D. Richard Cameron concerning the potential environmental effects associated with constructing and operating utility-scale renewable energy projects in the Mojave Desert and which recommends various policies for reducing such impacts on higher conservation value areas, thus reducing the trade-offs between converting to a green energy economy and conserving biodiversity. The Project does not propose development of a utility-scale renewable energy project in the Mojave Desert. However, as discussed is more detail in response to Comment F.8-95, the Project's Green Development Program does require the installation of rooftop mounted distributed solar generation equipment at various levels throughout the Project site and therefore promotes the recommendation of the cited 2016 Trainor report to increase the overall number distributed renewable energy systems in order to reduce land use impacts associated with centralized utility-scale energy facilities.

In response to this comment, the following document is added to the administrative record:

California Air Resources Board (CARB). 2017. 2017 Edition California GHG Emission Inventory: California Greenhouse Gas Emissions for 2000 to 2015 – Trends of Emissions and Other Indicators. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf.

Response to Comment F.8-81:

This comment's observation regarding the benefits of energy efficiency measures is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. As discussed in responses to Comments F.8-80 and F.8-204, the Project has been designed to be highly energy efficient and, in fact, will be required to significantly exceed all California energy efficiency standards applicable to residential and nonresidential buildings.

This comment cites a 2009 energy efficiency study by Nicole Hopper et al. that generally supports the Commenter's claim that energy efficiency measures reduce energy consumption and thus has beneficial impacts. This comment also cites a 2009 article by

1639 *Ibid*.

Robert McDonald *et al*. that generally supports the Commenter's claim that shifting from non-renewable fossil fuels to renewable energy sources will reduce GHG emissions, air, water and pollution impacts to biological resources, provided renewable energy facilities are properly sited. This comment also relies on articles by Bill Powers (2009) and Ethan Elkind (2009) that generally support the Commenter's claim that distributed solar is a good example of appropriately sited renewable energy facilities. As discussed in responses to Comments F.8-80 and F.8-204, the Project has been designed to be highly energy efficient and will promote the use of distributed renewable energy systems located on rooftops, within building footprints. The Project does not, however, propose development of a utility-scale renewable energy facility of the type studied in the Robert McDonald article.

The Commenter cites a 2013 publication of the Los Angeles Department of City Planning that generally supports this comment's claim that legislation is needed to promote the appropriate siting and use of renewable energy, such as CALGreen and its requirement that new construction incorporate solar-ready roofs and solar-ready pre-wiring. As discussed in response to Comment F.8-80, the Centennial Specific Plan's Green Development Program, MMs 21-1 and 21-3, require that, prior to any tentative tract map approval, the Project proponent must provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including meeting solar-ready roof and wiring requirements, and verification that the Project will *exceed* the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments.

As this comment correctly notes, it has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[1640, 1641] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery

[1640] California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

[1641] Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

storage, demand response, thermal storage technologies.[1642,1643] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[1644] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy.

However, commercial and residential energy efficiency standards have been made more stringent since 2005. For example, Title 24 standards sets minimum energy-saving requirements for new buildings and renovations that will reduce energy used for lighting, heating, cooling, ventilation, and water heating; the newest standards under Title 24 went into effect on January 1, 2017.[1645] As discussed above, the Project is required to comply with and exceed the Title 24 Building Energy Efficiency Standards, including those obligating new construction to be ZNE when such regulations are adopted as planned.

Response to Comment F.8-82:

Assuming that this comment is intended to be taken literally, its claim that the Draft EIR underestimates the Project's GHG emissions "by relying upon the unrealistic assumption that most residents will find onsite employment" is clearly not supported by the facts. The Draft EIR expressly discloses that the total number of Project residents will be far larger than the number of on-site jobs. As explained in the Draft EIR, the Project is expected to generate 57,150 residents but would only provide 23,675 on-site jobs.[1646] Thus, the statement that "most residents will find onsite employment" is not supported by the information in the Draft EIR.

Assuming that this comment is intended to refer only to Project residents *in the workforce*, however, the Draft EIR never claims or assumes that such residents will work at jobs located on the Project site. On page 5.10-49, the Draft EIR explains that, under the Project's land use plan, which balances the number of on-site jobs with on-site housing uses, all on-site jobs could theoretically be filled by Project workers, but it also explains a portion of the Project workforce "can be expected to live or work outside of the Project site area." Moreover, the Draft EIR never speculates as to the number of Project residents that will actually work at on-site jobs. Rather, the Draft EIR relies on the North County Sub-Area Traffic Model to estimate the volume of external and internal trips within the Project area based on parameters such as population and employment and the relative distances between areas

1642 *Ibid*.

1643 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1644 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

1645 CCR, Title 24

1646 DRP 2017, pp. 5.9-24 and -29

for which trips will be made, the same traffic model used in the AVAP EIR.[1647,1648] As shown on Draft EIR Table 5.10-19, the North County Sub-Area Traffic Model determined that 52 percent of the Project's average daily total trips would occur external to the Project site. The Draft EIR also explains that most of the Project's internal trips would occur between home and non-work activities, such as shopping and recreation.[1649] The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[1650,1651] This comment does not question the accuracy of the North County Sub-Area Traffic Model, nor does it provide evidence that the model is unreliable.

The Lead Agency disagrees with this comment's assertion that the Draft EIR's GHG analysis is deficient for failing to consider "the GHG emissions if the Project is not built in the order proposed." To the contrary, the Draft EIR's analysis of Project impacts related to GHG emissions does take into account Project construction phasing. As explained on Draft EIR page 5.21-50 and Draft EIR Appendix 5.11-A, the Project's construction-related GHG emissions are largely attributable to fuel use from construction equipment and were calculated by using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 using the construction inputs described in Section 5.11, Air Resources. Use of this GHG emission estimation tool is appropriate and is supported by substantial evidence ("CalEEMod is a 'state-of-the-practice' land use emissions calculator tool … used by municipal lead agencies to evaluate the GHG emissions pursuant to [CEQA]"[1652]). The major construction phases assumed by this analysis included demolition, site preparation, grading, building construction, architectural coating and paving.[1653] As explained in the Draft EIR, these phases were assumed to occur in connection with anticipated construction at the Project and related off-site Project impact areas as described in Section 4.0, Project Description.[1654] Specific inputs to CalEEMod included but were not limited to the start and finish dates of construction phases; inventories of construction equipment to be used during each phase; areas to be paved; and areas to be painted.[1655] Output emissions data were provided for off-road equipment and on-road vehicles.[1656]

The Draft EIR's GHG analysis further assumed that, once construction begins (in Year 1), it will proceed continuously for approximately 20 years, with full buildout completed after 20 years.[1657] The Draft EIR assumed that Project grading would occur from Year 1 through Year 18 and, for a conservative estimate, it was assumed that grading would be limited by weather

1647 *Id.*, p. 5.10-49
1648 DRP 2014, p. 5.16-25
1649 DRP 2017, p. 5.10-51
1650 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal. 3d 376, 410
1651 *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal. App. 4th 1341, 1362
1652 California Air Resources Board (CARB). 2015. Greenhouse Gas Quantification Methodology for the Strategic Growth Council Sustainable Agricultural Land Conservation Program Agricultural Conservation Easements Greenhouse Gas Reduction Fund Fiscal Year 2014-2015 (p. 1). Sacramento, CA: CARB. https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/sgcsalcpqm.pdf.
1653 DRP 2017, p. 5.21-50
1654 *Ibid.*
1655 *Id.,* p. 5.21-50
1656 *Ibid*.
1657 *Ibid*.

and other factors to 200 days per year.[1658] Project construction was assumed to begin in 2016, with a buildout complete in 2035, although the actual start of construction and buildout are likely to occur later than 2016 and 2035, respectively.[1659] The 2035 buildout date is consistent with the Project traffic impact analysis (see Section 5.10, Traffic Access and Circulation) and also with the CalEEMod model, which does not include on-road emissions factors beyond 2035.[1660] This is a conservative approach; if the actual start of construction occurs later than 2016 and buildout occurs later than 2035, both the construction equipment fleet and on-road vehicles are assumed to be "cleaner" than would be the case if construction starts in 2016 and buildout occurs in 2035, as described in CARB's 2016 Mobile Source Strategy.[1661] This is so because such later model vehicles will be subject to more stringent emission controls and fuel standards and thus generate less unit emissions with each future year. As such, assuming development of the Project site occurs sooner than is likely to occur provides a more conservative assessment of construction GHG emissions.

The Draft EIR also explained, however, that the rate of Project construction would vary with a variety of factors, including, but not limited to, market demand, weather, and as-found site conditions.[1662] Accordingly, it would be highly speculative to estimate the quantities of grading, building, paving, and painting on a year-by-year basis over a 20 year period.[1663] Therefore, the Draft EIR's GHG analysis assumed that each construction activity would be spread equally over the applicable years but, to be conservative, construction emissions were evaluated for a peak grading year.[1664]

The methodology described above is based on informed judgment and is prepared with a sufficient degree of analysis to allow the public and the Lead Agency to intelligently assess the Project's GHG impacts. This is all that CEQA requires.[1665] Moreover, CEQA permits the Lead Agency to rely on reasonable estimates and assumptions in its analysis, and the Draft EIR is required to evaluate environmental impacts only to the extent that it is reasonably feasible to do so.[1666] Indeed, the Draft EIR's GHG analysis is not required to engage in speculation, nor address all permutations of the data or variations on the issue.[1667,1668] The analytical methodology that the Draft EIR uses to evaluate the Project's GHG impacts satisfies these standards.

It should be noted that this comment provides no evidence to support its implied claim that the Draft EIR's GHG analysis would be different were it to assume that the "Project is not built in the order proposed." Indeed, as discussed in the Draft EIR, climate change is a *global*

1658 *Ibid*.
1659 *Id.,* p. 5.21-51
1660 *Ibid*.
1661 *Ibid*.
1662 *Id.,* p. 5.21-50
1663 *Ibid*.
1664 *Ibid*.
1665 CEQA Guidelines §15151; *Napa Citizens for Honest Gov't v. Nappy County Bd. of Supervisors* (2001) 91 Cal. App. 4th 342, 356
1666 CEQA Guidelines §15151; *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal. 3d 376, 410
1667 CEQA Guidelines §15145; *San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 680
1668 *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1365

phenomenon and the significance of greenhouse gas is inherently cumulative in nature.[1669] Accordingly, the Project's impact related to GHG emissions is appropriately considered on a cumulative level, not on a project level.[1670] This comment provides no evidence that the Project's total contribution to the global inventory of GHGs would be significantly different if the "Project is not built in the order proposed," as compared to the balanced development assumed by the Draft EIR. In any case, please see response to Comment F.8-11 for a discussion of the various mechanisms incorporated into the Centennial Specific Plan and the County Code to ensure that the Project cannot result in long-term development that substantially deviates from the balanced development described in the Draft EIR.

With regards to this comment's assertion that the Draft EIR does not adequately disclose or analyze the Project's GHG impacts, please also see response to Comment F.8-79.

In response to this comment, the following document is hereby added to the administrative record:

California Air Resources Board (CARB). 2015. Greenhouse Gas Quantification Methodology for the Strategic Growth Council Sustainable Agricultural Land Conservation Program Agricultural Conservation Easements Greenhouse Gas Reduction Fund Fiscal Year 2014-2015. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/sgcsalcpqm.pdf.

Response to Comment F.8-83:

As discussed in response to Comment F.8-204, the Project takes a very aggressive approach to reducing greenhouse gas (GHG) emissions arising from the Project. Among other things, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainability accommodating regional growth projections in a manner that reduces criteria air pollutant and GHG emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2). See also response to Comment F.8-20 for further discussion.

Consistent with Smart Growth principles, Medium- to Very High Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town

[1669] DRP 2017, p. 5.21-86
[1670] *Ibid*.

Center or Neighborhood Center.[1671] The Town Center of the Project is located in Village 3, and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center.[1672] An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[1673] Moreover, to reduce vehicle miles traveled, the Project includes an integrated network of roadways, walking and biking trails to reduce automobile use and facilitate safe and efficient travel. An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas.[1674] One hundred percent (100 percent) of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[1675]

As discussed in response to Comment F.8-204, the Project has also been designed to aggressively manage waste so as to reduce the Project's overall GHG footprint. With regard to construction waste, the Master Developer is required to provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code.[1676] This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code.

The Project will also implement the residential and nonresidential mandatory measures for material conservation and efficiency that are set forth in Chapter 4 (residential) and Division 5.4 (nonresidential) of the CALGreen Code, including but not limited to:

a. The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on recycling and composting will be provided to Property Owners.

b. Prior to the issuance of each building permit from commercial properties, including multi-family residences, schools, and places of worship, the Property Owner shall submit to the County a site plan of the property that depicts how solid wastes would be collected and stored for on-site processing, curbside collection, and/or self-hauling.

c. Prior to the sale, lease, or rental of any commercial property, including multi-family residential structures or portions thereof, the Property Owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and

[1671] *Id.,* p. 4-16
[1672] *Ibid*.
[1673] *Id.,* pp. 4-16, -17
[1674] *Id.,* p. 4-6
[1675] *Id.,* pp. 4-16, -17
[1676] *Id.,* Appendix 2-A to Appendix 4.0-A, p. 25

> stores recyclables, compostables, universal waste, hazardous waste, and electronic waste for on-site processing, curbside collection, and/or self-hauling.[1677]

Finally, the Project Applicant/Master Developer must set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station that includes a household, hazardous waste permanent collection and reuse center and allows for mulching/composting operations.[1678] The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services.[1679] Please also see responses to Comments F.8-80 and F.8-204 for a list of the many measures and project design features the Project is required to implement to ensure that it not only meets, but exceeds, applicable legal requirements regarding energy and water use efficiency.

The Commenter recommends that the County consider the incorporation of potential mitigation measures contained in lists prepared by CAPCOA and the California Office of the Attorney General (the latter list has actually been incorporated into the former list, and they are one document). The Commenter makes the same suggestion in Comment F.8-204, with an additional suggestion that the County consider mitigation measures in lists prepared by several other agencies. All of the mitigation measures in the two lists identified in this comment and in Comment F.8-204 have been considered and are fully addressed in response to Comment F.8-204. For example, the Attorney General recommends mitigation requiring the enforcement of idling times for construction vehicles, which has been incorporated into the Draft EIR as MMs 11-2 and 21-4. Similarly, CAPCOA recommends mitigation requiring nonresidential use to provide "end of trip" facilities (i.e., showers, lockers) to encourage use of bicycles for commute purposes, which recommendation has been incorporated into MM 11-4. Please refer to response to Comment F.8-204 for a complete explanation of the manner in which the Project and its MMs incorporate the MMs included in the various lists cited in this comment.

Response to Comment F.8-84:

Please see responses to Comments F.8-80 and F.8-204 for a discussion of the various measures the Project will implement to ensure efficient energy use on a Project-wide basis. With respect to "green building" principles, specifically, the Project includes a Green Development Program, which is intended to meet or exceed state, regional, and local requirements for energy efficiency and green building ordinances.[1680] The Centennial Green Development Program's Green Building component requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances. Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs, as discussed throughout response to Comment F.8-204. Sustainable and

1677 *Ibid*.
1678 *Ibid*.
1679 *Ibid*.
1680 *Id.,* Appendix 4.0-A, p. M-6

resiliency features will be incorporated in the design from the earliest stages through the final buildout.[1681] The Green Development Program is adopted by resolution and incorporates the County's Green Building Ordinances with respect to development for the Project Site.[1682]

This comment cites a 2008 report by the Commission for Environmental Cooperation, titled *Green Building In North America*, which evaluates the potential for green building to reduce global greenhouse gas emissions. As discussed above, and in responses to Comments F.8-80 and F.8-204, the Project is will implemented in a manner consistent with the cited report's green building recommendations.

Response to Comment F.8-85:

The mitigation measures recommended in this comment are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. All of the recommended mitigation measures identified in this comment are also recommended in Comment F.8-204, along with other recommended mitigation measures included in lists prepared by several state and local agencies. All of the mitigation measures identified in this comment and in Comment F.8-204 have been considered and are fully addressed in response to Comment F.8-204.

Response to Comment F.8-86:

The mitigation measures recommended in this comment are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. All of the mitigation measures identified in this comment are included in the mitigation measures that the Commenter recommends in Comment F.8-204, along with other recommended mitigation measures included in lists prepared by several state and local agencies. All of the mitigation measures identified in this comment and in Comment F.8-204 have been considered and are fully addressed in response to Comment F.8-204.

Response to Comment F.8-87:

This comment's reference to the Newhall Ranch project that has committed to a goal of zero net GHG emissions is noted. As discussed in Draft EIR Section 5.21.2, Relevant Plans, Policies, and Regulations, and response to Comment F.8-79, the original EIR certified for the Newhall Ranch project was the subject of the Supreme Court's decision in *Center for Biological Diversity v. Department of Fish and Wildlife,* S217763 (*Newhall*). In that opinion, the Court evaluated the California Department of Fish and Wildlife's (CDFW) analysis of potential impacts caused by GHG emissions contained in the *Newhall* EIR for the proposed land development called Newhall Ranch.[1683] In the *Newhall* EIR, the CDFW analyzed GHG

[1681] *Ibid*.

[1682] *Id.,* p. 2-60

[1683] California, State of. 2015a, Center for Biological Diversity v. Department of Fish and Wildlife (Cal. Supreme Ct., November 30, 2015, No. S217763).

emissions under Assembly Bill (AB) 32, using the business-as-usual (BAU) comparison as its sole criterion of significance.

In *Newhall*, the California Supreme Court concluded that a finding of consistency with meeting statewide emission reduction goals is a legally permissible criterion of significance when analyzing potential impacts of GHG emissions under CEQA. However, the Court found that the *Newhall* EIR's conclusion that the project's emissions would be less than significant under that criterion was not supported by substantial evidence, and remanded back to the appellate court the narrow issue of whether substantial evidence supported the application of AB 32 statewide GHG reduction goal of 29 percent to new land use projects.

On remand, the *Newhall* EIR was set aside by the lower court. In November 2016, the CDFW released a Draft Additional Environmental Analysis (AEA) intended to address the agency's CEQA compliance obligations.[1684] The AEA did not, however, respond to the Supreme Court's direction to provide substantial evidence supporting the 29 percent BAU statutory GHG reduction threshold relied upon by the *Newhall* EIR. The AEA also did not include an assessment of the *Newhall* project's consistency with any of the Court's suggested GHG CEQA compliance pathways, although referenced documentation in the *Newhall* administrative record do include and confirm compliance with each pathway. Instead, as described in the AEA, the *Newhall* project applicant (Five Point LLC) voluntarily modified its project and proposed to achieve "zero net" GHG emissions for the project with the implementation of the project applicant's "zero net emission" proposal, which was made enforceable by the addition of 13 mitigation measures that correspond to the applicant's proposal, as further described in the AEA. The AEA states that the adoption and implementation of the 13 mitigation measures would reduce mobile source, electricity, natural gas, vegetation removal, and construction-related emissions by the amount of emissions estimated for the project and result in no net contributions of GHG emissions from the project, or "zero net emissions." The AEA further concludes that because the project would result in no net increase of GHG emissions after implementation of the mitigation measures, there would be no contribution of GHG emissions to cumulative GHG emissions influencing global climate change and the *Newhall* project would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs. Consequently, the AEA concludes that project GHG and climate change impacts would be less than significant.[1685]

It is important to note that the *Newhall* AEA does not establish a new significance criteria of any kind, much less a "zero net" GHG threshold under CEQA. In fact, agencies that have considered a zero-threshold approach have rejected it. For example, despite having been urged to propose a zero-emissions CEQA threshold in its proposed amendments to the CEQA guidelines regarding the analysis of GHG emissions released in April 2009 (Proposed Guidelines), the state Office of Planning and Research (OPR) responded in its *Initial Statement of Reasons for Regulatory Action: Proposed Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97*

[1684] California Department of Fish and Wildlife (CDFW). 2016 (November 3). Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan Draft Additional Environmental Analysis. Sacramento, CA: CDFW.

[1685] *Id.,* pp. 1-18

that Section 15064.4(b)(1) of the Proposed Guidelines is not intended to suggest a zero emission threshold, as CEQA does not include a "one molecule" rule.[1686] (See also, SJVAPCD 2009, page 34 [explaining that OPR's Proposed Guidelines confirm that a lead agency is not responsible for wholly eliminating all GHG emissions from a project].)[1687] In addition, in its report to the Ventura County Air Pollution Control Board on GHG significance thresholds, staff reported that "[n]ot a single California air pollution agency is considering either of the first two approaches for GHG significance thresholds [a "no threshold approach" or a "zero threshold approach"].[1688]

Moreover, with respect to the *Newhall* AEA, the applicant imposed a "zero net emissions" program for GHG; it was not imposed under CEQA by the State of California, which is acting as the lead agency. Unlike a local city or county, the State has direct statutory and regulatory authority to reduce GHG emissions from all sectors of the California economy, including most notably the major sectors producing GHG emissions (electricity production, transportation fuels, and large-scale industrial facilities such as refineries and cement plants). In the *Newhall* AEA, for example, CARB and Cal/EPA were directly involved in – and contemporaneously produced a letter affirming the achievement of – the *Newhall* applicant's "zero net" voluntary proposal. With respect to the project analyzed in the Draft EIR, the County's land use jurisdiction does not extend to having jurisdiction or control over the vast majority of GHG emissions within the state. With respect to consideration of land use project, particularly large-scale projects, the Draft EIR considers, and the Project complies with, SB 375, which is the state's statutory program for ensuring GHG reductions from land use and transportation projects (discussed in Section 5.21.6, Environmental Impacts), as discussed in response to Comment F.8-79.

Contrary to this comment's assertions, CEQA does not require projects to reduce onsite GHG emissions "to the greatest extent practicable," nor does it require the EIR to provide substantial evidence demonstrating that GHG "reductions needed to achieve zero net energy are infeasible." Courts have consistently held that single projects cannot be required to bear a greater than proportional share of mitigating a cumulative significant impact.[1689,1690,1691] This limitation is also expressly stated in CEQA Guidelines §§15041(a), 15126.4(a)(4). Because GHG emissions from transportation, water and waste management and use, heating and cooling of buildings, and a myriad of other activities are common to all new and modified development projects, and are common attributes of simply residing, working or producing

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1686 California Natural Resources Agency (CNRA). 2009. (July). Initial Statement of Reasons for Regulatory Action: Proposed Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 (p. 20). Sacramento, CA: CNRA. http://resources.ca.gov/ceqa/docs/Initial_Statement_of_Reasons.pdf.

1687 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2009. (December 17). *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* (p. 34). Fresno, CA: SJVAPCD. https://www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf.

1688 Ventura County Air Pollution Control Board (VCAPCB). 2011. *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County*. Ventura, CA: VCAPCB. http://www.vcapcd.org/pubs/Planning/GHGThresholdReportRevised.pdf.

1689 *Dolan v. City of Tigard* (1994) 512 U.S. 374

1690 *Nollan v. Cal. Coastal Comm.* (1987) 483 U.S. 825, 835 n. 4

1691 *Ehrlich v. City of Culver City* (1996) 12 Cal. 4th 854

goods or services in California, the feasibility of the mitigation measures required for this project must be commensurate with a fair share allocation and not with a hypothetical "zero net" or "net reduction" threshold or standard. Within this cumulative impact mitigation measure framework, all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change.

The Commenter argued in *Newhall* that a "zero net" approach to mitigating for GHG impacts is required by CEQA. This approach was considered and rejected by the Office of Planning and Research, the expert state agency for implementing CEQA.[1692] The Commenter also urged the Court to adopt this approach in Newhall; the Supreme Court declined to do so and instead identified GHG compliance pathways that included compliance with laws, compliance with SB 375, and compliance with climate action plans.[1693,1694,1695]

It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[1696, 1697] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[1698,1699] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[1700] These and additional future building code standards updates, which must also take into account all

1692 14 CCR. §15000; 15126.4(c)

1693 *Newhall*, Opening Brief on the Merits, pp. 59-70

1694 *Id.,* Newhall's Answer Brief on the Merits, pp. 37-45

1695 Id., p. 229

1696 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

1697 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1698 *Ibid*.

1699 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1700 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02.

applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy.

The following document is hereby added to the administrative record in response to this comment:

Ventura County Air Pollution Control Board (VCAPCB). 2011. *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County*. Ventura, CA: VCAPCB. http://www.vcapcd.org/pubs/Planning/GHGThresholdReportRevised.pdf.

Response to Comment F.8-87A:

The document cited by this comment is addressed in response to Comment F.8-87. Please refer to that response for additional information regarding the cited document's relevance to the Project and the Draft EIR.

Response to Comment F.8-88:

This comment's assertion that any offset program must ensure "additionality" is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment accurately quotes the text of Health and Safety Code §38562(d). By its plain terms, Health and Safety Code §38562, inclusive of its subsection (d), applies only to CARB and not the Lead Agency. Health and Safety Code §38562 is not a provision of CEQA and it imposes no obligations on the Lead Agency with respect to its compliance with CEQA. Neither the CEQA statute nor the CEQA Guidelines expressly require lead agencies to ensure "additionality" when relying on GHG offsets as mitigation, as this comment implies. It is noted, however, that CEQA Guideline §15126.4(c)(3) does expressly authorize lead agencies to rely on "offsets that are not otherwise required" to mitigate the GHG impacts of a project. In any case, the Project does not rely on GHG offsets to mitigate the Project's impacts related to GHG emissions not otherwise covered by California's cap-and-trade program.

Response to Comment F.8-89:

This comment's interpretation of Health and Safety Code §38562(d)(2) is noted and will be provided to the Regional Planning Commission and Board of Supervisors for its consideration. As discussed in response to Comment F.8-88, Health and Safety Code §38562, inclusive of its subsection (d)(2), only applies to CARB and does not apply to the Lead Agency. Moreover, Health and Safety Code §38562 is not a provision of CEQA and it imposes no obligations on the Lead Agency with respect to its compliance with CEQA. Please also see response to Comment F.8-88.

Response to Comment F.8-90:

This comment's assertion that Health and Safety Code §38562(d)(2) and its use of the term "additional" also applies in the context of CEQA is noted. The Commenter accurately quotes

CEQA Guideline §15126.4(c)(3). This comment accurately quotes the California Resources Agency's Final Statement of Reasons for adopting CEQA Guideline §15126.4(c)(3). This comment's interpretation of said Final Statement of Reasons is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see response to Comment F.8-88 for additional information regarding Health and Safety Code §38562(d)(2) and CEQA Guideline §15126.4(c)(3).

Response to Comment F.8-90A:

The document cited by this comment is addressed in response to Comment F.8-90. Please refer to said response for additional information regarding the cited document's relevance to the Project and the Draft EIR.

Response to Comment F.8-91:

This comment's request that Project be required to zero net energy and include measures to ensure that any GHG offsets are "additional" is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see responses to Comments F.8-87 through F.8-90A for additional information regarding the concepts of zero net energy and "additional" offsets as they apply to the Project.

Response to Comment F.8-92:

As this comment correctly notes, the Court in *Sierra Club v. Gilroy City Council* described CEQA's mitigation requirements as being among CEQA's most important substantive provisions with which agencies must comply. This comment also accurately quotes a portion of the text of Public Resources Code §21002.

Response to Comment F.8-93:

This comment accurately quotes and paraphrases portions of CEQA Guidelines §15126.4(c). As this comment notes, CEQA Guidelines §15126.4(c) requires lead agencies to consider feasible means to mitigate a project's significant effects related to GHG emissions, which measures may include, among others: (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision; (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in CEQA Guidelines Appendix F; (3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions; (4) Measures that sequester GHGs; (5) In the case of the adoption of a plan, mitigation may include the identification of specific measures that may be implemented on a project-by-project basis. Per CEQA Guidelines §15126.4(c)(5), mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulations that reduces the cumulative effect of emissions.

Response to Comment F.8-94:

Contrary to this comment's claim, the Draft EIR does not incorporate proposed mitigation measures into the Project description in order to conclude that the Project's impacts will be less than significant. In fact, as suggested by this comment, all of the Project Design Features (PDFs) described in Draft EIR Section 5.21.4, Project Design Features, are also incorporated into the Draft EIR as binding and enforceable mitigation measures,[1701] and all are included in the Project's Mitigation Monitoring and Reporting Program (MMRP), which is set forth as Final EIR Appendix 2.0-C.Rev. For reference, the following chart lists by number all of the PDFs described in Section 5.21.4 along with the corresponding Draft EIR mitigation measure that implements each PDF:

Project Design Feature	Corresponding Mitigation Measure(s)
PDF 21-1	MM 21-2
PDF 21-2	MM 21-3
PDF 21-3	MM 21-1
PDF 21-4	MM 21-5
PDF 21-5	MM 21-6
PDF 21-6	MM 21-7
PDF 21-7	MM 21-8
PDF 21-8	MM 21-9
PDF 21-9	MM 10-25; MM 10-26
PDF 21-10	MM 21-14
PDF 21-11	MM 21-15
PDF 21-12	MM 21-16
PDF 21-13	MM 14-1; MM 21-17
PDF 21-14	MM 21-18
PDF 21-15	MM 21-19
PDF 21-16	MM 10-1
PDF 21-17	MM 21-10
PDF 21-18	MM 21-11
PDF 21-19	MM 21-12
PDF 21-20	MM 18-1
PDF 21-21	MM 21-4

Response to Comment F.8-95:

This comment's recommendation that mitigation measures identified in the Draft EIR could be strengthened is noted and will be provided to the Planning Commission. The Draft EIR includes 46 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and

[1701] DRP 2017, pp. 5.21-41 to -46

21-1 through 21-20). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in response to Comment F.8-204, and mitigation measures have been revised and added in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures as set forth in responses to Comments F.8-204, F.2-2, F.2-5, F.3-29, F.3-34, and F.8-189.

Specifically, regarding renewable energy production, MM 21-1 requires the Project Applicant/Developer to provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation, which may include, but is not limited to, solar, geothermal, biofuel and hydroelectric systems. In addition, MM 21-5 requires the Project to equip a minimum of 70 percent of public and community pools and spas with active solar water hearing systems where heating is necessary or desired, and MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, mitigation measure 21-2 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent.

In addition, the Specific Plan's Green Development Program requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations.

With regard to this comments concern regarding impacts to avian species and wildlife associated with wind energy development, the Project does not propose construction of wind turbines on the Project site. Indeed, Policy COS 13.9 of the Antelope Valley Area Plan expressly prohibits ground-mounted utility-scale renewable energy production facilities within the West EOA, where the Project site is located

This comment's assertion that the electric vehicle (EV) charger should be more widely available is noted for the record and will be provided the Regional Planning Commission and Board of Supervisors for consideration. The Draft EIR includes several mitigation measures to ensure an appropriate amount of EV charging stations will be available to Project residents and visitors. In response to this comment, the relevant mitigation measures have been revised to clarify their application, as follows:

MM 11-4 The Project's plans and specifications for non-residential buildings shall demonstrate that the following features have been incorporated into the building designs. Proof of

compliance shall be provided to the County prior to the issuance of occupancy permits.

a. For buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupant.

b. Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to ~~1~~25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces.

c. ~~Facilities~~ Electric Vehicle Charging Spaces (EV Space), as defined by CALGreen Code Section 202, shall be installed to support future installation of ~~e~~Electric ~~v~~Vehicle Supply Equipment (EVSE), as defined by CALGreen Code Section 202, ~~charging~~ at each non-residential building with ~~3~~10 or more parking spaces. Installation of each EV Space shall be consistent with Sections A5.106.5.3 and A5.106.5.3.1, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code. The EV Space facilities shall meet Section 406.9 (Electric Vehicle) of the *California Building Code* and as follows:

Total Number of Actual Parking Spaces	**Tier 1 Number of Required EV Spaces**
0-9	0
10-25	2
26-50	3
51-75	5
76-100	7
101-150	10
151-200	14
>200	8 percent of total spaces rounded up to nearest whole number

~~**Single charging space requirements.** When only a single charging space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1. The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.~~

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles (EV) at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Provide raceways from the electrical service panel to the designated parking areas which are required to be installed at the time of construction.

MM 11-6 The Project's plans and specifications for parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, shall demonstrate that the following features have been incorporated into the parking facility.

- The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations when a demand is demonstrated~~. Calculations for the required number of EV Spaces shall

be rounded up to the nearest whole number and ~~T~~the design and installation of each EV Space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:

Single charging space requirements. When only a single EV ~~charging s~~Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

Multiple charging spaces required. When multiple EV ~~charging s~~Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent.

MM 21-15 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction.

MM 21-16 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that "alternative energy fueling stations" shall be installed as follows. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel. An electric charging station shall allow for simultaneous charging of two electric vehicles.

- Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter.
- Multi-family residential buildings of at least seventeen ~~20~~ (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first ~~twenty~~ seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty~~ seventeen (~~20~~ 17) residential units thereafter.
- The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station.
- Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station.

MM 21-19 For parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than

one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 ~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated.~~ Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:

Single charging space requirements. When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electrical vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent.

The above mitigation measures go well beyond the mandatory regulatory requirements with respect to the provision of EV charging infrastructure. For example, MM 11-4 requires all Project nonresidential building with 10 or more parking spaces to install Electric Vehicle Charging Spaces (EV Spaces) in accordance with CALGreen Code Section A.5.106.5.3,

Nonresidential Voluntary Measures (Tier 1). This normally voluntary commitment is made a requirement of the Project by MM 11-4, thus ensuring that the Project will substantially exceed the CALGreen Code's mandatory requirements for the provision EV Spaces at nonresidential buildings, as shown by the following chart:

Nonresidential Building Parking Space Total	Legally Required Number of EV Spaces (CALGreen § 5.106.5.3)	MM 11-4 Required Number of EV Spaces (CALGreen §A5.106.5.3)
0-9	0	0
10-25	1	2
26-50	2	3
51-75	4	5
76-100	5	7
101-150	7	10
151-200	10	14
>200	6 percent of total	8 percent of total

MM 11-4 also requires the Project to exceed mandatory regulatory requirements with respect to the Project's provision of preferential parking for low-emitting, fuel efficient, and carpool vehicles at nonresidential, and with respect to the provision of onsite showers and lockers at nonresidential buildings to encourage workforce occupants to walk and bike to their jobs.

Under existing law, three percent, but in no case less than one, of the parking spaces provided for multifamily residential buildings with 17 units or more must be constructed as EV Spaces. MMs 11-6 and 21-19 expand on this requirement by requiring the Project to ensure that five percent of such spaces are constructed EV Spaces in accordance with the CALGreen Code Tier 1 Residential Voluntary Measures. Indeed, MMs 11-6 and 21-19 go even farther than the CALGreen Code Tier 1 voluntary measures by requiring the Project to also ensure that five percent of the total number of parking spaces in parking structures and parking lots that serve uses other than residential or nonresidential buildings, such as parks or trailheads, and which have 20 or more total spaces, are constructed as EV Spaces. Finally, MMs 11-6 and 21-19 go beyond applicable law by also requiring that bike parking be provided in residential parking facilities consistent with the requirements of CALGreen Code Residential Voluntary Measure A4.106.9.

In addition, MM 21-15 goes beyond the requirements of applicable law by requiring the Project to install a EV charging receptacle in every detached and attached single-residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A.4.106.4.1. Existing law – i.e., CALGreen Code Section 4.106.4.1 - merely requires that detached and attached single-family residences be wired to accommodate a EV charging receptacle to be install by the homeowner, if installed at all. Finally, existing law does not require any residential or nonresidential projects to provide electric vehicle charging stations or other form of alternative energy fueling station for low-emission or alternative fueled vehicles. The Project, however, will be required to go beyond the requirements of existing law by requiring the installation of alternative energy vehicle fueling stations (EVFS) (i.e., an electrical vehicle charging station or a station providing another new or improved technology) in the amounts

set forth in MM 21-16, as revised above. In response to this comment, MM 21-16 has been revised to (i) lower the threshold size of multi-family residential buildings that will qualify for at least one EVFS from 20 units to 17 units, and (ii) increasing the number EVFS that must be installed in a qualifying multi-family residential building by requiring one EVFS per every 17 units, rather than one EVFS per every 20 units. The combination of these measures, all of which go well beyond the requirements of existing law will ensure that EVFS will be widely available to residents of multi-family residential units and people traveling to the Project site.

The Lead Agency declines to adopt this comment's recommendation that EV chargers in commercial parking lots be equipped with "Level 3" DC fast charging equipment, rather than Level 2 charging equipment. First, California Air Resources Board staff has determined that Level 2 chargers is "the preferred EV charging method for public and private facilities" and is "typically found in public areas, parking garages and commercial business".[1702] As determined by the U.S. Environmental Protection Agency, "Level 3 chargers require significantly more capital and planning and thus make Level 2 [charging] deployment options more appealing despite longer charge times. In addition to the cost aspect, the installation process can often be complex, requiring permits and discussions with the utility".[1703] This determination is consistent with the findings of the California Office of Planning Research, which concluded that, "[c]ompared with Level 1 or Level 2 charging, direct current (DC) fast charging entails a much higher cost (currently $20,000 - $50,000 plus installation costs".[1704] Finally, most commercially available electric vehicles can only charge at Level 1 or 2, and those few manufactures that do offer Level 3 charging are either experiencing technical problems that require limiting the vehicle's fast charging abilities or they can't agree on the which of the three most common fast charging standards to use in their vehicles.[1705,1706,1707,1708] For these reasons, MMs 11-4 and 11-6 require the Project to design multiple EVFS based on Level 2 EVSE at its maximum operating ampacity, rather than Level 3.

1702 California Air Resources Board (CARB). 2015 (July 9). EV Charging Infrastructure Provisions CALGreen_Code Sections 5.106.5.3 and A5.106.5.3, Economic and Fiscal Impact Statement Attachment (p.28). Sacramento, CA: CARB. https://www.documents.dgs.ca.gov/bsc/2015TriCycle/CAC/Green/Exhibit-B-CARB-Cost-Analysis-and-Technical-Report.pdf.

1703 U.S. Environmental Protection Agency (EPA). 2013 (September). Energy Star Market and Industry Scoping Report Electric Vehicle Supply Equipment (EVSE) September 2013 (p. 4). Washington, DC: EPA. https://www.energystar.gov/sites/default/files/asset/document/Electric_Vehicle_Scoping_Report.pdf.

1704 California Office of Planning and Research (OPR). 2013. Zero-Emission Vehicles in California: Community Readiness Guidebook (p. 55). Sacramento, CA: OPR. http://opr.ca.gov/docs/ZEV_Guidebook.pdf.

1705 ChargePoint, Inc. Drivers Checklist: A Quick Guide to Fast Charging (p. 2). https://www.chargepoint.com/files/Quick_Guide_to_Fast_Charging.pdf.

1706 Lawrence, Eric D. (Lawrence). 2017 (April). Debate over charging stations slows electric car growth in Michigan. Detroit, MI: Detroit Free Press. http://www.freep.com/story/money/cars/2017/04/19/consumers-energy-electric-vehicle-plan/99796440/.

1707 Brown, Aaron (Brown) 2017 (May 8). Tesla explains why it sometimes limits supercharging speeds. New York, NY: The Drive. http://www.thedrive.com/tech/10070/tesla-explains-why-it-sometimes-limits-supercharger-charging-speeds.

1708 McDonald, Zach (McDonald). 2016 (Feb. 4). A Simple Guide to DC Fast Charging. Waterloo, Ontario, Canada: FleetCarma. https://www.fleetcarma.com/dc-fast-charging-guide/.

In response to this comment, the following documents are added to the administrative record:

Brown, Aaron (Brown) 2017 (May 8). Tesla explains why it sometimes limits supercharging speeds. New York, NY: The Drive. http://www.thedrive.com/tech/10070/tesla-explains-why-it-sometimes-limits-supercharger-charging-speeds.

California Air Resources Board (CARB). 2015 (July 9). EV Charging Infrastructure Provisions CALGreen_Code Sections 5.106.5.3 and A5.106.5.3, Economic and Fiscal Impact Statement Attachment. Sacramento, CA: CARB. https://www.documents.dgs.ca.gov/bsc/2015TriCycle/CAC/Green/Exhibit-B-CARB-Cost-Analysis-and-Technical-Report.pdf.

California Office of Planning and Research (OPR). 2013. Zero-Emission Vehicles in California: Community Readiness Guidebook. Sacramento, CA: OPR. http://opr.ca.gov/docs/ZEV_Guidebook.pdf.

ChargePoint, Inc. Drivers Checklist: A Quick Guide to Fast Charging. https://www.chargepoint.com/files/Quick_Guide_to_Fast_Charging.pdf.

Lawrence, Eric D. (Lawrence). 2017 (April). Debate over charging stations slows electric car growth in Michigan. Detroit, MI: Detroit Free Press. http://www.freep.com/story/money/cars/2017/04/19/consumers-energy-electric-vehicle-plan/99796440/.

McDonald, Zach (McDonald). 2016 (Feb. 4). A Simple Guide to DC Fast Charging. Waterloo, Ontario, Canada: FleetCarma. https://www.fleetcarma.com/dc-fast-charging-guide/.

U.S. Environmental Protection Agency (EPA). 2013 (September). Energy Star Market and Industry Scoping Report Electric Vehicle Supply Equipment (EVSE) September 2013. Washington, DC: EPA. https://www.energystar.gov/sites/default/files/asset/document/Electric_Vehicle_Scoping_Report.pdf.

Response to Comment F.8-96:

The Commenter's opinion about the adequacy of the Draft EIR's GHG analysis is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Contrary to this comment's claim, the Draft EIR is not required to explain why "stronger mitigation measures – including zero net energy standards – are infeasible." An EIR must describe feasible measures that could minimize the Project's significant adverse impacts.[1709] "Nothing in CEQA requires an EIR to explain why certain mitigation measures are infeasible."[1710] Moreover, for the reasons discussed in

[1709] CEQA Guidelines §15126.4(a)(1)
[1710] *Clover Valley Found. V. City of Rocklin* (2011) 197 Cal.App.4th 200, 245

response to Comment F.8-87, CEQA does not require projects to reduce on-site GHG emissions to net zero levels, nor does it impose such a standard on the Project.

As discussed in response to Comment F.8-79, the Project's potential GHG impacts were fully disclosed and analyzed in Section 5.21 of the Draft EIR. Moreover, the Draft EIR includes mitigation measures which require compliance with a non-exclusive list of laws and regulations requiring GHG reductions in equipment, activities, facilities and services associated with the project (MM 21-20) The Draft EIR also includes 45 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and 21-1 through 21-19). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in response to Comment F.8-204, and mitigation measures have been revised in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures as set forth in responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3A-46, and F.8-189.

In the *Newhall* litigation, the Commenter argued that the court should adopt a "zero net" approach to mitigating for GHG impacts on the basis that it is required by CEQA. The Supreme Court declined to do so and instead identified GHG compliance pathways that included compliance with laws, compliance with SB 375, and compliance with climate action plans.[1711,1712,1713] The Commenter's recommended "net zero" approach was also considered and rejected by the Office of Planning and Research, the expert state agency for implementing CEQA.[1714]

This comment's claim that the Draft EIR does not provide substantial evidence to support its determination that the Project's climate change impacts would be significant and unavoidable is not supported by the facts. As discussed in Section 5.21, Climate Change,[1715] and in response to Comment F.8-79, the Draft EIR evaluated the Project's GHG impacts using three of the pathways to compliance identified by the Newhall court – i.e., compliance with applicable regulatory programs (under Threshold 21-1), compliance with an SB 375 sustainable communities strategy, the SCAG 2016 RTP/SCS (under Threshold 21-2), and compliance with an adopted climate action plan, the Los Angeles CCAP (under Threshold 21-2).

As discussed in Draft EIR pages 5.21-48 through 5.21-70, the Draft EIR determined that the Project would comply with, and would be consistent with, applicable regulatory programs designed to reduce GHG emissions and would thus contribute to the achievement of AB 32's greenhouse gas reduction goals. Since the Project would comply with applicable regulatory programs designed to reduce GHG emissions, the Draft EIR found that the Project-level impact related to GHG emissions could be considered less than significant under Threshold 21-1. Furthermore, as discussed in Draft EIR pages 5.21-72 through 5.21-86, the

1711 *Newhall*, Opening Brief on the Merits, pp. 59-70,
1712 *Id.,* Newhall's Answer Brief on the Merits, pp. 37-45
1713 *Id.,* p. 229
1714 14 CCR §15000; 15126.4(c)
1715 DRP 2017, pp. 5.21-46 to -86

Draft EIR determined that the Project would be consistent with both the Los Angeles CCAP, (which meets the requirements for a programmatic climate action plan specified in Section 15183.5 of the State CEQA Guidelines) and the SCAG 2016 RTP/SCS, the regional sustainable communities strategy prepared pursuant to SB 375. Since the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and would be consistent with, and not conflict with, an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions, the Draft EIR determined that the Project-level impact related to GHG emissions could be considered less than significant under Threshold 21-2.

However, climate change is a global phenomenon and the significance of greenhouse gas emissions is inherently cumulative in nature. Accordingly, the Project's impact related to GHG emissions is most appropriately considered on a cumulative level, not on a project level. To date, California remains a global leader in mandating GHG emission reductions across a broad spectrum of economic sectors, and most other nations and states have not enacted regulations similar to those adopted in California. California also has nearly the lowest level of GHG per capita of any state. However, as explained on Draft EIR page 5.21-86, it is a fact that the County of Los Angeles has no jurisdictional control or responsibility for GHG reductions in other parts of California (and certainly not in the context of global action), which all contribute to climate change. In addition, it is a fact that the County does not have jurisdiction to enforce statewide implementation of all of the applicable GHG-reducing regulatory programs with which the Project (and other statewide projects) must comply. Although many other agencies with the necessary jurisdiction are currently taking action to reduce GHG emissions, the County cannot assure that these measures would ultimately be implemented by such agencies or sufficient to address climate change given its jurisdictional limitations. Therefore, the Draft EIR conservatively determined that the Project's incremental contribution to the global GHG emissions inventory would be considered cumulatively considerable and that this cumulative impact would be significant and unavoidable, even though the Project satisfies several "pathways to compliance" identified by the *Newhall* court.[1716] Since this Draft EIR determination is based on fact (i.e., the County's limited jurisdiction to enforce statewide regulatory programs), it is supported by substantial evidence, despite this comment's claim to the contrary.[1717]

While the Project has been designed and will have much lower per capita and per residential unit GHG emissions in relation to existing average per capita and per residential unit GHG emissions, the majority of Project GHG emissions occur from vehicular emissions that fall solely within the jurisdiction and control of federal and state agencies (e.g., in regulating the types and fuel efficiencies of vehicles), and in generating electricity within the grid serving the Project region including the Project site. Vehicular GHG emission reductions, for example, are achieved under the state's stringent GHG laws[1718] from a combination of existing legal mandates, including but not limited to the Cap and Trade program covering all fossil fuel related emissions from "wells to wheels," mandatory increases in non-fossil fuel vehicles, and compliance with regional land use and transportation strategies to reduce GHG from

[1716] *Id.,* p. 5.21-86

[1717] CEQA Guidelines §15384

[1718] S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).

land use and transportation patterns.[1719] Similarly, electricity generation from renewable resources such as solar and wind power, is mandated under state laws,[1720] and is also subject to evolving and improving technologies (e.g., storage) and governance frameworks (e.g., multi-state grid integration). Achieving a "net zero" greenhouse gas reduction outcome within the Project boundaries for transportation, electric generation, and other offsite sources that are outside the jurisdiction and control of Los Angeles County is infeasible. Other development applicants have proposed "net zero" greenhouse gas projects which require payments of fees or costs for offsite GHG reductions; however, imposing such external costs on a Project increases Project costs and reduce the affordability of Project housing.[1721,1722,1723] Extraordinarily high existing housing costs have already caused California to have the highest poverty rate in the nation according to the US Census,[1724] which in turn has already a substantial net out-migration of California's working families to much higher per-capita GHG states such as Texas, Nevada and Arizona.[1725] Increasing Project housing costs and reducing Project affordability will further exacerbate the California housing crisis and encourage more out-migration to higher per capita GHG states. Although greenhouse gas is a global pollutant for which reductions can be achieved in other countries and continents, mandating and monitoring such offsite reductions is outside the jurisdiction and control of the lead agency for CEQA purposes. Also, please see response to Comment F.8-87; all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change.

It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing

[1719] Governor's Office of Planning and Research (OPR). 2016 (Jan. 20). Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Sacramento, CA: OPR. https://perma.cc/8EWJ-MV3Y.

[1720] CCR. Title 24, Part 11

[1721] California Energy Commission (CEC). 2017 (August 22). Zero Net Energy Strategy Presentation. Sacramento, CA: CEC.

[1722] Governor's Office of Planning and Research (OPR). 2016 (January 20). Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Sacramento, CA: OPR.

[1723] California Air Resources Board (CARB). 2017 (January 20). *The 2017 Climate Change Scoping Plan Update* (p. 39). Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

[1724] Walters, Dan. 2017 (August 13). Why does California have the nation's highest poverty level? Sacramento, CA: CALMATTERS. https://perma.cc/GMM9-QWUA.

[1725] Lynch, Drew. 2017 (September 21). Californians Consider moving to rising housing costs, poll finds. CAL WATCHDOG.

rules.[1726, 1727] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[1728,1729] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[1730] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy.

This comment cites *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal. App. 4th 587, 600 to support its claim that the Draft EIR must base its determination that the Project's cumulative GHG impacts would be significant and unavoidable on substantial evidence. However, *Uphold Our Heritage* is inapposite. In that case, the court overturned a lead agency's CEQA finding that certain project alternatives analyzed in the challenged EIR were economically infeasible because that finding was not supported by substantial evidence in the record.[1731] Here, the EIR does not claim, and the Lead Agency has not found, that any of the alternatives identified in the EIR, or recommended by the Commenter, are economically infeasible. However, this comment is noted for the record and will be provided to the Planning Commission and City Council for consideration.

Response to Comment F.8-97:

Appendix F of the State California Environmental Quality Act (CEQA) Guidelines requires consideration of energy consumption, and the efficiency of that consumption, as part of an EIR; but does not require the analysis of whether the example energy conservation measures could be adopted. Consistent with the requirements of Appendix F, energy use and conservation, both direct and indirect, are addressed in several sections of the Draft EIR because these subjects touch on several different topics under CEQA. Appendix 2-A of Draft EIR Appendix 4.0-A presents the Centennial Project's Green Development Program, which details all the sustainable development practices that would be incorporated into the Project. This includes energy efficiency. Because the Draft EIR is analyzing implementation of the Specific Plan, including its Appendices such as the Green Development Program, the Draft

1726 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

1727 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1728 *Ibid*.

1729 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1730 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

1731 147 Cal. App. 4th at 598-599

EIR analyzes all proposed energy conservation measures. These are considered Project Design Features (PDFs). As discussed on Draft EIR page 2-6, "Because PDFs have been incorporated into the Project, they do not constitute mitigation measures as defined by CEQA. However, if the PDFs have mitigation value to reduce a potentially significant impact, then a corresponding mitigation measure has been prepared to ensure the implementation of the measure through the Mitigation Monitoring and Reporting Program (MMRP)". The Draft EIR includes PDFs and, where appropriate mitigation measures, related to energy conservation, or otherwise addresses energy efficiency, in the following sections, for example: 5.8, Land Use, Entitlements, and Planning (Table 5.8-1, pages 5.8-49, 5.8-52 through 5.8-58, and 5.8-69); 5.10, Traffic, Access, and Circulation (MM 10-1, page 5.10-144); 5.11, Air Resources (PDF 11-2, page 5.11-30; PDF 11-3, page 5.11-30); 5.18, Water Resources (PDF 18-2, page 5.18-39; MM 18-1, page 5.18-75); 5.19, Wastewater Collection (PDFs 19-1 and 19-3, page 5.19-8); 5.20, Dry Utilities (pages 5.20-11 and -12 under heading "Energy Conservation in the Project"; pages 5.20-21 under heading "Energy Conservation in the Project"; pages 5.20-21 and -22 under heading "Vehicle Trip Reductions in the Centennial Project"); and 5.21, Climate Change (PDFs 21-1 through 21-8 on pages 5.21-42 and -43; "Energy Use" analysis beginning on page 5.21-56; "Water Supply, Treatment, and Distribution" analysis beginning on page 5.21-60; "Mobile Sources" analysis beginning on page 5.21-62; MMs 21-1 through 21-13, MM 21-15 through 21-20 on pages 5.21-88 through -93). As such, wherever energy conservation is relevant to the analysis of environmental impacts, the appropriate energy efficiency features of the proposed Project, presented in PDFs and MMs, are part of the analysis of environmental impacts and associated conclusions.

Please see also response to Comment F.8-204, which thoroughly addresses specific energy-related MMs suggested for incorporation by the Commenter.

Response to Comment F.8-98:

Contrary to this comment's claim, Draft EIR page 5.2-18 does not state that 55 percent of the Project site is in the Gorman Drainage Area. Rather, Draft EIR page 5.2-18 states that 55 percent of the Gorman Drainage Area is located within the Project site.

As discussed in response to Comment D.3-7, the following changes have been incorporated into the Draft EIR to match the numbers in Appendix 5.2-B:

The fourth and fifth sentences in the third paragraph on page 3-5 of the Draft EIR have been revised to read:

> Approximately 4.2 ~~ten~~ percent of the Project site is within the Gorman Drainage Area and the Los Angeles RWQCB (Region 4). However, ~~90~~ 95.8 percent of the Project site is located within the jurisdiction of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB), which has been designated "Region 6" by the SWRCB (see Exhibit 5.2-1, Regional Water Quality Control Board Boundaries).

The first and second sentences in the third paragraph on page 4-54 of the Draft EIR have been revised to read:

> Approximately ~~93~~ 95.8 percent of the Project site is within the jurisdiction of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB); this area is not covered by an MS4 Permit due to the lack of development in the area. The remaining approximately ~~7~~ 4.2 percent of the Project site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB); an MS4 permit has been approved by the Los Angeles RWQCB and is applicable to the portion of the site under the Los Angeles RWQCB's jurisdiction.

These changes to the Draft EIR are incorporated by reference into subsequent sections of the Draft EIR. These changes do not alter the analysis or conclusions related to Project impacts on water quality or hydrology.

Response to Comment F.8-99:

Drainages within the Project area are discussed in Section 3.1.5, Hydrology and Drainage Characteristics, and on pages 5.2-15 to 5.2-18 of the Draft EIR, which discuss Gorman Creek, Oso Creek, Quail Lake, and the Santa Clara River. As discussed in Draft EIR Section 5.2.5 and in Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, the Project will avoid most of the watercourses and watershed areas in the Gorman Creek, Quail Lake, and Oso Creek Drainage Areas. Approximately ten percent of the proposed development would occur west of the West Branch of the Aqueduct, and drainage impacts in this area would primarily affect Oso Creek tributaries flowing north from the southern side (i.e., the northerly face) of Oso Canyon. Drainage impacts in the Gorman Creek Drainage Area would largely be avoided. No watercourse impacts would occur in the Quail Lake Drainage Area.

Approximately 90 percent of the proposed development would occur east of the West Branch of the Aqueduct. As discussed in Draft EIR Section 5.2.5 and in Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, 18 of the proposed regional detention and retention basins will be located to the east of the Aqueduct. Smaller drainages in this location would generally be integrated with the Project's storm drain system. Flow patterns associated with several existing larger tributary systems, including the East Tributary systems and the Cow Spring Canyon, Horse Camp Canyon, the 300th Street Tributary systems, will largely be maintained by avoiding or constructing flow controls in existing channels or by recreating existing channels after site grading. Flow, low impact development (LID), and hydromodification management facilities (e.g., detention and retention basins) will be constructed adjacent to channels, primarily in downstream reach locations.

Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake watershed, which includes the lake. Consequently, no runoff from Project developed areas

will flow to or occur within Quail Lake, and the Quail Lake drainage and watershed will not affect the hydrology, flood, or water quality conditions in the lake and the lake's watershed and drainage system.

Potential water quality impacts to the Santa Clara River are discussed in Draft EIR Section 5.4, Water Quality, and in Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report, Section 7.6, Impacts to the Santa Clara River. Potential impacts to the Santa Clara River was determined to be less than significant because: (a) the Project area that drains into the Santa Clara River watershed comprises approximately 822 acres, or 0.08 percent of the 1,634 square-mile Santa Clara River watershed; (b) Project discharges occur significantly upstream of the Santa Clara River (approximately 35 miles) and mix with natural area drainage in Gorman Creek and with State Water Project (SWP) water in two storage reservoirs, Pyramid Lake and Lake Piru, prior to draining to the Santa Clara River; (c) the natural hydrologic connection between Project discharges and the Santa Clara River has been significantly altered and interrupted by the construction of intervening waterbodies, including Pyramid Lake and Piru Lake, and water quality in the Santa Clara River drainage is dominated by the operation of these facilities as part of the SWP system; and (d) as discussed below, the analysis of Project concentrations or pollutants of concern in runoff from developed areas are below all benchmark water quality objectives and will not significantly impact receiving waters or any designated beneficial uses for these waters, including the Santa Clara River.

The Draft EIR provides a detailed and thorough analysis of water quality impacts potentially associated with all proposed Project development and land uses in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Pertinent hydrological information for the water quality analysis in included in Section 5.2, Hydrology and Flood, Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report. As discussed on pages 5.4-31 to 5.4-34 of the Draft EIR, the Project analysis of water quality impacts considered a representative range of potential pollutants of concern that could affect surface and groundwater from the construction and development of the Project based on the proposed land uses in the Project site. Pollutants of concern were analyzed in the Draft EIR if they exhibited one or more of the following deleterious characteristics: (a) current loadings or historic deposits of a pollutant impact the beneficial uses of a receiving water; (b) elevated levels of a pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein; or (c) the detectable inputs of a pollutant at concentrations or loads would be considered potentially toxic to humans and/or flora and fauna.

The Draft EIR analyzed pollutants of concern that are anticipated to be or could potentially be generated by the Project at concentrations that exhibit any of the these characteristics based on water quality data collected in Los Angeles County from land uses that are proposed by the Project, consideration of the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, California Toxic Rule (CTR) criteria, and current federal Clean Water Act Section 303(d) listings. The reasons for identifying certain pollutants of concern,

the significance criteria used to analyze these constituents, and the rationales for not considering certain potential constituents in the analysis are discussed in detail in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. As discussed on pages 5.2-38 to 5.2-39, the Draft EIR water quality impact analysis quantitatively analyzes the following pollutants of concern for which there are sufficient flow composite sampling data in the Los Angeles County database:

- TSS (sediment)
- Total Phosphorus
- Nitrate Nitrite-Nitrogen, Ammonia, and Total Nitrogen
- Total and Dissolved Copper
- Total Lead
- Total and Dissolved Zinc
- Chloride

Post-development storm water runoff water quality impacts associated with the following pollutants of concern that could be generated by proposed Project land uses, including commercial and industrial land uses, were qualitatively addressed due to the unavailability of flow composite sampling data based on literature information and professional judgment:

- Turbidity
- Pesticides
- Pathogens (bacteria, viruses, and protozoa)
- Petroleum hydrocarbons (oil and grease, PAHs)
- Trash and debris
- MBAS
- Toxicity
- Emerging Contaminants

As discussed on Draft EIR pages 5.4-21 to 5.4-22, the Draft EIR considered all of the applicable Lahontan Regional Water Quality Control Board Basin Plan and Los Angeles Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, including Basin Plan beneficial uses and water quality objectives that protect wildlife and wildlife habitat.

The Lahontan Regional Water Quality Control Board Basin Plan wildlife and habitat beneficial use designations considered in the Draft EIR include:

- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

Los Angeles Regional Water Quality Control Board Basin Plan wildlife and habitat beneficial use designations considered in the Draft EIR include:

- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

Other Lahontan Regional Water Quality Control Board Basin Plan surface water beneficial use designations considered in the Draft EIR include:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential);
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential);
- GWR: Natural or artificial groundwater recharge (existing or potential);
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential);
- REC-1: Recreational bodily contact with water, where ingestion is reasonably possible (existing or potential);
- REC-2: Recreational activities involving contact in proximity to water, but not involving body contact (existing or potential);
- COMM: Commercial or recreational collection of fish or other organisms (existing or potential).
- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential).
- IND: Industrial activities that do not depend primarily on water quality (existing or potential).
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential).

Other Los Angeles Regional Water Quality Control Board Basin Plan surface water beneficial use designations considered in the Draft EIR include:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (intermittent and conditional [i.e., may be considered for exemptions at a later date]).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (intermittent).
- GWR: Natural and artificial groundwater recharge (intermittent).
- REC-1: Recreational bodily contact with water where ingestion is reasonably possible (intermittent).
- REC-2: Recreational activities involving contact in proximity to water (intermittent).
- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
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The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Los Angeles Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing).
- IND: Industrial activities that do not depend primarily on water quality (potential).
- PROC: Industrial activities that depend primarily on water quality (existing).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing).

The quantitative analysis approach utilized in the Draft EIR is discussed on pages 5.4-37 and 5.4-38, and includes the use of hourly rainfall data measured at the nearest gage to the Project site for storm over 30 years. Event Mean Concentrations (EMCs) pollutant concentrations for proposed Project land uses are estimated from data collected in Los Angeles County where sufficient data existed for the applicable pollutants of concern. Pollutant loads were estimated as the product of the storm event runoff times the EMC, and individual storm event loads are added to estimate the annual load. The analysis considers the LID, hydrology, and hydromodification BMPs planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The mean pollutant concentrations and loads in storm water are estimated following treatment, including capture by the LID, hydrology, and hydromodification BMPs for each storm event, taking into consideration the intensity of rainfall, duration of the storm, and duration between storm events. The analysis accounted for conditions when a treatment facility would be full and flows would bypass the facility as well as runoff volume reductions from the BMPs due to infiltration and evaporation. The analysis uses representative data for local conditions and infiltration parameters are based on soil hydrologic groups, soil texture classes, and the federal Natural Resource Conservation Service Soil Survey of the Project area. To conservatively reflect post-development conditions, soil compaction impacts were modeled for post-development open and landscaped areas assuming a 25 percent reduction in saturated hydraulic conductivity, or infiltration rate, from the pre-developed to post-developed conditions and impervious surfaces were modeled assuming no infiltration.

The results of the quantitative analysis for pollutants of concern are discussed on Draft EIR pages 5.4-57 to 5.4-69 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The results of the qualitative analysis of pollutants of concern are discussed on Draft EIR pages 5.4-75 to 5.4-89 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The Draft EIR analysis demonstrates that with the implementation of LID, hydrology, and hydromodification BMPs that meet the performance requirements of MMs 4-1 and 4-2, which will be incorporated into the Project Mitigation Monitoring and Reporting Program (MMRP) and enforceable by the County, none of the pollutants of concern would exceed applicable water quality objectives for all Los Angeles and Lahontan Basin Plan beneficial uses, including beneficial uses pertaining to wildlife and habitat under Project construction or operational (buildout) conditions. The comment does not identify any substantive issue or concern with the analysis of Project water quality impacts, including potential impacts to Basin Plan beneficial use designations pertaining to wildlife and habitat.

Surveys were conducted to document the biological resources within the Project impact area. Surveys to document biological resources for the Centennial Project included all areas, aquatic and riparian habitat included, on-site as well as off-site where direct impacts will occur. All drainages within this survey area, such as Oso Creek, were included within all applicable biological surveys such as vegetation mapping, jurisdictional delineations, and focused protocol surveys for special status riparian bird species. Drainages that are not on-

site and not within or immediately adjacent to an off-site impact area were not surveyed. Biological resources within unimpacted or indirectly impacted off-site areas are generally determined from regional data and aerial photographs as opposed to site specific surveys. In addition, as described above, the Draft EIR provides a detailed and thorough analysis of water quality impacts, including pollutants potentially associated with all proposed Project development and land uses to determine if they exhibited deleterious characteristics to flora and fauna. The analysis concludes that none of the pollutants of concern would exceed applicable water quality objectives for beneficial uses pertaining to wildlife and habitat under Project construction or operational (buildout) conditions. As a result, downstream aquatic and riparian habitat and associated wildlife would not be impacted to any measurable degree. As such, additional detailed off-site surveys within drainage features such as Gorman Creek or Quail Lake are unwarranted.

Response to Comment F.8-100:

The Draft EIR provides a thorough discussion of potential water quality impacts that could be associated with Project construction and development based on pollutants of concern that could be generated by proposed Project land uses, and demonstrates that, with the implementation of low impact development (LID), hydrology, and hydromodification best management practices (BMPs) required for the Project, these impacts will be mitigated to less than significant levels. The analysis of potential Project water quality impacts is discussed in Draft EIR Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Pertinent hydrological information for the water quality analysis in included in Section 5.2, Hydrology and Flood, Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report.

As discussed on pages 5.4-31 to 5.4-34 of the Draft EIR, the Project analysis of water quality impacts considers a representative range of potential pollutants of concern that could affect surface and groundwater from the construction and development of the Project based on the proposed land uses in the Project site. Pollutants of concern are analyzed in the Draft EIR if they exhibit one or more of the following deleterious characteristics: (a) current loadings or historic deposits of a pollutant impact the beneficial uses of a receiving water (i.e., the pollutant is subject to a Total Maximum Daily Load or the receiving water is listed as impaired for the pollutant pursuant to Section 303(d) of the Clean Water Act, even if the pollutant is unlikely to be generated by the Project); (b) elevated levels of a pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein; or (c) the detectable inputs of a pollutant at concentrations or loads would be considered potentially toxic to humans and/or flora and fauna (i.e., any pollutant expected to be generated by Project construction and/or operation at levels considered potentially toxic to humans and/or flora and fauna are considered pollutants of concern that are analyzed in the Draft EIR).

The Draft EIR analyzed pollutants of concern that are anticipated to be or could potentially be generated by the Project at concentrations that exhibit any of the these characteristics based on water quality data collected in Los Angeles County from land uses that are proposed

by the Project, consideration of the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, California Toxic Rule (CTR) criteria, and current federal Clean Water Act Section 303(d) listings. The reasons for identifying certain pollutants of concern, the significance criteria used to analyze these constituents, and the rationales for not considering certain potential constituents in the analysis are discussed in detail in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. As discussed on pages 5.2-38 to 5.2-39, the Draft EIR water quality impact analysis quantitatively analyzes the following pollutants of concern for which there are sufficient flow composite sampling data in the Los Angeles County database:

- TSS (sediment)
- Total Phosphorus
- Nitrate Nitrite-Nitrogen, Ammonia, and Total Nitrogen
- Total and Dissolved Copper
- Total Lead
- Total and Dissolved Zinc
- Chloride

Post-development storm water runoff water quality impacts associated with the following pollutants of concern were qualitatively addressed due to the unavailability of flow composite sampling data based on literature information and professional judgment:

- Turbidity
- Pesticides
- Pathogens (bacteria, viruses, and protozoa)
- Petroleum hydrocarbons (oil and grease, PAHs)
- Trash and debris
- MBAS
- Toxicity
- Emerging Contaminants

As discussed on Draft EIR pages 5.4-21 to 5.4-23, the Draft EIR considered all of the applicable Lahontan Regional Water Quality Control Board Basin Plan and Los Angeles Regional Water Quality Control Board Basin Plan surface water and groundwater beneficial uses and water quality objectives.

The Draft EIR evaluates the Project's potential impact on the following surface water beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential);

- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential);
- GWR: Natural or artificial groundwater recharge (existing or potential);
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential);
- REC-1: Recreational bodily contact with water, where ingestion is reasonably possible (existing or potential);
- REC-2: Recreational activities involving contact in proximity to water, but not involving body contact (existing or potential);
- COMM: Commercial or recreational collection of fish or other organisms (existing or potential);
- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential).
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- IND: Industrial activities that do not depend primarily on water quality (existing or potential).
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential).

The Draft EIR evaluates the Project's potential impact on the following surface water beneficial use designations identified in the Los Angeles Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (intermittent and conditional [i.e., may be considered for exemptions at a later date]).

- AGR: Agricultural supply waters used for farming, horticulture, or ranching (intermittent).
- GWR: Natural and artificial groundwater recharge (intermittent).
- REC-1: Recreational bodily contact with water where ingestion is reasonably possible (intermittent).
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- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

The Draft EIR evaluates the Project's potential impact on following groundwater beneficial use designations identified in the Los Angeles Regional Water Quality Control Board Basin Plan, taking into consideration water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing).
- IND: Industrial activities that do not depend primarily on water quality (potential).
- PROC: Industrial activities that depend primarily on water quality (existing).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing).

The quantitative analysis approach utilized in the Draft EIR is discussed on pages 5.4-37 and 5.4-38, and includes the use of hourly rainfall data measured at the nearest gage to the Project site for storm over 30 years. Event Mean Concentrations (EMCs) pollutant concentrations for proposed Project land uses are estimated from data collected in Los Angeles County where sufficient data existed for the applicable pollutants of concern. Pollutant loads were estimated as the product of the storm event runoff times the EMC, and individual storm event loads are added to estimate the annual load. The analysis considers the LID, hydrology, and hydromodification BMPs planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The mean pollutant concentrations and loads in storm water are estimated following treatment, including capture by the LID, hydrology, and hydromodification BMPs for each storm event, taking into consideration the intensity of rainfall, duration of the storm, and duration between storm events. The analysis accounted

for conditions when a treatment facility would be full and flows would bypass the facility as well as runoff volume reductions from the BMPs due to infiltration and evaporation. The analysis uses representative data for local conditions and infiltration parameters are based on soil hydrologic groups, soil texture classes, and the federal Natural Resource Conservation Service Soil Survey of the Project area. To conservatively reflect post-development conditions, soil compaction impacts were modeled for post-development open and landscaped areas assuming a 25 percent reduction in saturated hydraulic conductivity, or infiltration rate, from the pre-developed to post-developed conditions and impervious surfaces were modeled assuming no infiltration.

The results of the quantitative analysis for pollutants of concern are discussed on Draft EIR pages 5.4-57 to 5.4-69 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The results of the qualitative analysis of pollutants of concern are discussed on Draft EIR pages 5.4-75 to 5.4-89 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The Draft EIR analysis demonstrates that with the implementation of LID, hydrology, and hydromodification BMPs that meet the performance requirements of MMs 4-1 and 4-2, which will be incorporated into the Project MMRP and enforceable by the County, none of the pollutants of concern would exceed applicable water quality objectives for all applicable Lahontan and Los Angeles Basin Plan beneficial uses under Project construction or operational (buildout) conditions. The comment does not identify any substantive issue or concern with the analysis of Project water quality impacts, including potential impacts to Basin Plan beneficial use designation.

As discussed in Draft EIR Section 5.2.5 and in Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, the Project will avoid most of the watercourses and watershed areas in the Gorman Creek, Quail Lake, and Oso Creek Drainage Areas. Approximately 10 percent of the proposed development would occur west of the West Branch of the Aqueduct, and drainage impacts in this area would primarily affect Oso Creek tributaries flowing north from the southern side (i.e., the northerly face) of Oso Canyon. Drainage impacts in the Gorman Creek Drainage Area would largely be avoided. No watercourse impacts would occur in the Quail Lake Drainage Area. Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake watershed, which includes the lake. Consequently, no runoff from Project developed areas will flow to or occur within Quail Lake and the Quail Lake drainage and watershed, and the Project will not affect the hydrology, flood, or water quality conditions in the lake and the lake's watershed and drainage system. Drainage impacts in the Gorman Creek Drainage Area would also largely be avoided. As discussed in Draft EIR Section 5.4, Water Quality and in Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report, Section 7.6, the Project will also not cause significant water quality impacts to the Santa Clara River or to the Pyramid Lake and Piru Lake State Water Project reservoirs located to the south of the Project. Project area drainage amounts to 0.08 percent of the Santa

Clara River watershed, and water quality in the drainage is dominated by imported State Water Project supplies, including supplies stored in Pyramid Lake and Piru Lake.

Consequently, the Draft EIR provides a thorough discussion of potential water quality impacts to receiving waters related to Project construction and operational (buildout) conditions, considers and discloses the potential magnitude of these impacts for applicable pollutants of concern, and provides substantial evidence that Project impacts will be less than significant with mitigation. The Project will not drain into or affect Quail Lake, the Quail Lake drainage, or affect the water quality in any other lake, including the Pyramid Lake and Piru Lake State Water Project facilities located south of the Project.

Section 5.7 of Draft EIR, beginning on page 5.7-64, describes all special status plant and wildlife species occurring or potentially occurring within the Project area including within water features such as creeks and reservoirs. As noted in Tables 5.7-5 and 5.7-8 of the Draft EIR, several special status species may occur within riparian or aquatic habitat associated with Oso Creek and other similar habitat areas. While some of these species will be impacted by the proposed Project due to loss of habitat, these impacts have been determined to be less than significant or reduced to less than significant with implementation of mitigation and these species would not be impacted by changes in water quality resulting from the Project. As described above, the Draft EIR provides a detailed and thorough analysis of water quality impacts, including pollutants potentially associated with all proposed Project development and land uses to determine if they exhibited deleterious characteristics to flora and fauna. The analysis concludes that none of the pollutants of concern would exceed applicable water quality objectives for beneficial uses pertaining to wildlife and habitat under Project construction or operational (buildout) conditions. As a result, downstream aquatic and riparian habitat and associated special status plant and wildlife species would not be impacted to any measurable degree.

Response to Comment F.8-101:

This water quality analysis methodology used in the Draft EIR identifies and analyzes pollutants of concern that could occur from all Project land uses, including commercial and industrial land uses. The Draft EIR provides a thorough analysis of potential water quality impacts, including to wildlife, associated with Project construction and development and demonstrates that, with the implementation of low impact development (LID), hydrology, and hydromodification best management practices (BMPs) required for the Project, these impacts will be mitigated to less than significant levels. The analysis of potential Project water quality impacts is discussed in Draft EIR Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Pertinent hydrological information for the water quality analysis in included in Section 5.2, Hydrology and Flood, Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report.

As discussed on pages 5.4-31 to 5.4-34 of the Draft EIR, the Project analysis of water quality impacts considers a representative range of potential pollutants of concern that could affect surface and groundwater from the construction and development of the Project based on the

proposed land uses in the Project site. Pollutants of concern are analyzed in the Draft EIR if they exhibit one or more of the following deleterious characteristics: (a) current loadings or historic deposits of a pollutant impact the beneficial uses of a receiving water; (b) elevated levels of a pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein; or (c) the detectable inputs of a pollutant at concentrations or loads would be considered potentially toxic to humans and/or flora and fauna.

The Draft EIR analyzed pollutants of concern that are anticipated to be or could potentially be generated by the Project at concentrations that exhibit any of the these characteristics based on water quality data collected in Los Angeles County from land uses that are proposed by the Project, consideration of the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, California Toxic Rule (CTR) criteria, and current federal Clean Water Act Section 303(d) listings. The reasons for identifying certain pollutants of concern, the significance criteria used to analyze these constituents, and the rationales for not considering certain potential constituents in the analysis are discussed in detail in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Several pollutants of concern discussed in the analysis, such as Petroleum Hydrocarbons (Oil and Grease and PAHs), and Methylene blue activated substances (MBAS), are explicitly linked with industrial and/or commercial activity in the Draft EIR discussion (Draft EIR pages 5.4-34 to 5.4-35) Others, such as metals, trash and debris, and chloride, are commonly known to be generated by industrial and/or commercial land uses.

As discussed on pages 5.2-38 to 5.2-39, the Draft EIR water quality impact analysis quantitatively analyzes the following pollutants of concern that could be generated by proposed Project land uses, including commercial and industrial land uses, for which there are sufficient flow composite sampling data in the Los Angeles County database:

- TSS (sediment)
- Total Phosphorus
- Nitrate Nitrite-Nitrogen, Ammonia, and Total Nitrogen
- Total and Dissolved Copper
- Total Lead
- Total and Dissolved Zinc
- Chloride

Post-development storm water runoff water quality impacts associated with the following pollutants of concern that could be generated by proposed Project land uses, including commercial and industrial land uses, were qualitatively addressed due to the unavailability of flow composite sampling data based on literature information and professional judgment:

- Turbidity
- Pesticides
- Pathogens (bacteria, viruses, and protozoa)
- Petroleum hydrocarbons (oil and grease, PAHs)

- Trash and debris
- MBAS
- Toxicity
- Emerging Contaminants

As discussed on Draft EIR pages 5.4-21 to 5.4-23, the Draft EIR considered all of the applicable Lahontan Regional Water Quality Control Board Basin Plan and Los Angeles Regional Water Quality Control Board Basin Plan surface water and groundwater beneficial uses and water quality objectives.

The Draft EIR evaluates the Project's potential impact on the following surface water beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential);
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- COMM: Commercial or recreational collection of fish or other organisms (existing or potential).
- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential).

- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential).
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The Draft EIR evaluates the Project's potential impact on the following surface water beneficial use designations identified in the Los Angeles Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (intermittent and conditional [i.e., may be considered for exemptions at a later date]).
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The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Los Angeles Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

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- IND: Industrial activities that do not depend primarily on water quality (potential).
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The quantitative analysis approach utilized in the Draft EIR is discussed on pages 5.4-37 and 5.4-38, and includes the use of hourly rainfall data measured at the nearest gage to the Project site for storm over 30 years. Event Mean Concentrations (EMCs) pollutant concentrations for proposed Project land uses are estimated from data collected in Los Angeles County where sufficient data existed for the applicable pollutants of concern. Pollutant loads were estimated as the product of the storm event runoff times the EMC, and individual storm event loads are added to estimate the annual load. The analysis considers the LID, hydrology, and hydromodification BMPs planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The mean pollutant concentrations and loads in storm water are estimated following treatment, including capture by the LID, hydrology, and hydromodification BMPs for each storm event, taking into consideration the intensity of rainfall, duration of the storm, and duration between storm events. The analysis accounted for conditions when a treatment facility would be full and flows would bypass the facility as well as runoff volume reductions from the BMPs due to infiltration and evaporation. The analysis uses representative data for local conditions and infiltration parameters are based on soil hydrologic groups, soil texture classes, and the federal Natural Resource Conservation Service Soil Survey of the Project area. To conservatively reflect post-development conditions, soil compaction impacts were modeled for post-development open and landscaped areas assuming a 25 percent reduction in saturated hydraulic conductivity, or infiltration rate, from the pre-developed to post-developed conditions and impervious surfaces were modeled assuming no infiltration.

The results of the quantitative analysis for pollutants of concern are discussed on Draft EIR pages 5.4-57 to 5.4-69 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The results of the qualitative analysis of pollutants of concern are discussed on Draft EIR pages 5.4-75 to 5.4-89 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The Draft EIR analysis demonstrates that with the implementation of LID, hydrology, and hydromodification BMPs that meet the performance requirements of MMs 4-1 and 4-2, which will be incorporated into the Project MMRP and enforceable by the County, none of the pollutants of concern would exceed applicable water quality objectives for all Lahontan and Los Angeles Basin Plan beneficial uses, including wildlife and habitat beneficial uses, under Project construction or operational (buildout) conditions. As discussed above, the analysis includes consideration of pollutants of concern that would be expected from commercial, industrial and other urban uses in the Project during construction and operations (buildout). Consequently, the Draft EIR analysis considers and discusses potential industrial and commercial land use water quality impacts as well as residential and other proposed land uses.

The case cited in the comment concerns an EIR prepared by the California Department of Food and Agriculture (DFA) for actions related to the eradication of the glassy-winged sharpshooter, an agricultural pest. One of the proposed actions was applying pesticides in any location statewide where the pest may be discovered. The EIR did not include an analysis

of the use of any pesticide in any specific location where spraying could occur, including near schools, sensitive receptors or other locations. The court found that the EIR was deficient because it contained no analysis of potential impacts in in the specific context of the areas where applications could occur.

As discussed on pages 5.4-77 to 5.4-78, the Draft EIR considers potential water quality impacts in the Project area and in offsite receiving waters, from: (a) legacy organochlorine pesticides including Chlordane, Dieldrin, DDT and Toxaphene; (b) organophosphate pesticides that largely replaced organochlorine pesticides, including diazinon and chlorpyrifos; (c) pyrethroid pesticides, which are a synthetic form of naturally occurring pyrethrins; and (d) fipronil and its related degradates (fipronil desulfinyl, fipronil sulfone, and fipronil sulfide). The analysis discloses the potential toxicity of these and other urban pesticides in relation to their degradation rates in water and sediments. The analysis states that most pesticides, including historical pesticides that may be present at the site, are relatively insoluble in water and tend to adsorb to the surfaces of sediment, which would be stabilized with development or, if eroded, would be settled or filtered out of the water column by the Project's regional and distributed LID BMPs required by MM 4-1 (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations and Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The discussion states that potential pesticide impacts will be further reduced by implementing an Integrated Pest Management (IPM) program consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and the Natural Resources Statewide Integrated Pest Management Program. The IPM program will prevent or suppress pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and limited use of pesticides with applicable IPM BMPs required by MM 4-2. The implementation of LID BMPs under MM 4-1 and IPM measures in accordance with MM 4-2 must be confirmed by the County as part of each tentative tract map application, and both mitigation measures will be incorporated into the Project MMRP and enforceable by the County.

Consequently, in contrast with the cited case, the Draft EIR analysis of potential pesticide impacts considers site-specific conditions, discloses site specific risks from a broad range of legacy and urban pesticides, and requires site-specific, enforceable mitigation measures to reduce the potential impacts to less than significant levels. The Draft EIR also requires that compliance with the site-specific LID BMPs and IPM measures be confirmed by the County prior to the approval of each tract map and be included and enforceable under the Project MMRP that must be adopted by the County under CEQA.

Response to Comment F.8-102:

The Draft EIR water quality analysis in Section 5.2 and in Appendix 5.2-A considers the low impact development (LID), hydrology, and hydromodification best management practices (BMPs) planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with

Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The LID, BMPs, and source controls that will achieve the water quality and hydromodification objectives (Draft EIR Section 5.4) discussed in the Draft EIR are also described in detail in Section 5 of Draft EIR Appendix 5.4-A, Centennial Master Plan Hydrology, and Appendix 5.4-B, Centennial Water Quality Technical Report. Draft EIR Sections 5.2 and 5.4 and Draft EIR Appendices 5.2-A, 5.4-A, and 5.4-B demonstrate that water quality and hydromodification control measures can be feasibly implemented throughout the Project in a manner that will protect all applicable surface and groundwater beneficial uses and meet all applicable surface water and groundwater quality objectives in the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan.

MM 4-1 requires that the Project implement LID and water quality control BMPs that achieve the applicable Los Angeles County LID performance standards. These performance standards were used to design the LID and BMP controls identified in Draft EIR Sections 5.2 and 5.4 and Draft EIR Appendices 5.2-A, 5.4-A, and 5.4-B. Consequently, MM 4-1 requires that the Project implement LID and BMP controls will achieve the same water quality and hydromodification controls identified in the Draft EIR. In addition, MM 4-1 requires that compliance with the applicable Los Angeles County LID performance standards must be confirmed by the County as part of each tentative tract map application. MM 4-1 will also be incorporated into the Project MMRP and enforceable by the County. Consequently, pursuant to MM 4-1, the Project is subject to mandatory, enforceable LID and BMP control requirements that must meet applicable Los Angeles County LID performance standards. MM 4-1 also requires that the Project identify and demonstrate that specific LID and BMP controls meet the applicable Los Angeles County LID performance standards as part of the County review and approval process for each tract map. MM 4-1 thus imposes specific mitigation requirements that are consistent with the Draft EIR analysis and ensures that water quality protections will be implemented with each tract map that are at least as effective as those discussed in Draft EIR Sections 5.2 and 5.4 and Draft EIR Appendices 5.2-A, 5.4-A, and 5.4-B.

Response to Comment F.8-103:

The Draft EIR provides a detailed and thorough analysis of water quality impacts potentially associated with all proposed Project development and land uses, including to wildlife, in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Pertinent hydrological information for the water quality analysis in included in Section 5.2, Hydrology and Flood, Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report. As discussed on pages 5.4-31 to 5.4-34 of the Draft EIR, the Project analysis of water quality impacts considered a representative range of potential pollutants of concern that could affect surface and groundwater from the construction and development of the Project based on the proposed land uses in the Project site. Pollutants of concern were analyzed in the Draft EIR if they exhibited one or more of the following deleterious characteristics: (a) current loadings or historic deposits of a pollutant impact the beneficial uses of a receiving water; (b) elevated levels of a pollutant are found in sediments of a receiving water and/or

have the potential to bioaccumulate in organisms therein; or (c) the detectable inputs of a pollutant at concentrations or loads would be considered potentially toxic to humans and/or flora and fauna.

The Draft EIR analyzed pollutants of concern that are anticipated to be or could potentially be generated by the Project at concentrations that exhibit any of the these characteristics based on water quality data collected in Los Angeles County from land uses that are proposed by the Project, consideration of the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, California Toxic Rule (CTR) criteria, and current federal Clean Water Act Section 303(d) listings. The reasons for identifying certain pollutants of concern, the significance criteria used to analyze these constituents, and the rationales for not considering certain potential constituents in the analysis are discussed in detail in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. As discussed on pages 5.2-38 to 5.2-39, the Draft EIR water quality impact analysis quantitatively analyzes the following pollutants of concern for which there are sufficient flow composite sampling data in the Los Angeles County database:

- TSS (sediment)
- Total Phosphorus
- Nitrate Nitrite-Nitrogen, Ammonia, and Total Nitrogen
- Total and Dissolved Copper
- Total Lead
- Total and Dissolved Zinc
- Chloride

Post-development storm water runoff water quality impacts associated with the following pollutants of concern that could be generated by proposed Project land uses, including commercial and industrial land uses, were qualitatively addressed due to the unavailability of flow composite sampling data based on literature information and professional judgment:

- Turbidity
- Pesticides
- Pathogens (bacteria, viruses, and protozoa)
- Petroleum hydrocarbons (oil and grease, PAHs)
- Trash and debris
- MBAS
- Toxicity
- Emerging Contaminants

As discussed on Draft EIR pages 5.4-21 to 5.4-22, the Draft EIR considered all of the applicable Lahontan Regional Water Quality Control Board Basin Plan and Los Angeles Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, including Basin Plan beneficial uses and water quality objectives that protect wildlife and wildlife habitat.

The Lahontan Regional Water Quality Control Board Basin Plan wildlife and habitat beneficial use designations considered in the Draft EIR include:

- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

Los Angeles Regional Water Quality Control Board Basin Plan wildlife and habitat beneficial use designations considered in the Draft EIR include:

- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

Other Lahontan Regional Water Quality Control Board Basin Plan surface water beneficial use designations considered in the Draft EIR include:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential);
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential);
- GWR: Natural or artificial groundwater recharge (existing or potential);
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential);
- REC-1: Recreational bodily contact with water, where ingestion is reasonably possible (existing or potential);
- REC-2: Recreational activities involving contact in proximity to water, but not involving body contact (existing or potential);
- COMM: Commercial or recreational collection of fish or other organisms (existing or potential).
- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;

- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential).
- IND: Industrial activities that do not depend primarily on water quality (existing or potential).
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential).

Other Los Angeles Regional Water Quality Control Board Basin Plan surface water beneficial use designations considered in the Draft EIR include:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (intermittent and conditional [i.e., may be considered for exemptions at a later date]).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (intermittent).
- GWR: Natural and artificial groundwater recharge (intermittent).
- REC-1: Recreational bodily contact with water where ingestion is reasonably possible (intermittent).
- REC-2: Recreational activities involving contact in proximity to water (intermittent).
- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Los Angeles Regional Water Quality Control

Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing).
- IND: Industrial activities that do not depend primarily on water quality (potential).
- PROC: Industrial activities that depend primarily on water quality (existing).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing).

The quantitative analysis approach utilized in the Draft EIR is discussed on pages 5.4-37 and 5.4-38, and includes the use of hourly rainfall data measured at the nearest gage to the Project site for storm over 30 years. Event Mean Concentrations (EMCs) pollutant concentrations for proposed Project land uses are estimated from data collected in Los Angeles County where sufficient data existed for the applicable pollutants of concern. Pollutant loads were estimated as the product of the storm event runoff times the EMC, and individual storm event loads are added to estimate the annual load. The analysis considers the LID, hydrology, and hydromodification BMPs planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The mean pollutant concentrations and loads in storm water are estimated following treatment, including capture by the LID, hydrology, and hydromodification BMPs for each storm event, taking into consideration the intensity of rainfall, duration of the storm, and duration between storm events. The analysis accounted for conditions when a treatment facility would be full and flows would bypass the facility as well as runoff volume reductions from the BMPs due to infiltration and evaporation. The analysis uses representative data for local conditions and infiltration parameters are based on soil hydrologic groups, soil texture classes, and the federal Natural Resource Conservation Service Soil Survey of the Project area. To conservatively reflect post-development conditions, soil compaction impacts were modeled for post-development open and landscaped areas assuming a 25 percent reduction in saturated hydraulic conductivity, or infiltration rate, from the pre-developed to post-developed conditions and impervious surfaces were modeled assuming no infiltration.

The results of the quantitative analysis for pollutants of concern are discussed on Draft EIR pages 5.4-57 to 5.4-69 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The results of the qualitative analysis of pollutants of concern are discussed on Draft EIR pages 5.4-75 to 5.4-89 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The Draft EIR analysis demonstrates that with the implementation of LID, hydrology, and hydromodification BMPs that meet the performance requirements of MMs 2-1, 4-1, and 4-2, which will be incorporated into the Project MMRP and enforceable by the County, none of the pollutants of concern would exceed applicable water quality objectives for all Lahontan and Los Angeles Basin Plan beneficial uses, including wildlife and habitat beneficial uses, under Project construction or operational (buildout) conditions.

As discussed on pages 5.4-77 and 5.4-78, the Draft EIR considers potential water quality impacts in the Project area and in offsite receiving waters, from: (a) legacy organochlorine pesticides including Chlordane, Dieldrin, DDT and Toxaphene; (b) organophosphate pesticides that largely replaced organochlorine pesticides, including diazinon and chlorpyrifos; (c) pyrethroid pesticides, which are a synthetic form of naturally occurring pyrethrins; and (d) fipronil and its related degradates (fipronil desulfinyl, fipronil sulfone, and fipronil sulfide). The analysis discloses the potential toxicity of these and other urban pesticides in relation to their degradation rates in water and sediments. The analysis states that most pesticides, including historical pesticides that may be present at the site, are relatively insoluble in water and tend to adsorb to the surfaces of sediment, which would be stabilized with development or, if eroded, would be settled or filtered out of the water column by the Project's regional and distributed LID BMPs required by MM 4-1 (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations and Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The discussion states that potential pesticide impacts will be further reduced by implementing an Integrated Pest Management (IPM) program consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and the Natural Resources Statewide Integrated Pest Management Program. The IPM program will prevent or suppress pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and limited use of pesticides with applicable IPM BMPs required by MM 4-2. The implementation of LID BMPs under MM 4-1 and IPM measures in accordance with MM 4-2 must be confirmed by the County as part of each tentative tract map application, and both mitigation measures will be incorporated into the Project MMRP and enforceable by the County. Consequently, the Draft EIR provides a thorough analysis of water quality impacts related to Project construction and operations (buildout), including from potential urban use of and legacy pesticides, and that considers potential impacts to wildlife.

Section 5.7 of the Draft EIR provides an analysis of all Project impacts on biological resources on and adjacent to the site. The impact analysis includes both project construction as well as direct and indirect long-term impacts on biological resources associated with Project implementation such as the increased human activity described in Section 5.7.6. In addition, many of the impacts are considered significant and mitigation is required which specifically pertains to human activity such as MM 7-17 on pages 5.7-192 and 5.7-193.

In addition, as described above, the Draft EIR provides a detailed and thorough analysis of water quality impacts, including pollutants potentially associated with all proposed Project development and land uses to determine if they exhibited deleterious characteristics to flora and fauna. The analysis concludes that none of the pollutants of concern would exceed applicable water quality objectives for beneficial uses pertaining to wildlife and habitat under Project construction or operational (buildout) conditions. As a result, downstream aquatic and riparian habitat and associated wildlife would not be impacted to any measurable degree.

Response to Comment F.8-104:

This comment references a portion of MM 4-2 on Draft EIR page 5.4-30. The full mitigation measure is on Draft EIR pages 5.4-30 and 5.4-31. MM 4-2 requires that the Project implement an integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program (IPM Program). The IPM program is widely recognized as the leading authority for providing documentation and guidance for the implementation of pest management approaches in urban (and other) contexts that avoid and minimize the use of pesticides and other measures that could harm the environment and wildlife other than the target pests.

As discussed on Draft EIR page 4-81, and in Draft EIR Appendix 5.4-A, Centennial Water Quality Technical Report, Section 5.2.1, IPM is a strategy that focuses on long-term prevention or suppression of pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and the judicious use of pesticides according to treatment thresholds, when monitoring indicates pesticides are needed because pest populations exceed established thresholds. The integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program are publicly available at http://www.ipm.ucdavis.edu/. As discussed in Draft EIR Appendix 5.4-A, the Project will implement the IPM guidelines by incorporating several requirements identified by the IPM Program, including (1) identifying the key decision IPM decisions makers, other key roles (such as the recordkeeping), and the IPM funding mechanisms; (2) identifying plant species and potential pests for these plant species; (3) identifying management strategies for each potential pest consistent with IPM guidelines, such as modifying landscaping to be less conducive to pest survival, using pest- resistant plant varieties, using mulch to suppress weeds, encouraging naturally occurring biological controls, educating the public to be more tolerant of pests, removing pests mechanically or with barriers and traps, developing a list of pesticides that are less toxic to the environment, and developing formulations that will control the pest if other methods are not successful; (4) monitoring to examine vegetation and surrounding areas for pests to evaluate trends and to identify when controls are needed; (5) establishing injury levels and action thresholds for each potential pest that is listed in the IPM; (6) describing cultural, mechanical, environmental, and biological pest control methods and pesticides authorized for use, including specific criteria for selecting pest management methods that are least disruptive to natural controls and least damaging to water quality, and procedures for evaluating the effectiveness of the control method; (7) describing soil assessment techniques, fertilizer types, application methods, and proper storage and handling of fertilizers; (8) incorporating pesticide safety; regulatory requirements; spill mitigation; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training requirements; (9) describing low volume water approaches to landscape irrigation, the training to be provided to landscape crews that will focus on applying water only when needed to enhance plant root growth, managing irrigation to avoid conditions conducive to disease

development, and minimizing runoff containing pollutants; (10) identifying record keeping requirements; (11) identifying training requirements for pest management personnel; and (12) describing the methods to be used to evaluate the overall effectiveness of the IPM program and a schedule for reviewing the IPM to incorporate new technology.

MM 4-2 requires that compliance with the IPM guidelines and landscaping BMPs must be confirmed in a landscaping plan submitted to the County during the review and approval process for each tract map application. Consistent with the IPM Program guidelines, the plan must address:

- Pest identification.
- Practices to prevent pest incidence and reduce pest buildup.
- Monitoring requirements to examine vegetation and surrounding areas for pests; to evaluate trends; and to identify when controls are needed.
- Establishment of action thresholds that trigger control actions.
- Pest-control methods (cultural, mechanical, environmental, biological) and appropriate pesticides.
- Pesticide management controls including those that comply with safety requirements (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); regulatory requirements; spill mitigation measures; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation).
- Fertilizer management tasks including those for soil assessment, fertilizer types, application methods, and storage and handling.

To further clarify these requirements, the first paragraph of MM 4-2 is hereby modified to read as follows:

> The Project shall implement integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program <u>which are available online at http://www.ipm.ucdavis.edu/</u>. <u>The integrated pest management program will be provided to the County in association with the Landscape Plan submitted to the County with each tentative tract map.</u> The IPM and landscaping BMPs shall be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The BMPs shall include a Planting Plan that is consistent with the plant water use requirements of Section 3.~~3~~<u>4</u> of the Centennial Specific Plan; with procedures for removing non- native vegetation and planting native vegetation; with fertilizer guidelines; and with the IPM approach for

> preventing or suppressing pest problems (i.e., insects and diseases). This shall be done through a combination of techniques including using pest-resistant plants; using biological controls; incorporating cultural practices; including habitat modification; and judiciously using pesticides. The IPM and landscaping BMPs shall, in addition to identifying IMP and landscaping BMP management and funding roles and responsibilities, monitoring, training, and timely IPM and BMP program review requirements to incorporate new technologies that may become available, address the following:

MM 4-2 identifies IPM requirements that have been developed by recognized pest management experts affiliated with the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program and requires that the Project demonstrate compliance with IPM requirements during the County review and approval process for each Project tract map. MM 4-2 will also be incorporated into the Project MMRP and enforceable by the County. Consequently, the Project is subject to mandatory, enforceable IPM compliance requirements that implement the IPM guidelines developed by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program.

Response to Comment F.8-105:

This comment references a portion of MM 4-2 on Draft EIR page 5.4-30. The full mitigation measure is on Draft EIR pages 5.4-30 and 5.4-31. MM 4-2 requires that the Project implement an integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program (IPM Program). The IPM program is widely recognized as the leading authority for providing documentation and guidance for the implementation of pest management approaches in urban (and other) contexts that avoid and minimize the use of pesticides and other measures that could harm the environment and wildlife other than the target pests.

As discussed on Draft EIR page 4-81, and in Draft EIR Appendix 5.4-A, Centennial Water Quality Technical Report, Section 5.2.1, IPM is a strategy that focuses on long-term prevention or suppression of pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and the judicious use of pesticides according to treatment thresholds, when monitoring indicates pesticides are needed because pest populations exceed established thresholds. The integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program are publicly available at http://www.ipm.ucdavis.edu/. As discussed in Draft EIR Appendix 5.4-A, the Project will implement the IPM guidelines by incorporating several requirements identified by the IPM Program, including (1) identifying the key decision IPM decisions makers, other key roles (such as the recordkeeping), and the IPM funding mechanisms; (2) identifying plant species and potential pests for these plant species; (3) identifying management strategies for each

potential pest consistent with IPM guidelines, such as modifying landscaping to be less conducive to pest survival, using pest- resistant plant varieties, using mulch to suppress weeds, encouraging naturally occurring biological controls, educating the public to be more tolerant of pests, removing pests mechanically or with barriers and traps, developing a list of pesticides that are less toxic to the environment, and developing formulations that will control the pest if other methods are not successful; (4) monitoring to examine vegetation and surrounding areas for pests to evaluate trends and to identify when controls are needed; (5) establishing injury levels and action thresholds for each potential pest that is listed in the IPM; (6) describing cultural, mechanical, environmental, and biological pest control methods and pesticides authorized for use, including specific criteria for selecting pest management methods that are least disruptive to natural controls and least damaging to water quality, and procedures for evaluating the effectiveness of the control method; (7) describing soil assessment techniques, fertilizer types, application methods, and proper storage and handling of fertilizers; (8) incorporating pesticide safety; regulatory requirements; spill mitigation; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training requirements; (9) describing low volume water approaches to landscape irrigation, the training to be provided to landscape crews that will focus on applying water only when needed to enhance plant root growth, managing irrigation to avoid conditions conducive to disease development, and minimizing runoff containing pollutants; (10) identifying record keeping requirements; (11) identifying training requirements for pest management personnel; and (12) describing the methods to be used to evaluate the overall effectiveness of the IPM program and a schedule for reviewing the IPM to incorporate new technology.

MM 4-2 requires that compliance with the IPM guidelines and landscaping BMPs must be confirmed in a landscaping plan submitted to the County during the review and approval process for each tract map application. Consistent with the IPM Program guidelines, the plan must address:

- Pest identification.
- Practices to prevent pest incidence and reduce pest buildup.
- Monitoring requirements to examine vegetation and surrounding areas for pests; to evaluate trends; and to identify when controls are needed.
- Establishment of action thresholds that trigger control actions.
- Pest-control methods (cultural, mechanical, environmental, biological) and appropriate pesticides.
- Pesticide management controls including those that comply with safety requirements (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); regulatory requirements; spill mitigation measures; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation).

- Fertilizer management tasks including those for soil assessment, fertilizer types, application methods, and storage and handling.

To further clarify these requirements, the first paragraph of MM 4-2 is hereby modified to read as follows:

> The Project shall implement integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program which are available online at http://www.ipm.ucdavis.edu/. The IPM and landscaping BMPs shall be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The BMPs shall include a Planting Plan that is consistent with the plant water use requirements of Section 3.~~3~~4 of the Centennial Specific Plan; with procedures for removing non- native vegetation and planting native vegetation; with fertilizer guidelines; and with the IPM approach for preventing or suppressing pest problems (i.e., insects and diseases). This shall be done through a combination of techniques including using pest-resistant plants; using biological controls; incorporating cultural practices; including habitat modification; and judiciously using pesticides. The IPM and landscaping BMPs shall, in addition to identifying IMP and landscaping BMP management and funding roles and responsibilities, monitoring, training, and timely IPM and BMP program review requirements to incorporate new technologies that may become available, address the following:

MM 4-2 identifies IPM requirements that have been developed by recognized pest management experts affiliated with the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program and requires that the Project demonstrate compliance with IPM requirements during the County review and approval process for each Project tract map. MM 4-2 will also be incorporated into the Project MMRP and enforceable by the County. Consequently, the Project is subject to mandatory, enforceable IPM compliance requirements that implement the IPM guidelines developed by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program.

As discussed on Draft EIR page 5.7-48, the California tree frog, California toad, and the black-bellied salamander are common species and not special status or "sensitive" species as stated in the comment. In addition, it is widely recognized that one of the basic objectives of the IMP Program is to develop effective pest management methods that minimize environmental harm and protect wildlife and wildlife habitats The University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program specifically states that the IPM is a process to "solve pest problems while minimizing risks to people and the environment" and to address pest control "in a manner that minimizes risks

to human health, beneficial and nontarget organisms, and the environment".[1732] The fact that the IPM Program includes the protection of sensitive wildlife and habitats has also been recognized by several other State and federal environmental protection and wildlife agencies and programs, including the -U.S. Environmental Protection Agency (EPA); the University of California, Division of Agriculture and Natural Resources; the U.S. Fish and Wildlife Service; and the Natural Resources Conservation Service or the U.S. Department of Agriculture. The table below provides a summary of statements and applicable online sources published by these agencies and institutions.

Representative Agency and Institutional References to Integrated Pest Management and Environmental Protection Objectives

Statement	Reference
IPM is an effective and environmentally-sensitive approach that offers a wide variety of tools to reduce contact with pests and exposure to pesticides. Knowledgeable, proactive stakeholders can enable a community to prevent or significantly reduce pollution from unnecessary pesticide use.	Introduction to Integrated Pest Management, USEPA. https://www.epa.gov/managing-pests-schools/introduction-integrated-pest-management#main-content
IPM is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.	University of California Division of Agriculture and Natural Resources Publication 8093, 2003. Establishing Integrated Pest Management Policies and Programs: A Guide for Public Agencies. http://anrcatalog.ucanr.edu/pdf/8093.pdf
IPM considers if there are sensitive resources present at some of the sites, such as rare or listed species, these resources and their locations are discussed and low-risk treatment options are selected to protect the sensitive species or sites. For example, if an infestation is present on lands deemed "high risk potential" for groundwater contamination, an herbicide treatment that might contaminate groundwater resources would be inappropriate. Similarly, a broad-spectrum herbicide would be inappropriate unless it was used as a spot treatment only on the targeted pest and precautions are identified to reduce drift, leaching, and runoff to nearby sensitive areas. The IPM process includes comparing all chemical treatments to endangered species and ground/surface water sensitivity analysis models to ensure that herbicide applications pose a minimal risk to these biologically sensitive areas.	US Fish and Wildlife Service, Integrated Pest Management Plan, 2004-2009, Devils Lake Wetland Management Complex, Devils Lake, North Dakota. No date. https://www.fws.gov/invasives/staffTrainingModule/pdfs/planning/IPM%20PLAN%20Jim%20Revised3-22-f05%20Times%20Roman.pdf
IPM practices have been developed to improve pest control while minimizing impacts on beneficial species, such as pollinators. Integrated pest management protects pollinators by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks. It is a long-	US Fish and Wildlife Service IPM Fact Sheet, October 2006. https://www.fws.gov/pollinators/pdfs/IPMpol.pdf

[1732] University of California, Division of Agriculture and Natural Resources (UCANR). 2017. What is Integrated Pest Management (IPM)? UCANR: CA. http://www2.ipm.ucanr.edu/WhatIsIPM/.

Statement	Reference
standing, science-based, decision-making process that coordinates the use of pest biology, environmental information, and available technology to prevent unacceptable levels of pest damage by the most economical means, while posing the least possible risk to people, property, resources, and the environment, including pollinators. IPM provides an effective strategy for managing outdoor (backyards, golf courses, natural areas) and indoor (homes and businesses) pests. IPM serves as an umbrella to provide an effective, all encompassing, minimal-risk approach to protect wildlife, wildlife habitats, and people from pests.	
Integrated Pest Management (IPM) ideally combines biological and cultural controls with limited pesticide use to keep pest populations below economically damaging levels, prevent future pest problems, and minimize the harmful effects of pesticides on humans and natural resources, including wildlife. IPM limits pesticide use, which affects non-target species such as beneficial insects and wildlife. Estimates of wild birds killed in the United States every year by exposure to legally applied pesticides range in the tens of millions. Aquatic invertebrates, fish, amphibians, mammals, and others are also at risk. Insects are a major vehicle for pollination in orchards and vineyards, but their populations decrease after pesticide misuse. Herbicides can reduce or eliminate potential wildlife food and cover plants. Use of insecticides can reduce beneficial invertebrate populations that help control pests and are important food sources to many wildlife species. By using insecticides to address pest problems only where other measures fail to achieve the desired level of control, IPM seeks to minimize the negative effects of pesticide use on wildlife and other natural resources.	Natural Resources Conservation Service, U.S. Department of Agriculture, IPM and Wildlife Fact Sheet, April 2004. https://policy.nrcs.usda.gov/OpenNonWebContent.aspx?content=18487.wba

Response to Comment F.8-106:

The comment correctly states that the Project includes the construction of many detention and retention basins as part of the drainage plan. However, all of the Project basins are designed to attenuate flows during high flow events only with drawdown immediately thereafter. As a result, ponded water is not expected to persist for more than a few days on average and not more than a week for a major precipitation event. Pertinent hydrological information is included on pages 5.2-48 and 5.2-49 of Section 5.2, Hydrology and Flood, of the Draft EIR as well as generally in Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report. The American bullfrog (*Lithobates catesbeianus*), is an invasive species in California and is known to be harmful to many native wildlife species as noted in the comment. However, the habitat requirements for this species include year-round permanent pools. The limited inundation period of the basins created by the Project is not sufficient to represent suitable bullfrog habitat and would not attract or harbor this species.

Response to Comment F.8-107:

The cited statements about habitat destruction are noted and were considered when preparing the Draft EIR. Section 5.7.6, Environmental Impacts, includes an in-depth analysis of impacts to biological resources such as: special status plants,[1733] wildlife,[1734] and vegetation;[1735] wildlife movement;[1736] and jurisdictional resources,[1737] among others. Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity are included in Section 5.7.7, Mitigation Measures, in the Draft EIR to reduce impacts to these biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR.

Response to Comment F.8-108:

The Commenter's opinions regarding habitat loss and use by future species is noted. The Draft EIR includes an assessment of all species at the project and cumulative impact levels. The Draft EIR conclusion that habitat loss is not an adverse impact on wildlife resources at a project or cumulative level[1738] is consistent with the independent judgement of the scientists and representatives of the six leading environmental groups that signed the Tejon Ranch Land Use and Conservation Plan, as described in response to Comment F.3-12 above. The Antelope Valley Area Plan (AVAP) concentrates development within designated Economic Opportunity Areas (including the West EOA location of the Project site), which the AVAP EIR concludes is environmentally superior to the development pattern allowed under the former Town & Country Area Plan in relation to multiple environmental resource considerations, including reduced impacts to biological resources.[1739]

As stated in response to Comment F.8-107, based on State CEQA Guidelines, the Draft EIR analyzes and mitigates potentially significant indirect impacts (such as light and noise) to a less than significant level (MMs 7-15 through 7-19,[1740] MM 11-3,[1741] MM 13-2,[1742] and MM 13-6[1743]). As discussed in Section 5.2, Hydrology and Flood, and Section 5.4, Water Quality, regional and distributed water quality treatment measures (e.g. regional detention and retention basins and parcel-specific measures) will meet County Low Impact

1733 DRP 2017, pp. 5.7-142 to -145
1734 *Id.,* pp. 5.7-145 to -153
1735 *Id.,* pp. 5.7-155 to -162, -171 and -172
1736 *Id.,* pp. 5.7-164 to -170
1737 *Id.,* pp. 5.7-162 to -164
1738 *Id.,* pp. 5.7-145 to -153, 7-16
1739 DRP 2014a, Section 7; DRP 2014b, Response A4, Response to comments from Ileene Anderson, Center for Biological Diversity
1740 DRP 2017, pp. 5.7-166 to -170, -191 to -194
1741 *Id.,* p. 5.11-79
1742 *Id.,* pp. 5.13-29 and -30
1743 *Id.,* p. 5.13-31

Development (LID) standards for new development and will provide sufficient treatment capacity to reduce potential surface and ground water quality (MM 2-1[1744] and MM 4-1[1745]).

Section 5.7.6, Environmental Impacts, includes an analysis of direct impacts. Regarding pollution in the form of pesticides and rodenticides, MM 4-2 in the Draft EIR will be modified to prohibit the use of rodenticides containing anticoagulants on the Project site or Mitigation Preserve lands. With this prohibition, the other suggestions in the comment are not required. The following text will be added as the seventh bullet (last bullet) to MM 4-2 in Section 5.4, Water Quality:

- All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.

Regarding the spread of non-native and invasive species PDF 7-8 described on page 5.7-140 of the Draft EIR requires the preparation and update of a list of invasive plants species to be prohibited from use within the Project site, to be distributed to residents. If these species are on the list, they will be prohibited from use on the Project site.

Regarding habitat fragmentation and loss of mobility due to fencing; species expected to utilize the internal open space areas following Project buildout are expected to consist predominantly of common urban and suburban adapted species. These species are able to persist in these environments regardless of typical fencing and such barriers by using streets and green space areas. In addition, the Project has been designed to include are green space connections between undeveloped open space areas where feasible resulting in increased mobility for such species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is considered less than significant accordingly.[1746]

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[1747] to reduce impacts to biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed in Section 7.0, Cumulative impacts of the Draft EIR.

[1744] *Id.,* p. 5.2-49
[1745] *Id.,* p. 5.4-90
[1746] *Id.,* p. 5.7-166
[1747] *Id.,* pp. 5.7-173 to -194

Response to Comment F.8-109:

The Commenter's opinion about urban infill projects is noted. Regarding corridors, as discussed on pages 5.7-63 and 5.7-64 of the Draft EIR, Oso Canyon and its many tributaries west of the Aqueduct and the east-west-oriented drainages that are located east of the Aqueduct are undoubtedly used by some animals as local travel paths as they move across their home range areas that include the Project site; however, the Aqueduct effectively serves to block east-west movement on the site for most ground-dwelling wildlife. Limited opportunities for wildlife to cross the Aqueduct have been identified at a few locations, but wildlife movement across that formidable barrier is expected to be a rare event. Because of the presence of cover and canopy provided by trees and shrubs, and because of the availability of seasonal water, the drainage area immediately north of State Route 138 (SR-138) and east of the Aqueduct on the Project site can serve as a valuable foraging resource area. Most wildlife using this area likely access it for water and/or to forage by crossing SR-138 from the more vegetated upland areas to the south of SR-138. Because individuals of many of the larger wildlife species in the region tend not to cross large expanses with sparse shrub cover (typical of the majority of the Project site), the central and eastern portions of the Project site are not likely to be used by the larger species to disperse between and within the regional open space areas in the site vicinity. The Project site does provide unobstructed local movement opportunities for small animals and aerially dispersing plants and animals that reside in the area. In addition, the Project design has incorporated undercrossing to facilitate local movement across SR-138. In addition, PDF 7-7 on page 5.7-139 of the Draft EIR requires the applicant to explore locating a wildlife-friendly crossing across the Aqueduct with the California Department of Water Resources. The ideal location for such a crossing would be adjacent to Quail Lake or adjacent to the new bridge proposed across the Aqueduct. Final design of any such crossing shall be reviewed and approved by Los Angeles County. Lastly, MM-14, described on page 5.7-190 and 5.7-191, sets forth the specific requirements for the undercrossing located where the SR-138 crosses the Project's western border near the current intersection with Cement Plant and requires an open space buffer near the bridge of the aqueduct for the Cement Plant Road and other areas to allow for greater wildlife mobility.

As mentioned in MM 7-3 on page 5.7-177 and MM 7-20 on page 5.7-194, Project fencing requirements are temporary and used to prevent wildlife entry into an area for their protection during a construction or land preparation period then removed. Also, the Project's fencing requirements shall be consistent with the Antelope Valley Area Plan (AVAP) biological resources policies. As listed on page 5.7-9, Policy COS 4.7 of the AVAP, where fencing is necessary for privacy or safety, require appropriate development standards that maximize opportunities for wildlife movement. Please also see response to Comment F.8-108. In addition, in an effort to minimize impacts of fencing, MM 7-15 shall be modified to add an additional paragraph to the end as follows:

> <u>All vertical open pipes used for fence posts, property line stakes, signs, roof veneration, chimneys, vault toilets, and similar structures and metal fence stakes used on the Project shall be capped. Capping can be accomplished</u>

> using bolts or other materials to avoid raptor talons becoming entrapped within the bolt holes of metal fence stakes.

In addition, the first sentence of MM 7-4 on page 5.7-177 is hereby modified as follows:

> All open space preservation areas adjacent to active construction sites shall be denoted with wildlife-friendly fencing installed and maintained during construction to ensure that construction activities remain within the development footprint.

The development areas of the Project site have been selected for this use consistent with other regional planning efforts. As described on page 5.7-16 of the Draft EIR, the Tejon Ranch Company (TRC) entered into a Conservation and Land Use Agreement (TRCRWA) with Audubon California, the Endangered Habitats League, the Natural Resources Defense Council, the Planning and Conservation League, the Sierra Club (Resource Groups), and the then newly formed, independent non-profit Tejon Ranch Conservancy (Conservancy). The TRCRWA covers the Centennial Project site and the remainder of Tejon Ranch (Ranch). The TRCRWA allows TRC and its development partners to pursue approvals from permitting agencies to develop portions of the Ranch, including the Project site, while providing for the designation and permanent protection of approximately 145,000 acres of contiguous open space areas immediately north of the Project site, to protect the biological resources and wildlife connectivity of the 270,000-acre Ranch. The TRCRWA also established options for the dedication or sale of approximately 62,000 acres in five additional areas of the Ranch for further open space preservation. In addition, 33,000 acres of designated open space within the development areas have been preserved. Collectively, these open space dedication and acquisition areas comprise approximately 240,000 acres, or approximately 90 percent of the 270,000-acre Ranch.

In addition, the TUMSHCP ensures the persistence of covered species, including sustaining viable populations of those species, providing for (within property dispersal) and protecting current opportunities for wildlife movement beyond the Ranch by preserving existing landscape linkages. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and the measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages across cismontane Southern California.

The TUMSHCP will be a major contributor to ensuring the viability of the Tehachapi Landscape linkage into the future. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species

occur in the foothills and lowland areas as well, including the Project site. These species will benefit from the TUMSHCP, in addition to the Centennial Mitigation Preserve program described in the Draft EIR.

Lastly, the Project design is consistent with the AVAP inclusive of open space designations, SEA protection, and preservation of habitat linkages.[1748] The AVAP is a community-based plan that is a subset of the County of Los Angeles General Plan, which includes the Project area. The AVAP EIR provides an analysis of all potential, reasonably foreseeable environmental impacts related to the implementation of the AVAP "to indicate possible ways to reduce or avoid environmental damage and to identify alternatives" to the AVAP.[1749] Additionally, the AVAP EIR discloses "significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present and reasonably foreseeable future projects."[1750] The development areas of the Project, as required, fall within the AVAP designated development areas.

Also note, regarding use of toxic pesticides and herbicides, MM 4-2 in the Draft EIR will be modified to prohibit the use of rodenticides containing anticoagulants on the Project site or Mitigation Preserve lands.[1751] The following text will be added as the seventh bullet (last bullet) to MM 4-2 in Section 5.4, Water Quality:

- <u>All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.</u>

Furthermore, the Draft EIR includes PDF 4-2 and MM 4-2 in Section 5.4, Water Quality, which require that the Project implement an Integrated Pest Management (IPM) program consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and the Natural Resources Statewide Integrated Pest Management Program. The IPM program must prevent or suppress pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and judicious use of pesticides. Pesticide management BMPs will be implemented to promote safety (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); compliance with regulatory requirements; spill mitigation; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation).[1752] MM 4-2 provides more than guidelines for development of the IPM; it sets forth a performance standard that requires prevention or suppression of pest problems through a combination of techniques

[1748] DRP 2017, Table 5.8-1, pp. 5.8-23 to -70
[1749] DRP 2014, p. 2-1
[1750] *Ibid.*
[1751] DRP 2017, p. 5.4-90
[1752] *Id.,* pp. 5.4-30, -90

described above.[1753] Additionally, the Landscaping Plan, which includes the IPM and landscaping BMPs, must be submitted to the County for review and approval for each tract map.[1754]

Response to Comment F.8-110:

Although there is high biological value on portions of the Project site, the majority of the site has been heavily grazed by cattle for many years, which has led to a relatively pervasive invasion of non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*).[1755] The Commenter's opinion that the site should not be developed is noted. In addition, the statement that the Project site provides crucial linkages for imperiled terrestrial animals and avian species, is not supported by the results of expert assessment of the Project site. Please see pages 5.7-50 through 5.7-64 and pages 5.7-164 through 5.7-170 of the Draft EIR for an in-depth and adequate discussion of wildlife movement, which includes post-Project impact considerations, connectivity of different guilds, and a complete evaluation on the Project's impacts on wildlife movement. Various regional wildlife studies have been conducted on the Project site (see Table 5.7-2 in Section 5.7-3, Environmental Setting). The conclusion of these studies has been that the sparse vegetation occurring on the Project site, coupled with the existing barriers of the California Aqueduct (both West Branch and East Branch) and Interstate 5, is not favorable for wildlife movement across the site as part of regional migration and local movement. Please note that considerable consideration is given to major movement deterrents in the Project area, including the SR-138 and the California aqueduct, due to their substantial potential to prevent movement of some wildlife. Accordingly, passage points (some of which are bridges) are discussed at length accordingly. SEA 17 is widely recognized as a crucial linkage area for the region and contains many undisturbed habitats. The Project has been designed to avoid direct impacts to SEA 17 completely (see Exhibit 4-11 in Section 4.0, Project Description). Also, see response to Comment F.8-109 for discussion of the Project's consistency with regional planning efforts including the TRCRWA, TUMSHCP, and the AVAP.

Response to Comment F.8-111:

The comment expresses an opinion about the Project. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

Response to Comment F.8-112:

With respect to the biological importance of Tejon Ranch and the Project site and preservation of contiguous lands, see response to Comment F.7-22.

[1753] *Id.,* pp. 5.4-30, -31, -79, -90, -91
[1754] *Id.,* p. 5.7-190, MM 7-13
[1755] *Id.,* p. 5.7-159

It should be noted that while the Project site is within the general region of convergence of three biological regions, it does not contain this convergence within its borders. Rather, the convergence is generally occurring in the area, inclusive of on-site as well as mostly off-site lands.[1756] The geological fault line information and impacts related thereto are discuss in the Draft EIR Section 5.1, Geotechnical. In addition, although there is high biological value on portions of the Project site, much of the site has been impacted by non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*).[1757] Similarly, riparian areas are degraded in most of the low-lying drainages. Consequently, biological diversity is less than would otherwise be expected in many areas. However, native grasslands occur in a patchy distribution throughout large portions of the site which may be attributed to the grazing, which has potentially minimized non-native growth to a level sufficient to allow persistence of native perennial bunch grasses, as described on pages 5.7-42 through 5.7-47 of the Draft EIR. Project implementation would include mitigation actions (see Section 5.7.7, Mitigation Measures, of the Draft EIR) resulting in improved functions and values of many of these resources, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR.

Lastly, Section 5.7 of the Draft EIR provides a complete project-level assessment of the biological resource impacts of the Centennial Project. All data collected for the Project are presented and analyzed using the best available scientific information to determine the impacts of the Project as required.

Response to Comment F.8-112A:

The footnote refers to the report: *Proposed Reserve Design for Tejon Ranch – A Threatened California Legacy*.[1758] This report discusses a proposed reserve that combines four landscape unit-specific reserve designs into a single reserve system for the Tejon Ranch totaling 246,382 acres. The original comment advocates that the proposed reserve will help maintain the regional uniqueness. See response to Comment F.8-112. The design of the proposed reserve suggested by the authors is based on larger general landscape level analysis. However, it lacks nearly all of the Centennial site-specific studies that are utilized in the Draft EIR. The assessment of the existing and impacted biological resources and the corresponding biological values of the Project site and adjacent areas as described in Section 5.7, Biological Resources, of the Draft EIR provide a far greater and more detailed level of analysis supported by a myriad of site-specific studies. As such, the determination of the site's development areas, as well as the Mitigation Preserve lands, are consistent with protection of the regional biological resource value. Many of the stated goals of the proposed reserve, including to conserve a large and intact area of natural open space, avoid habitat fragmentation, protect an adequate representation of physical and biological diversity, and enhance existing conservation investments, among others, are met in the proposed Mitigation Preserve. In addition, the Project site is consistent with other regional planning

1756 *Id.,* pp. 5.7-50 to -64, -164 to -170

1757 *Id.,* p. 5.7-159

1758 Conservation Biology Institute and South Coast Wildlands. 2006 (May). *Proposed Reserve Design for Tejon Ranch – A Threatened California Legacy.* http://scwildlands.org/reports/proposedreserve_tejonranch.pdf.

documents including the TRCRWA, the TUMSHCP, and the AVAP (see response to Comment F.7-22).

Response to Comment F.8-112B:

This footnote links to a blog by the California State Action Plan. The blog discusses how the update to the State Wildlife Action Plan 2015 (SWAP) used three separate sets of geographic units (or scales) to identify priority conservation targets (species, habitats, and ecosystems that are the focus of conservation strategies), assess threats to those targets, and develop strategies to conserve those targets. USDA ecoregions were used as the biogeographic units to assess threats and develop strategies for the terrestrial targets of the SWAP. Three ecoregions—the Sierra Nevada, the Mojave Desert, and the South Coast—are mentioned in Comment F.8-112. See response to Comment F.8-112 for further discussion.

Response to Comment F.8-112C:

This footnote links to Chapter 18 from the book, *Geology of California's Imperial Valley*. The chapter discusses the San Areas Fault System. It highlights the details of the San Andreas Fault, including its geographic extent; the nature if its configuration, branches, age, shallow depth; regional differences due to the fault, including the "Big Bend" area, which underlies the Project site in part. See response to Comment F.8-112.

Response to Comment F.8-113:

The Draft EIR has an obligation to follow State CEQA Guidelines and to report on the findings of the various focused and general plant and wildlife surveys that have occurred over the life of the Project.[1759] Detailed studies and mapping provide clearer, not obfuscated information. The grassland studies were conducted with input from the Significant Ecological Areas Technical Advisory Committee (SEATAC) and detailed information was required in an effort to more accurately map and describe the different types of grasslands occurring on the Project site. Mitigation for sensitive habitats requires accurate vegetation mapping procedures, and the grassland studies were integral to the modeling and mapping process on the Project site. The methodology for vegetation mapping is described beginning on page 5.7-24, with further details of the methodology for delineation of grasslands provided beginning on page 5.7-25. The Draft EIR analyzes Project impacts to native grasslands and includes conservation measures to mitigate for losses.[1760] Mitigation for impacts to the native grassland on the Project site shall be no less than 2:1 (see MM 7-10).[1761]

Response to Comment F.8-114:

The Commenter is correct; the original plant report, drafted in December 2004, was revised in May 2006. The revisions that were made to the December 2004 report were made to Section 1, Introduction, and Section 3, Landscape Setting. No edits were made to Sections 2, 4, or 5 (Background Information, Special-Status Plant Surveys, and Perennial Bunchgrass

[1759] DRP 2017, Table 5.7-2, p. 5.7-19
[1760] *Id.,* Sections 5.7.6 and 5.7.7
[1761] *Id.,* p. 5.7-180

Plant Community Study, respectively). All edits were qualitative in nature and did not affect the technical aspects of the report. Edits are as follows:

2004 report, page 1, last paragraph: "The bunchgrass stand on the site is unique in California as an extensive, high quality intact native perennial bunchgrass community" was changed to "The bunchgrass stand on the site constitutes an especially high-quality native perennial bunchgrass community."

2004 report, page 1, last paragraph: "The results can be used to assess potential impacts of the proposed project to this unique native perennial bunchgrass community" was changed to "The results can be used to assess potential impacts of the proposed project to this native perennial bunchgrass community".

2004 report, page 14, second paragraph: "Native perennial bunchgrass community/ wildflower field, (referred to as a 'perennial bunchgrass plant community' in this report), is one of the dominant plant communities in the study area" was changed to "Native perennial bunchgrass community/wildflower field, (referred to as a 'perennial bunchgrass plant community' in this report), is the dominant plant community in the study area".

2004 report, page 14, third paragraph: "This plant community is characterized by a relatively high cover of perennial bunchgrass species (typically greater than 20%), a conspicuously low cover of non-native annual grasses, and prominent open spaces between the individual bunchgrass clumps that support a showy, diverse array of native wildflowers during favorable rain years" was changed to "This plant community is characterized by a relatively high cover of perennial bunchgrass species (often greater than 20%), a conspicuously low cover of non-native annual grasses, and prominent open spaces between the individual bunchgrass clumps that support a diverse array of native wildflowers during favorable rain years"

2004 report, page 15, first paragraph: "… with a conspicuous wildflower component and an unusual lack of introduced annual grass species. Quite frankly, we have rarely seen extensive intact perennial bunchgrass stands of this nature, and it required a second year, with the wildflower component absent, to recognize the habitat as a perennial bunchgrass community" was changed to "… with a conspicuous wildflower component and a lack of introduced annual grass species." The second sentence was removed from the report as it is an anecdotal statement, and inappropriate for a technical report,

2004 report, page 15, second paragraph was removed as it was a duplicate of a paragraph already included on Page 1.

2004 report, page 15, third paragraph: "However, the community has been almost entirely out-competed and replaced by invasive annual grasses introduced during Europeans settlement (Heady, 1995)" was changed to "However, the plant species that made up this community have been entirely out-competed and replaced by invasive annual grasses introduced during Europeans settlement (Heady, 1995)."

2004 report, page 15, third paragraph: "The State of California also considers areas with conspicuous native wildflower displays to be a sensitive plant community called a wildflower field (Holland, 1986; CNDDB, 2004)" was changed to "The State of California also considers areas with conspicuous native wildflower displays to be a sensitive plant community, referred to as wildflower fields (Holland, 1986; CNDDB, 2004)"

2004 report, page 15, fourth paragraph: "The perennial bunchgrass community on the site occupies roughly 5,500 acres within the entire 9,542-acre study area" was changed to "The perennial bunchgrass community on the site occupies approximately 5,500 acres within the entire 9,542-acre study area."

The changes made between the draft and final reports are qualitative. Project mitigation for grasslands include the permanent preservation of 14,908 acres, as well as the available for future biological enhancement activities, if needed, on the 7,490 of grasslands of Wildlife Conservation Board easement areas.

Response to Comment F.8-115:

A literature review and preliminary general walk-over survey of mitigation lands was conducted for the Draft EIR.[1762] Total open space mitigation land is approximately 27,000 acres, which is an approximate 3:1 open space to developed ratio. Both a literature review and on-site reconnaissance survey of mitigation lands were completed as part of the Draft EIR preparation process.[1763] Additionally, a soils, slope, and aspect model was produced to confirm equal conditions could be found on the preserve lands. In the review of these lands, similar species (special status and non-special status) were observed, and have been documented in the California Natural Diversity Database, and thousands of acres of similar habitat were observed.[1764] The on-site mitigation area was designated as part of the overall Specific Plan boundary area for the Project site, which includes both interstitial open space areas within the outer edge of the development envelope and open space areas adjacent to the development areas.[1765]

Response to Comment F.8-116:

Please refer to response to Comment F.8-115. As stated in the Draft EIR in MM 7-10 and MM 7-11,[1766] all mitigation ratios for special status biological resources (except riparian and wetland vegetation types that are not considered jurisdictional by permitting resource agencies) are 2:1 (conserved: impacted) at a minimum. Riparian and wetland vegetation types that are not considered jurisdictional by permitting resource agencies are mitigated at a 1:1 ratio as described in MM 7-12.[1767] Preserved habitat shall be of equal or greater biological value and function. It is acknowledged that a net loss may occur for some species

[1762] DRP 2017, pp. 5.7-18 to -31
[1763] *Ibid.*
[1764] *Id.,* pp. 5.7-18 to -31
[1765] Revised Exhibit 5.7-10; DRP 2017, Appendix 5.0-C
[1766] DRP 2017, p. 5.7-182
[1767] *Id.,* pp. 5.7-180 to -190

or habitats. The mitigation strategy proposed for the Project is current standard mitigation for upland vegetation types.

Response to Comment F.8-116A:

The footnote refers to a study titled, "How Much Compensation is Enough? A Framework for Incorporating Uncertainty and Time Discounting When Calculating Offset Ratios for Impacted Habitat," authored by Atte Moilanen, Astrid J. A. van Teeffelen, Yakov Ben-Haim, and Simon Ferrier published in the journal Restoration Ecology. The research article reviews off-set or mitigation ratios and the problems with success. The article points out that uncertainty in the value of mitigation lands warrants larger ratios to increase certainty. It also states that the risk and uncertainty is much lower and values are more certain when preserving lands in their existing condition as opposed to restoring. The Centennial mitigation lands will be used for very small amount of restoration associated with riparian habitat and woodlands while the majority, nearly all, is to be preserved with management oversight to maintain current conditions.[1768] As such, the article supports the concept that uncertainty of mitigation for projects such as Centennial is much lower due to the existing values on the preserved lands and the lack of reliance on future unknown values of these lands. Also see response to Comment F.8-116.

Response to Comment F.8-117:

The Commenter's opinion regarding plant and animal species occurrence data is noted for the record. The entirety of the Project site has been evaluated for biological resources in numerous studies conducted over a 16-year period, all of which are described in Section 5.7, Biological Resources, of the Draft EIR. Third-party data, such as the scientific biological resources information developed as part of the Tejon Ranch Land Use and Conservation Agreement between Tejon Ranch and the Sierra Club, Natural Resource Defense Council, California Audubon Society, Endangered Habitats League, and Planning and Conservation League; the biological resource information developed and used in environmental impact reports (EIRs) for areas that include the Project site such as the Antelope Valley Area Plan EIR (Los Angeles County), the Northwest SR-138 Corridor Improvement Project EIR (Caltrans), and the Sustainable Communities Strategy EIR (SCAG); and relevant third-party scientific literature is cited in the extensive bibliography included in Section 5.7, Biological Resources, of the Draft EIR.[1769]

More specifically, with respect to the focused surveys done on the Project site and addressed in the Draft EIR, these have been conducted on the Project site since 1999 in potentially suitable habitat for the species being surveyed—an industry-wide methodology. Wildlife species generally inhabit certain habitats while avoiding others. For example, a survey for breeding tricolored blackbirds would focus on areas potentially containing their breeding habitat (marsh) and would avoid areas where no potential for that habitat occurs (oak woodland). A combination of tools such as vegetation and/or topography maps, aerial photograph, and historical knowledge of the site help biologists narrow down their survey

[1768] *Id.,* pp. 4-43 to -46
[1769] DRP 2017, Section 5.7.9 beginning on p. 5.7-195

area for a given species. Certain surveys, such as plant surveys, have been conducted comprehensively and cover the entire Project footprint.[1770] Other surveys are more general in nature, such as raptor surveys, and again in that instance the entire Project site would be surveyed. Focused surveys have been conducted in accordance with approved protocols.[1771] The various biologists studying the site since 1999 have had full access to the Project site. The diversity of the wildlife species is as expected for an extensively grazed landscape (compacted soil, invasive species) with relatively low vegetative cover over the majority of the Project site.

Page 5.7-14 of the Draft EIR describes the characteristics of the surrounding area and states that the Project site is in a region that is at the confluence of several major geographic features and associated biomes, including the Tehachapi Mountains, Coast Ranges, Transverse Ranges (San Gabriel Mountains and Liebre Mountain), Antelope Valley of the Mojave Desert, Central Valley, and the San Andreas Fault Zone. Page 5.7-15 describes how the Tehachapi Mountains to the north of the site are characterized by mosaics of oak woodlands, savannas, scrub/shrub lands, perennial/annual grasslands, and the Angeles National Forest encompasses much of the land further to the south. These descriptions describe the "uniqueness" of the Project region. Specific biological resources that are considered unusual, rare, or unique in the region are generally discussed in detail in the document, such as blue oak woodland[1772], extensive grassland and wildflower fields[1773], and tricolored blackbirds[1774]. The cumulative consideration of each of the unique biological resources values on the Project site and in the region provide the reader with a landscape-level perspective. The approach used by the Draft EIR is consistent with standard practice and is not intended to underplay "landscape scale uniqueness" but rather to portray the site's biological resources with industry standard methods.

Response to Comment F.8-118:

The Commenter is correct. Two separate firms conducted grassland studies on the Project site and the surrounding areas. The site was studied by Natural Resources Consultants (NRC) in 2008, as well as in 2006 and 2007.[1775] No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-119:

The Commenter is correct in identifying the correlation between soil types and plant occurrences, as noted in the 2004 Vollmar Consulting study referenced by the Commenter, and as discussed in the Draft EIR, Chapter 5.7 *Biological Resources,* on pages 5.7-20 (Table 5.7-2), 5.7-24 through 27, 5.7-29, 5.7-41, 5.7-43, 5.7-44, 5.7-46, 5.7-83, 5.7-85, 5.7-87 through 5.7-93, 5.7-157, and 5.7-266. It should be noted that, although much of the grassland acreage on the Project site contains a high percentage of non-native species, all grasslands

1770 *Id.,* Table 5.7-2
1771 *Id.,* Appendix 5.7-B
1772 *Id.,* p. 5.7-36
1773 *Id.,* p. 5.7-40
1774 *Id.,* pp. 5.7-112 to -114
1775 *Id.,* Table 5.7-2

impacted on the Project site are being treated as a special status habitat type and shall be mitigated for at no less than a 2:1 ratio.[1776] Furthermore, and as stated on page 5.7-181, MM 7-10, mitigation for loss of those areas modeled as native perennial grassland will provide similar habitat quality as that which was lost. The result shall be native perennial grassland and wildflower field values that are equal to or greater than the overall ecological functions and values of those lost as a result of Project implementation. Preservation shall include dedication and long-term management working towards the goal of a self-sustaining system. Long-term management will include focused major problematic non-native species eradication (e.g., feral pigs) where feasible.[1777] Preservation will occur on open space lands on the Project site and on other lands within Tejon Ranch.

The Commenter states that the Vollmar study anecdotally observed differences in the size and quality of NPG and wildflower fields (WFF) in the eastern and central portions of the Project site, where they were noted as being larger and more species rich. The NRC studies were rigorous multi-year (2006, 2007, and 2008) studies that included predictive modeling, while the Vollmar study was conducted in one year (2004) and was not nearly as intensive as the NRC studies.[1778] The Vollmar study states that the NPG on the Project site are "primarily restricted to two geologic formations, Continental Deposits and Terrace Deposits"; however, the multi-year NRC studies show very high species richness and relative native cover for grassland plots located within Santa Margarita formations in the western portion of the Project site (unimpacted Mitigation Preserve area).[1779] The NRC studies corroborate the Vollmar anecdotal observations of relatively large, species rich, native grasslands in the central and eastern portion of the Project site, but this is not the only area on the Project site where high quality grasslands occur; the western portion also contains high quality NPG.

The Commenter points to the east-west trending ridges and valley landforms in the central and eastern portion of the Project site to explain the high species richness and large stand size (per Vollmar) of NPG and WFF in these areas, and questions evaluation of the grasslands in the areas proposed to be developed versus areas that would provide mitigation for the developed areas due to a lack of these particular land forms. While the Commenter is correct, the Project site does support landforms unique to the local area—east-west trending ridgelines and valleys, close inspection of the surrounding lands show similar or higher-quality NPG and WFF than are found on the Project site.[1780] Differences in cover of several plant groups, including native perennial forbs and native perennial grasses were not found among the four defined sampling sites (southern slopes, Centennial Specific Plan boundary, north mitigation area, and south mitigation area).[1781] The highest quality grassland and native forb communities were found in the southern slopes area north of the Project site, and where Mitigation Preserve Areas 2, 3, 4, and 6 are currently located.

[1776] *Id.,* p. 5.7-160
[1777] *Id.,* p. 5.7-181
[1778] *Id.,* p. 5.7-26
[1779] *Id.,* Appendix 5.7-B
[1780] *Ibid.*
[1781] *Ibid.*

Response to Comment F.8-120:

The NRC grassland studies were designed to conduct a comprehensive quantitative analysis describing the distribution and composition of native and non-native grasslands within the Centennial Specific Plan.[1782] In order to ensure the highest possible quality, Centennial Founders assembled a Scientific Review Committee composed of Bruce Pavlick, Ph.D. and Dennis Murphy, Ph.D. to monitor all aspects of this study including study design, data acquisition, and statistical analyses.[1783] Because the Project overlapped SEA 17 prior to 2008, the SEATAC committee was also involved in reviewing, and providing suggestions on, the NRC grassland studies.

The Commenter incorrectly states that the NRC studies did not factor in geology or soils into their studies. The variables used in the NRC analysis included: elevation, slope, aspect, slope position, topographic ruggedness index, compound topographic index (CTI), curvature, easting, and curvature x easting. Not only was geology/topography factored in the study, but CTI has been shown to be highly correlated with several soil attributes such as horizon depth, silt percentage, organic matter content, and phosphorus. The variables used in the NRC study are much more precise than solely soil type.

Additionally, the Commenter suggests that the NRC studies are strongly compromised by not incorporating the soil type into the variables analyzed. As stated above, soil attributes (CTI) were incorporated into the design, and incorporating the soil type would not serve to improve the studies. The NRC studies were scientifically sound and achieved a successful predictive model describing the distribution of native perennial bunch grass (NPBG) stands within the Centennial Specific Plan Area. Species richness, native species richness, and cover of native species are all positively correlated with several topographic variables, including elevation, easting, and slope. While the NRC predictive model was able to predict the cover class of four distinct classes of NPBG 37 percent of the time; the accuracy increased to 69 percent when placed in two categories (Category A: <10 percent, Category B: ≥ 10 percent). NRC recognizes there is room for improvement within the design of the model by incorporating temporal variation of rainfall. By refining the existing model, the predictive capability, statistical robustness, and overall accuracy of the NPBG model will increase.[1784] According to the grassland Scientific Advisory Committee, for biological systems, a model with 69 percent accuracy is generally considered above average.[1785]

Response to Comment F.8-121:

For the purposes of accurately describing the existing NPBG on the Project site in order to properly assess impacts and mitigation, extensive multi-year grassland studies were conducted on the Project site and the vicinity of the Project site.[1786] Based on the predictive NPBG cover generated by the GIS model developed by NRC, the grasslands were divided into four categories: absolute cover of less than 4.99 percent, between 5.00 and 9.99 percent,

[1782] *Id.,* pp. 5.7-26 and -27
[1783] *Id.,* Appendix 5.7-B; *Id.,* p. 5.7-26
[1784] *Id.,* Appendix 5.7-B
[1785] *Id.,* pp. 5.7-27 and -47
[1786] *Id.,* p. 5.7-19, Table 5.7-2

between 10.00 and 14.99 percent, and greater than 15.00 percent.[1787] Describing SPA grasslands using these four categories allowed the predictions of the model to reference standard percent-cover definitions for native and non-native grasslands used by local and regional resource protection agencies. Additionally, a description of the native perennial grasslands found on the Project site can be found on Draft EIR page 5.7-40, in Section 5.7.3, Environmental Setting, of the Draft EIR. This discussion provides the most closely related Sawyer and Keeler-Wolf and Twisselmann and Moe description of the native grasslands found on-site.

Response to Comment F.8-122:

The NRC grassland studies collected cover data for the following categories: native perennial bunch grass, native perennial rhizomatous grass, native annual grass, introduced annual grass, other native species, other introduced species, litter, rock, bare ground, and unknown plant species. As stated on page 5 of the 2007 NRC grassland study, "The dependent variable we chose to model as a surrogate measure of native perennial grasslands was absolute canopy cover of NPBG (See Section 4.3). Although grassland quality is ideally determined by additional factors such as native species richness and cover, amount of bare ground present, and severity of invasion from non-natives, choosing to model absolute NPBG cover facilitates easy interpretation and increased predictability. Attempts were made to model the distribution of native annual forbs and other variables; however, the predictive ability of these models was poor. Other components of healthy native grasslands [such as ground cover] were analyzed as part of the grassland composition analysis (see Section 2.3.1.2) and as validation of the NPBG habitat model." Bare ground was analyzed as part of the NRC studies, and was found to be highly correlated with the highest quality NPBG and native annual forb community.[1788]

Response to Comment F.8-123:

Wildflower fields are a component of the grasslands. Rigorous characterization of the wildflower fields can be found in the NRC grassland studies. The primary stated objective of the 2008 NRC grassland study was to, "Quantify trends in grassland community composition within the SPA [Specific Plan Area] and mitigation areas with particular attention given to a) native perennial bunchgrasses and b) native annual forbs".[1789,1790] The NRC grassland studies thoroughly analyzed the composition of the native annual and perennial forbs found on the Project site and the mitigation preserve areas. Based on statistical analysis, five different community types were determined and mapped for the Tehachapi sampling area in 2007. Variables included: northing, easting, elevation, aspect, slope, curvature, species richness, nativeness index, and percent cover. While the Commenter is correct, high quality native annual forbs (NAF) and native perennial forbs (NPF) can be found in the central and eastern portion of the Project site, the highest quality native forb cover was found in the southern slopes sampling area (generally north of the Project site) in 2007, while in 2008

[1787] *Id.,* pp. 5.7-44 and -45
[1788] *Id.,* Appendix 5.7-B
[1789] *Id.,* Appendix 5.7-B, Plant-8
[1790] *Ibid.*

the southern mitigation area had the highest cover of native forbs. The cover of native annual forbs increases with elevation and easting, possibly due to greater available water from snowpack.[1791,1792] Attempts were made to model the spatial distribution of the annual forbs but predictive results were poor due to the drastic variability of cover among years with differing precipitation rates.

The Commenter makes a statement about the Vollmar study recording over 70 native species, and a positive correlation was found between native forb species richness and increasing NPG cover. Over 130 native forb species were documented in the 2007 NRC study. The NRC studies did not show a significant correlation between native forb species and NPBG, but instead found that native forbs were common throughout the Project area and off-site mitigation grasslands.[1793] Please refer to the grassland studies included in Draft EIR Appendix 5.7-B, Nos. Plant-5, Plant-6, and Plant-8 for a detailed description and analysis of the wildflower field communities found on and adjacent to the Project site.

Response to Comment F.8-124:

The grassland community, as a whole, on the Project site is being treated as special status, and appropriate mitigation is provided in the Draft EIR.[1794] Rather than splitting up the grasslands into sensitive and non-sensitive sections, the Project is treating the grasslands as a whole, with the functions and values being mitigated for by the preservation and enhancement of grassland areas nearby that are composed of the same mosaic distribution of non-native and native dominated communities. The NRC studies provide exhaustive quantification of the wildflower field communities as well as the native bunch grass communities found on the Project site and vicinity. Mapping of five statistically distinct communities is provided in the 2007 NRC report, and high quality native forb communities mapped can be found within this report. Please refer to responses to Comments F.8-121 through F.8-123 for further background information regarding vegetation mapping.

Response to Comment F.8-125:

Please see response to Comment F.8-124 for a discussion of the Project's conservative approach to treating grasslands, which recognizes the mosaic of grassland types and qualities and requires mitigation for impacts to all grasslands, not just NPG and WFF, most of which qualify as non-native grasslands. In addition, the validity of the Mitigation Preserve to provide for the preservation of grasslands and wildflower fields, similar to the impacts grasslands and wildflower fields, is demonstrated in the Draft EIR. As shown on revised Exhibit 5.7-10, Mitigation Preserve, included in this Final EIR following page 3-116 (Volume 2) and originally on page 5.7-135 of the Draft EIR, immediately adjacent lands that represent as close a proximity as feasible are captured within the Mitigation Preserve. The lands, including the grasslands within them, are not only contiguous with the Project site, but also with other open space lands set aside by the Tejon Ranch Company. The NRC grassland studies of the site and adjacent lands provide data indicating that the highest quality NPBG

1791 *Id.,* Appendix 5.7-B, Plant-5
1792 *Ibid.*
1793 *Id.,* Appendix 5.7-B, Plant-8
1794 *Id.,* pp. 5.7-180 to -183, MM 7-10

and native forb communities occurring in the Mitigation Preserve areas.[1795] Further, as described in Appendix 5.7-C of the Draft EIR, a reconnaissance survey of the mitigation preserve in 2015, conducted during peak bloom as part of a Mitigation Lands Review, confirmed this finding. Vast native wildflower fields, larger than any observed on the Projects site, were observed within the mitigation preserve.[1796] The Commenter states that the NRC studies omitted geological/soils as a parameter; however, the studies and resulting model were far more comprehensive than relying solely on geology/soils. Variables used in statistical analysis included: northing, easting, elevation, aspect, slope, curvature, among others. Please see response to Comment F.8-120 for further discussion on geology/soils used as parameters in the NRC studies.

Response to Comment F.8-126:

The comment is noted for the record. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-127:

While the Project site does contain some areas of high quality native grasslands, exhaustive multi-year studies of the surrounding lands have concluded that higher quality grasslands and wildflower fields are found within the mitigation areas.[1797] It is reasonable to conclude that the proximity to snowpack in the higher elevations may benefit these areas.

Also see responses to Comments F.8-113 and F.8-118 through F.8-122.

Response to Comment F.8-128:

The grasslands are not unique to the Project site; 14,908 acres of grasslands will be preserved on the Mitigation Preserve, which grasslands abut and present a continuation of the Project site grasslands.

Mitigation lands have been surveyed in part, a literature review has been conducted, and a soils, slope, aspect analysis has been conducted to confirm similar conditions occur on the Project site and mitigation preserve. During these efforts, several of the special status species that have been documented on the Project site were found in the mitigation preserve. Suitable habitat for all special status plants is present on the Mitigation Preserve and individual plants will be preserved.

In accordance with the recommendation in Comment B.4-43, the Project's priority shall be preservation of the six special status plant species impacted by the Project. Prior to issuance of grading permits, detected special status plant species populations on the Mitigation Preserve meeting the 2:1 mitigation ratio, shall be quantified and documented for preservation in perpetuity. If the preservation ratio is less than 2:1 for one or more of the six impacted species, enhancement and/or creation to expand preserved population(s) of the species to a quantity representing a minimum 2:1 ratio within the Mitigation Preserve shall

[1795] *Id.,* Appendix 5.7-B
[1796] *Id.,* Appendix 5.7-C
[1797] DRP 2017, Appendix 5.7-B

be accomplished using the feasible methods further delineated in the table provided in response to Comment F.8-128.

To modify the Draft EIR in accordance with this preservation component per the discussion above, the last two sentences of the second paragraph on page 5.7-142 are hereby edited as follows:

> Implementation of MM 7-1, proposed to mitigate for impacts to special status plants, would reduce the level of impact by promoting the distribution of this species in the Project region through the preservation and/or ~~propagation~~ enhancement of ~~new~~ existing populations and creation of new populations, if necessary, in the Mitigation Preserve. The expansion of the local population of this species is expected to increase its potential to be sustained in perpetuity.

To modify the Draft EIR in accordance with this preservation component per the discussion above, the last two sentences of the first partial paragraph on page 5.7-143 are hereby edited as follows:

> Implementation of MM 7-1, to mitigate for impacts to special status plants, would reduce the level of impact by promoting the distribution of this species in the Project region through the preservation and/or ~~propagation~~ enhancement of ~~new~~ existing populations in the Mitigation Preserve. The expansion of the local population of this species is expected to increase its potential to be sustained in perpetuity.

Additionally, the final sentence in the fourth paragraph of MM 7-1 on page 5.7-174 is hereby edited as follows:

> These existing areas shall be (in order of priority) preserved, enhanced, expanded, ~~or~~ restored, or created ~~or new areas shall be created in suitable habitat~~ in order to compensate at a 2:1 ratio for the thousands of individual special status plants that will be lost due to the Project.

Beyond preservation (the priority for plant mitigation goals), the preferred method for achieving the 2:1 replacement ratio of special status plant species is enhancement or expanding of existing populations. Creation of populations is the method that shall be employed if the 2:1 ratio cannot be met through preservation and enhancement. Although a literature search did not find specific information on the species impacted on the Project site, many successful rare plant restoration projects have been conducted. For example, The New England Wild Flower Society developed a successful method to germinate Robbins' cinquefoil seeds and to accelerate their development into seed-producing adults for transplanting. Between 1973 and 2006 the population rebounded 2.5 times. The species was removed from the federal Endangered list in 2002. Follow up monitoring post-recovery

goals, indicated the cinquefoil numbers and condition remained stable.[1798] Further, successful reintroduction has also been accomplished with the special status species western yampah (*Perideridia erythrorhiza*), endemic to southern Oregon.[1799] Although long-term monitoring data is not available, during the three years the transplantation was monitored, 90 percent of transplanted plants reproduced successfully.

Evidence for a greater degree of potential success is based on observations of many of the special status plants requiring mitigation located in the Mitigation Preserve during a reconnaissance survey and during focused plant surveys. Such observations indicate highly compatible conditions for the proposed preservation, creation, and/or enhancement/restoration of special status plant populations. Apart from direct observations of special status plants requiring mitigation, the level of compatibility is supported by similarities in soil type, slope, aspect, and distance from known populations. Additionally, special status plant species impacted by the Project (California androsace, adobe yampah, and sylvan microseris), and many other special status plant species not impacted by the Project, have been documented in the Mitigation Preserve by the Tejon Mountain Village Project.[1800] The documentation of multiple populations of these species on the Mitigation Preserve further adds to the regional value of these mitigation lands and the increases the likelihood of persistence of the species in the region.

Furthermore, the Project's 39,000-acre Mitigation Preserve is coupled with two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement (TRCRWA) and the Tehachapi Upland Multiple Species Habitat Conservation Plan (TUMSHCP), which further contribute to sustaining regional plant populations. Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch. Maintenance of the open space or conserved lands will be the responsibility of the Conservancy, funded in large part by a fee based on a portion of the purchase price for each residential parcel on Tejon Ranch. Since Centennial constitutes over 75 percent of the currently planned residential units on the Ranch, it will bear the substantial costs of funding the Conservancy.[1801]

In addition, the TUMSHCP ensures the persistence of covered species, including sustaining viable populations of those species. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and mitigation measures is a conservation commitment that is, by

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1798 United States Department of Agriculture, Forest Service (USDAFS). 2017 (November, access date). Recovery of Robbins' Cinquefoil - *A Partnership Success*. Washington, DC: USDAFS. https://www.fs.fed.us/wildflowers/Rare_Plants/conservation/success/potentilla_robbinsiana_recovery.shtml.

1799 Roberts, Kimberly A. 2003. Conservation Biology of Perideridia erythrorhiza (Apiaceae): Experimental Reintroduction and Life History. Oregon: Oregon State University.

1800 Kern County Planning Department (Kern County). 2009 (May). *Draft Environmental Impact Report, SCH# 2005101018, Tejon Mountain Village by TMV, LLC*. Kern County, CA: Kern County.

1801 DRP 2017, pp. 5.7-62 and -63

design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident plant and wildlife populations. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species occur in the foothills and lowland areas as well, including the Centennial site. These species will benefit from the TUMSHCP in addition to the Centennial Mitigation Preserve program.[1802] In addition, the U.S. Fish and Wildlife Service considered development within the region, specifically inclusive of several major projects including Centennial, Newhall, Tejon Mountain Village, and Grapevine, in the TUMHSCP, and concluded that the TUMSHCP includes measures to minimize and mitigate remaining impacts on Covered Species and measures that contribute to conservation and recovery.[1803]

In addition, the last two sentences of the second paragraph of MM 7-1 are hereby deleted as extraneous (see also the table provided in response to Comment F.8-128 for more detail on the Special Status Plant Species Restoration Plan):

> ~~Adoption of this plan shall be used as the performance standard. An overview of the plan objectives is provided in the Biological Resource Mitigation Program to be submitted and approved by the County prior to issuance of grading permits.~~

Response to Comment F.8-129:

Please see response to Comment F.8-128.

Response to Comment F.8-129A:

The referenced document is acknowledged and will be provided as part of the record. The document is cited to support a specific assertion in Comment F.8-129, which is substantively addressed in response to Comment F.8-128. Please see responses to Comments F.8-128 and F.8-129.

Response to Comment F.8-130:

The Biological Resources Mitigation Program is simply a compilation of each of the separate required mitigation plans and would have no additional information. Each of the referenced plans listed in the mitigation measures on pages 5.7-173 and 5.7-194 of the Draft EIR includes performance objectives and identifies feasible means of achieving those performance objectives, which is a form of mitigation measure commonly used and has been

[1802] *Id.,* p. 5.7-63
[1803] *Id.,* pp. 5.7-16 to -18

repeatedly confirmed as legally adequate in CEQA court cases. Please see response to Comment F.8-173.

Response to Comment F.8-131:

For the Mitigation Preserve, a Mitigation Monitoring and Reporting Program (MMRP) will be developed and initially managed by biologists until sign-off is achieved by the appropriate Agencies, at which time the Tejon Conservancy shall manage the mitigation lands in accordance with the Ranch-wide Management Plan. Grazing is an ongoing use in this open space preserve area, and as discussed in the Draft EIR,[1804] grazing practices have largely resulted in the conditions that exist in this area. MM 7-1 provides specific mitigation requirements for designated special status plant species in the open space preserve. Grazing is anticipated to continue to be a key component of the management of these open space lands, and the value of grazing as a means of protecting plant species has been consistently recognized by federal and State biological protection agencies. For example, in the TUMSHCP, the USFWS requires grazing[1805] and in the Tejon Mountain Village permits from CDFW, CDFW requires grazing. The Commenter's negative opinion about grazing, and the role of grazing in the Ranch-wide Management Plan, is noted. It should be noted that the Ranch-wide Management Plan includes grazing practices and monitoring focused specifically on maintaining grasslands and increasing habitats for pronghorn and other species. See response to Comment F.8-173. The Ranch-wide Management Plan also includes a suite of management tools like weed management and active and passive restoration; therefore, grazing is among a suite of management tools to be utilized to preserve the habitat in perpetuity.

Response to Comment F.8-131A:

The footnote provides a link to the Tejon Ranch Conservancy Ranch-wide Management Plan. See response to Comment F.8-131.

Response to Comment F.8-132:

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-133:

An estimated six acres of oak woodlands are anticipated to be impacted by Project activities,[1806] and the Draft EIR determines that Project-related oak woodland impacts are considered potentially significant.[1807] Mitigation for impacted oak woodlands is outlined in Section 5.7.7, Mitigation Measures. MM 7-11 calls for a 2:1 ratio of conserved versus impacted acreage. Further clarification of the Oak mitigation requirement is included in

[1804] *Id.,* pp. 5.7-11, 45, 159

[1805] Dudek and Associates, Inc. (Dudek). 2013 (April). *Final Tehachapi Upland Multiple Species Habitat Conservation Plan* (Prepared for the Tejon Ranch Corp). Encinitas, CA: Dudek.

[1806] DRP 2017, p. 5.7-157, Table 5.7-12

[1807] *Id.*, pp. 5.7-160 and -161

response to the Commenter's related deferred mitigation comment in response to Comment F.8-173, infra. Additionally, the Oak Woodland Mitigation Plan is required to comply with the standards and requirements of Section 21083.4 of the California Public Resources Code (SB 1334) and the County of Los Angeles Oak Tree Ordinance, which includes among other things that the tree replacement requires that replacement trees be the same species removed. In addition, the measure requires site-specific native acorns to be collected to ensure that acorns collected are of a similar genetic stock to those existing on the site. Specifically, item 6 on page 5.7-184 of the Draft EIR states that creation of structurally diverse oak woodland habitat within and contiguous to existing oak woodlands will be accomplished by planting locally collected oak acorns, plus yearly sowings of additional locally collected acorns.

Response to Comment F.8-134:

The Commenter's opinion is noted. Please refer to response to Comment F.8-173.

Response to Comment F.8-135:

Draft EIR Appendix 5.7-B, Plant-11, was initially prepared in 2009 when the Project development footprint extended into approximately 174 additional acres of oak woodland and affected 3,486 more oak trees that are subject to the County's oak tree protection ordinance.[1808] Following approval of the Antelope Valley Area Plan and designation of the boundaries of the West EOA, the Project development footprint was reduced with impacts to oak woodlands decreasing to 6 acres,[1809] and impacts to oak trees decreasing to 91 trees.[1810] The proposed Project does substantially reduce impacts to oak woodlands and oak trees in relation to the project footprint under consideration in the referenced plan, and an additional oak woodland/oak tree reduction plan is not required under CEQA.

Response to Comment F.8-136:

All wildlife species detected during the previous 20 years plus of surveys on the Project site have been recorded. Please refer to the wildlife compendium provided as Appendix 5.7-A, Plant and Wildlife Compendia, to the Draft EIR, and to the description of wildlife species documented onsite on pages 5.7-47 through 5.7-50, and pages 5.7-88 through 5.7-128. The comment expresses an opinion about the Project. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

Response to Comment F.8-137:

No take of a fully protected species is anticipated to occur as part of the Project implementation. The four fully-protected species referenced by the Commenter are all birds and use the site only for foraging habitat. All observations of the four fully-protected bird species have been fly-overs migrants, or seasonal foraging and no breeding of these species

[1808] *Id.*, p. 8-33
[1809] *Id.*, p. 5.7-88
[1810] *Id.*, p. 5.7-171

has been recorded on the Project site. Additionally, one of these four species, the bald eagle, has only been observed on off-site adjacent areas, with no observation on-site. As outlined in MMs 7-2 and 7-8, pre-construction surveys for breeding raptors shall be conducted and Project impacts to all breeding raptors (including the four identified fully protected species) shall be avoided. Direct impacts to non-breeding raptors are not expected; however, a biological monitor will be on-site during construction activities to survey for and alter or relocate crews should a fully protected species enter the vicinity of the work area. Loss of foraging habitat, alone, from development would not cause take for purposes of California's fully protected species laws. Because these four species only use the Project site for foraging, there would be no direct impacts with implementation of MMs 7-2, 7-6, 7-8, as explained further in responses to Comments F.8-143 through F.8-149. As such no "take" of a California fully protected species would occur.

Additionally, regarding the statement that the bald eagle was not identified in the Draft EIR, presumably the Commenter is referring to the Draft EIR compendium.[1811] The bald eagle is appropriately not included because the species has not been observed on-site. The Commenter refers to Appendix 5.7-B, Gen 6, which states on page 43 at the end of the first paragraph, "While bald eagle and southwestern pond turtle were not observed on the site, they were observed adjacent to the site at Quail Lake." The Commenter also refers to Appendix 5.7-B, Birds 1, which states in the last paragraph of page 9, "A total of twelve special-status animals were observed on the study area; an additional species, bald eagle (listed as federally threatened) was observed foraging at nearby Quail Lake." Both of the referenced documents address bald eagle specifically and both indicate observing this species off site at Quail Lake. Therefore, the bald eagle is appropriately not included in the Draft EIR Plant and Wildlife Compendium in Appendix 5.7-A because the species has not been observed on-site.

Response to Comment F.8-137A:

The footnote links to the California Department of Fish and Wildlife's (CDFW) Fully Protected Animals webpage. It lists all the wildlife species found in the Fish and Game Code Sections 3511, 4700, 5050, and 5515. All fully protected species on or adjacent to the Project site were analyzed. See response to Comment F.8-137.

Response to Comment F.8-138:

The Draft EIR also notes the success of the condor recovery efforts. Condor use of the Project area is discussed on page 5.7-119. See also response to Comment F.8-139.

Response to Comment F.8-138A:

The cited document is acknowledged and will be included in the record. It is cited in Comment F.8-138 to support the statement that Condor recovery efforts have been

[1811] *Id.,* Appendix 5.7-A

successful in California. The Draft EIR also notes that success on page 5.7-119. See also response to Comment F.8-138.

Response to Comment F.8-139:

The Commenter is correct. The Draft EIR incorrectly states that all condors are fitted with radio transmitters. Although the statement was true at one point, wild population expansion has made it infeasible for all condors. A more accurate statement based, on recent condor status updates from the USFWS, would be to say that, *many* are fitted with transmitters.[1812] In response to this comment, the following text is hereby added within the second paragraph on page 5.7-148 of the Draft EIR:

> ~~All~~ Most adult California condors are wing-tagged and many are fitted with radio transmitters.

High altitude fly-overs of the Project site are not disputed in the Draft EIR, but it is not accurate to suggest condors are "consistently using the proposed Project site", as the Commenter has suggested here. To state that the Project site is within the boundaries of the California condor flight path would be more accurate.

Response to Comment F.8-140:

As shown in the referenced 2009 Cogan report, the Project site is on the eastern edge of the historic condor range, and some fly-overs have occurred, although the core flight paths are located to the west of the Project site. The Cogan report shows only visually recorded flight lines over the Project site between 1982 and 1987. During years GPS data was collected, no locations were recorded over the Project site between 2003 and 2008.[1813] As described on page 5.7-119 of the Draft EIR, current satellite and radio-telemetry location data have shown that California condors occasionally travel above the Project site, but rarely occur on the Project site itself. The Draft EIR goes on to describe observations of flying condors prior to 1987 indicate that, on the few instances that they were known to have flown over valley floor habitat (including the Centennial Project site), the birds were usually flying high over the landscape, probably at an altitude of over 1,000 feet. During these flights, the condors rarely, if ever, landed and their movements appeared transitory. To date, four GPS location points out of many thousands were in the vicinity of the Centennial Project site. The Draft EIR fully acknowledges the rare instances of flyover condors.[1814]

1812 U.S. Fish and Wildlife Service (USFWS). 2015 (December 31). *California Condor Recovery Program 2015 Annual Condor Population Status Update*. www.fws.gov/cno/es/pdf%20files/Ca-Condor-Recovery-Prog2015PopulationStatus.pdf.

1813 Cogan, Christopher B. 2009 (June 12). *California Condor Activity in the Tejon Ranch Region.* San Francisco, CA: Center for Biological Diversity. https://www.biologicaldiversity.org/species/birds/California_condor/pdfs/CondorActivityInTheTejonRanchRegion.pdf.

1814 DRP 2017, pp. 5.7-94, -119, -120

Response to Comment F.8-140A:

The reference footnote is the same as the 2009 Cogan report cited by the Commenter and is responded to in response to Comment F.8-140.

Response to Comment F.8-141:

The Draft EIR correctly concluded that impacts to condor less than significant. The USFWS analysis supports this conclusion. See response to Comment F.8-143. Nevertheless, MM 7-6 is revised to incorporate recommendations from Pete Bloom (2009) as follows:

MM 7-6 Construction Monitoring - The Project Applicant~~/Developer~~ shall retain a ~~qualified~~ CDFW/USFWS-approved "Authorized Biologist~~ with knowledge of California condors~~," to ~~monitor~~ be on-call during all construction activities. If condors are observed foraging or landing in the Project area~~. The resumes of the proposed Biologist(s) will be provided to the CDFW for concurrence. This Biologist(s) will be referred to as the "Authorized Biologist" hereinafter. During clearing and grubbing of construction areas~~, the Authorized Biologist shall ~~be present at all times. During mass grading, construction sites shall be monitored on a daily basis, and the Authorized Biologist will~~ have the authority to stop all construction activities until appropriate corrective measures have been ~~completed~~ implemented. If condors are observed landing in the Project area, the Applicant shall avoid further construction within 500 feet of the sighting until the animals have left the area, or as otherwise authorized by CDFW and USFWS. If the condors are nesting within 0.5-mile of any Project area, no construction activities shall occur within this 0.5-mile buffer until the condors leave, or as otherwise directed by CDFW and USFWS. All condor sightings in the Project area ~~will~~ shall be reported to CDFW and USFWS within 24 hours of the sighting.

~~To further protect California condors potentially foraging in the Project area over the long term from negative interactions with humans and/or artificial structures, the~~ Cattle Carcass Relocation - The Project Applicant~~/Developer~~ shall remove dead cattle that are found ~~or reported~~ within 1,000 feet of the boundary of a residential or commercial development within 24 hours. ~~Dead cattle shall be relocated to a predetermined location.~~ The Approved Biologist will select locations ~~where carcasses shall be placed shall be~~ a minimum of 1,000 feet from ~~a~~ development ~~area boundary. Appropriate locations~~ areas for ~~transfer~~ relocation of carcasses ~~include open grasslands and oak/grassland areas where condors can readily detect carcasses~~

~~and easily land and take off without encountering physical obstacles such as powerlines and other utility structures~~. The proposed locations would be ~~selected and~~ approved by the CDFW and USFWS. ~~Pursuant to this measure, a~~ A telephone number for reporting dead cattle shall be provided ~~and actively maintained. Any cattle carcasses transferred to the relocation areas shall be reported to the USFWS Condor Group~~ by the Applicant.

Utility Hazards - All surfaces on new antennae and phone/utility towers shall be designed, installed, and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching. Whenever possible, utility towers and antennae should be self-supporting (i.e. not use guy wires), and be as visible as possible (using sold panel siding or dense/wide lattice work).

Condor Educational Curriculum - The Applicant shall provide a Condor Educational Curriculum that includes the life history of the California condor, how to identify condors, TRC hunting rules and regulations, prohibited behaviors related to condors such as hunting with lead ammunition, and the legal consequences of inadvertently or otherwise illegally shooting or harming California condors. The information will also identify types of microtrash that could be ingested by adult breeding condors and describe measures to eliminate microtrash and provide information on how to report roadkill for removal. In addition, these rules, regulations, and prohibitions shall be listed within CC&Rs.

Microtrash - During construction, the ~~area~~ Applicant shall ~~be~~ ensure that all Project areas are kept clean of debris ~~(e.g., cable, trash, and construction materials). The Project Applicant/Developer shall collect all~~ including microtrash and litter ~~(i.e., anything shiny, such as broken glass), vehicle fluids, and food waste from the Project area on a daily basis~~. Workers ~~shall~~ will be trained on the issue of microtrash: what constitutes microtrash, its potential effects on California condors, and how to avoid the deposition of microtrash.

In addition, the Applicant will ensure that routine community maintenance activities include regular efforts to eliminate microtrash on and near all work sites, recreational events, roads, and adjacent open space areas.

If it is determined that condors are ingesting microtrash in the Project area, the Applicant, CDFW, and USFWS shall evaluate potential remedies to reduce, and, if possible, eliminate microtrash ingestion. Such remedies may include increased education and awareness to residents, guests, staff, and workers regarding the dangers of microtrash, increased monitoring of events and activities that are potential sources of microtrash, and more frequent collection of microtrash.

Condor Deterrent Activities - If the Authorized Biologist deems it necessary, USFWS California condor hazing methods that do not rise to the level of "Take" under the ESA (Service 2014) will be employed. Only the Authorized Biologist, with approval from the USFWS, will conduct hazing and only when such actions are warranted. If the Authorized Biologist is not immediately available, a subset of less aggressive hazing methods, such as yelling, stomping, leashed dog barking or low pressure water spray, may be used when a clear escape route for the condors is identified and upon guidance from USFWS.

Condor Tracking – The Applicant will provide the USFWS with twenty-five (25) GPS satellite tracking transmitters (total cost not to exceed $150,000.00) prior to grading plan approval. This will allow the USFWS to more quickly identify the immediate location of birds that are not moving relative to the ground, which usually indicates that an injury, illness, or death has occurred. The ability to track the movements and locations of individual condors can aid in the monitoring of the overall effectiveness of measures to minimize and mitigate the indirect impact of microtrash by locating possible areas where microtrash was ingested. It can also aide in identifying the location where condors were shot if such an incident were to occur.

Response to Comment F.8-142:

Based on this comment and others, MM 7-6 of Section 5.7.7, Mitigation Measures, of the Draft EIR have been revised. Please see response to Comment F.8-138. In addition, the Draft EIR analyzed the build out of the Project, including on-going occupancy and use of the Project site, and includes condor mitigation measures that remain applicable for on-going operations which address debris removal including microtrash. See MM 7-6 on page 5.7-177 of the Draft EIR as well as response to Comment F.8-138.

Response to Comment F.8-143:

Please refer to the response to Comment F.8-141. The U.S. Fish and Wildlife Service (USFWS), which is the federal agency charged with implementing the federal Endangered Species Act,

including programs and permitting relating to the California condor, examined the impacts of the build out (affecting less than 10 percent of the Ranch) under the Tejon Ranch-Wide Agreement, including the Centennial Project, as part of the cumulative impacts analysis for the TUMSHCP. The USFWS concluded that the completion of these development projects would not adversely affect the recovery of the condor.[1815] The Draft EIR similarly concludes that Project implementation is not expected to result in significant adverse impacts on this species. However, MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. See response to Comment F.8-141 for the revisions to MM 7-6.

Response to Comment F.8-144:

Although surveys for the Draft EIR documented golden eagles foraging on the Project site, no nests were found.[1816] Additional aerial nesting surveys were not performed because the impact footprint for the proposed Project does not provide suitable nesting habitat for this species. This raptor is known to nest in the higher elevations surrounding than found on the Project site.[1817] The few observations of golden eagles were high overhead either foraging or passing by, with no behavior suggesting nesting activity on or near the Project site. Based on these observations, additional aerial nesting surveys were not considered necessary because any nesting golden eagles would likely be outside standard buffers used to avoid impacts to an active raptor nest. However, MM 7-2 on page 5.7-176 of the Draft EIR is amended as follows to require pre-construction nesting surveys for golden eagles prior to initial site preparation. Surveys within ten miles are unwarranted due to the lack of potential effect Project implementation could have on nesting eagles at such great distances from the Project site. Edits made to MM 7-2 increase the distance for golden eagle to ½ mile, which adequately protects golden eagles within potential zone of impact from the Project.[1818] (See response to Comment B.4-26 for additional revisions to MM 7-2 related to Swainson's hawk.) MM 7-2 on Draft EIR page 5.7-176 is hereby edited with the addition of the following text:

> Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate golden eagle pre-construction surveys and avoidance measures as identified below.
>
> *Golden eagle pre-construction surveys*
>
> Pre-construction surveys for golden eagle shall be conducted prior to construction activities. Surveys for active nests will be conducted by the Project Lead Biologist in all potentially suitable habitat areas within a 0.5-mile radius of all Project activities. Methods employed shall be consistent

[1815] USFWS 2012

[1816] DRP 2017, pp. 5.7-92, -150

[1817] California Department of Fish and Wildlife (CDFW). 2017 (November). California Natural Diversity Database. Records of Occurrence for the golden eagle occurring in USGS Grapevine, Pastoria Creek, Winters Ridge, Liebre Twins, Frazier Mountain, Lebec, La Liebre Ranch, Neenach School, Alamo Mountain, Black Mountain, Liebre Mountain, and Burnt Peak, California 7.5-minute quadrangle maps. Sacramento, CA: CDFG, Natural Heritage Division.

[1818] Pagel, J.E., D.M. Whittington, and G.T. Allen (Pagel et al.). 2010. *Interim Golden Eagle inventory and monitoring protocols; and other recommendations*. Division of Migratory Bird Management, U.S. Fish and Wildlife Service.

> with standard and appropriate protocols for golden eagle and within the appropriate season of the year prior to construction.
>
> *Golden eagle avoidance measures*
>
> If active golden eagle nests are found during these surveys, no intensive disturbances (e.g., heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities) or other Project-related activities that may cause nest abandonment or forced fledging shall occur during initial ground disturbance construction within 0.50 mile of an active nest between March 1 and September 15. The buffer zone may be decreased to 0.25 mile around nests for subsequent construction (i.e., in areas where disturbance—such as heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities—is not a normal occurrence during the nesting season). Active nest trees (where the nest is intact and has been used in the last year) shall not be removed.

Golden eagles occupy very large territories with average territorial sizes in southern and northern California estimated to be 36 square miles and 48 square miles, respectively.[1819] The Los Angeles County breeding-season population is about nine pairs.[1820] Based on this information and the results of Project surveys, only one or two pairs of golden eagles are expected to occupy the west end of the Antelope Valley containing the Project site. This regional area is largely undeveloped and provides abundant foraging opportunities for this raptor. As a result, the Draft EIR determined that the loss of approximately 6,416 acres of golden eagle foraging habitat would be considered an adverse impact, but not significant due to the amount of foraging habitat available regionally.[1821] For this reason, Project implementation is not expected to reduce the region's current carrying capacity for this species. Furthermore, the loss of foraging ground does not automatically equate to a reduction in the size of a population occurring in a region. Often, potentially suitable habitat is unoccupied. The results of surveys for many species listed in Table 5.7-8, Special Status Wildlife Species, beginning on page 5.7-89, were negative regardless of the fact that potentially suitable habitat is present on the Project site. Carrying capacity is based on a maximum fulfillment of potentially suitable habitat scenario, which is rarely realized at any given time for a population in a region.[1822] Species population sizes are typically continuously in flux as individuals' home ranges, foraging areas, and or nesting areas expand and retract in response to a wide range of changing habitat conditions related to seasons, weather, prey availability, etc. Like most wildlife species, the population size of golden eagle in the region is dynamic and varies from year to year, season to season, and so on. This variation occurs naturally within most wildlife populations. Consequently, it cannot be

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1819 Zeiner, D.C., W.F. Laudenslayer Jr., K.E. Mayer, M. White (Eds). 1990. *California's Wildlife Vol. 3: Mammals.* Sacramento, CA: CDFG, The Resources Agency.

1820 Allen, L. W., Garrett, K. L., Wimer, M. C. 2016 (June). *Los Angeles County Breeding Bird Atlas.* Los Angeles: Los Angeles Audubon Society.

1821 DRP 2017, p. 5.7-150

1822 Wikipedia contributors. 2017 (October 30, last edited). Carrying capacity. *Wikipedia, The Free Encyclopedia*. https://en.wikipedia.org/wiki/Carrying_capacity.

assumed that the loss of a relatively small percentage of habitat supporting the regional population of golden eagle will automatically result in the loss of a breeding pair in the overall region and a reduction in carrying capacity. Furthermore, "take" as defined by Fish and Game Code is to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.[1823] Project implementation, inclusive of permanent loss of habitat, is not expected to result in any action that would meet the definition of "take" for California Fully Protected Species. As such, the Draft EIR adequately assesses and determines that no "take" of golden eagle would occur. Also see response to Comment F.8-149 for further discussion on the concept of carrying capacity.

Potential indirect impacts on golden eagle, such as electrocution and collisions, are not expected to occur. MM 7-6 includes the following language, "All surfaces on new antennae and phone/utility towers shall be designed and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching".[1824] Furthermore, the Project site does not propose any structures (such as wind energy) that would potentially increase collisions for golden eagle. In order to minimize impacts on native wildlife, including golden eagle, modifications to MM 7-15 on page 5.7-191 shall be made to ban the use of rodenticides on the Project site as follows:

> The Homeowners Association shall supply an educational pamphlet to future residents of the Project site regarding: the importance of not feeding wildlife; information stating that trash (containing food) and microtrash that could potentially attract condors should not be accessible to wildlife; the necessity of keeping the ground free of fallen fruit from trees; and instructions about not leaving pet food outside. Additionally, in order to minimize impacts on native wildlife, the use of rodenticides on the Project site shall be prohibited.

Response to Comment F.8-144A:

The referenced document presents an updated study on population and sustainable take levels in the United States for bald and golden eagles. The causes of mortality discussed in this document, poisoning, collisions, and electrocution and starvation, were analyzed in the Draft EIR and not expected to occur as a result of Project development. See response to Comment F.8-144.

Response to Comment F.8-145:

The Draft EIR includes mitigation intended to prevent "take" of golden eagle. In addition, the MM 7-8 will be further modified to be more restrictive to add additional protection of golden eagle nests.

[1823] Fish and Game Code, No. 86
[1824] DRP 2017, p. 5.7-176

Based on this comment, MM 7-8 on page 5.7-179 of the Draft EIR is hereby replaced in its entirety with the following:

> The Project Biologist shall conduct pre-construction nesting bird surveys no earlier than seven days prior to any Project-related construction/ground disturbance activities within each construction area and a 500-foot buffer that occurs during the nesting/breeding season of special-status bird species potentially nesting on the site, with the exception of the special-status bird species addressed under separate subheadings below (including burrowing owl, golden eagle, and Swainson's hawk). The pre-construction surveys shall be conducted between January 1 and September 15, or as determined by the Project Biologist. If construction activities are delayed for more than 14 consecutive days, the surveys shall be repeated.
>
> The purpose of the pre-construction nesting bird surveys will be to determine whether occupied nests are present in the disturbance zone or within 500 feet of the disturbance zone boundary.
>
> If occupied nests are found, then limits of construction to avoid occupied nests shall be established by the Project Biologist in the field with flagging, fencing, fencing, or other appropriate barriers. The following minimum no-disturbance buffers will be required: 250 feet around active non-listed passerine nests and 500 feet around active non-listed raptor nests. Construction personnel shall be instructed on the sensitivity of nest areas. Project-related activities will not occur within the no-disturbance buffers. The Project Biologist shall serve as a construction monitor during those periods when construction activities are to occur near active nest areas to avoid inadvertent impacts to these nests. The Project Biologist may adjust the 250-foot or 500-foot setback at his or her discretion depending on the species, the behavioral baseline conditions determined through passive monitoring, and the location of the nest (e.g., if the nest is well-protected in an area buffered by dense vegetation). Once a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, construction may proceed in the setback areas. Monitoring reports shall include information regarding active nests and status of nests.

Please see response to Comment F.8-144.

Response to Comment F.8-145A:

The referenced article is presented as evidence that human disturbances can affect breeding golden eagles, even at a great distance. The article presents various recommended temporal and spatial buffer distances for golden eagles and concludes that the buffer sizes and timing should be site-specific. As stated in response to Comment F.8-145, the Draft EIR has been modified in MM 7-8 to clarify any raptor nest buffer (inclusive of golden eagles) shall be determined by the biologist, and shall be the appropriate size for avoiding disturbances, therefore avoiding take of any fully protected nest.

Response to Comment F.8-145B:

The referenced article studied cliff nesting golden eagles in the Phantom Canyon Preserve and used Geographic Information Systems to map the viewsheds (line of site) of six golden eagle nests. The standard 333-meter radius circular buffer was overlaid on the viewshed map. Inference by the Commenter that this method must be employed to avoid any disturbance to the nesting birds is unfounded. As stated in response to Comment F.8-145, MM 7-8 in the Draft EIR has been modified to clarify that any raptor nest buffer (inclusive of golden eagles) shall be determined by the biologist, and shall be the appropriate size for avoiding disturbances, therefore avoiding take of any fully protected nest.

Response to Comment F.8-145C:

The referenced article studied the effect of windfarms on golden eagles in Scotland. The Commenter presents the article as evidence that golden eagles avoid industrial areas within their territory. As stated on page 38 of the article, although the eagles avoided the windfarms (reason unknown), occupancy did not change and no real shift in the location of the core areas was observed. A direct comparison of golden eagle behavior patterns in relation to wind farms (with moving turbines) and a housing development cannot be made.

Response to Comment F.8-146:

The discussion of bald eagle utilization of the site is on the bottom of page 5.7-120 and the top of page 5.7-121 of the Draft EIR, and states that the bald eagle has not been observed on site. Page 5.7-148 of the Draft EIR states that Quail Lake, located off-site, provides suitable foraging habitat for the bald eagle where it has occasionally been observed. The discussion goes on to state that trees in the surrounding area provide potentially suitable nest sites for the bald eagle, but nesting at this location has not yet been documented. The lack of observations on site, the infrequent detections of this species adjacent to the site, and the lack of any known nesting in the area, as outlined in the Draft EIR, attests to the limited utilization of the Project area by bald eagle. Further corroboration is provided in the recent publication regarding the breeding birds of Los Angeles County which described bald eagles as rare migrants and winter visitors in the Project area from November to April, and mostly occurring around the larger lakes in the northwest part of the county.[1825] In fact, prior to the 2016-2017 breeding season, when a pair of bald eagles successfully nested in the San Gabriel Mountains, approximately 65 miles southwest of the Project site, bald eagles had not been detected nesting on the mainland in Los Angeles County since 1930.[1826] This supplemental information further demonstrates the extremely limited use of the Project area by bald eagle.

In regard to a quantification of suitable foraging habitat impacted by the Project, the Draft EIR provides several points within the bald eagle discussions describing the habitat. Page 5.7-121 of the Draft EIR states that potentially suitable foraging habitat occurs just off the site at Quail Lake and along the California Aqueduct. Page 5.7-120 mentions that bald eagles frequent estuaries, large lakes, reservoirs, major rivers, and some seacoast habitats.

[1825] Allen et al. 2016
[1826] *Ibid.*

Further discussion on page 5.7-120 states that fish are the major component of bald eagle diet, but waterfowl, gulls, and carrion are also eaten. The Draft EIR also discusses the presence of fish resources on and adjacent to the site, on page 5.7-48, explaining that because most watercourses in the area are ephemeral and infiltrate into sandy desert soils on and east of the Project site, fish habitat is extremely limited and only the most ubiquitous and tolerant fish species, such as the non-native mosquito fish (*Gambusia affinis*), are expected to occur. No stocked fish have been reported in the Project site. Common freshwater fish are present in adjacent off-site areas, such as Quail Lake and the Aqueduct; according to the DWR, Quail Lake contains striped bass (*Morone saxatilis*), channel catfish (*Ictalurus punctatus*), blackfish (*Orthodon microlepidotus*), tule perch (*Hysterocarpus traski*), threadfin shad (*Dorosoma petenense*), and hitch (*Lavinia exilicauda*).[1827] Although bald eagle may occasionally forage away from aquatic sources, clearly the preferred and primary foraging habitat type does not occur on the Project site. It is only due to the proximity to Quail Lake, and the California aqueduct to a lesser degree, that the bald eagle may potentially occur on site for foraging. From the information provided in the Draft EIR, it can be clearly deduced that there is no preferred foraging habitat on the Project site for bald eagle. Page 5.7-98, Table 5.7-8, specifies that this species occasional forages in rangelands and page 5.7-120 mentions occasional foraging on carrion as mentioned above. Foraging habitat on the Project site is thereby limited to rangelands adjacent to the primary foraging habitat of Quail Lake. A strict quantification of the foraging habitat impacted by the Project is unnecessary because the impact assessment provided on page 5.7-148 of the Draft EIR concludes the lack of an impact based on the complete lack of use of the Project site's potentially suitable habitat, as demonstrated through the Draft EIR's discussions of this species. In other words, the acreage of habitat potentially suitable for foraging on the site could be considered all foraging lands or grasslands, however, none of the habitat is expected to be used based on site surveys and historic evidence of the absence of this species in the Project area.

In regard to a quantification of suitable nesting habitat impacted by the Project, the Draft EIR provides a similar set of points within the bald eagle discussions. Page 5.7-120 of the Draft EIR states that bald eagles usually nest in trees near water, but are known to nest on cliffs. Page 5.7-121 of the Draft EIR states that due to the proximity of potentially suitable foraging habitat just off the site at Quail Lake and along the California Aqueduct, the bald eagle may potentially nest in trees on the site. Page 5.7-148 of the Draft EIR also mentions that trees in the area surrounding Quail Lake provide potentially suitable nests sites for the bald eagle, but goes on to state that nesting at Quail Lake has never been documented. The vegetation map shown in Exhibit 5.7-1, as well as the tree impact map of Exhibit 5.7-14 clearly show trees that would be impacted by the project. Proximate to Quail Lake, tree impacts (including temporary construction-period impacts) are limited to 50 trees within 3.55 acres of woodland located approximately one-quarter mile northwest of the lake, which can be deduced to be the only potentially suitable nesting habitat on the Project site. However, these trees would be highly unlikely to be utilized by nesting bald eagle given the large number of riparian trees which occur much closer to the lake along its shoreline. Further, summarizing the occurrence record, this species has not been detected nesting on the Project site over the

[1827] California Department of Water Resources, Public Affairs (DWR, Public Affairs). 2009. State Water Project Recreation Sites: Quail Lake. Sacramento, CA: DWR, Public Affairs.

course of many years of various surveys, described in Table 5.7-8, and has never been recorded nesting at Quail Lake or in the Project region and is considered extirpated from breeding in the Project region. Page 5.7-121 of the Draft EIR states that the success of any potential future breeding at Quail Lake would be dependent on the quality of the foraging opportunities provided by available aquatic habitats regardless, to some degree, of adjacent upland habitats. The Draft EIR definition of suitable nesting habitat, with detailed vegetation and tree impact quantities, provides for an adequate understanding of potential Project impacts to bald eagle nesting habitat.

The comment that the Draft EIR determines that the Project is not expected to have any impact to golden eagle is incorrect. The Draft EIR clearly states on page 5.7-150 that that the loss of approximately 6,416 acres of foraging habitat for golden eagle would be considered an adverse impact. The discussion goes on to state the impact would be considered less than significant, and this determination is based on the small amount of lost foraging habitat relative to the extensive amount of foraging habitat available regionally. Additionally, as mentioned on page 5.4-150 of the Draft EIR, this species has not been detected nesting on the Project site despite the many years of various surveys conducted, as listed in Table 5.7-8[1828]. Similarly, the comment that the Draft EIR relies on MM 7-6[1829] instead of providing an explanation is incorrect as shown above. However, the Draft EIR does rely on MM 7-8[1830] to prevent Project impacts on nesting golden eagle among other species in the unlikely event a breeding pair is present on the site in the future. Page 5.4-150 of the Draft EIR states that nests of golden eagle, and other species, would be protected by the Migratory Bird Treaty Act (MBTA). Therefore, MM 7-8, described on pages 5.7-179 and 5.7-180, is included to protect nesting birds during construction. This measure is an industry standard and requires surveys prior to commencing Project construction activities within the nesting bird season and requires no disturbance buffers to ensure bird nesting is able to proceed until an identified nest is no longer active. This measure also ensures adherence with the MBTA as well as Fish and Game Code protecting nesting birds and raptors.

The comment also states that MM 7-6 fails to address impacts to which bald eagle are vulnerable. The statement is true; however, MM 7-6 is a California condor-specific measure. This measure is not intended to address golden eagle, bald eagle, or any species other than the California condor. MM 7-8 addresses the potentially nesting golden eagle, potentially nesting bald eagle, among other potentially nesting avian species. However, it is worth noting that the specific impact types the comment describes as missing from this measure, including poisoning, electrocution, and collisions, are reduced within revisions to the Draft EIR as part of response to comments.

Also, in order to provide consistency and clarity regarding the analysis of bald eagles, the following text on page 5.7-148, in Section 5.7.6, Environmental Impacts, of the Draft EIR is hereby revised as follows:

1828 DRP 2017, p. 5.7-89
1829 *Id.,* p. 5.7-177
1830 *Ibid.*

~~All~~ Most adult California condors are wing-tagged and many are fitted with radio transmitters. ~~These birds have~~ The condor has been documented flying high over the area (with one reported landing), but foraging and breeding activities are conducted elsewhere and not on or in the vicinity of the Project site (Bloom 2009; BonTerra Psomas 2015d). Therefore, Project implementation is not expected to result in ~~any~~ impacts on the condor ~~these two species~~ and no mitigation is required. MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. The bald eagle may occur infrequently for foraging, and marginal breeding habitat occurs on-site or adjacent to Quail Lake. Due to the limited use expected, and available foraging habitat at Quail Lake, impacts to foraging habitat would be considered adverse but less than significant per State CEQA Guidelines. Potential breeding sites are located outside the impact area and direct impacts to breeding bald eagles are not expected to occur; however, MM 7-8 is provided to ensure no direct impacts occur.

Response to Comment F.8-147:

The Draft EIR clearly mentions avoidance of nesting raptors and other birds, which includes bald eagle, in MM 7-8 on pages 5.7-179 and 5.7-180. This measure is also specifically referred to in the bald eagle impact discussion on page 5.7-148. Many site-specific factors can influence the distance of appropriate buffers for any nesting bird. However, any disturbance that might result in failure of a nesting is outlawed. Therefore, the most appropriate approach, and by far the most commonly used, is for an on-site biologist to develop an appropriate buffer for each specific scenario to ensure no impacts to nesting birds. The Commenter's suggested buffer distances could be applied if determined to be appropriate at the time of occurrence in the future, but should not be pre-determined as a blanket buffer to fit all scenarios. In fact, the biologist may determine buffer distances greater than those suggested is appropriate in a particular scenario and would therefore be applied. Non-breeding buffers are not required based on the determination of less than signification impacts resulting from the highly unlikely potential for occurrence due to lack of primary foraging habitat on site and no observations on site as described in the impact assessment on page 5.7-148. In addition, the majority of the Project footprint, and thereby the majority of disturbances from the project occur at distances of greater than 600 meters from Quail Lake. Consequently, a management zone buffering the primary suitable foraging and nesting locations adjacent to the site, similar to that suggested, has been established within the Project design. The only exceptions include a road to the west that is expected to have infrequent truck traffic (i.e. National Cement Plant Road) and a proposed community park to the east that is expected to have minimal disturbances.

Additionally, and as stated in response to Comment F.8-145, MM 7-8 has been modified to include additional protection measures to further ensure the protection of nesting raptors and other nesting birds.

Response to Comment F.8-147A:

The footnote refers to two studies regarding bald eagles and raptors in general and their sensitivity to disturbance. The studies show a range of disturbances dependent on a variety of factors. All of the bald eagle areas analyzed are open water features such as rivers due to their prevalence to forage predominantly at these features. The Project is consistent with the idea of buffers as large as 750 feet as can been seen in the Project design surrounding Quail lake. Buffers around the lake are greater than 1,000 feet for nearly the entire circumference of the lake. In addition, implementation MM 7-8[1831] provides complete avoidance of impacts to nesting birds consistent with the Migratory Bird Treaty Act mentioned in the comment. Also see response to Comment F.8-147.

Response to Comment F.8-147B:

The referenced document is noted for the record. It is referenced in Comment F.8-147 to support an assertion regarding appropriate management zones for non-breeding bald eagle roosting sites. As noted in response to Comment F.8-147, non-breeding buffers are not required based on the determination of less than signification impacts resulting from the highly unlikely potential for occurrence due to lack of primary foraging habitat on site and no observations on site as described in the impact assessment on page 5.7-148. Please see F.8-147 for further discussion.

Response to Comment F.8-148:

As described in response to Comment F.8-146 and discussed in the Draft EIR on pages 5.7-120 and 5.7-121, the lack of observations on site, the infrequent detections of this species adjacent to the site, and the lack of any known nesting in the area outlined in the Draft EIR attest to the limited utilization of the Project area by bald eagle. The Draft EIR goes on to explain that impacts would be considered highly unlikely as a result of the rareness in the region. Direct impacts to bald eagle or impacts to recently occupied habitat would violate the Golden Eagle Protection Act; however, Project impacts on this species are not expected, and implementation of MM 7-8[1832] furthers verifies that the potential impacts do not occur consist with the requirements of the Golden Eagle Protection Act.

Response to Comment F.8-149:

No "take" of a white-tailed kite, a California fully protected species, is anticipated with implementation of the Project.[1833] The loss of foraging ground does not automatically equate to a reduction in the size of a population occurring in a region. Often, potentially suitable habitat is unoccupied. The results of surveys for many species listed in Table 5.7-8, Special Status Wildlife Species, beginning on Draft EIR page 5.7-89, were negative regardless of the fact that potentially suitable habitat is present on the Project site. Carrying capacity is based on a maximum fulfillment of potentially suitable habitat scenario, which is rarely realized at

1831 DRP 2017, p. 5.7-179
1832 *Id.,* p. 5.7-179
1833 *Id.,* p. 5.7-150

any given time for a population in a region.[1834] Species population sizes are typically continuously in flux as individuals' home ranges, foraging areas, and or nesting areas expand and retract into different potentially suitable habitat areas. Like most wildlife species, the population size of white-tailed kite in the region is dynamic and varies from year to year, season to season, and so on. This variation occurs naturally within most wildlife populations. Consequently, it cannot be assumed that the loss of a relatively small percentage of habitat of the regional population of white-tailed kite will automatically result in the loss of a breeding pair in the overall region and a reduction in carrying capacity. An additional example can be found in the Draft EIR on page 5.7-117, which describes increases in the regional population of Swainson's hawks. Recent surveys suggest that this species is recolonizing portions of its historic range in the Antelope Valley.[1835] In addition, recent surveys in 2008, 2009, and 2010 in the western Antelope Valley, east of the Project region, have found nesting Swainson's hawks at new sites.[1836] Habitat for this species, and presumably carrying capacity, has been reduced over the past 100 years as development has spread, but the Swainson's hawk population has been shown to be increasing in the Antelope Valley. Clearly there are a large number of factors which contribute to a population's size at any given time and loss of a relatively small percentage of that population's habitat cannot be assumed to have an automatic specific effect on one or more individuals, a pair, or a pair's ability to reproduce and subsequently effect the population size. Furthermore, "take" as defined by the USFWS is to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct[1837] and by CDFW as to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.[1838,1839] Project implementation, inclusive of permanent loss of habitat, is not expected to have any results that would meet the definition of "take" by USFWS or California terms. As such, the Draft EIR adequately assesses and determines that no "take" of white-tailed kite would occur.

Response to Comment F.8-150:

Swainson's hawks migrating through the Project area occasionally stop to forage, which is the explanation for the note on foraging. The Draft EIR states that the Swainson's hawk is expected to occur on-site for foraging, but is not expected to occur on-site for nesting.[1840] The Commenter's conclusion that Swainson's hawk populations in Antelope Valley are decreasing based on the use of more land for renewable energy generation and the fallowing of formerly irrigated agricultural lands related to water supply or other factors is noted.

1834 See https://en.wikipedia.org/wiki/Carrying_capacity.

1835 California Department of Fish and Wildlife (CDFW). 2015. California Natural Diversity Database. Records of Occurrence for the USGS Grapevine, Pastoria Creek, Winters Ridge, Liebre Twins, Frazier Mountain, Lebec, La Liebre Ranch, Neenach School, Alamo Mountain, Black Mountain, Liebre Mountain, and Burnt Peak, California 7.5-minute quadrangle maps. Sacramento, CA: CDFG, Natural Heritage Division.

1836 California Energy Commission and California Department of Fish and Game (CEC and CDFG). 2010 (June). *Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California.* Sacramento, CA: CDFG.

1837 16 U.S.C., §1532 [19]

1838 Fish and Game Code, No. 86

1839 DRP 2017, pp. 5.7-3 and -5

1840 DRP 2017, p. 5.7-116

Response to Comment F.8-150A:

This comment is a duplicate of Comment F.8-150; please see response to Comment F.8-150.

Response to Comment F.8-151:

Although marginally suitable breeding habitat occurs on-site, this species is not known to breed in the Project region and due to lack of observed breeding during multiple protocol breeding season surveys, Swainson's hawk is not expected to occur for breeding on the Project site. In order to provide clarity, the third full sentence on the top of page 5.7-149 in Section 5.7.6, Environmental Impacts, of the Draft EIR has been revised as follows:

> The primary threat to this species is the loss of breeding habitats, which are not present on the Project site; therefore, these impacts are considered adverse but less than significant and no mitigation is required. As with other migratory birds, however, this species may occur as a breeder in the future and MM 7-2 is included to conduct pre-construction protocol surveys for the Swainson's hawk to confirm absence prior to disturbance.

In response to comments, additional detail has been added to MM 7-2 regarding pre-construction surveys and measures (see response to Comment B.4-26).

In review of the Draft EIR data supporting the Swainson's hawk discussion on pages 5.7-115 and 5.7-116 of the Draft EIR, the following revision is hereby made to the third sentence of the first full paragraph on page 5.7-116 to clarify the statement and reference:

> ~~Unpublished data from Pete Bloom and Woodridge (2004) indicates that there has been recent recolonization of historic habitats in the Antelope Valley and population increases in the Owens Valley.~~ Recent surveys have suggested this species is recolonizing portions of its historic range in the Antelope (CDFW 2016b).

In response to this comment, the following document is added to the administrative record:

California Department of Fish and Wildlife (CDFW). 2016b. Five-Year Status Review: Swainson's Hawk (*Buteo swainsoni*) in California. Sacramento, CA: CDFW. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=133622&inline.

Response to Comment F.8-152:

In preparation of the Draft EIR, all California species were assessed.[1841] Species without clear potential to occur based on habitat suitability and/or existing records are removed from further evaluation. The assessment of ring-tailed cat (or ringtail), in the region and on the site, is based on best available scientific information coupled with habitat assessments conducted by biologists traversing the site on multiple occasions searching for potentially suitable habitat elements and evidence of occupation of any and all wildlife species. The

[1841] *Id.,* pp. 5.7-18 to -50

determination not to include ringtail is based predominantly on known range and distribution and habitat suitability. Based on these elements, species are often excluded and site surveys would not be necessary. However, in an effort to ensure ringtails are not directly impacted, a pre-construction survey and direction on how to proceed depending on the results will be added to the Draft EIR. MM 7-2, beginning on page 5.7-175, regarding pre-construction surveys will be modified by inserting the following text to the end of the measure in a new paragraph:

> Pre-construction surveys for the ring-tailed cat shall be conducted throughout the Project disturbance area in the appropriate season within the year prior to disturbance. If results are negative, Project activities will proceed without further restrictions in regard to this species. If detected, the applicant shall consult with CDFW and modify Project activities at that time to ensure complete avoidance and no take of ring-tailed cat will occur.

Response to Comment F.8-152A:

The cited document is acknowledged and will be provided as part of the record. The hyperlink provides the website location for the ring-tailed cat range data cited by the Commenter in Comment F.8-152. Please see response to Comment F.8-152.

Response to Comment F.8-153:

The willow flycatcher subspecies are State-listed as endangered; however, as noted on the CDFW Special Animals listing and noted on page 5.7-94 of the Draft EIR, the status is specific to nesting. Based on the subspecies distribution, only the southwestern willow flycatcher has potential to nest in the Project region. Therefore, only analysis of the nesting potential for the southwestern willow flycatcher is applicable regarding regulatory compliance on the Project site. Migrating birds that are in an area momentarily are typically not considered to "occupy" the site. In migration, suitable habitat becomes far more diverse and these birds can be seen in areas, such as chaparral, which considered non-suitable for nesting. The USFWS survey protocol itself is based on trying to determine occupation while breeding; therefore, surveys may note the observation of willow flycatchers during migration on many project sites, but the results of the focused surveys submitted to the USFWS do not conclude that the site is "occupied." On the contrary, such reports will routinely indicate that willow flycatcher was observed as a migrant and was not detected breeding and the site is therefore unoccupied. The industry standard is to consider these results negative. The statement that the site is not occupied by these species is accurate as well as the determination of less than significant impacts based on these results.

Response to Comment F.8-153A:

The footnote links to a CDFW California Natural Diversity Database of State & Federally Listed Endangered & Threatened Animals of California. The purpose of this database is to present the species name along with the listing (State or federally-Threatened or Endangered) and listing date. The CDFW Special Animals List is a more comprehensive document which tracks all animal taxa tracked by the CDFW's California Natural Diversity

Database (CNDDB), regardless of their legal or protection status. This document clearly shows the willow flycatcher species and subspecies' Endangered status applies when the bird is nesting. The willow flycatcher does not have "fully protected" status, which appears to be the Commenter's suggestion.

Response to Comment F.8-154:

Although the riparian bird species mentioned were surveyed for and determined not to occupy the Project site during the breeding season, there remains potential for this to change in the future. The statement in the Draft EIR that there may be future breeders on the site is accurate and the mitigation measure to conduct surveys for them, including western yellow-billed cuckoo, prior to construction provides a mechanism to ensure that these conditions remain the same.[1842] MM 7-5 is clarified to include western yellow-billed cuckoo:

> Within the year prior to, and within the appropriate season, focused surveys for the following special status species shall be repeated: arroyo toad, Tehachapi slender salamander, California red-legged frog (concurrent with two-striped garter snake and western pond turtle focused surveys), western spadefoot, mountain plover, southwestern willow flycatcher, western yellow-billed cuckoo, and least Bell's vireo. Surveys shall be conducted in accordance with the approved CDFW or U.S. Fish and Wildlife Species (USFWS) protocol for that species.

Due to the Project buildout schedule of approximately 20 years, it could possibly change, although the likelihood is typically reduced as more years and surveys continue to indicate negative results. The impact assessment presented in the Draft EIR is based on existing conditions, consistent with the State CEQA Guidelines, and currently the site is not occupied. Sites that are not occupied are assessed accordingly. If the site was to become occupied in the future, MM-17 provides additional protection. The following text is hereby added to the last paragraph of MM 7-17 on page 5.7-193 of the Draft EIR:

> Domestic cats shall be prohibited from free-roaming (i.e., be allowed outdoors), and shall be required to have a microchip. All dogs shall be required to be leashed while in the designated natural open space areas, and bags for removing pet excrement will be provided at trail entrances and other appropriate locations. In addition, all dogs and cats shall be required to be neutered or spayed; all dogs shall be required to have a microchip; and potential owners shall show evidence prior to entry into the Centennial Development, as required by Los Angeles County Code (Section 10.20.350). These restrictions/features and their purpose will be described within educational material and distributed to new homeowners and made available to all homeowners as needed.

[1842] DRP 2017, pp. 5.7-179, 180, MM 7-8

Additionally, the following text is hereby inserted in MM 7-17 following the first sentence in the first paragraph on pages 5.7-192 and 5.7-193:

> The program's educational materials shall discuss the presence of native animals (e.g., coyote, bobcat, and mountain lion), indicate that those native animals could prey on pets, indicate that no actions shall be taken against native animals should they prey on pets allowed outdoors, and indicate that pets must be leashed while using the designated trail system and/or in any areas within or adjacent to open space. The educational materials shall also discuss the impacts pets can have on native birds. Control of stray and feral cats and dogs will be conducted in open space areas on an as-needed basis. Feral cats and dogs may be trapped and deposited with the local Society for the Prevention of Cruelty to Animals or the Los Angeles County Department of Animal Control.

Response to Comment F.8-155:

The comment is noted. The County notes that on April 19, 2018, the California Fish and Game Commission authorized the listing of tricolored blackbird as a "threatened" species.[1843] However, it is noted that Candidate species are afforded the same legal protections as State-listed species. Therefore, consultation with CDFW will be required. The relevant analysis therefore remains the same under CEQA, and no mitigation measure updates are required. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-156:

The Draft EIR text referenced by the Commenter refers to potential Project impacts before implementation of any biological resources mitigation measures. With respect to foraging habitat, the Draft EIR indicated that loss of foraging habitat could interrupt breeding if both Quail Lake and the north pond were used for breeding at the same time. As noted above, it has been nine years since any tricolored blackbird were found at the north pond, the habitat has become severely degraded, and the area is not likely to become suitable in the future. The species routinely shifts breeding locations, and there are also existing suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the existing foraging habitat for that season during construction, and the land use adjacent to Quail Lake up to approximately ½ mile is almost entirely open space recreation and, therefore, will be permeable and available for foraging. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance riparian areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional

[1843] FGC 2018; Nossaman 2018

breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide forage ranging species to continue to persist in the region.

Therefore, the Draft EIR is hereby clarified with the following addition to the last full paragraph on page 5.7-149:

> Due to the shifting of tricolored blackbird nesting locations from year to year, a subset of two or three of the available nesting locations may represent the entire regional breeding population. A substantial reduction of foraging lands surrounding this subset of nesting locations could result in considerable reduction of nesting success. A review of the Quail Lake and the on-site colony subset identified a potential post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In a given year, if these two areas were used for nesting, the reduced availability of suitable foraging land could result in substantial reduction in nesting success. However, the north pond has become unsuitable habitat, so the likelihood of its future use by tricolored blackbird is very low. Additionally, the species shifts breeding locations between sites, and there are also existing potentially suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the breeding colony for that season during construction. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance wetland areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide forage ranging species to continue to persist in the region. Based on the revised MMs 7-7, 7-10, and 7-12, the impacts to foraging habitat are less than significant.

Response to Comment F.8-157:

The comment summarizes content of the Draft EIR.

Response to Comment F.8-158:

Please see response to Comment F.8-156. No additional enhancement is required, as MMs 7-10 and 7-12 will preserve 15,258 acres of tricolored blackbird foraging and breeding habitat. Accordingly, MM 7-7 to further respond to this concern and those mentioned in other comments, the following edits are hereby made to MM 7-7:

The Project shall incorporate avoidance and additional open space buffer features for each of the two ~~this~~ known tricolored blackbird nesting areas on and adjacent to the Project site ~~area~~. Permanent impacts will be restricted to a distance of 400 feet from the nesting area excluding small impact areas associated with infrastructure and utilities along SR-138 immediately south of Quail Lake. The nesting area will be delineated by a qualified Ornithologist based on all available data (three years of site-specific data shall be used). Temporary impacts (i.e., construction noise) within a ¼ mile ~~400 feet~~ of active nesting areas shall be restricted to the non-breeding season. The breeding season for this species shall be considered April 1 through July 1. The applicant shall consult with CDFW and may obtain an Incidental Take permit if determined appropriate.

~~The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat. Potentially suitable areas for enhancement and preservation include lower Oso Canyon proximate to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source.~~

Response to Comment F.8-159:

The Draft EIR provides mitigation for impacts to the American badger, among other species, through implementation of MMs 7-2 and 7-3 described on pages 5.7-175 through 5.7-177, which require pre-construction surveys, biological monitoring during construction, and relocation of some species to areas outside Project's impact footprint. In review of the Commenter's request, MM 7-2 of the Draft EIR has been modified. These modifications, described in response to Comment B.4-29, provide greater detail regarding the preconstruction and avoidance steps to be implemented for the American badger. With these changes, direct impacts on badger individuals is entirely avoided through the use of clear den marking and buffer establishment. However, passive relocation is relied on in some sense because badgers that vacate dens or young that disperse from dens in the Project construction zone are expected to relocate within adjacent regional open space areas. As stated in the special status mammals impact analysis in the second paragraph of page 5.7-153, compared to the amount of suitable habitat available in the region, the loss of habitat resulting from Project implementation would be less than significant. As described on pages 5.7-126 of the Draft EIR, this species occupies a wide variety of habitats and ranges throughout the State, such as dry open stages of most shrub, forest, and herbaceous habitats with friable soils. Badgers are generally associated with treeless regions, prairies, park lands, and cold desert, as described on page 5.7-98 of the Draft EIR. These various habitat types constitute a large percentage of the Project region. Based on review of the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program

(FRAP) most recent vegetation data for the region[1844], areas of likely suitability are in excess of 155,000 acres in the Project region. In addition, several vegetation studies, listed in Table 5.7-2 beginning on page 5.7-19 and provided as Appendix 5.7-B of the Draft EIR, and a review of the Mitigation Preserve lands (on- and off-site) presented in Appendix 5.7-C of the Draft EIR, demonstrate that the dominant vegetation types within these immediately adjacent lands to be preserved and beyond are consistent with the habitat requirements for the American badger, and contain more than 14,000 acres of grassland among other suitable vegetation types.[1845] Consequently, badgers that may relocate from the Project disturbance area into adjacent lands and beyond throughout the Project region are expected to encounter sufficient opportunity to persist in the region with others badgers of the regional population. In regard to "take" resulting passive relocation, the Draft EIR does not authorize any individual to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill American badger in accordance with Section 86 of the Fish and Game Code, and there is no evidence provided to suggest the contrary.

In response to this comment, the following document is added to the administrative record:

California Department of Forestry and Fire Protection (CAL FIRE). 2015 (Release date). Fire and Resource Assessment Program: FVEG. Sacramento, CA: CAL FIRE. http://frap.fire.ca.gov/data/frapgisdata-sw-fveg_download.

Response to Comment F.8-159A:

The document referred to in the footnote describes American badger morphology, subspecies, distribution, and ecology as well as home range size. The document shares a few studies of limited robustness such as studies estimating species home ranges based on tracking of a single individual. The document also mentions a large range in reported number of dens per hectare. However, in general, the document supports the Commenter's statement in Comment F.8-159 that it is feasible for several badgers could be displaced as result of Project implementation. Pages 5.7-98 and 5.7-126 of the Draft EIR acknowledges suitable habitat of the site and observations indicating site occupation. The impact analysis on page 5.7-153 of the Draft EIR states that the impacts to the species are potentially significant and that mitigation is required. The Draft EIR is consistent with the information presented in the referenced paper.

Response to Comment F.8-160:

There are no officially recognized focused survey protocols for either the silvery legless lizard or coast horned lizard. Determinations of presence or absence are typically based on range and habitat suitability, and these factors are sufficient for estimating site distribution and potential Project impacts accordingly. Focused surveys are not conducted for most species that are assessed for potential impacts, this is standard practice. Furthermore, the impacts of lost habitat do not only look at the acreage of impact in and of itself, but rather a

[1844] California Department of Forestry and Fire Protection (CAL FIRE). 2015 (Release date). Fire and Resource Assessment Program: FVEG. Sacramento, CA: CAL FIRE. http://frap.fire.ca.gov/data/frapgisdata-sw-fveg_download.
[1845] DRP 2017, p. 5.7-158, Table 5.7-12

comparison as to the percentage of the total regional population. This can be estimated by reviewing the description of preferred suitable habitat provided in Table 5.7-8 on Draft EIR pages 5.7-90 and 5.7-110. Habitat includes coastal dune, valley-foothill, chaparral, and coastal scrub habitats. Of these habitats, the site has valley-foothill but does not have any of the other preferred habitats.[1846] A review of an aerial photograph in combination with knowledge of the region presents an approximation of the regionally potentially suitable habitat. This establishes an understanding of the Project's effect on the sustainment of the regional population of this species. It is important to note that the assumption of 700 acres of potentially suitable habitat[1847] is conservative and assumes maximum occupation of all potentially suitable habitat. This is highly unlikely to be the case because potentially suitable habitat is often found to be unoccupied. Therefore, the impact assessment identifies the worst-case scenario for extent of impacts on this species. A refinement of this area following focused surveys would only reduce the impact. Based on these factors, the impacts to these species are considered less than significant.[1848] Implementation of MMs 7-2 through 7-4,[1849] which require avoidance of impacts outside disturbance limits, pre-construction surveys, and biological monitoring (including relocation of individuals from the Project's impact footprint, if detected) would further help these species.[1850] Lastly, it should be noted that incidental loss of individuals that go undetected and/or are unable to be captured and relocated represent a sustainable impact for regional populations. That is to say, the regional population of silvery legless lizards is likely to persist as such with both the permanent habitat loss as well as possible accidental loss of a number of individuals remains a relatively small impact compare to the regional habitat suitability.

Response to Comment F.8-161:

Proposed MMs 7-2 through 7-4 are intended as salvage activities to minimize direct loss. They are not intended to avoid all impacts and they are not required to reduce the impact because it was determined to be less than significant. Therefore, implementation of these measures, although potentially less than 100 percent effective, is a further reduction in impacts to this species. Please also refer to response to Comment F.8-160.

Response to Comment F.8-161A:

This comment is a footnote which refers to a 1991 study by C. Kenneth Dodd, Jr. and Richard A. Siegel which looked at the success of relocation and translocation programs for amphibians and reptiles. The authors also looked at reasons why the methods are a popular form of mitigation. In conclusion, a series of recommendations are provided to guide future relocation efforts. Primarily, prior to commencing with a relocation effort, the site should be studied, a plan prepared, and monitoring should be required. Proposed MMs 7-2 through 7-4 generally address these concerns and require approval of a plan prior to relocation efforts to provide greater assurances of success.

1846 *Id.,* p. 5.7-147
1847 *Ibid.*
1848 *Ibid.*
1849 *Id.,* p. 5.7-175 to -177
1850 *Id.,* p. 5.7-147

Response to Comment F.8-162:

As demonstrated by the avian species observed and documented in the Plant and Wildlife Compendium in Appendix 5.7-A of the Draft EIR, birds do use the Project site during migration. Project surveys identified specific parts of the Project site as particularly valuable to migrant birds. As a result, PDF 7-3[1851] was designed to protect these Project features and minimize potential impacts on migratory birds. The Draft EIR acknowledges the migration of common bird species through the Project site on page 5.7-49; and analyzes the migration of individual special status species through the Project site beginning on pages 5.7-112 through 5.7-124, and 5.7-148 through 5.7-151 of the Draft EIR. Quantifying the exact number of birds migrating through the Project site via point counts is not necessary, as the Draft EIR takes a conservative approach and assumes presence of migrating birds on the Project site for those that are known to utilize similar habitat types found on the Project site and that are known to migrate through the region. Baseline data was gathered during the previous nearly 20 years conducting biological surveys on the Project site and, and as noted above, resulting data is provided in the various wildlife compendia. Any potentially significant impacts to migrating birds are mitigated to a less than significant level via MM 7-8, which prevents impacts to nesting birds per the Migratory Bird Treaty Act; MM 7-2, which prevents impacts to Swainson's hawk and burrowing owl; and MM 7-5, which prevents impacts to mountain plover, southwestern willow flycatcher, western yellow-billed cuckoo, and least Bell's vireo. Additionally, the loss of roughly 7,000 acres of land impacted by the Project (rather than almost over 10,000 as stated in the comment) is offset by the approximately 5,624 acres of on-site open space (of which approximately 3,866 acres are designated as SEA 17, to be preserved in perpetuity within the site boundaries), and the approximately 39,213 acres of off-site open space acres that would be set aside for preservation as mitigation for impacts to biological resources, including migrating birds. Impacts to bats are also analyzed in the Draft EIR, and any potentially significant impacts are mitigated to a less than significant level through MM 7-9, which prevents impacts to roosting bats; MM 7-3 for biological monitoring during construction; MM 7-4 for clear demarcation of disturbance limits. In addition, please see responses to Comments F.8-144, F.8-145, and F.8-146.

Response to Comment F.8-163:

Single pairs or individual burrowing owls have been observed on or in the vicinity of the Project site during multiple bird surveys performed between March 2000 and July 2015.[1852] Focused burrowing owl surveys have also been conducted.[1853] Specifically, qualified wildlife biologists conducted protocol-level focused surveys for the western burrowing owl in 2003 and 2006.[1854] One pair was observed in the eastern portion of the site in 2001 and one pair was observed just off the site to the north in 2006 using an abandoned irrigation standpipe; this species was not detected on site since 2001.[1855] Additionally, as part of a comprehensive grassland quality survey conducted on the Project site in April 2006, a search for evidence

1851 *Id.,* p. 5.7-139
1852 *Id.,* p. 5.7-19 to -23, Table 5.7-2
1853 *Id.,* Appendix 5.7-B, Birds-4; *Id.,* Appendix 5.7-B, Gen-6
1854 *Id.,* p. 5.7-22, Table 5.7-2
1855 *Id.,* p. 5.7-115

of burrowing owl presence on the site, as well as a habitat and occurrence record evaluation using geographic information system (GIS) databases and analytical tools, was conducted by Natural Resource Consultants (NRC). Through these methods, NRC determined that burrowing owls are likely to be present on the Project site but are locally distributed and uncommon. During at least 1,044 man-hours of fieldwork over three weeks, two individual burrowing owls were observed, both of which were slightly off-site to the east. NRC concluded that though grassland habitats preferred by burrowing owls are present on the site, burrowing owls are uncommon and/or locally distributed.[1856] The Project site is at the edge of the known range of the species as shown by the CDFW's California Wildlife Habitat Relationships Database.[1857] Although not focused protocol-level surveys for burrowing owl, the biologists conducting special status plant survey transects for the Project in 2015 and 2016 also searched for, but did not find, the burrowing owl or burrowing owl sign during the surveys. Suitable burrowing owl habitat consists of relatively short vegetation with only sparse shrubs and taller vegetation combined with the presence of burrows for roosting and nesting.[1858] In California, burrowing owls are largely dependent on California ground squirrels (*Spermophilus beecheyi*) to dig their burrows,[1859] although burrows from less common burrowing wildlife such as kit fox may also be used. The surveys have found the California ground squirrel, as well as kit fox or other suitably sized burrows, to be largely absent from the Project site; as a result, the Project site's grasslands lack suitable burrows for the burrowing owl and is generally unsuitable for that species. The Draft EIR ultimately uses a conservative approach by requiring specific burrowing owl mitigation. Also see response to Comment F.3-13.

In order to provide clarity, the following text is hereby inserted after the second paragraph of MM 7-2 on page 5.7-175 of the Draft EIR:

> Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate burrowing owl pre-construction surveys and avoidance and mitigation measures as identified below.
>
> *Burrowing Owl Pre-Construction Surveys*
>
> The project biologist shall conduct pre-construction take-avoidance surveys no more than 30 days prior to ground-disturbing activities within each construction area. Focused burrowing owl surveys shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (March 2012). Breeding season surveys shall include at least four survey passes completed between February 15 and July 15, with at least one visit between February 15 and April 15, and a minimum of three survey visits (at least 3 weeks apart) between April 15 and July 15, including at least one visit after June 15. Non-breeding season surveys shall include at least four visits spread evenly throughout the non-breeding season. The surveys

1856 *Id.,* Appendix 5.7-B, Birds-4
1857 Zeiner, et al. 1990
1858 Gervalis et al. 2008
1859 *Ibid.*

shall be conducted in suitable burrowing owl habitat within 150 meters (492 feet) of the project footprint. Surveys shall be conducted by walking 20-meter transects. Because burrowing owls can recolonize a site after a few days, time lapses between project activities trigger subsequent take avoidance surveys, including, but not limited to an additional survey within 24 hours of ground-disturbing activities. Once surveys are completed, the project biologist shall prepare a survey report on the survey methods and results.

Burrowing Owl Avoidance and Mitigation Measures

Submit for DRP and CDFW approval and subsequently implement a Burrowing Owl Exclusion Plan, which includes four avoidance and relocation strategy tiers and associated mitigation requirements set forth in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012): Tier 1 – Avoidance Buffers; Tier 2 – Passive Relocation; Tier 3 – Prevention of Recolonization of Development Areas; and Tier 4 – Active Relocation (Optional). Site monitoring shall be required prior to, during, and after exclusions of burrowing owls from their burrows. Excluded burrowing owls shall be monitored and documented using artificial or natural borrows on adjoining Mitigation Preserve lands or other open space.

Avoidance buffers shall be established in accordance with the buffer distances described in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012), which range from 50 to 500 meters, depending on the season and level of disturbance. The buffers may be reduced, but only after consultation with and approval from CDFW.

In addition, the following paragraph in MM 7-2 on page 5.7-175 is hereby deleted:

~~Pre-construction burrowing owl and Swainson's hawk surveys shall be conducted in all potentially suitable habitat areas prior to initial site preparation. Methods employed shall be consistent with standard and appropriate protocols for both species within the appropriate season of the year prior to construction. Burrowing owl pre-construction surveys shall be conducted prior to the start of construction/ground-breaking activities. Surveys will be conducted following the California Department of Fish and Wildlife's (CDFW's) 2012 burrowing owl survey protocol. These surveys shall be conducted weekly beginning 30 days prior to the start of construction with the final survey occurring 1 day prior to construction.~~

Response to Comment F.8-163A:

Of the 94 total pairs of burrowing owl detected in the western Mojave Desert region during the referenced 2006-2007 study,[1860] most were clustered in the Antelope, Apple, and Lucerne Valleys, where agriculture and residential areas were more concentrated than elsewhere in this region. These results seem to compare favorably with the results of the Los Angeles County Breeding Bird Atlas that shows most burrowing owl pairs were situated around Lancaster and Palmdale.[1861] This breeding bird atlas project concluded that the Los Angeles County population of burrowing owls is probably less than 50 pairs. Based on these and other studies in the region, the distribution of burrowing owls in the region appears to be of a rather sparsely distributed species that concentrate in semi-colonial gatherings in areas that provide a combination of suitable foraging habitat with suitable nesting and roosting burrows. The Project site appears to provide the former, but not the latter. The information presented in the study is consistent with the Draft EIR analysis for this species. Also see response to Comment F.8-163.

Response to Comment F.8-164:

The Draft EIR assesses the presence and suitable habitat for northern harrier and loggerhead shrike;[1862] and includes the northern harrier and loggerhead shrike in the impact analysis.[1863] As discussed on page 5.7-150, "The golden eagle, northern harrier, and white-tailed kite have been observed foraging on the Project site, but nesting has not yet been documented on the Project site. Project implementation would result is the loss of approximately 6,416 acres of foraging habitat for these raptors that would be considered adverse, but less than significant. The potential exists for all three raptors to nest on the Project site. As golden eagle and white-tailed kite are California Fully Protected species, "take" would not be allowed. In addition, the nests of all three species would be protected by the Migratory Bird Treaty Act (MBTA). Therefore, MM 7-8 is included to protect nesting birds during construction." As discussed on page 5.7-151, "Small numbers of loggerhead shrikes have been observed year-round on the Project site. Although nesting has not yet been documented, this species is expected to breed on the Project site. Relative to numbers of this species elsewhere in the Antelope Valley, the Project site does not support a population that would be considered regionally important; therefore, the loss of approximately 460 acres of suitable habitat for this species would be considered adverse, but less than significant. The nests of this species would be protected by the MBTA; therefore, MM 7-8 is included for protection of nesting birds during construction."

1860 Wilkerson, R.L. and R.B. Siegel. 2011. Distribution and Abundance of Western Burrowing Owls (*Athene Cunicularia hypugaea*) in Southeastern California. *The Southwestern Naturalist*, 56(3):378-384. Southwestern Association of Naturalists.

1861 Allen, L.W., K.L. Garrett, and M.C. Wimer (Allen, et al.). 2016 (June 3). *Los Angeles County Breeding Bird Atlas*. Los Angeles, CA: Los Angeles Audubon Society.

1862 DRP 2017, p. 5.7-117 and -121

1863 *Id.,* p. 5.7-150 and -151

Response to Comment F.8-165:

The study results provided in the comment are acknowledged. The data presented is for the entirety of Tejon Ranch, which does not necessarily represent the Project site. Recent population distribution data received from Tejon Ranch shows a distribution concentrated north east of the project site within the Mitigation Preserve with much more infrequent occurrence on the Project site (see new Exhibit B.4-34). New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. Furthermore, the on-site observations are largely within the on-site preserve area. These data are consistent with the Draft EIR analysis and the determination of less than significant impacts. In addition, as stated on page 5.7-153 of the Draft EIR, as part of the Ranch-wide Management Plan,[1864] which is an implementation tool of the Ranch-Wide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures that are also supported by CDFW. Potential measures could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation; completing further evaluation of modeling tools at a site-specific level (such as those used on the Carrizo Plain), and incorporating volunteer involvement with supportive activities such as fencing retrofits.

Response to Comment F.8-165A:

The footnote refers to a study titled "*A literature review and analysis of pronghorn populations at Tejon Ranch, California*" authored by S. G. Kohlmann and J.D. Yoakum prepared for the Center for Biological Diversity. The study looked at the population of pronghorn on the southern slope of the Tehachapi range, which is the same population discussed in the Draft EIR on pages 5.7-127, 5.7-128, and 5.7-153. The facts of the pronghorn population found in the document are consistent with the Draft EIR discussion. The study goes on to describe the decline of the population and potential issues. As described on page 5.7-153, regardless of these circumstances, the Project's impact would be considered less than significant pursuant to CEQA. However, please note that as part of the Ranch-wide Management Plan,[1865] which is an implementation tool of the Ranch-Wide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures that are also supported by CDFW. Potential measures could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation, completing further evaluation of modeling tools at a site-specific level (such as those used on the Carrizo Plain), and incorporating volunteer involvement with supportive activities such as fencing retrofits as described on page 5.7-153 of the Draft EIR. Also see response to Comment F.8-165.

Response to Comment F.8-166:

The Commenter's claim that Project implementation will likely extirpate the population of pronghorn occurring on Tejon Ranch is unfounded. The Project site represents a small fraction of the land that comprises Tejon Ranch. The data shows that Pronghorn do not

1864 Final EIR Appendix 5.7-D
1865 *Ibid.*

substantially use or rely on the Project site and preservation of the Mitigation Preserve and management of the grasslands in perpetuity consistent with the Ranch-wide Management Plan will benefit the pronghorn.

Response to Comment F.8-167:

Please see responses to Comments F.8-165 and F.8-166, above. In regard to the observations of pronghorn at the Poppy Preserve and Petersen Ranch, the occurrences, assuming they have been verified, can only be considered outliers at this time. Individuals of regional populations of wildlife species are sometimes found outside the known occurrence area. However, unless the occurrence is repeated, it is typically considered a single event and not evidence of a population trend or expanded distribution. Further evaluation on impacts to this species is unwarranted based on responses to Comments F.8-165 and F.8-166 and the existing evaluation in the Draft EIR.

Response to Comment F.8-168:

Please see pages 5.7-50 through 5.7-64 and 5.7-164 through 5.7-170 of the Draft EIR for an in-depth and adequate discussion of wildlife movement, which includes post-Project impact considerations, connectivity of different guilds, and a complete evaluation of the Project's impacts on wildlife movement. Please note that consideration is given to major movement deterrents in the Project area, including the SR-138 and the California Aqueduct, due to their substantial potential to prevent movement of some wildlife. Accordingly, passage points (some of which are bridges) are discussed at length.

Response to Comment F.8-169:

Please see response to Comment F.8-168 above.

Response to Comment F.8-170:

The Commenters' suggestion that the County is required to designate the Project site as a SEA is both meritless and time barred.

The six selection criteria from the County's General Plan do not list characteristics that compel the County to designate a particular area as a SEA. The criteria describe necessary prerequisites that *permit* the County to *exercise its discretion* to designate an area as a SEA. (See LACDRP 2015: "All of the County's SEAs and CRAs *must* satisfy at least one of the six SEA selection criteria" [emphasis added].[1866]) The fact that an area is eligible to be designated as a SEA does not mean that it must be so designated. Moreover, as the Commenters acknowledge, the Project site does not meet the first criterion used by the County in determining whether to designate a SEA: that the location is the "habitat of core populations of endangered or threatened plant or animal species."[1867]

[1866] LACDRP 2015, Appendix G, p. 52
[1867] *Ibid.*

It is well established that a legislative body's determinations under its General Plan are entitled to "great deference," because "the body which adopted the general plan policies in its legislative capacity has unique competence to interpret those policies when applying them in its adjudicatory capacity."[1868] In 2015, the County Board of Supervisors carefully applied the requirements and guidance of its General Plan when deciding which areas of the AVAP should be designated as SEAs. Ultimately, the Board of Supervisors designated 342,773 acres of SEA within the AVAP, adding "o*ver 200,000 new acres* of designated Significant Ecological Areas" as compared to the pre-2015 plan.[1869] At the same time that the Board "vastly expanded SEAs," the Board also decided not to designate an SEA in the West Economic Area in order to ensure that development would meet the AVAP's goal "to direct expected growth into the EOAs, the areas specifically designated for growth under the Rural Preservation Strategy."[1870] The Commenters cite no authority suggesting that, simply because an area meets some of the County's SEA selection criteria, the area must be designated as an SEA.

Regardless, the decision about whether the Project site should be designated as an SEA is no longer at issue. The determination that the Project site should not be designated as an SEA was final at least as of June 2015, when the Board of Supervisors approved the AVAP and decided not to designate the Project site as an SEA. No party filed any challenge contending that the Board was required to designate the Project site as an SEA, and neither did any party file any challenge contending that the lack of an SEA designation was inconsistent with the County's General Plan. The statute of limitations to bring any such challenge expired more than two years ago.[1871]

Commenter CBD, the only party to challenge to the County's approval of the AVAP, did *not* argue in its challenge that the County was required to designate the Project site as an SEA or that the County's failure to do so violated the County's General Plan or any other applicable law.[1872] As described in responses to Comments F.8-229 and F.8-233, CBD only challenged the County's CEQA compliance when approving the AVAP, and even CBD's CEQA challenge was extremely narrow, arguing only that the AVAP EIR and County approval findings failed to reflect certain relatively minor amendments the County Board of Supervisors made in June 2015 to the version of the AVAP presented to the Board in November 2014.[1873] As described in responses to Comments F.8-229 and F.8-233, in May 2017, the Los Angeles

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1868 *Highway 68 Coalition v. Cty. of Monterey* (2017) 14 Cal.App.5th 833, 896 [quoting *Save Our Peninsula Cmte. v. Monterey Cty. Bd. of Supervisors*, (2001) 87 Cal.App.4th 99, 142]

1869 County of Los Angeles' Opposition to Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles,* No. BS156932 (L.A. Cty. Sup. Ct. Dec. 12, 2016) ("County AVAP Br."), at pp. 1, 9 (emphasis in the original)

1870 *Id.*, pp. 2, 11

1871 Gov. Code §§ 65009(c)(1), 65860(b)

1872 Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles,* No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016) ("CBD AVAP Open. Br."); Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017) ("CBD AVAP Reply Br.")

1873 *Ibid.*

Superior Court rejected commenter CBD's narrow CEQA challenge, affirming the validity of the AVAP EIR.[1874]

In addition to being time-barred, any argument that the County is required to designate the Project site as an SEA is also barred by basic principles of res judicata. "Res judicata bars not only the reopening of the original controversy, but also subsequent litigation of all issues which were or *could have been* raised in the original suit" (citation omitted, emphasis added).[1875] Since commenter CBD could have made this argument in its challenge to the AVAP, and declined to do so, it will not be able to bring any subsequent action to make this claim.

Moreover, as described in response to Comment F.8-233, the Project site has been identified for development in several different previously approved plans, and in several different certified EIRs. Since no party challenged these plan adoptions or challenged any of these EIRs within the applicable statutes of limitations, the designation of the Project site for development is an issue that cannot now be challenged.

Response to Comment F.8-170A:

The content of this website, which summarizes certain County General Plan provisions regarding SEAs, is addressed in response to Comment F.8-170. Please refer to that response for additional information regarding the cited document's relevance to the Project and the Draft EIR.

Response to Comment F.8-170B:

The content of this website, which summarizes certain County General Plan provisions regarding SEAs, is addressed in response to Comment F.8-170. Please refer to that response for additional information regarding the cited document's relevance to the Project and the Draft EIR.

Response to Comment F.8-171:

The Commenter's opinion is noted but is contrary to the unanimous vote of the County Board of Supervisors in approving the Antelope Valley Area Plan. For additional information on this issue, please see response to Comment F.8-170.

Response to Comment F.8-172:

The Regional Conservation Investment Strategy (RCIS) program referenced by the Commenter is a pilot program authorized by Assembly Bill 2087 (2016).

[1874] AVAP Ruling
[1875] *Thompson v. Ioane* (2017) 11 Cal. App. 5th 1180, 1191

Background on RCIS Program. The Legislature expressly described the purpose of this program in Section 1850 of the California Fish and Game Code, which provides in pertinent part:

> It is . . . the policy of the state to encourage voluntary conservation mechanisms to **identify and implement advance mitigation actions** that do all of the following:
>
> (1) Can be used to compensate for project impacts, including, but not limited to, infrastructure and renewable energy projects, more efficiently.
>
> (2) Are effective ecologically.
>
> (3) Will help to conserve regionally important biological and other ecological resources.
>
> It is . . . the intent of the Legislature to create nonregulatory mechanisms to guide investments in conservation, infrastructure, and compensatory mitigation for impacts to natural resources, including impacts to threatened and endangered species, other sensitive species, natural communities, ecological processes, and connectivity.
>
> In enacting this chapter, **it is not the intent of the Legislature to regulate the use of land, establish land use designations, or to affect, limit, or restrict the land use authority of any public agency**.
>
> (Fish & Game Code Section 1850(c)-(e), emphasis added.)

In Guidance issued by the California Department of Fish and Wildlife (CDFW), the program's purpose was summarized, in its entirety, as follows:

> - Achieve more **strategic, effective conservation**
> - Promote resiliency to climate change & other pressures
> - Support infrastructure & other projects with **efficient mitigation delivery**
>
> (RCIS Program Guidelines Public Presentation[1876], emphasis added.)

The RCIS legislation mandates the contents of a RCIS plan, which includes but is not limited to the requirement that the RCIS plan "**account for reasonably foreseeable development** of major infrastructure facilities, including, but not limited to, renewable energy and housing." The RCIS plan must also "include provisions **ensuring that the strategy will be in compliance with all applicable** state and **local requirements** and does not preempt the authority of local agencies to implement infrastructure and urban development in local

[1876] RCIS Program Guidelines Public Presentation (June 21, 2017), PDF available at https://www.wildlife.ca.gov/Conservation/Planning/Regional-Conservation.

general plans." (emphasis added).[1877] The RCIS plan must be developed "in consultation with local agencies that have land use authority."[1878] A draft RCIS plan must be submitted to CDFW for initial review, a revised version that adequately addresses CDFW's comments must then be prepared and made available for public review, and following public review the final version must be submitted to and may be approved by CDFW.[1879]

Antelope Valley RCIS Pilot. The process to prepare the Antelope Valley RCIS pilot (AV RCIS) began in 2016 and resulted in the publication of an "administrative draft" AV RCIS in June of 2017 (June Admin Draft).

The County was involved with the AV RCIS as a member of the Steering Committee and submitted extensive comments and requested changes for the June 2017 Admin Draft, which had been circulated for internal review. Additional comments and concerns were submitted regarding the inaccuracies within the biological descriptions, the need to hire a botanist familiar with the native vegetation of the Antelope Valley and its compatibility with the recently adopted Antelope Valley Area Plan (AVAP). The County is no longer a member of the AV RCIS Steering Committee and continues to be concerned with regards to the adequacy of the document both in its scientific integrity as well as in meeting the intent of the RCIS legislation.

Regarding June Admin Draft being "Best Available Science". The comment that the Draft EIR needs to be revised and recirculated to "incorporate the results of the RCIS process" is noted.

As mentioned above, the County had concerns about the biological information that was provided in the Admin Draft and requested that they be addressed prior to submitting the document to CDFW. To date, the County believes that those concerns have not been addressed as the AVRCIS appears to be on hold.

The June Admin draft explains that a "map-based Environmental Evaluation Modeling System (EEMS)[1880] was used to generate the biological value model results." The draft report goes on to explain that "[t]he biological value model was developed interactively with stakeholder involvement, where input from stakeholders and local experts could be dynamically changed, resulting in a transparent and nimble modeling process." It was not clear from the habitat descriptions provided what characteristics were used for modeling the potential suitability of habitat for focal species, and County Biologists had expressed concerns with the adequacy of some of the habitat descriptions that appeared to be pulled from other parts of the state or country, and not specific to known conditions within the region or County. The draft report directs the reader to two Appendices, F and G, for an explanation of the methodology used to rank the biological value of lands within the AV RCIS area.[1881] Appendix F includes maps of modeled distribution of the focal species, and Appendix G, which should have provided details of the modeling methodology, is missing.

[1877] Fish & Game (F&G) Code § 1853(c)(7-8)
[1878] *Id.,* § 1853(e)
[1879] *Id.,* § 1854
[1880] Sheehan 2016
[1881] June Admin Draft, p. 3-3

Appendix G reads in its entirety: "Description of Modeling Methodology to be provided."[1882] The missing modeling methodology was in turn used to generate the draft report's conclusions and figures about the biological resource values of the Centennial project site and other Antelope Valley lands. A detailed response cannot be provided to missing modeling methodology, which precludes the ability for the lead agency to evaluate its legitimacy.

The Draft EIR does, however, include an assessment of the three biological resource values identified by the Commenter as relevant in the June Admin Draft. With respect to the June Admin Draft's designation of the project site as a habitat core area called "Western Antelope Valley", for example, the designation encompasses nearly all of the Centennial Project site. The Draft EIR includes all biological resources, inclusive of the three species groups (desert, agriculture/grassland, and foothill/riparian) included in the June Admin Draft, were in fact studied and documented in regard to their occurrence on the Project site. Subsequent analysis reviewed the impacts of the Centennial project accordingly. The Project site in the Draft EIR, however, was not separated as distinctly named "unit" of land as was the case with the June Admin Draft; instead, the biological resource values on the Project site were considered as part of the mosaic of habitat areas in the region, which vary in quality and connectivity throughout. It should be noted that the Project region, in regard to the biological resources evaluation in the Draft EIR, did not truncate at the Los Angeles County boundary but continued northward into Kern County and up to the Tehachapi Mountains ridgeline. As such, substantially greater habitat areas occur within the region considered in the Draft EIR, including those preserved in open space uses such as the conserved lands in Tejon Ranch and the conserved lands for the Angeles National Forest, than is identified in the AV RCIS Area. The Project has also been designed to avoid the highest biological value portions of the site, and approximately 1/3 of the areas on the west and northwest portions of the area mapped in the June Admin Draft as the "Western Antelope Valley" have been avoided and preserved within the Centennial On- and Off-site Mitigation Preserve.

Similarly, the area identified as a habitat core and referred to as "Pine Canyon" contains a portion of the Project site which was studied and analyzed in detail as well. This area contains habitat applicable to all three species groups modeled by the AV RCIS including desert, agriculture/grassland, and foothill/riparian. In addition, this area was also evaluated for off-site mitigation value and is included nearly in its entirety within the Centennial On- and Off-site Mitigation Preserve. The Centennial Mitigation Preserve captures a total of 45,000+ acres within the area (inclusive of Kern County) which represents a large percentage of the general regional core habitats west of Palmdale and Lancaster, including core habitats identified by the June Admin Draft preparers and project opponents.

Finally, the Draft EIR extensively considered the issue of the Project site's importance to wildlife movement and connectivity, as discussed in Draft EIR Section 5.7, Biological Resources (Impact 7-2). The Draft EIR concludes that as mitigated, the Project will have a less than significant impact on wildlife movement. Specifically, the Draft EIR concludes based on extensive project-level analyses conducted over two decades, that:

[1882] *Id.,* App. G

> Information presented in the Wildlife Movement discussion clearly identifies the foothills and highlands of the Tehachapi Mountains as the regional linkage zone, and the core area of this linkage zone is several miles to the northwest of the Project Site. As a result, the Project's indirect impacts [to wildlife movement] are not expected to reach the primary regional linkage area, and regionally connectivity is expected to be minimally impacted. The Project would not cause any regional populations of plants or animals in adjacent regions to become isolated. The Project's indirect impacts on wildlife movement are therefore considered to be less than significant.
>
> (DRP 2017, p. 5.7-170)

The June Admin Draft, although it does not include the technical methodology used to create its resource ranking maps, shows the east-west center of the Project site as a "least cost corridor" for wildlife movement, where as noted by the Commenter "the animals have the easiest time moving through the area." (Figure 3-9) However, this location is bisected by the California aqueduct, and onsite evidence shows that there is minimal to no linkage across the aqueduct in the center of the site. This wildlife connectivity example is one of numerous examples of the kind of simple but fundamental errors that occur when predicting biological information as opposed to having access to or developing the range of site-specific studies completed for the Draft EIR. Even such foundational information as the location of the Project itself is in error in the June Admin Draft, which for example omits southern and eastern site areas from Figure 2-13. Similarly, Figures 2-3 and 2-5 incorrectly maps areas of the Project site as grasslands which are known to be woodlands, and Figure 3-13 depicts as riparian locations on the site that are not riparian.

Appendix F, "Focal Species Habitat Models," consist solely of a series of 27 figures, 26 of which depict predicted species occurrence data and confirmed species occurrence data. The methodology used to create the Figures is not explained. Half of the figures show some predicted or confirmed occurrence information on the Centennial project site. The Draft EIR considered each of the 14 species for which predicted or actual occurrence data is depicted in Appendix F. The June Admin Draft both understates and overstates species data, apparently excluding the site-specific data included in the Draft EIR that had been published earlier in the summer. Specific responses are provided below for all species for which Appendix F shows predicted occurrences on the Project site:

Appendix F Species Figures	June Admin Draft and Actual Ground-Truthed Conditions Accurately Reported in Centennial Draft EIR
F-11: California Condor	June Admin Draft predicts extensive foraging and some roosting activity on the Project site; however, condor GPS tracking data and other data reported in the Draft EIR confirm that there is very little foraging, and no roosting (DRP 2017, pp. 5.7-94, 5.7-118 through 5.7-120, and 5.7-148).
F-12: Golden Eagle	June Admin Draft shows isolated area near SR-138 as part of the "species range;" however, this species is known to occur throughout much of the region both on- and off- the Project site (DRP 2017, pp. 5.7-90, 5.7-114, and 5.7-150).
F-14: Least Bell's Vireo	June Admin Draft predicts "high occurrence" areas on Project site; however, numerous onsite surveys show extremely little usage and no evidence validates high occurrence prediction. In addition, the Project site is not within USFWS designated Critical Habitat for this species (DRP 2017, pp. 5.7-97, 5.7-122, and 5.7-148).
F-15: Loggerhead Shrike	June Admin Draft shows predicted "high occurrence" areas on the Project site and throughout much of the project region; however, the eBird and CNDDB data provided suggest a much more sparse occurrence and no evidence validates high occurrence. As discussed in the Draft EIR, shrike were detected in various areas of the Project site, but that nesting habitat is expected to be restricted to Oso Canyon and the woodland habitats at western edge of site. (DRP 2017, pp. 5.7-95, 5.7-121, and 5.7-151)
F-16: Long-Billed Curlew	June Admin Draft shows predicted "high occurrence" areas on the Project site; however, the eBird and CNDDB data provided suggest a very limited occurrence in the region. Surveys conducted for the Centennial project detected only a few migrants on-site over multiple years. Potentially suitable breeding habitat is present on the Project site, but no nesting activities have been observed (DRP 2017, pp. 5.7-95, 5.7-121, and 5.7-151).
F-18: Northern Harrier	June Admin Draft shows predicted "high occurrence" areas on the Project site and adjacent areas; however, observation data included in Appendix F does not exhibit higher use in this area relative to the balance of the RCIS area. The Draft EIR indicates that this raptor was observed using the Project site for foraging but not breeding, although potentially suitable nesting habitat is present where sufficient amounts of vegetative cover are available to protect this ground-nesting raptor (DRP 2017, pp. 5.7-93, 5.7-117, and 5.7-150).
F-19: Prairie Falcon	June Admin Draft shows predicted "high occurrence" areas on a portion of the Project site and throughout most of the valley floor portions of the RCIS area; however, the observation data provided does not support a conclusion of higher use in Project area relative to other areas of the RCIS where the species has been detected more regularly. As described in the Draft EIR, the prairie falcon was observed using the Project site for foraging but it is not expected to breed on-site. (DRP 2017, p. 5.7-103). Also note, this falcon is not considered special status for the purposes of State CEQA guidelines but was discussed in the Draft EIR as a species considered to be at risk of decline or extirpation in Los Angeles County by the Los Angeles Chapter of the Audubon Society (DRP 2017, p. 5.7-89).
F-20: Swainson's Hawk	June Admin Draft depicts "Expert Model Distribution" range of this species which appears to depict foraging during both breeding and migrating periods without any distinction between these very different periods. No explanation of the meaning of this category is provided and the lack of distinction between migrating and breeding areas is inconsistent with other species shown such as the willow flycatcher. Surveys for the Draft EIR found migrants passing by in spring, and foraging over the east end of the Project site in vicinity of the alfalfa fields, but no breeding birds were detected. The riparian habitats on the Project site are considered too sparse to provide suitable nesting habitat for this raptor (DRP 2017, pp. 5.7-93, 5.7-115, 5.7-116, 5.7-145, 5.7-148 and 5.7-149).

Appendix F Species Figures	June Admin Draft and Actual Ground-Truthed Conditions Accurately Reported in Centennial Draft EIR
F-21: Tricolored Blackbird	June Admin Draft shows predicted "high occurrence" areas on a portion of the Project site and throughout much of the RCIS area; however, the observation data provided does not support a conclusion of higher use in the Project area relative to other areas of the RCIS where the species has been detected more regularly. As described in the Draft EIR, a nesting colony was detected on-site in 2006 and 2008 using vegetation associated with a pond on the north-central edge of the Project site, but not thereafter. In 2015, large numbers were found nesting outside the Project site in vegetation surrounding Quail Lake. The Project site provides suitable foraging habitat, but very little potentially suitable nesting habitat (DRP 2017, pp. 5.7-91, 5.7-111, 5.7-112, 5.7-113, 5.7-114, 5.7-149 and 5.7-150).
F-22: Willow Flycatcher	June Admin Draft predicts several scattered "high occurrence" locations on the Project site; however, onsite surveys have confirmed that breeding is not occurring on predicted areas of the site. Migrant willow flycatchers may occur in almost any habitat and at any location in the region during spring and fall migrations, however, numerous onsite surveys show extremely little usage and no evidence validates high occurrence prediction. In addition, the Project site is not within USFWS designated Critical Habitat for this species (DRP 2017, pp. 5.7-94, 5.7-118, and 5.7-148).
F-23: American Badger	June Admin Draft predicts "high occurrence" locations on portions of the Project site and vast portions of the valley floor within the RCIS area. Although dens have been observed on-site, they have occurred in areas outside of the mapped "high occurrence" area where, in fact, no detections have occurred. Additional, the areas designated as high occurrence provide no evidence of increased suitability relative to most other areas on the site (DRP 2017, pp. 5.7-98, 5.7-126, and 5.7-153).
F-24: Desert Kit Fox	June Admin Draft predicts "high occurrence" over most of the Project site as well as adjacent areas; however, this species is not known to exist in these areas and have never been located during two decades of on-site survey work.
F-25: Mojave Ground Squirrel	June Admin Draft correctly indicates no occurrence for this species on the Project site. The Project site is west of the known range of the Mojave ground squirrel.
F-26: Mountain Lion	June Admin Draft shows isolated area near SR-138 as part of the "species range;" however, this species is known to occur throughout much of the region both on- and off- the Project site.
F-27: Tehachapi Pocket Mouse	June Admin Draft predicts "high occurrence" at Project site; however, the entirety of the Project site was assessed by a qualified biologist and determined to be unsuitable habitat for this species.

The factual errors in the June Admin Draft are typical of what would be expected to occur in a large-scale planning exercise, given the cost and time required to complete site-specific surveys. However, it is also the case that much of this work is predictive and has not been validated by actual site surveys. Since Appendix F, along with the missing Appendix G, served as source data for most of the biological value ranking information in the June Admin Draft, and the species mapping source data is substantially in error as applied to the Project site, the June Admin Draft does not create substantial evidence of a new or worse significant adverse biological resource impact, and accordingly recirculation of a revised Draft EIR is unwarranted.

Commenters' Views Conflict with Independent Biological Resource Expert Findings by Five State Agencies and Sierra Club, NRDC, Endangered Habitats League and Audubon California. Finally, while the June Admin Draft is more recent, the Commenters' assertion that it presents significant new information warranting recirculation must be weighed against the many independent agencies and environmental advocacy groups that have already extensively evaluated the biological resource values of Tejon Ranch in the context of the proposed development of the Centennial site. The Tejon Ranch Land Use and Conservation Agreement (Ranch-Wide Agreement or TRCRWA) is a historic example of the "voluntary conservation mechanisms" that the Legislature intended the RCIS program to encourage. Specifically, and as agreed to in Exhibit R of the TRCRWA the Secretary for the California Resources Agency, the Director of the California Department of Fish and Game, the Director of the Wildlife Conservation Board, the Director of the California State Parks Department, the Secretary for the California Environmental Protection Agency, and the Chair of the California State Water Resources Control Board:

> [W]e understand that of the approximately 270,000 acres comprising [Tejon] Ranch, the Ranch-wide Agreement would provide for the permanent preservation of at least 178,000 acres and for the option to preserve an additional 62,000 acres through the purchase of conservation easements, or potentially fee title, for an anticipated total of approximately 240,000 acres, or almost 90 percent of the total Ranch acreage. Because of the many unique factors noted above, **including the sheer magnitude of this conservation effort and the significant resource values attributed to this property**, and in viewing the 240,000 acres in the Conserved Areas in a holistic manner, **we expect that TRC [Tejon Ranchcorp, the owner of Tejon Ranch] will be allowed to use those Conserved Areas and corresponding natural resource values associated with these Conserved Areas to meet the land conservation and corresponding natural resource mitigation requirements for and the planned development** and other activities within the Developed Areas, **including** the designated planned development projects of Tejon Mountain Village, **Centennial** and Grapevine, subject to potential limitations for Conserved Areas acquired using public funds as described below.[1883]

According to the environmental advocacy group signatories to the TRCRWA, including Audubon California, the Endangered Habitats League, the Natural Resources Defense Council, the Planning and Conservation League, and the Sierra Club (collectively referred to as the "Resource Group" in the TRCRWA):

[1883] Conservation easements were acquired with public funding on the 62,000 acres referenced in Appendix R, as described in the Draft EIR. The Draft EIR notes that pursuant the Ranch-Wide Agreement, conservation easements were purchased in March of 2011, and that three of the five conservation easement purchase areas comprising approximately 20,000 acres are proximate to the Centennial site (DRP 2017, p. 4-45). The Draft EIR also notes that management of these areas is "subject to the conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch" (DRP 2017, p. 5.7-62).

> This Agreement was reached **after two years of careful scientific analysis** and intense negotiations between TRC, its partners and the Resource Groups. All parties believe that the Agreement provides for a far better conservation outcome than the typical project-specific permitting and protracted litigation methods most often used in development and conservation disputes. (TRCRWA, Executive Summary, 2008, emphasis added)
>
> The Parties to this Agreement desire to protect in perpetuity substantial and significant natural resource values of the 270,000-acre Tejon Ranch. These natural resource values include an extraordinary diversity of native species and vegetation communities, numerous special status plant and animal species, intact watersheds and landscaping supporting natural ecosystem functions and regionally significant habitat connectivity.
>
> The long-term conservation of Tejon Ranch has been one of the highest priorities of the Resource Organizations. . . . By comprehensively addressing the entire Tejon Ranch, this Agreement avoids fragmentation of many of the environmentally sensitive areas on Tejon Ranch.
>
> This Agreement allows TRC to pursue development plans in defined development areas without opposition from the Resource Organizations while enabling a conservancy to preserve Tejon Ranch's natural resource values for future generations."
>
> (TRCRWA, p. 1-2, emphasis added)

Given that 90 percent of Tejon Ranch was permanently conserved, and only 10 percent can be developed (inclusive of the Centennial site), the inclusion of Tejon Ranch in the initial administrative draft of the AV Plan (submitted under separate cover by the same commenter, see Comment F.9-1 below) did not further the RCIS program purpose of proactively identifying future conservation and mitigation lands for future compensatory mitigation use. Tejon Ranch, inclusive of the Centennial site, was also the subject of two years of intense scientific review by the Resource Organizations as part of the TRCRWA process, and has been the subject of more than 20 years of biological resource studies as part of the Centennial Draft EIR preparation process.

Response to Comment F.8-172A:

The Commenter provides this citation to support its statement that there is a new type of non-regulatory conservation program in California called the Regional Conservation Investment Strategy Program. The cited web address leads to a summary webpage prepared by the California Department of Fish and Wildlife that summarizes the program. This reference is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. Please see response to Comment F.8-172 for a substantive response regarding the Regional Conservation Investment Strategy Program.

Response to Comment F.8-172B:

The referenced one-page document is titled *Antelope Valley Regional Conservation Investment Strategy (AV RCIS),* with a footer that reads "Antelope Valley RCIS, Public Meeting, March 7, 2017." The document consists of (i) a Stakeholders for the AV RCIS," which list includes the name of commenter CBD. The Commenter's submittal of this document, and the document itself, are noted, included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The assertion for which the Commenter provides this citation is substantively addressed in response to Comment F.8-172.

Response to Comment F.8-173:

As a general matter, mitigation plans are not required to be circulated with the EIR so long as the mitigation measure identifies the criteria the lead agency will apply in determining that the impact will be mitigated. This type of mitigation approach is consistent with CEQA, which permits the formulation of detailed plans at a future date as long as the mitigation measure includes specified performance standards and identifies a range of feasible measures that may be implemented to achieve the performance standard and meet mitigation commitments.[1884]

The following table summarizes the applicable performance standard, and feasible measures for meeting this standard, for each of the referenced mitigation plans. The more detailed text in some of these mitigation measures also remains applicable to the Project. Note that there is no separate "plan" proposed for the biological resources mitigation program as a whole, which consists of all biological resource mitigation measures. Implementation of these biological resource mitigation measures, as well as other mitigation measures, is included in the County's Mitigation Monitoring and Reporting Program (MMRP).

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
Special Status Plant Species Restoration Plan (MM 7-1)	1) Preservation on Mitigation Preserve (excluding WCB Easement Areas) at a 2:1 ratio for impacted individual rare plants 2) If preservation alone does not meet the ratio, creation or enhancement (to increase individual plant occurrences) on Mitigation Preserve (including WCB Easements) sufficient to meet the 2:1 mitigation ratio.	Prior to grading for each phase: a. Identify rare plant areas on Mitigation Preserve sufficient to achieve 2:1 and document location of preserved populations. b. If 2:1 ratio is not preserved, then submit a plan to enhance and/or establish populations on Mitigation Preserve to be approved by the County and CDFW. The plan, shall contain the following methods to ensure that the performance criteria are met: (1) identification of and suitability analysis for the enhancement area; (2) procedures for the collection and temporary storage of seed (all

[1884] CEQA Guidelines § 15126.4(a)(1)(B)

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
		available seed from every impacted occurrence shall be collected); (3) planting procedures, including soil preparation and irrigation; (4) a schedule and action plan to maintain and monitor enhanced, restored, and/or created populations; (5) methods to control plant densities of competing plants; (6) for preservation area(s), identification of plant occurrence locations for future management under the Ranch-wide Management Plan; (7) for creation or enhancement area(s), monitoring to confirm successful implementation of the 2:1 mitigation ratio; (8) contingency measures to further create or enhance plantings in creation or enhancement areas where monitoring results do not show successful 2:1 mitigation, which shall remain in effect until such time as the 2:1 mitigation ratio has been achieved.
Wildlife Relocation Plan (MM 7-2)	Relocate silvery legless lizard, coast horned lizard, and two garter snakes in advance of construction to minimize species mortality.	The Plan shall provide the methods for the safe relocation of silvery legless lizard, cost horned lizard and two-striped garter snake detected during pre-construction surveys and shall include: (1) identification of potentially suitable areas for receiving relocated animals outside the planned construction area; (2) trapping and relocation methods that shall be used in the relocation process, including adherence to the Amphibian Task Force Fieldwork Code of Practice; and (3) identification of number of individuals of each species that shall be allowed to be placed in each planned relocation area. The Plan shall be prepared by a qualified biologist; (2) provided to CDFW for review and comment; (3) approved by the County prior to issuance of the first grading permit; and (4) implemented prior to grading an area for which the pre-construction survey identified one or more of these species.

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
Native Perennial Grassland and Wildflower Field Mitigation* (MM 7-10)	Grasslands, inclusive of native perennial grasslands and wildflower fields, shall be preserved at a 2:1 ratio (i.e., minimum of 12,832 acres preserved), and managed in accordance with the RWMP.	A total of 14,908 acres of grassland preservation in the Mitigation Preserve has been identified in Figure 5.7-10. Management of the Mitigation Preserve shall be in accordance with the RWMP, which incorporates BMPs for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions (see RWMP Vol. II Sections 5.1 and 5.2). The RWMP includes standards for management of the grasslands areas that will preserve the grasslands in perpetuity. The RWMP shall include a Figure depicting the Mitigation Preserve lands used to meet this 2:1 preserve ratio.
Oak Woodland Habitat Mitigation Plan (MM 7-11)	Meet a 2:1 ratio by: (1) Preserving 6.2 acres of mixed oak woodland on the Mitigation Preserve; and (2) Creating 6.2 acres of mixed oak woodland on the Mitigation Preserve meeting a density of 80 oak trees per acre (or such other density as directed by the County Forester, including the establishment of 322 oak trees to replace impacted individual oak trees at a ratio of 3:1 for non-heritage oaks and 10:1 for heritage oaks.	The Plan shall provide for the creation of oak woodlands, shall comply with the standards and requirements of Section 21083.4 of the *California Public Resources Code* (SB 1334) and the County of Los Angeles Oak Tree Ordinance, and shall include the following actions at a minimum: 1. process for native acorn collection within the project watershed for planting (a) in ground and (b) in containers 2. site selection for planting in consultation with County Forester 3. propagation of container trees on site 4. strategy to provide overstory, midstory and understory, including acorn plantings, container tree plantings and yearly sowing 5. include a planting management program for review by the County Forester (e.g., three planting seasons. The first planting season, year 0, being the acorn and sun tolerant ground covers; the second planting season occurring at approximately year 5, introducing sun/shade tolerant species: and the third planting season at year 10 with the introduction of more shade tolerate understory species, including the use of reference sites.) 6. temporary irrigation, weeding and management procedures 7. annual monitoring for a 15-year period, which includes (i) qualitative monitoring (i.e., photographs and general observations); (ii) yearly quantitative monitoring (i.e., randomly

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
		placed transects to assess vegetation type coverage and systematically assess all mitigation oak trees); and (iii) annual reports. The Plan shall be (1) prepared by a qualified Restoration Specialist and (2) approved by the County prior to any clearing or grading for any tract map that affects any oak woodland vegetation.
Streambed and Wetland Habitat Creation and Enhancement Plan (MM 7-12)	Mitigate for the loss of waters/riparian areas by (1) providing approximately 4,748.5 functional equivalent units under the Functional Capacity Unit (FCU) methodology (or other accepted functional value unit); or (2) meeting the following mitigation ratios: a. Wetland Waters: 2:1, including 1:1 restoration and 1:1 enhancement, of wetland waters. b. Streams: i. 1:1 preservation of ephemeral and/or intermittent streams for permanent impacts to ephemeral non-wetland waters of the state (non-riparian) ii. 1:1 preservation of intermittent streams for permanent impacts to intermittent non-wetland waters of the state (non-riparian) iii. 1:1 restoration of intermittent streams for temporary impacts to intermittent non-wetland waters of the state (non-riparian) c. Riparian Vegetation: 2:1, including 1:1 restoration and 1:1 enhancement of riparian vegetation.	Under either performance standard methodology, enhancement and creation will be performed pursuant to a Plan which shall comply with all requirements specified in the regulatory agency permits and/or agreements, shall follow all construction mitigation measures of the EIR, and shall include the following for each tentative tract map area: a) statement of impacts and avoidance, including temporary and permanent impacts b) statement of mitigation performance standard being met (functional value or acreage ratio) c) standards for minimizing and restoring temporary impacts, which include recontouring and erosion control for intermittent channels and reseeding requirements for riparian vegetation areas. d) identification of preservation, enhancement and/or creation sites on Mitigation Preserve e) for permanent impacts: (i) a summary of location of preserved wetlands and/or waters required to achieve applicable preservation performance standards; (ii) procedures to restore and/or enhance wetlands and/or waters and replace riparian vegetation in-kind as required to achieve applicable enhancement/ restoration performance standards, which shall include: (A) Site Preparation, including fencing, grading and contouring to improve topographic heterogeneity and floodplain benching, erosion control; (B) Planting Implementation, including, plant species, sizes, mulching, seed mix; (C) Maintenance Practices, including supplemental watering, weed control, trash removal, pest management, cattle exclusion

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
		methods; (D) Monitoring Requirements, including a minimum 5-year period of (I) qualitative; (II) quantitative and (III) annual reporting to confirm compliance with vegetation success criteria at the end of a five year period: for species richness (≥10), native vegetative cover (≥70%) and invasive species (≤5%); and (E) Contingency Measures to ensure compliance with applicable mitigation performance standards. The Plan shall be (1) prepared by a qualified Restoration Specialist; and (2) approved by the County and CDFW, and RWQCB prior to grading that would impact jurisdictional waters or wetlands.
Landscaping Plan (MM 7-13)	Prevent the introduction of non-native, invasive species in the landscaping used in project development areas.	The Plan shall provide for a list of allowed and prohibited plant types and shall include at a minimum: 1) A plant palette of low irrigation, non-invasive species that are adapted to the conditions found on the Project site. 2) a prohibition on the use of and retail of invasive plants 3) a requirement that the list of allowed and prohibited plants be provided to the Homeowners Association for distribution to future residents on site. The Plan shall be (1) prepared by a qualitied biologist; (2) submitted to the County for approval with each tentative map; (3) provided to builders; and (4) provided to future project occupants as described in the Specific Plan.

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
Fire Protection Implementation Plan (MM 7-21)	Meet State and County fire prevention requirements for the development area, and prohibit vegetation clearance for fire risk abatement within Significant Ecological Area (SEA) 17 or mitigation preserve areas.	The Plan shall include: (a) a summary of applicable State and County fire risk abatement requirements; (b) a prohibition on the use of vegetation clearance within SEA 17 or mitigation preserve areas. A Plan shall be submitted to the County for approval with the first tentative map., and shall be updated to include new or modified State or County fire risk abatement requirements as part of each subsequent tentative tract map submittal.
Golf Course Management Plan (MM 7-22)	Construct and manage golf courses, if proposed, utilizing best practices to minimize environmental impacts.	The Plan shall incorporate the design and management measures consistent with the Audubon Cooperative Sanctuary Program for Golf Courses (or equivalent); an overview of this Program is provided as Final EIR Appendix 5.7-F. The Plan shall be submitted to the County for approval with any tentative map that includes a golf course.
* Based on response to comments edits, no new plan is required.		

Response to Comment F.8-174:

The Commenter's opinions about mitigation compliance are noted. The Commenter provides no examples or citations to studies showing mitigation non-compliance. Please see response to Comment F.8-173 confirming that CEQA does not require details mitigation plans to be included in an EIR, provided that the EIR includes performance objectives and feasible measures for achieving those objectives. These objectives and measures are provided in the table above.

Response to Comment F.8-175:

The Commenter's opinion regarding the effect of climate change on the biological landscape of the Project site is noted. According to the U.S. Environmental Protection Agency (USEPA), "[a]verage temperatures have risen across the contiguous 48 states since 1901, with an increased rate of warming over the past 30 years. Eight of the top 10 warmest years on record have occurred since 1998…Within the United States, temperatures in parts of the north, the west, and Alaska have increased the most." The USEPA goes on to conclude that other climate change impacts include more extreme temperatures during the summer and winter, more severe storms, and greater annual precipitation.[1885] Notwithstanding global climate change impacts, like increased rainfall, the Project site is also influenced by California's historic variation in rainfall levels and multi-year drought conditions.

[1885] U.S. Environmental Protection Agency (USEPA). 2016 (August 2, last updated). Climate Change Indicators: Weather and Climate. Washington, DC: USEPA. https://www.epa.gov/climate-indicators/weather-climate.

Accordingly, climate change is an existing condition that has influenced the current biological setting of the Project site, and this existing physical setting is the "baseline" from which Project impacts are assessed in Section 5.7, Biological Resources, in the Draft EIR. The California Supreme Court has affirmed several earlier appellate court decisions that held that the California Environmental Quality Act does not require an assessment of the environment's impact on a project. See *Ballona Wetlands Land Trust v. City of Los Angeles (2011) 201 Cal.App.4th 455*, in which the Court held:

> We believe that identifying the environmental effects of attracting development and people to an area is consistent with CEQA's legislative purpose and statutory requirements, but identifying the effects on the project and its users of locating the project in a particular setting is neither consistent with CEQA's legislative purpose nor required by the CEQA statutes.[1886]

The California Supreme Court declined to review or overturn the *Ballona* decision, which concluded that the climate change impact of sea level rise did not need to be addressed in a coastline development project under CEQA. Indeed, in a later decision, the California Supreme Court confirmed that CEQA does not require an assessment of the environment's impact on a project.[1887]

As in *Ballona*, where the court held that CEQA does not require an EIR to include an impact assessment or mitigation measures addressing the predicted increase in sea level caused by global climate change, here CEQA does not require the EIR to include climate change adaptation strategies to address the effects of global climate change on the Project site's biological resources.

However, it should be noted that the Project does incorporate features that would assist with climate change adaptation, including preservation of significant contiguous open space preserve areas that are positioned intermediately between the desert floor and higher slopes to help accommodate potential future climate zone changes within these areas; these permanently preserved open space areas include both Project mitigation lands as well as the hundreds of thousands of acres preserved under the TRCRWA. The Project also includes design features such as wildlife corridors for smaller species throughout the Project site. The Project is also required to comply with all GHG reduction measures under applicable laws (including newly-adopted laws and regulations), and to further reduce GHG as required by MMs 21-1 through 21-20 on pages 5.21-88 through 5.21-94 of the Draft EIR.

Response to Comment F.8-176:

The Commenter's opinions that global climate change will result in habitat destruction and fragmentation, loss of connectivity for terrestrial wildlife, and that introduction of predator and invasive species associated with the proposed Project, are noted. Within the context of the analysis required by CEQA, the Draft EIR addressed the setting, impacts, and mitigation

[1886] *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal. App. 4th 455 ("*Ballona*")
[1887] *CBIA v. BAAQMD*

measures for habitat impacts including fragmentation and habitat loss,[1888] wildlife connectivity,[1889] predators such as feral cats being more likely to occur in developed areas,[1890] and invasive species avoidance and control.[1891] The Commenter's opinions that the location of the Project site could undermine future climate change adaptation and mitigation strategies, and harm the ecosystem in the context of climate change, are noted. As discussed in response to Comment F.8-20, the Project is sited in a location projected for future development by, and is consistent with, the regional Sustainable Communities Strategy adopted pursuant to Senate Bill 375, the state's premiere strategy for addressing greenhouse gas emissions related to the land use sector.

Response to Comment F.8-177:

Conserved lands are required to be managed in accordance with all applicable mitigation requirements, and all applicable legal requirements. Mitigation requirements for the open space lands to be preserved as part of the Project approval process are included in the Draft EIR (MMs 7-4, 7-10, 7-11, and 7-17).[1892] The Commenter's concern about the effect of global climate change on conservation lands and conservation activities is noted, but, as described above in response to Comment F.8-175, is outside the scope of CEQA.

Response to Comment F.8-177A:

The comment is noted for the record. The comment does not address or question the content of the Draft EIR, but instead provides the website location for the Ranch-wide Management Plan (RWMP) data cited by the Commenter in Comment F.8-177. It should be noted that in an effort to make the plan for implementing MM-7-10 available,[1893] the RWMP shall be adopted and no new plan (referred to as the Native Perennial Grassland and Wildflower Field Mitigation Plan in the Draft EIR) will be prepared. Management of the Mitigation Preserve shall be in accordance with the RWMP, which incorporates BMPs for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions. The RWMP includes standards for management of the grasslands areas that will preserve the grasslands in perpetuity. The RWMP shall be included in the Final EIR as a new appendix and the following edit is hereby made to page 5.7-62 of the Draft EIR.

> Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-~~W~~wide Management Plan (RWMP) (Final EIR Appendix 5.7-D) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

1888 DRP 2017, pp. 5.7-142 to -164
1889 *Id.,* pp. 5.7-164 to -170
1890 *Id.,* p. 5.7-169
1891 *Id.,* p. 5.7-167
1892 *Id.,* pp. 5.7-177, -180, -181, -192
1893 *Id.,* p. 5.7-180

Response to Comment F.8-178:

Please refer to response to Comment F.8-175. The Commenter's opinion regarding the effect of climate change on the biological resources of the Project site is noted. As discussed in response to Comment F.8-175, climate change is an existing condition that has influenced the current biological setting of the Project site, and this existing physical setting is the "baseline" from which Project impacts are assessed in Section 5.7, Biological Resources, in the Draft EIR. The comment that the Draft EIR needs to include an analysis of the Project's impacts to biological resources due to climate change, like the *Ballona* decision that CEQA does not require an impact assessment or mitigation measures for the predicted increase in sea level caused by global climate change, falls outside the scope of the analysis required under CEQA.

In addition, in an effort to provide a general understanding of the potential impacts of climate changes on biological resources, a new section is added to the Draft EIR. The following text is hereby inserted at the end of Section 5.7.6, Environmental Impacts, on page 5.7-173.

> *Impact of Climate Change on Biological Resources*
>
> Climate change is projected to be a powerful stressor, posing a risk of abrupt and irreversible regional-scale change in the composition, structure, and function of terrestrial, freshwater, and marine ecosystems (IPCC 2014). It may affect air temperature, precipitation, snowpack, streamflow, water availability, fire, and vegetation. In addition, marine environments may experience rising ocean temperature, sea level rise, ocean acidification, and upwelling. While climate models attempt to predict future changes, some of these results are already observable. The table below provides a list of observed impacts in North American attributed to climate change since the IPCC's fourth Assessment Report, published in 2007.

Observed Impacts in North America Attributed to Climate Change

Observed Impact	Confidence	Contribution from Climate Change
Shrinkage of glaciers	high	major
Decreasing amount of water in spring snowpack	high	major
Shift to earlier peak flow in snow-dominated rivers	high	major
Increased runoff	medium	minor
Phenology changes and species distribution shifts upward in elevation and northward	medium	major
Increased wildlife frequency in subarctic conifer forests and tundra	medium	major
Regional increases in tree mortality and insect infestations in forests	low	minor
Increase in wildfire activity, fire frequency and duration, and burnt area in forests	medium	minor
Changes in mussel beds along the west coast	high	major
Changed migration and survival of salmon in the northeast Pacific	high	major
Confidence in the validity of a finding is based on the type, amount, quality, and consistency of evidence (e.g., data, mechanistic understanding, theory, models, expert judgment) and the degree of agreement. Source: IPCC 2014		

These effects on the environment due to climate change may have a variety of direct and indirect effects on plant and wildlife species. Climate change, especially in conjunction with other stressors such as habitat modification, pollution, and invasive species, presents an increased risk of extinction for both terrestrial and aquatic species. This risk is expected to increase with both the magnitude and rate of climate change (IPCC 2014).

Statewide modelling predicts that alpine/subalpine forest, evergreen conifer forest cover, mixed evergreen woodland, and shrubland will decline while mixed evergreen forest and grassland are predicted to increase (Lenihan 2008). In southwestern California, the area of chaparral/coastal sage scrub is projected to decrease by 38 to 44 percent and the area of grassland is projected to increase by 345 to 390 percent by 2070 (PRBO 2011). Sea level rise may affect coastal and estuarine habitats, potentially leading to the inundation and loss of tidal marshes (PRBO 2011).

Changes in vegetation communities can be exacerbated by changes in fire severity and frequency. The effect of climate change on fire in California is complex, with different climate models predicting either a decrease or increase in the probability of large fires in southern California. Drier conditions in one model projected a reduced fire risk while a wetter climate model predicted in increase in the probability of large fires (PRBO 2011). Fire may slow or limit the encroachment of woody vegetation into grasslands

under less dry conditions, but hasten the transition from woody vegetation to grassland under drier conditions (Lenihan 2008). Fires may impact species through direct mortality and indirectly by modifying vegetation structure and composition.

In response to climate change's effects on the environment, terrestrial plant and wildlife species shift their geographic ranges and seasonal activities. This can lead to changing interactions among species, including competition and predator-prey dynamics. Species are expected to generally relocate upward in elevation and to higher latitudes; however, the response varies across species, with some are projected to move to lower elevations (Langham et al. 2015). National Audubon Society (2015) modeling predicts that 314 of the 588 North American bird species studied will lose more than 50 percent of their current geographic range by 2080. Warming has also been found to cause shifts in the abundance, geographic distribution, migration patterns, and timing of seasonal activities of marine species. This has been observed over recent decades and is projected to continue.

The Project will accommodate residential and employment uses and related community uses such as schools and parks that will be located either within the Project site or in an alternative in or outside of California. In the states most likely to receive California migrants—Texas, Nevada, Arizona—the United States Energy Information Administration reports have per capita GHG emissions that are more than twice as high as California's per capita emissions.[1894] As discussed in Section 5.21, California has enacted the nation's most stringent GHG reduction mandates including SB 32. Accommodating population and employment growth in California, including at the Project site, will result in lower global GHG emissions than failing to accommodate such growth in California in a land use pattern that is consistent with and helps implement the SCAG regional GHG reduction plan as approved by the CARB under SB375. Please refer to Section 5.21 of the Draft EIR, and responses to Comments F.8-79 through F.8-86 for additional analysis of the Project's climate change impacts.

Response to Comment F.8-179:

Please see responses to Comments F.8-173 and F.8-174.

Response to Comment F.8-180:

The Commenter's suggestion that existing, disturbed areas be considered as an alternative to the Project site has already been addressed in the Draft EIR. As explained in more detail in response to Comment F.8-65, the Draft EIR presents a reasonable range of potentially feasible on- and off-site alternatives to the Project that would reduce and/or avoid some of the Project's potentially significant environmental impacts while achieving most of its objectives. The selected alternatives promote informed decision making and public

[1894] U.S. Energy Information Administration (USEIA). 2017 (January 17). *Energy-Related Carbon Dioxide Emissions at the State Level, 2000-2014.* Washington, DC: USEIA. https://www.eia.gov/environment/emissions/state/analysis/.

participation by providing for consideration of a range of alternative land use patterns and siting options that will reduce and/or avoid some of the Project's significant environmental effects and attain most of the Project objectives. Accordingly, the alternatives analysis complies with the requirements of *Public Resources Code* §§ 21002, 21002.1(a). This comment suggests that the Draft EIR analyze an alternative that would place the Project on "disturbed lands that could be restored." However, the environmental setting of the AVAP planning area does not provide opportunities for high-density mixed-use development on previously disturbed areas located outside of designated EOAs in a manner that would also be consistent with AVAP's planning vision and Rural Preservation Strategy.

As explained in the Project Draft EIR and in the AVAP EIR, the AVAP planning area covers 1,800 square miles of predominately rural land that is either undeveloped or occupied by government uses, such as National Forests.[1895,1896] A smaller portion of the AVAP planning is occupied by single-family uses, military facilities, farmland and regional parks, and the remaining 1 percent of the total land area is occupied by multi-family residential, commercial, office, industrial, golf courses, schools and miscellaneous uses.[1897] The only truly urban areas within the boundaries of the AVAP planning area are the incorporated cities of Lancaster and Palmdale, which are outside of the County's land use jurisdiction.[1898] There are a few scattered communities in the AVAP planning area within the County's land use jurisdiction, but these are small rural communities that cannot accommodate projected future growth without significantly comprising their existing rural character.[1899] Given the rural qualities of the AVAP planning area, there are no "disturbed lands that could be restored" that could feasibly accommodate future growth projected for the Project site's TAZs in high-density mixed use commercial/residential development projects. Certainly not without seriously compromising the rural character of the AVAP planning area outside of designated EOAs and completely undermining the AVAP project objectives described above.

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to designated EOA, which were specifically selected to due to their proximity to large existing and planned transportation infrastructure projects (i.e., the High Desert Corridor and NW-138 Corridor Improvement Project).[1900] Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (*see* AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude designated EOAs, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (*See* AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within EOAs so as to preserve the rural character of Antelope Valley outside of the EOAs. Thus, contrary to the Commenter's claims in this and other related comments, the Draft EIR's decision to reject

1895 DRP 2017, pp. 4-8 to -10
1896 DRP 2014a, p. 5.10-4
1897 *Ibid*.
1898 *Ibid*.
1899 *Ibid*.
1900 DRP 2015, p. I-8

alternatives that would not support the AVAP's recommended distribution of population density and building intensity within the West EOA is not improper. Rather, it is a reasonable and appropriate criterion when considered in the context of the AVAP's planning vision and Rural Preservation Strategy. Please see responses to Comments F.8-65 and F.8-72 for further discussion.

Response to Comment F.8-180A:

The document cited in this comment is acknowledged and will be provided in the record. The Commenter cites this document to support the statement that "Restored habitat has never been documented to support the full functioning ecosystem processes of undisturbed habitat." The document does not support this statement, but rather is limited to a discussion of the authors' experiences with restoration of El Segundo Blue Butterfly habitat for projects, and opinions regarding why some restoration fails and the elements required for efficacious restoration, specifically, historical accuracy, ecotype accuracy, and type conversion. Those proposed mitigation measures in the Draft EIR which include habitat restoration, require seed source from the immediate area and limit type conversion to non-native habitat. Furthermore, the existing habitat impacted by the Project is not undisturbed habitat. The Project site has been grazed and cultivated for many years and is substantially degraded with a greater percentage of non-native vegetation than native. As such, the mitigation efforts are required to produce equal of greater functioning value habitat, not equal to undisturbed habitat values, as described on page 5.7-188 of the Draft EIR. Lastly, habitat restoration is a method employed and approved as successful by resources agencies routinely as part of State and federal permitting processes.

Response to Comment F.8-181:

The Draft EIR mitigation measures do not rely on the Ranch-Wide Agreement (TRCRWA). The TRCRWA is only described and discussed as a regional planning tool[1901] which provides a basic understanding of planned uses for the area. All Project mitigation is independent of the TRCRWA, consistent with CEQA Guidelines and enforceable by the County, as set forth in the Mitigation Monitoring and Reporting Program (MMRP) included in Final EIR Appendix 2.0-C.Rev. The Mitigation Preserve described on pages 5.7-135 through 5.7-138 in Section 5.7.4 of the Draft EIR, includes lands that fall within the TRCRWA areas.[1902] The Project is able to use the TRCRWA lands to implement Project mitigation, but the Draft EIR does not take credit for preservation where a conservation easement already exists. The Draft EIR states that of the six areas of mitigation lands, two (Areas 3 and 4) are the subject of a Wildlife Conservation Board (WCB) conservation easement. Off-site mitigation lands acquired by the WCB are not eligible for passive mitigation credit; however, these lands are eligible mitigation lands for enhancement, restoration, and creation of biological values.[1903]

[1901] DRP 2017, pp. 5.7-16, -62, -63
[1902] Final EIR Appendix 5.7-E, Exhibit E
[1903] WCB Easement Sections 6(b)(1)(B); and 1 (jj); Final EIR Appendix 5.7-E, Exhibit R, P.2 Bullet 3

The WCB easement areas include 7,490 acres of grasslands, not 12,145 acres.[1904] While those areas continue to be available for enhancement, in response to comments and discussion with CDFW, the Applicant has added additional Antelope Valley grasslands for preservation within Tejon Ranch to ensure the 2:1 preservation ratio is met. The additional off-site grasslands mitigation area, Area 7, is depicted in revised Exhibit 5.7-10, and comprises 7,877 acres of additional preserved grasslands located within the contiguous preserved open space areas of Tejon Ranch. The WCB conservation easement areas also remain part of the open space mitigation lands for the Project, but MM 7-10 has been revised to clarify that these areas are available only for enhancement, restoration, and creation mitigation, and not for preservation. Additionally, as discussed in the responses to Comments B.4-17, B.4-43, B.4-60, B.4-63, F.3-12, F.3A-19, F.7-22, F.8-10, F.8-119, F.8-121, F.8-123, F.8-124, F.8-125, F.8-128, and G.12-3, with the addition of the new mitigation preservation lands, the 2:1 preservation ratio is met without enhancement activities on WCB lands. Therefore, the following text in the third paragraph of PDF 7-1 on pages 5.7-135 and 5.7-136, is hereby revised as follows:

> These areas combine to form an extensive regional mitigation preserve system of ~~27,408~~ 43,079 acres (see revised Exhibit 5.7-10, Mitigation Preserve). Detailed floral sampling was conducted within grasslands on the Project site including impact areas, as well as within the Mitigation Preserve (NRC 2006a, 2007a, 2007b, 2007c, 2008b). Generally, studies consisted of quadrat sampling (338 total quadrats) and analysis of data generated results on regional species composition, between-site species composition, and plant community-based analysis~~.~~ within grasslands on the Project site within the impact area and mitigation areas (NRC 2008b) and 2016, and 2017 site reconnaissance surveys over a period of ~~four~~ five days, within mitigation areas.

The following text in the first sentence of the fourth paragraph of PDF 7-1 on page 5.7-136, is hereby revised as follows:

> The proposed ~~27,408~~ 43,079-acre preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values which are described in each of the corresponding mitigation plans.

The following text in the second paragraph of PDF 7-2 on page 5.7-137, is hereby revised as follows:

> Mitigation lands for impacts to biological resources would consist of approximately ~~3,861~~ 3,866 acres of unimpacted~~/~~ SEA lands on the site and ~~23,547~~ 39,213 acres within additional off-site areas, ~~including~~ consisting of areas on Tejon Ranch, referred to as Areas 1 through ~~6~~7. These mitigation lands comprise two on-site and ~~six~~ seven off-site areas which would provide sufficient land and biological resources to implement mitigation strategies to

[1904] Revised Exhibit 5.7-10

fully mitigate for Project impacts. ~~Two~~ The majority of three of these areas, Areas 3 ~~and~~, 4, and 5, are the subject of the Wildlife Conservation Board conservation easements that expressly allow for such mitigation use of these lands. These areas, although available for mitigation activities that include enhancement, restoration, or creation, are not available for preserved mitigation acreage since the existing Conservation Easement already requires preservation (but allows mitigation use for enhancement, restoration, or creation).

The following text is hereby added after the ninth paragraph of PDF 7-2 on page 5.7-138:

Area 7 consists of two distinct areas that comprise 15,668 acres total. Area 7 is in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and borders Area 6 to the north. Approximately half of Area 7 is dominated by undifferentiated grasslands, which are scattered throughout but mostly occurring in the southern half of this mitigation area. The other half of Area 7 is covered in various scrub types such as mixed chaparral, desert scrub, and sagebrush, and at higher elevations oak woodland, montane chaparral, montane hardwood-conifer forest, and pinyon-juniper forest. Several major northwest-to-southeast trending drainage features are found within Area 7 that contain riparian vegetation, oak woodland, and Joshua tree woodland.

The tenth paragraph of PDF 7-2 on page 5.7-138 is hereby revised as follows:

The combined off-site M~~m~~itigation P~~p~~reserve area amounts to ~~23,547~~ 39,213 acres of mitigation lands. In total, the mitigation preserve system available for mitigation covers ~~27,408~~ 43,079 acres and includes both on- and off-site mitigation areas. Appropriate lands with grassland resources have been included in the Mitigation Preserve to ensure a 2:1 replacement ratio in areas outside the existing WCB conservation easements. Furthermore, enhancement activities may be implemented within, but may not be limited to, Mitigation Preserve Areas 3, 4, and 5.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

Implementation of MM 7-10 would reduce these impacts to less than significant levels through preservation of ~~14,375~~ 14,908 acres of on-site and off-site grasslands.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

> The grassland mitigation is based on site-specific characteristics including, for example, the existence of native grasslands in the ~~27,408~~ 43,079-acre on-site (unimpacted/SEA lands) and off-site preserve areas.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

> Specifically, the Project proposes to preserve ~~14,375~~ 14,908 acres of grasslands within the ~~27,404~~ 43,079-acre on-site (unimpacted~~/~~ SEA lands) and off-site mitigation preserve, which is part of a larger 240,000-acre conservation area (including dedication and acquisition areas).

The following text in the first paragraph and Table A of MM 7-10 on pages 5.7-180 and 5.7-181, is hereby revised as follows:

> The Project Applicant/Developer shall preserve grasslands, including native perennial grassland and associated wildflower field vegetation types, at a minimum 2:1 ratio within the ~~approximate 27,408-acre~~ M~~m~~itigation P~~p~~reserve (see Table A). The Project would impact 6,416 acres of grasslands; therefore, a total of 12,832 acres of grassland mitigation acreage is required to bring impacts to a less than significant level.

TABLE A
GRASSLAND MITIGATION ACREAGES

Mitigation Area	Grasslands	Total Acreage
On-Site Mitigation Preserve ~~Unimpacted/SEA~~		
On-Site Mitigation Preserve ~~Unimpacted/SEA~~	1,989	~~3,861~~ 3,866
Subtotal (Total On-Site Mitigation Area)	*1,989*	*~~3,861~~ 3,866*
Off-Site Mitigation Preserve ~~Open Space~~		
Area 1	~~1,641~~ 1,734	6,417
Area 2	~~1,602~~ 1,597	2,556
Area 3	~~3,059~~ 0	4,183
Area 4	~~4,429~~ 706	7,319
Area 5	~~643~~ 0	643
Area 6	~~1,012~~ 1,005	2,429
Area 7	7,877	15,668
Subtotal (Total Off-site Mitigation Area)	*~~12,386~~ 12,919*	*~~23,547~~ 39,213*
Total Mitigation Area	**~~14,375~~ 14,908****	**~~27,408~~ 43,079**
~~SEA: Significant Ecological Area~~		
**Goal for 2:1 Grassland Mitigation is 12,832 Acres		

The following text in the first sentence of the third paragraph of MM 7-10 on page 5.7-182, is hereby revised as follows:

> As outlined in Table A above, the ~~14,375~~ 14,908 acres of grassland preservation will occur in open space areas on site and in the ~~six~~ seven other areas.

The following text is hereby revised in the last paragraph of MM 7-10 on page 5.7-182 of the Draft EIR:

> The ~~open space~~ Mitigation Ppreserve, including the grasslands within it, shall be preserved in perpetuity to offset Project impacts on native grasslands and wildflower fields prior to issuance of a grading permit for the Project site. The phasing of mitigation has been previously described. The preservation and management of these grasslands through the ~~Native Perennial Grassland and Wildflower Field Mitigation Plan~~ RWMP will sufficiently offset and fully mitigate the impacts on native grasslands and wildflower fields associated with the Project.

The following text in the last sentence of the third paragraph of MM 7-11 on pages 5.7-182 and 5.7-183, is hereby revised as follows:

> The combined acreage of oak woodland preserved both on site (unimpacted~~/~~ Significant Ecological Area [SEA]) and within the off-site mitigation areas is ~~3,102~~ 3,090 acres and is expected to substantially exceed the required 50 percent of mitigation as preservation.

Additionally, in an effort to make the grassland preservation management plan available, the Ranch-wide Management Plan (RWMP) shall be included in the Final EIR as a new appendix and the following edit is hereby made to page 5.7-62 of the Draft EIR.

> Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-~~W~~wide Management Plan (RWMP) (Final EIR Appendix 5.7-D) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

See also, responses to Comments B.4-43, F.3A-18, F.3A-19, F.8-123, F.8-125, and F.8-128, regarding the grassland qualities of off-site mitigation lands.

Response to Comment F.8-182:

This comment inaccurately summarizes the Draft EIR analysis of potential Project indirect farmland impacts and does not accurately reflect the regional context of farmland in the Antelope Valley Area Plan (AVAP) planning area discussed in the Draft EIR and in the EIR certified by Los Angeles County in 2015 for the AVAP (SCH# 2014061043) (AVAP EIR). The AVAP was adopted by Los Angeles County in June 2015. The Draft EIR fully discloses and considers potential impacts related to the indirect, offsite conversion of farmland, identifies the potential magnitude of these impacts, and concludes that Project and related growth in the West Economic Opportunity Area (West EOA), which includes the Project area and other adjacent lands[1905], as specifically intended by the County in the adoption of the AVAP would result in significant impacts to prime, statewide important or unique farmland as required by Appendix G of the CEQA Guidelines. The Draft EIR also concludes that due to Project development in the West EOA, additional development could occur outside the West EOA and found that this would be significant, adverse indirect growth-inducing impact.[1906] Consistent with the findings made by Los Angeles County in the AVAP EIR, and in the EIR certified by the County for the current Los Angeles County General Plan 2035 adopted in October 2015 (SCH# 2011081042), the Draft EIR found that these impacts would remain significant and unavoidable due to the lack of feasible mitigation.

The analysis of potential farmland impacts in the Draft EIR is based on the regional Antelope Valley planning and growth context established by the County's General Plan and the AVAP,

[1905] DRP 2017, Exhibit 4-2a
[1906] *Id.,* p. 6-9

which is 1 of 11 community-based plans applicable to unincorporated County planning areas. The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[1907] In preparing the AVAP, the County undertook an extensive and inclusive 8-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[1908] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and formed the foundation of the AVAP.[1909] This community vision is embodied in the AVAP's "Rural Preservation Strategy," which is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1910] The AVAP implements the Rural Preservation Strategy by identifying four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1911]These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1912]

The Project site is located entirely within the AVAP West EOA.[1913] The AVAP defines EOAs as clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1914] The AVAP Rural Preservation Strategy provides that major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1915]

As required by CEQA, the AVAP EIR analyzed potential impacts to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland identified by the California Farmland Mapping and Monitoring Program (FMMP). As discussed on pages 5.5-4 and 5.5-5 of the Draft EIR, these categories of mapped farmlands correspond with irrigated lands that have been in active cultivation during the prior two 2-year cycles of the FMMP. The Draft EIR[1916] and the AVAP EIR[1917] also identify Farmland of Local Importance, which are lands designated by the County Board of Supervisors and an advisory committee that do not meet the FMMP criteria for Prime Farmland or Farmland of Statewide Importance because they are not irrigated.[1918] The County has not amended the CEQA Appendix G thresholds of significance to include non-irrigated Farmland of Local Importance, and the AVAP and General Plan 2035

[1907] *Id.,* p. 5.8-10
[1908] DRP 2015, p. I-5
[1909] *Ibid*.
[1910] *Id.,* p. I-6
[1911] *Id.,* p. I-7; DRP 2014a, p. 7-7
[1912] *Ibid*.
[1913] DRP 2017, p. 4-4 and Exhibit 4-2a
[1914] DRP 2015, p. I-8
[1915] *Ibid*.
[1916] DRP 2017, Exhibit 5.5-1
[1917] DRP 2014a, Exhibit 5.2-1
[1918] DRP 2017, p. 5.5-5

EIRs certified by the County do not consider impacts to Farmland of Local Importance as potentially significant.[1919] Consequently, consistent with Appendix G of the CEQA guidelines, the AVAP and General Plan EIRs consider impacts to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. These three categories of irrigated farmland are collectively referred to as "Important Farmland" in the AVAP EIR direct and indirect farmland impact analysis.[1920]

The AVAP EIR evaluated direct farmland impacts by considering the compatibility of the proposed land use designations in the AVAP with the continuation of agricultural activity within the 22,839 acres of Prime Farmland, 743 acres of Farmland of Statewide Importance, and 452 acres of Unique Farmland (24,034 total acres) that were identified by the FMMP within the AVAP planning area.[1921] The AVAP EIR considered that only the proposed RL10 (Rural Land, one dwelling unit per 10 gross acres) and RL20 (Rural Land, one dwelling unit per 20 gross acres) land use designations would be compatible with continued intensive commercial agriculture and that all other AVAP land use designations would be incompatible with continued agricultural use. The AVAP EIR assumed that all of the 24,034 acres of mapped farmland outside of the RL10 and RL20 designations would be converted to non-agricultural uses by buildout of the AVAP, including 5,968 acres of Prime Farmland, 133 acres of Farmland of Statewide Importance, and 68 acres of Unique Farmland (6,169 total acres).[1922] As shown on Exhibit 4-2A of the Draft EIR, none of the mapped farmland within the Project or immediately adjacent to the Project, including offsite mapped Prime Farmland located adjacent to the eastern edge of the Project between West Malinda and West Avenue B-8,[1923] is subject to the RL10 or RL20 designations. Consequently, these areas are included in the 6,169 total acres of farmland impacts identified in the AVAP EIR. The AVAP EIR found that the conversion 6,169 total acres of farmland would be a significant and unavoidable impact.[1924] The AVAP EIR also found that the buildout of the AVAP would indirectly result in the conversion of mapped Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses, notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. These indirect farmland conversion impacts were also determined to be significant and unavoidable.[1925]

The analysis of farmland impacts in the Draft EIR was completed based on the independent review completed for this EIR, but it is noteworthy that this analysis is also consistent with the AVAP and the AVAP EIR analysis. As shown in Draft EIR Table 5.5-4, the Project includes 12,323 acres, of which 642 are mapped as Prime Farmland, 62 acres are mapped as disturbed or otherwise vacant lands, and 11,616 acres are mapped as grazing land by the FMMP. Although the Project is located entirely within the West EOA where growth is anticipated and focused in accordance with the AVAP Rural Preservation Strategy, approximately 5,624 acres (approximately 45.6 percent) of the Project site would be designated as open space, including natural resource protection, greenways, parks for active

[1919] DRP 2014a, Section 5.2.2, threshold AG-1
[1920] *Id.,* Section 5.2, Impacts 5.2-1 and 5.2-5
[1921] *Id.,* Table 5.2-3
[1922] *Ibid*.
[1923] DRP 2017, Exhibit 5.5-1
[1924] DRP 2014a, Section 5.2-9, Impact 5.2-1
[1925] *Id.,* Section 5.2-9, Impact 5.2-5

and passive recreational use, and the continuation of grazing in certain areas.[1926] In addition, as discussed on Draft EIR page 4-45, on June 17, 2008 the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy that preserves approximately 90 percent of the 270,000-acre Ranch. The Project also includes 39,213 acres of offsite open space preserves within Tejon Ranch lands, including 8,973 acres in Los Angeles County.[1927] Project PDF 5-1 allows for continued grazing operations on portions of the Open Space preserve areas and the inclusion of a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses) within the Project.[1928] Consequently, the Project will result in substantial preservation of mapped grazing land, the continuation of grazing, and continued agriculture within the West EOA, in addition to the significant conservation of natural and open space that will occur under the Conservation and Land Use Agreement and in the Project offsite open space preserves.

Contrary to the comment, which includes a partial, heavily edited quotation from the Draft EIR, the Draft EIR did not conclude that potential indirect farmland impacts would be less than significant. Indeed, the Draft EIR reached the same conclusions as the AVAP EIR only after completing an independent farmland analysis based on available data, which included but was not limited to the AVAP EIR analysis of this issue. The EIR independently weighed the evidentiary value of the AVAP EIR's information and analysis for the purposes of independently assessing the Project's potential impacts to farmland. The AVAP also provided a reasonable basis for predicting potential off-site and cumulative impacts within the AVAP region, but other important factors – such as the groundwater adjudication process completed for the Antelope Valley and the new state law requiring comprehensive and sustainable groundwater management (Sustainable Groundwater Management Act of 2014) were also considered as part of this EIR's independent evaluation of agricultural issues. Draft EIR Section 5.5, Threshold 5-5, page 5.5-18 states that "All physical direct and indirect impacts of Project implementation, both on-site and off-site, are addressed under Thresholds 5-1 and 5-4 [timberlands] above. There would be no other changes in the environment not addressed under Thresholds 5-1 and 5-4 that would indirectly result in conversion of Farmland to non- agricultural use or forest land to non-forest land use." Consistent with CEQA Guidelines Appendix G, the discussion in Threshold 5-1 of the Draft EIR discloses that Project development will directly impact 642 acres of mapped Prime Farmland within the site.[1929] The Draft EIR states that the Project impacts to Prime Farmland are included in the 6,169 total acres of farmland impacts, including 5,968 acres of mapped Prime Farmland, considered in the AVAP EIR.[1930] As discussed on page 5.5-14 of the Draft EIR Threshold 5-1 analysis, the Draft EIR states that "The Project is consistent with the intent of the AVAP's land use policy that anticipates conversion of Farmland on and proximate to

[1926] DRP 2017, Appendix 4.0-A, Section 3.13 and Table 2-16
[1927] *Id.,* Exhibit 4-12
[1928] *Id.,* p. 5.5-1
[1929] *Id.,* p. 5.5-12
[1930] *Id.,* pp. 7-13 and -14

the site, among other areas, and the Project would not result in any new impacts to agricultural lands not previously considered in the AVAP EIR." As discussed above, the analysis of farmland impacts in the AVAP EIR includes the conversion of all mapped Prime Farmland within and immediately adjacent to the Project and within the West EOA, as well the conversion of additional farmland to nonagricultural use notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. The AVAP EIR found that both the direct and indirect impacts of farmland conversion, consistent with the implementation of the AVAP, would be significant and unavoidable.[1931] The Draft EIR analysis is consistent with the direct and indirect farmland impacts in the AVAP EIR analysis, and both direct and indirect Project farmland impacts are considered to be significant.

The Draft EIR discussion of potential indirect farmland impacts[1932] references the discussion of growth inducement in Draft EIR Section 6.0. As shown in Draft EIR Exhibits 4-2A and 5.5-1, there are areas of mapped Prime and Unique Farmland located outside of the Project area and outside of or adjacent to the West EOA boundary that could be subject to these indirect growth-inducing impacts. The Draft EIR found that the Project would have a significant, adverse growth-inducing impact due to the potential incentives to develop land outside the West EOA.[1933] In addition, the Draft EIR found that the Project would contribute to a cumulatively considerable impact related to farmland conversion even though the on-site conversion of 642 acres of prime farmland is part of the total of 6,169 acres farmland considered in the AVAP EIR.[1934] Consequently, the Draft EIR finds the Project's direct, indirect, and cumulative impacts to be significant.

As discussed above, the AVAP EIR found that the direct and indirect farmland impacts from the implementation of the AVAP, which includes Project development in the West EOA, would be significant and unavoidable. The County made several findings regarding the infeasibility of mitigating for farmland impacts in the AVAP EIR. First, the County found that, consistent with several, but not all court rulings (e.g., *Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956), *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) and *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) as cited in the AVAP EIR), the preservation of offsite farmland in a mitigation bank, by easement or other means, does not mitigate for the onsite conversion of farmland to non-agricultural uses. The County also found that farmland impact mitigation is infeasible because most of Los Angeles County outside of the AVAP area is urbanized, mountainous or has other constraints, such as lack of water supply or lack of soil suitability that make commercial agriculture infeasible, and the use of mitigation banks or other programs to preserve offsite agriculture mitigation would require acquisition of land outside of Los Angeles County.[1935] As discussed on pages 5.5-13 and 5.5-14, the Draft EIR references and incorporates the mitigation feasibility analysis in the AVAP EIR. The Draft EIR further discussed the feasibility of mitigating for Project impacts to onsite prime farmland by establishing 642 acres of new farming areas on Tejon Ranch. As

[1931] DRP 2014a, Section 5.2-9, Impacts 5.2-1 and 5.2-5
[1932] DRP 2017, p. 5.5-18
[1933] *Id.,* p. 6-9
[1934] *Id.,* pp. 7-13 and -14
[1935] DRP 2014a, p. 5.2-24

discussed on Draft EIR page 5.5-14, such mitigation would be infeasible due to the implementation of the Tejon Ranch Conservation and Land Use Agreement, which preserves over 90 percent of Tejon Ranch, and the lack of sufficient locations on the remaining portions of the Ranch that could be cultivated to meet Prime Farmland standards. Consequently, consistent with the AVAP EIR, the Draft EIR determined that Project impacts to farmland, including direct, indirect and cumulative impacts, would remain significant and unavoidable.

The infeasibility of mitigating for agricultural impacts related to the Project and the implementation of the AVAP as discussed in the Draft EIR and the AVAP EIR is further supported by a Court-approved Adjudication Judgment and Physical Solution for the Antelope Valley Groundwater Basin entered in December 2015. As discussed in Draft EIR Section 5.18, Water Resources, a physical solution refers to agreed-upon or judicially imposed resolution of conflicting groundwater claims. The Adjudication Judgment and Physical Solution adopted for the Antelope Valley establishes a regional watermaster to regulate groundwater use consistent with applicable law and the total sustainable yield of the basin under the auspices of the court. As of January 2016, all groundwater users in the basin are required to begin a 7-year rampdown period during which groundwater production will be reduced to levels consistent with the total sustainable yield of approximately 110,000 afy. Among other provisions, the Adjudication Judgment and Physical Solution allows for interbasin groundwater transfers subject to Watermaster approval.[1936]

As discussed on Draft EIR page 5.5-6, over time agriculture and military uses have declined and urban land uses have emerged as the primary economic driver in the region. As discussed in Draft EIR Section 6.0, Growth-Inducing Impacts, the AVAP EIR projects that the full buildout of the AVAP in 2035 would result in 311,920 new residents and 81,441 new dwelling units in the Antelope Valley. The current Urban Water Management Plan adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site states that, although land uses within the Antelope Valley have historically focused primarily on agriculture, the Antelope Valley is in transition from predominantly agricultural uses to predominantly residential and industrial uses.[1937] As a result, since the 1980s there has been a rapid increase in the demand for municipal and industrial (M&I) water. In the 1990s, however, certain agricultural interests, including commercial carrot and onion farming entities, began operating in the Antelope Valley and significantly increased groundwater production demand in the region. Increased agricultural and M&I groundwater use reduced groundwater levels across the Antelope Valley basin and, starting in 1999, generated a legal conflict that resulted in the December 2015 Adjudication Judgment and Physical Solution.[1938]

The Adjudication Judgment and Physical Solution requires that all groundwater users in the Antelope Valley basin reduce production to levels determined by the Court to be sustainable

[1936] DRP 2017, Section 5.18.3; *Id.,* Appendix 5.18-D

[1937] Los Angeles County Waterworks District 40. 2017 (final version, February 2). UWMP (page 2-1). https://dpw.lacounty.gov/wwd/web/Documents/2015%20Integrated%20Urban%20Water%20Management%20Plan%20for%20the%20Antelope%20Valley.pdf.

[1938] *Id.,* p. 5-5

over a seven-year rampdown period starting in 2016. As shown in Exhibit 4 of Draft EIR Appendix 5.18-D, groundwater use by Antelope Valley senior rights holders (groundwater users with overlying production rights) will be reduced by over 40 percent at the end of the rampdown period. Two of the largest agricultural interests in the region, Bolthouse Properties LLC and Diamond Farming Co. LLC/Crystal Organic LLC/Grimmway/Lapis, will be required to reduce groundwater production from a pre-rampdown total of 20,160 afy to just 11,931 afy in accordance with the Adjudication Judgment and Physical Solution. As a result of these groundwater use limitations, future agricultural production is anticipated to be significantly reduced in the Antelope Valley. In addition, the groundwater transfer provisions of the Adjudication Judgment and Physical Solution will allow agricultural users to sell groundwater rights with the approval of the Watermaster to M&I and other users in the basin that are likely to value such supplies above the economic rates of return that can be obtained from water use for farming. The economic incentives to transfer groundwater rights would further reduce farming in the region.

In August 2017, the Antelope Valley Watermaster filed the first annual report required by the Adjudication Judgment and Physical Solution.[1939] The report states that the acreage of Antelope Valley under cultivation in the region has fallen by 32 percent from the levels reported in a 2010 expert report prepared in support of the adjudication.[1940] This result is consistent with the anticipated decline in Antelope Valley agriculture from continued urban growth, the significant reduction in groundwater production allowed by the Adjudication Judgment and Physical Solution, including groundwater use by agricultural producers, and economic incentives to transfer groundwater from agricultural to more highly-valued M&I uses over time.

In addition to the cases cited by the County in support of a CEQA lead agency's findings that agricultural preservation does not mitigate for onsite agricultural conversion, other cases have upheld CEQA findings that agricultural mitigation is infeasible in rapidly urbanizing regions, such as the AVAP area, due to economic factors. In *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 350-351 ("*Beaumont*"), the California Court of Appeals upheld a determination by a CEQA lead agency that, due to continuing urban and suburban development, agricultural land values were increasing and agricultural landowners were under pressure to sell or convert their lands for development. As a result, the Court found that the CEQA lead agency "reasonably concluded that any measures to reduce the [project's] direct and cumulative adverse impacts on agricultural land uses ... would not have been economically feasible." The *Beaumont* court cited *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1269-1271, in which the appellate court upheld a CEQA lead agency's decision that a significant adverse impact to agricultural lands could not be feasibly mitigated due to the "negative economics" of long-term agriculture in the region, including "increasing land prices and environmental regulation, higher water and labor costs, higher property taxes, competition from other parts of the state and foreign countries, and growing urbanization." In *Masonite Corp. v. County of Mendocino*, (2013) 218 Cal. App. 4th 230, the appellate court held that while a CEQA lead agency cannot conclude as

[1939] Final Antelope Valley Watermaster 2016 Annual Report. 2017 (August 1). http://www.avek.org/fileLibrary/file_753.pdf.

[1940] *Id.,* pp. 34-35

a matter of law that agricultural impact mitigation is infeasible, it may, as is the case in the AVAP EIR and in the Draft EIR, make such a determination based on the applicable facts.

Consistent with these cases, there is substantial evidence in California that attempts to mitigate for farmland impacts by farmland preservation, such as mitigation banks or easements, can increase the likelihood that agriculture will be abandoned in rapidly growing regions. Riverside County for example, has experienced a long-term transformation from agricultural to urban land uses that is similar to the historical land uses changes in the AVAP area. During the CEQA review process of the 2003 Riverside County General Plan, the County attempted to mitigate for impacts to agricultural uses by limiting allowable development yields on existing farmland to reduce the attractiveness of future development, and by requiring payment into a proposed mitigation bank that would purchase permanent conservation easements on, and remove future development rights from, agricultural land. This proposed mitigation was strongly opposed by the Riverside County Farm Bureau, which submitted written comments to the County stating that "General Plan policies that the EIR states are intended to mitigate adverse impacts to agriculture would instead have the effect of driving agriculture out of business and converting agricultural resources to non-agricultural use. That is because, in urbanizing areas such as Riverside County, the viability of agriculture is dependent upon the economic value of the agricultural land. The General Plan policies and EIR MMs would substantially impact the economic value of agricultural land by, among other things, restricting development of agricultural land...and by preventing the conversion of agricultural land to other productive uses....In this way, the General Plan and EIR impair the agricultural landowner's access to capital necessary to invest in the agricultural operations, which in turn results in conversion of the agricultural resources to non- agricultural uses." The Bureau's comments concluded that the proposed bank and other measures would "have the effect of decreasing the economic base of agricultural operations and increasing the cost of community development on agricultural land with no meaningful mitigation for the impacts to agriculture within the County."[1941] Based on such evidence, Riverside County removed the proposed farmland mitigation measures from the General Plan and has subsequently determined that mitigation for farmland impacts in the County is infeasible.

Consequently, the Draft EIR determination that mitigation for farmland impacts is infeasible is based on substantial evidence, including Los Angeles County findings that offsite mitigation does not compensate for onsite farmland impacts, and that because the County is largely urbanized, mountainous, or has other lands that are subject to water, soil or other constraints that preclude intensive commercial agriculture in the County, mitigation for farmland impacts associated with the buildout of the AVAP, which includes the Project, is infeasible.[1942] In addition, The Draft EIR found that Project mitigation is infeasible because most of the land in the Tejon Ranch is already subject to a conservation agreement, and there is not sufficient land within the remaining development areas of the Ranch with suitable characteristics to support the establishment of new Prime Farmland to compensate for

[1941] Riverside County Farm Bureau. Comments on the Draft Program Environmental Impact Report ("PEIR") No. 441. http://www.riversidecfb.com/pdf/Magazine/october02.pdf.

[1942] DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5

onsite Project impacts.[1943] These findings are further supported by the implementation of the Antelope Valley Basin Adjudication Judgment and Physical Solution, which significantly reduces the amount of groundwater available for all users in the basin, including agriculture, and increases economic incentives for agricultural users to transfer groundwater rights to M&I users. In August 2017, the Watermaster reported that the acreage of agricultural lands under cultivation in the Antelope has already declined by 32 percent from the levels in a 2010 report prepared for the adjudication process. Recent court cases and evidence from rapidly growing, former agricultural regions similar to the AVAP area further support the fact that, due to the economics of urbanization, a CEQA lead agency can reasonably conclude that mitigation in the form of offsite preservation is economically infeasible or, as in Riverside County, potentially counterproductive to the continuation of agricultural activity.

In summary, the Draft EIR found that the Project's direct, indirect, and cumulative impacts to mapped farmlands, in accordance with the State CEQA Guidelines Appendix G thresholds utilized by Los Angeles County, would be significant and unavoidable. These findings are supported by substantial evidence in the record as prepared by the CEQA lead agency in the 2015 AVAP and Los Angeles County General Plan Update EIRs, the Adjudication Judgment and Physical Solution approved in December 2015 for the Antelope Valley Basin by the California Superior Court, evidence of significant agricultural acreage declines in the Antelope Valley reported by the Watermaster for the Antelope Valley Basin, and cases and evidence supporting CEQA determinations that agricultural mitigation is economically infeasible or may actually be counterproductive due to the economics of farming in rapidly urbanizing areas.

In response to the comment, Draft EIR Exhibit 5.5-1 is hereby revised to correct a typographical error in the legend as follows:

> ~~F~~ L – Farmland of Local Importance

This correction does not change any of the analysis or conclusions in the Draft EIR.

Response to Comment F.8-183:

The comment cites to a typographical error in the Draft EIR concerning the potential use of a 489-acre agricultural protection easement. As discussed in more detail below, the EIR's independent analysis of farmland impacts and the feasibility of mitigation in the Draft EIR was also consistent with the AVAP and the AVAP EIR analysis and mitigation for farmland impacts was determined to be infeasible. Consequently, the second full paragraph of text on Draft EIR page 5.5-13 is hereby revised as follows:

> Also, the Project would accommodate a total of 50 acres of small-scale agriculture and agriculture-related uses, including, but not limited to community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, and commercial greenhouses (PDF 5-1). However, these activities may or may not occur within the 642 acres of the site

[1943] DRP 2017, pp. 5.5-13 and -14

currently designated as Prime Farmland. ~~In addition, Tejon Ranch will put an agricultural preservation easement of not less than 489 acres of Prime and Unique farmland outside of the Project site, but on the Tejon Ranch property.~~

After weighing the evidentiary value of data and analysis set forth in the AVAP EIR for the purposes of independently assessing the Project's potential impacts to farmland, the Draft EIR came to the same conclusion as the AVAP EIR regarding such impacts, particularly with respect to off-site and cumulative farmland impacts. As shown in Draft EIR Table 5.5-4, the Project includes 12,323 acres, of which 642 are mapped as Prime Farmland, 62 acres are mapped as disturbed or otherwise vacant lands, and 11,616 acres are mapped as grazing land by the FMMP. Although the Project is located entirely within the West EOA, where growth is anticipated and focused in accordance with the AVAP Rural Preservation Strategy, approximately 5,624 acres (approximately 45.6 percent) of the Project site would be designated as open space, including natural resource protection, greenways, parks for active and passive recreational use, and the continuation of grazing in certain areas.[1944] In addition, as discussed on Draft EIR page 4-45, on June 17, 2008 the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy that preserves approximately 90 percent of the 270,000-acre Ranch. The Project also includes 39,213 acres of offsite open space preserves within Tejon Ranch lands, including 8,973 acres in Los Angeles County.[1945] PDF 5-1 allows for continued grazing operations on portions of the Open Space preserve areas and the inclusion of a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses) within the Project.[1946] Consequently, the Project will result in substantial preservation of mapped grazing land, the continuation of grazing, and continued agriculture within the West EOA in addition to the significant conservation of natural and open space that will occur under the Conservation and Land Use Agreement and in the Project offsite open space preserves.

Consistent with State CEQA Guidelines Appendix G, the discussion in Threshold 5-1 of the Draft EIR discloses that Project development will directly impact 642 acres of mapped Prime Farmland within the site.[1947] The Draft EIR states that the Project impacts to prime farmland are included in the 6,169 total acres of farmland impacts, including 5,968 acres of mapped Prime Farmland, considered in the AVAP EIR.[1948] As discussed above, the analysis of farmland impacts in the AVAP EIR includes the conversion of all mapped Prime Farmland within and immediately adjacent to the Project site and within the West EOA, as well the conversion of additional farmland to nonagricultural use notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. The Draft EIR uses these forecasts to independently determine that the Project's direct and indirect impacts of

1944 *Id.,* Appendix 4.0-A, Section 3.12 and Table 2-16
1945 *Id.,* Exhibit 4-12
1946 *Id.,* p. 5.5-1
1947 *Id.,* p. 5.5-12
1948 *Id.,* pp. 7-13 and -14

farmland conversion would be significant and unavoidable, consistent with the conclusion of the AVAP EIR.

The Draft EIR discussion of potential indirect farmland impacts[1949] references the discussion of growth inducement in Draft EIR Section 6.0, Growth-Inducing Impacts. As shown in Draft EIR Exhibits 4-2A and 5.5-1, there are areas of mapped Prime and Unique farmland located outside of the Project area and outside of or adjacent to the West EOA boundary that could be subject to these indirect growth-inducing impacts. The Draft EIR found that the Project would have a significant adverse growth-inducing impact due to the potential incentives to develop land outside the West EOA.[1950] In addition, the Draft EIR found that the Project would contribute to a cumulatively considerable impact related to farmland conversion even though the on-site conversion of 642 acres of prime farmland is part of the total of 6,169 acres farmland considered in the AVAP EIR.[1951] The Draft EIR concludes that the Project's direct, indirect, and cumulative impacts to farmland are all significant.

As discussed on Draft EIR pages 5.5-13 and 5.5-14, as part of its independent review, the Draft EIR references and incorporates the AVAP EIR's farmland impact mitigation feasibility analysis. The County made several findings regarding the infeasibility of mitigating for farmland impacts in the AVAP EIR. First, the County found that, consistent with several, but not all court rulings (e.g., *Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956), *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) and *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) as cited in the AVAP EIR), the preservation of offsite farmland in a mitigation bank, by easement or other means, does not mitigate for the onsite conversion of farmland to non-agricultural uses. The County also found that farmland impact mitigation is infeasible because most of Los Angeles County outside of the AVAP area is urbanized, mountainous, or has other constraints, such as lack of water supply or lack of soil suitability that make commercial agriculture infeasible, and the use of mitigation banks or other programs to preserve offsite agriculture mitigation would require acquisition of land outside of Los Angeles County.[1952] The Draft EIR further discussed the feasibility of mitigating for Project impacts to onsite prime farmland by establishing 642 acres of new farming areas on Tejon Ranch. As discussed on Draft EIR page 5.5-14, such mitigation would be infeasible due to the implementation of the Tejon Ranch Conservation and Land Use Agreement, which preserves over 90 percent of Tejon Ranch, and the lack of sufficient locations on the remaining portions of the Ranch that could be cultivated to meet Prime Farmland standards. Consequently, consistent with the AVAP EIR, the Draft EIR independently determined that Project impacts to farmland, including direct, indirect, and cumulative impacts, would remain significant and unavoidable.

The infeasibility of mitigating for agricultural impacts related to the Project and the implementation of the AVAP as discussed in the Draft EIR and the AVAP EIR is further supported by a Court-approved Adjudication Judgment and Physical Solution for the

[1949] DRP 2017, p. 5.5-18
[1950] *Id.,* p. 6-9
[1951] *Id.,* pp. 7-13 and -14
[1952] DRP 2014a, p. 5.2-24

Antelope Valley Groundwater Basin entered in December 2015. As discussed in Draft EIR Section 5.18, Water Resources, a physical solution refers to agreed-upon or judicially imposed resolution of conflicting groundwater claims. The Adjudication Judgment and Physical Solution adopted for the Antelope Valley establishes a regional watermaster to regulate groundwater use consistent with applicable law and the total sustainable yield of the basin under the auspices of the court. As of January 2016, all groundwater users in the basin are required to begin a 7-year rampdown period during which groundwater production will be reduced to levels consistent with the total sustainable yield of approximately 110,000 afy. Among other provisions, the Adjudication Judgment and Physical Solution allows for interbasin groundwater transfers subject to Watermaster approval.[1953]

As discussed on Draft EIR page 5.5-6, over time agriculture and military uses have declined and urban land uses have emerged as the primary economic driver in the region. As discussed on Draft EIR page 6-8, the AVAP EIR projects that the full buildout of the AVAP in 2035 would result in 311,920 new residents and 81,441 new dwelling units in the Antelope Valley. The current Urban Water Management Plan (UWMP) adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site states that although land uses within the Antelope Valley have historically focused primarily on agriculture, the Antelope Valley is in transition from predominantly agricultural uses to predominantly residential and industrial uses.[1954] As a result, since the 1980s there has been a rapid increase in the demand for municipal and industrial (M&I) water. In the 1990s, however, certain agricultural interests, including commercial carrot and onion farming entities, began operating in the Antelope Valley and significantly increased groundwater production demand in the region. Increased agricultural and M&I groundwater use reduced groundwater levels across the Antelope Valley basin and, starting in 1999, generated a legal conflict that resulted in the December 2015 Adjudication Judgment and Physical Solution.[1955]

The Adjudication Judgment and Physical Solution requires that all groundwater users in the Antelope Valley basin reduce production to levels determined by the Court to be sustainable over a seven-year rampdown period starting in 2016. As shown in Exhibit 4 of Draft EIR Appendix 5.18-D, groundwater use by Antelope Valley senior rights holders (groundwater users with overlying production rights) will be reduced by over 40 percent at the end of the rampdown period. Two of the largest agricultural interests in the region, Bolthouse Properties LLC and Diamond Farming Co. LLC/Crystal Organic LLC/Grimmway/Lapis, will be required to reduce groundwater production from a pre-rampdown total of 20,160 afy to just 11,931 afy in accordance with the Adjudication Judgment and Physical Solution. As a result, agricultural production is anticipated to be significantly reduced in the Antelope Valley due to groundwater use limitations. In addition, the groundwater transfer provisions of the Adjudication Judgment and Physical Solution will allow agricultural users to sell groundwater rights with the approval of the Watermaster to M&I and other users in the basin that are likely to value such supplies above the economic rates of return that can be

[1953] DRP 2017, Section 5.18.3; see also DRP 2017, Appendix 5.18-D
[1954] Los Angeles County Waterworks District 40 2017, page 2-1
[1955] *Id.,* p. 5-5

obtained from water use for farming. The economic incentives to transfer groundwater rights would further reduce farming in the region.

In August 2017, the Antelope Valley Watermaster filed the first annual report required by the Adjudication Judgment and Physical Solution.[1956] The report states that the acreage of Antelope Valley under cultivation in the region has fallen by 32 percent from the levels reported in a 2010 expert report prepared in support of the adjudication.[1957] This result is consistent with the anticipated decline in Antelope Valley agriculture from continued urban growth, the significant reduction in groundwater production allowed by the Adjudication Judgment and Physical Solution, including groundwater use by agricultural producers, and economic incentives to transfer groundwater from agricultural to more highly-valued M&I uses over time.

In addition to the cases cited by the County in support of a CEQA lead agency's findings that agricultural preservation does not mitigate for onsite agricultural conversion, other cases have upheld CEQA findings that agricultural mitigation is infeasible in rapidly urbanizing regions, such as the AVAP area, due to economic factors. In *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 350-351 ("*Beaumont*"), the California Court of Appeals upheld a determination by a CEQA lead agency that, due to continuing urban and suburban development, agricultural land values were increasing and agricultural landowners were under pressure to sell or convert their lands for development. As a result, the Court found that the CEQA lead agency "reasonably concluded that any measures to reduce the [project's] direct and cumulative adverse impacts on agricultural land uses ... would not have been economically feasible." The *Beaumont* court cited *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1269-1271, in which the appellate court upheld a CEQA lead agency's decision that a significant adverse impact to agricultural lands could not be feasibly mitigated due to the "negative economics" of long-term agriculture in the region, including "increasing land prices and environmental regulation, higher water and labor costs, higher property taxes, competition from other parts of the state and foreign countries, and growing urbanization." In *Masonite Corp. v. County of Mendocino*, (2013) 218 Cal. App. 4th 230, the appellate court held that while a CEQA lead agency cannot conclude as a matter of law that agricultural impact mitigation is infeasible, it may, as is the case in the AVAP EIR and in the Draft EIR, make such a determination based on the applicable facts.

Consistent with these cases, there is substantial evidence in California that attempts to mitigate for farmland impacts by farmland preservation, such as mitigation banks or easements, can increase the likelihood that agriculture will be abandoned in rapidly growing regions. For example, Riverside County has experienced a long-term transformation from agricultural to urban land uses that is similar to the historical land uses changes in the AVAP area. During the CEQA review process of the 2003 Riverside County General Plan, the County attempted to mitigate for impacts to agricultural uses by limiting allowable development yields on existing farmland to reduce the attractiveness of future development, and by requiring payment into a proposed mitigation bank that would purchase permanent

[1956] Final Antelope Valley Watermaster 2016 Annual Report. 2017 (August 1). http://www.avek.org/fileLibrary/file_753.pdf.

[1957] *Id.,* pp. 34-35

conservation easements on, and remove future development rights from, agricultural land. This proposed mitigation was strongly opposed by the Riverside County Farm Bureau, which submitted written comments to the County stating that "General Plan policies that the EIR states are intended to mitigate adverse impacts to agriculture would instead have the effect of driving agriculture out of business and converting agricultural resources to non-agricultural use. That is because, in urbanizing areas such as Riverside County, the viability of agriculture is dependent upon the economic value of the agricultural land. The General Plan policies and EIR MMs would substantially impact the economic value of agricultural land by, among other things, restricting development of agricultural land...and by preventing the conversion of agricultural land to other productive uses....In this way, the General Plan and EIR impair the agricultural landowner's access to capital necessary to invest in the agricultural operations, which in turn results in conversion of the agricultural resources to non- agricultural uses." The Bureau's comments concluded that the proposed bank and other measures would "have the effect of decreasing the economic base of agricultural operations and increasing the cost of community development on agricultural land with no meaningful mitigation for the impacts to agriculture within the County."[1958] Based on such evidence, Riverside County removed the proposed farmland MMs from the General Plan, and has subsequently determined that mitigation for farmland impacts in the County is infeasible.

Consequently, the Draft EIR determination that mitigation for farmland impacts is infeasible is based on substantial evidence, including Los Angeles County findings that offsite mitigation does not compensate for onsite farmland impacts, and that because the County is largely urbanized, mountainous, or has other lands that are subject to water, soil or other constraints that preclude intensive commercial agriculture in the County, mitigation for farmland impacts associated with the buildout of the AVAP, which includes the Project, is infeasible.[1959] In addition, the Draft EIR found that Project mitigation is infeasible because most of the land in the Tejon Ranch is already subject to a conservation agreement, and there is not sufficient land within the remaining development areas of the Ranch with suitable characteristics to support the establishment new Prime Farmland to compensate for onsite Project impacts.[1960] These findings are further supported by the implementation of the Antelope Valley Basin Adjudication Judgment and Physical Solution, which significantly reduces the amount of groundwater available for all users in the basin, including agriculture, and increases economic incentives for agricultural users to transfer groundwater rights to M&I users. In August 2017, the Watermaster reported that the acreage of agricultural lands under cultivation in the Antelope Valley has already declined by 32 percent from the levels in a 2010 report prepared for the adjudication process. Recent court cases and evidence from rapidly growing, former agricultural regions similar to the AVAP area further support the fact that, due to the economics of urbanization, a CEQA lead agency can reasonably conclude that mitigation in the form of offsite preservation is economically infeasible or, as in Riverside County, potentially counterproductive to the continuation of agricultural activity.

[1958] Riverside County Farm Bureau. Comments on the Draft Program Environmental Impact Report ("PEIR") No. 441. http://www.riversidecfb.com/pdf/Magazine/october02.pdf.

[1959] DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5

[1960] DRP 2017, pp. 5.5-13 and -14

In summary, the Draft EIR found that the Project's direct, indirect, and cumulative impacts to mapped farmlands in accordance with the State CEQA Guidelines Appendix G thresholds utilized by Los Angeles County, would be significant and unavoidable. These findings are supported by substantial evidence in the record as prepared by the CEQA lead agency in the 2015 AVAP and Los Angeles County General Plan Update EIRs, the Adjudication Judgment and Physical Solution approved in December 2015 for the Antelope Valley Basin by the California Superior Court, evidence of significant agricultural acreage declines in the Antelope Valley reported by the Watermaster for the Antelope Valley Basin, and cases and evidence supporting CEQA determinations that that agricultural mitigation is economically infeasible or may actually be counterproductive due to the economics of farming in rapidly urbanizing areas.

Response to Comment F.8-184:

As shown in Draft EIR Table 5.5-4, the Project includes 12,323 acres, of which 642 are mapped as Prime Farmland, 62 acres are mapped as disturbed or otherwise vacant lands, and 11,616 acres are mapped as grazing land by the FMMP. Although the Project is located entirely within the West EOA, where growth is anticipated and focused in accordance with the AVAP Rural Preservation Strategy, approximately 5,624 acres (approximately 45.6 percent) of the Project site would be designated as open space, including natural resource protection, greenways, parks for active and passive recreational use, and the continuation of grazing in certain areas.[1961] In addition, as discussed on Draft EIR page 4-45, on June 17, 2008 the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy that preserves approximately 90 percent of the 270,000-acre Ranch. The Project also includes 39,213 acres of offsite open space preserves within Tejon Ranch lands, including 8,973 acres in Los Angeles County.[1962] PDF 5-1 allows for continued grazing operations on portions of the Open Space preserve areas and the inclusion of a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses) within the Project.[1963] Consequently, the Project will result in substantial preservation of mapped grazing land, the continuation of grazing, and continued agriculture within the West EOA in addition to the significant conservation of natural and open space that will occur under the Conservation and Land Use Agreement and in the Project offsite open space preserves.

Consistent with State CEQA Guidelines Appendix G, the discussion in Threshold 5-1 of the Draft EIR discloses that Project development will directly impact 642 acres of mapped Prime Farmland within the site.[1964] The Draft EIR states that the Project impacts to Prime Farmland are included in the 6,169 total acres of farmland impacts, including 5,968 acres of mapped

[1961] *Id.,* Appendix 4.0-A, Section 3.12 and Table 2-16
[1962] *Id.,* Exhibit 4-12
[1963] *Id.,* p. 5.5-1
[1964] *Id.,* p. 5.5-12

Prime Farmland, considered in the AVAP EIR.[1965] As discussed above, the analysis of farmland impacts in the AVAP EIR includes the conversion of all mapped Prime Farmland within and immediately adjacent to the Project and within the West EOA, as well the conversion of additional farmland to nonagricultural use notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. The Draft EIR uses these forecasts to independently determined that the Project's direct and indirect impacts of farmland conversion would be significant and unavoidable, consistent with the conclusions of the AVAP EIR.

The Draft EIR discussion of potential indirect farmland impacts[1966] references the discussion of growth inducement in Draft EIR Section 6.0, Growth-Inducing Impacts. As shown in Draft EIR Exhibits 4-2A and Exhibit 5.5-1, there are areas of mapped Prime and Unique Farmland located outside of the Project area and outside of or adjacent to the West EOA boundary that could be subject to these indirect growth-inducing impacts. The Draft EIR found that the Project would have a significant adverse growth-inducing impact due to the potential incentives to develop land outside the West EOA.[1967] In addition, the Draft EIR found that the Project would contribute to a cumulatively considerable impact related to farmland conversion even though the on-site conversion of 642 acres of prime farmland is part of the total of 6,169 acres farmland considered in the AVAP EIR.[1968] The Project's direct, indirect, and cumulative impacts to farmland are all considered to be significant in the Draft EIR.

As discussed on Draft EIR pages 5.5-13 and 5.5-14, as part of its independent review, the Draft EIR references and incorporates the AVAP EIR's farmland impact mitigation feasibility analysis The County made several findings regarding the infeasibility of mitigating for farmland impacts in the AVAP EIR. First, the County found that, consistent with several, but not all court rulings (e.g., *Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956), *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) and *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) as cited in the AVAP EIR), the preservation of offsite farmland in a mitigation bank, by easement or other means does not mitigate for the onsite conversion of farmland to non-agricultural uses. The County also found that farmland impact mitigation is infeasible because most of Los Angeles County outside of the AVAP area is urbanized, mountainous, or has other constraints, such as lack of water supply or lack of soil suitability that make commercial agriculture infeasible, and the use of mitigation banks or other programs to preserve offsite agriculture mitigation would require acquisition of land outside of Los Angeles County.[1969] The Draft EIR further discussed the feasibility of mitigating for Project impacts to onsite Prime Farmland by establishing 642 acres of new farming areas on Tejon Ranch. As discussed on Draft EIR page 5.5-14, such mitigation would be infeasible due to the implementation of the Tejon Ranch Conservation and Land Use Agreement, which preserves over 90 percent of Tejon Ranch, and the lack of sufficient locations on the remaining portions of the Ranch that could be cultivated to meet Prime

[1965] *Id.,* pp. 7-13 and -14
[1966] DRP 2017, p. 5.5-18
[1967] *Id.,* p. 6-9
[1968] *Id.,* pp. 7-13 and -14
[1969] DRP 2014a, p. 5.2-24

Farmland standards. Consequently, consistent with the AVAP EIR, the Draft EIR independently determined that Project impacts to farmland, including direct, indirect, and cumulative impacts, would remain significant and unavoidable.

The infeasibility of mitigating for agricultural impacts related to the Project and the implementation of the AVAP as discussed in the Draft EIR and the AVAP EIR is further supported by a Court-approved Adjudication Judgment and Physical Solution for the Antelope Valley Groundwater Basin entered in December 2015. As discussed in Draft EIR Section 5.18, Water Resources, a physical solution refers to agreed-upon or judicially imposed resolution of conflicting groundwater claims. The Adjudication Judgment and Physical Solution adopted for the Antelope Valley establishes a regional watermaster to regulate groundwater use consistent with applicable law and the total sustainable yield of the basin under the auspices of the court. As of January 2016, all groundwater users in the basin are required to begin a 7-year rampdown period during which groundwater production will be reduced to levels consistent with the total sustainable yield of approximately 110,000 afy. Among other provisions, the Adjudication Judgment and Physical Solution allows for interbasin groundwater transfers subject to Watermaster approval.[1970]

As discussed on Draft EIR page 5.5-6, over time agriculture and military uses have declined and urban land uses have emerged as the primary economic driver in the region. As discussed on Draft EIR page 6-8, the AVAP EIR projects that the full buildout of the AVAP in 2035 would result in 311,920 new residents and 81,441 new dwelling units in the Antelope Valley. The current Urban Water Management Plan adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site states that although historically land uses within the Antelope Valley have focused primarily on agriculture, the Antelope Valley is in transition from predominantly agricultural uses to predominantly residential and industrial uses.[1971] As a result, since the 1980s there has been a rapid increase in the demand for municipal and industrial (M&I) water. In the 1990s, however, certain agricultural interests, including commercial carrot and onion farming entities, began operating in the Antelope Valley and significantly increased groundwater production demand in the region. Increased agricultural and M&I groundwater use reduced groundwater levels across the Antelope Valley basin and, starting in 1999, generated a legal conflict that resulted in the December 2015 Adjudication Judgment and Physical Solution.[1972]

The Adjudication Judgment and Physical Solution requires that all groundwater users in the Antelope Valley basin reduce production to levels determined by the Court to be sustainable over a seven-year rampdown period starting in 2016. As shown in Exhibit 4 of Draft EIR Appendix 5.18-D, groundwater use by Antelope Valley senior rights holders (groundwater users with overlying production rights) will be reduced by over 40 percent at the end of the rampdown period. Two of the largest agricultural interests in the region, Bolthouse Properties LLC and Diamond Farming Co. LLC/Crystal Organic LLC/Grimmway/Lapis, will be required to reduce groundwater production from a pre-rampdown total of 20,160 afy to

[1970] DRP 2017, Section 5.18.3; see also DRP 2017, Appendix 5.18-D
[1971] Los Angeles County Waterworks District 40 2017 p. 2-1
[1972] *Id.,* p. 5-5

just 11,931 afy in accordance with the Adjudication Judgment and Physical Solution. As a result of these groundwater use limitations, future agricultural production is anticipated to be significantly reduced in the Antelope Valley. In addition, the groundwater transfer provisions of the Adjudication Judgment and Physical Solution will allow agricultural users to sell groundwater rights with the approval of the Watermaster to M&I and other users in the basin that are likely to value such supplies above the economic rates of return that can be obtained from water use for farming. The economic incentives to transfer groundwater rights would further reduce farming in the region.

In August 2017, the Antelope Valley Watermaster filed the first annual report required by the Adjudication Judgment and Physical Solution.[1973] The report states that the acreage of Antelope Valley under cultivation in the region has fallen by 32 percent from the levels reported in a 2010 expert report prepared in support of the adjudication.[1974] This result is consistent with the anticipated decline in Antelope Valley agriculture from continued urban growth, the significant reduction in groundwater production allowed by the Adjudication Judgment and Physical Solution, including groundwater use by agricultural producers, and economic incentives to transfer groundwater from agricultural to more highly-valued M&I uses over time.

In addition to the cases cited by the County in support of a CEQA lead agency's findings that agricultural preservation does not mitigate for onsite agricultural conversion, other cases have upheld CEQA findings that agricultural mitigation is infeasible in rapidly urbanizing regions, such as the AVAP area, due to economic factors. In *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 350-351 ("*Beaumont*"), the California Court of Appeals upheld a determination by a CEQA lead agency that, due to continuing urban and suburban development, agricultural land values were increasing and agricultural landowners were under pressure to sell or convert their lands for development. As a result, the Court found that the CEQA lead agency "reasonably concluded that any measures to reduce the [project's] direct and cumulative adverse impacts on agricultural land uses ... would not have been economically feasible." The *Beaumont* court cited *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1269-1271, in which the appellate court upheld a CEQA lead agency's decision that a significant adverse impact to agricultural lands could not be feasibly mitigated due to the "negative economics" of long-term agriculture in the region, including "increasing land prices and environmental regulation, higher water and labor costs, higher property taxes, competition from other parts of the state and foreign countries, and growing urbanization." In *Masonite Corp. v. County of Mendocino*, (2013) 218 Cal. App. 4th 230 the appellate court held that while a CEQA lead agency cannot conclude as a matter of law that agricultural impact mitigation is infeasible, it may, as is the case in the AVAP EIR and in the Draft EIR, make such a determination based on the applicable facts.

Consistent with these cases, there is substantial evidence in California that attempts to mitigate for farmland impacts by farmland preservation, such as mitigation banks or easements, can increase the likelihood that agriculture will be abandoned in rapidly growing

[1973] Final Antelope Valley Watermaster 2016 Annual Report. 2017 (August 1). http://www.avek.org/fileLibrary/file_753.pdf.

[1974] *Id.,* pp. 34-35

regions. For example, Riverside County has experienced a long-term transformation from agricultural to urban land uses that is similar to the historical land uses changes in the AVAP area. During the CEQA review process of the 2003 Riverside County General Plan, the County attempted to mitigate for impacts to agricultural uses by limiting allowable development yields on existing farmland to reduce the attractiveness of future development, and by requiring payment into a proposed mitigation bank that would purchase permanent conservation easements on, and remove future development rights from, agricultural land. This proposed mitigation was strongly opposed by the Riverside County Farm Bureau, which submitted written comments to the County stating that "General Plan policies that the EIR states are intended to mitigate adverse impacts to agriculture would instead have the effect of driving agriculture out of business and converting agricultural resources to non-agricultural use. That is because, in urbanizing areas such as Riverside County, the viability of agriculture is dependent upon the economic value of the agricultural land. The General Plan policies and EIR mitigation measures would substantially impact the economic value of agricultural land by, among other things, restricting development of agricultural land...and by preventing the conversion of agricultural land to other productive uses....In this way, the General Plan and EIR impair the agricultural landowner's access to capital necessary to invest in the agricultural operations, which in turn results in conversion of the agricultural resources to non- agricultural uses." The Bureau's comments concluded that the proposed bank and other measures would "have the effect of decreasing the economic base of agricultural operations and increasing the cost of community development on agricultural land with no meaningful mitigation for the impacts to agriculture within the County."[1975] Based on such evidence, Riverside County removed the proposed farmland MMs from the General Plan, and has subsequently determined that mitigation for farmland impacts in the County is infeasible.

Consequently, the Draft EIR determination that mitigation for farmland impacts is infeasible is based on substantial evidence, including Los Angeles County findings that offsite mitigation does not compensate for onsite farmland impacts, and that because the County is largely urbanized, mountainous, or has other lands that are subject to water, soil or other constraints that preclude intensive commercial agriculture in the County, mitigation for farmland impacts associated with the buildout of the AVAP, which includes the Project, is infeasible.[1976] In addition, the Draft EIR found that Project mitigation is infeasible because most of the land in the Tejon Ranch is already subject to a conservation agreement, and there is not sufficient land within the remaining development areas of the Ranch with suitable characteristics to support the establishment new prime farmland to compensate for onsite Project impacts.[1977] These findings are further supported by the implementation of the Antelope Valley Basin Adjudication Judgment and Physical Solution, which significantly reduces the amount of groundwater available for all users in the basin, including agriculture, and increases economic incentives for agricultural users to transfer groundwater rights to M&I users. In August 2017, the Watermaster reported that the acreage of agricultural lands under cultivation in the Antelope Valley has already declined by 32 percent from the levels

[1975] Riverside County Farm Bureau. Comments on the Draft Program Environmental Impact Report ("PEIR") No. 441. http://www.riversidecfb.com/pdf/Magazine/october02.pdf.

[1976] DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5

[1977] DRP 2017, pp. 5.5-13 and -14

in a 2010 report prepared for the adjudication process. Recent court cases and evidence from rapidly growing, former agricultural regions similar to the AVAP area further support the fact that, due to the economics of urbanization, a CEQA lead agency can reasonably conclude that mitigation in the form of offsite preservation is economically infeasible or, as in Riverside County, potentially counterproductive to the continuation of agricultural activity.

In summary, the Draft EIR found that the Project's direct, indirect and cumulative impacts to mapped farmlands in accordance with the State CEQA Guidelines Appendix G thresholds utilized by Los Angeles County would be significant and unavoidable. These findings are supported by substantial evidence in the record as prepared by the CEQA lead agency in the 2015 AVAP and Los Angeles County General Plan Update EIRs, the Adjudication Judgment and Physical Solution approved in December 2015 for the Antelope Valley Basin by the California Superior Court, evidence of significant agricultural acreage declines in the Antelope Valley reported by the Watermaster for the Antelope Valley Basin, and cases and evidence supporting CEQA determinations that agricultural mitigation is economically infeasible or may actually be counterproductive due to the economics of farming in rapidly urbanizing areas.

Response to Comment F.8-185:

The analysis of potential farmland impacts in the Draft EIR is based on the regional Antelope Valley planning and growth context established by the County's General Plan and the AVAP, which is one of 11 community-based plans applicable to unincorporated County planning areas. The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[1978] In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[1979] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[1980] This community vision is embodied in the AVAP's "Rural Preservation Strategy," which is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1981] The AVAP implements the Rural Preservation Strategy by identifying four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1982] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1983]

[1978] *Id.,* p. 5.8-9
[1979] DRP 2015, p. I-5
[1980] *Ibid*.
[1981] *Id.,* p. I-6
[1982] *Id.,* p. I-7; DRP 2014, p. 7-7
[1983] *Ibid*.

The Project site is located entirely within the AVAP West EOA.[1984] The AVAP defines EOAs as clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1985] The AVAP Rural Preservation Strategy provides that major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1986]

As required by Appendix G of the State CEQA Guidelines, the AVAP EIR analyzed potential impacts to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland identified by the California Farmland Mapping and Monitoring Program (FMMP). As discussed on Draft EIR pages 5.5-4 and 5.5-5, these categories of mapped farmlands correspond with irrigated lands that have been in active cultivation during the prior two 2-year cycles of the FMMP. These three categories of irrigated farmland are collectively referred to as "Important Farmland" in the AVAP EIR and the Draft EIR.[1987]

The Draft EIR reached the same conclusions as the AVAP EIR after weighing the evidentiary value of the AVAP EIR's information and analysis for the purposes of independently assessing the Project's potential impacts to farmland, particularly with respect to off-site and cumulative farmland impacts. The AVAP EIR evaluated direct farmland impacts by considering the compatibility of the proposed land use designations in the AVAP with the continuation of agricultural activity within the 22,839 acres of prime farmland, 743 acres of Farmland of Statewide Importance, and 452 acres of Unique Farmland (24,034 total acres) that were identified by the FMMP within the AVAP planning area.[1988] The AVAP EIR considered that only the proposed RL10 (Rural Land, one dwelling unit per 10 gross acres) and RL20 (Rural Land, one dwelling unit per 20 gross acres) land use designations would be compatible with continued intensive commercial agriculture and that all other AVAP land use designations would be incompatible with continued agricultural use. The AVAP EIR assumed that all of the 24,034 acres of mapped farmland outside of the RL10 and RL20 designations would be converted to non-agricultural uses by buildout of the AVAP, including 5,968 acres of Prime Farmland, 133 acres of Farmland of Statewide Importance, and 68 acres of Unique Farmland (6,169 total acres).[1989] As shown on Exhibit 4-2A of the Draft EIR, none of the mapped farmland within the Project or immediately adjacent to the Project site, including offsite mapped Prime Farmland located adjacent to the eastern edge of the Project between West Malinda and West Avenue B-8[1990] is subject to the RL10 or RL20 designations. Consequently, these areas are included in the 6,169 total acres of farmland impacts identified in the AVAP EIR. The AVAP EIR found that the conversion 6,169 total acres of farmland would be a significant and unavoidable impact.[1991] The AVAP EIR also found that the buildout of the AVAP would indirectly result in the conversion of mapped Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses, notwithstanding

1984 DRP 2017, p. 4-4 and Exhibit 4-2a
1985 DRP 2015, p. I-8
1986 *Ibid*.
1987 DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5
1988 *Id.,* p. 5.5-5
1989 *Ibid*.
1990 DRP 2017, Exhibit 5.5-1
1991 DRP 2014a, Section 5.2-9, Impact 5.2-1

AVAP goals and policies intended to protect farming operations from urbanization. These indirect farmland conversion impacts were also determined to be significant and unavoidable.[1992]

As shown in Draft EIR Table 5.5-4, the Project includes 12,323 acres, of which 642 are mapped as Prime Farmland, 62 acres are mapped as disturbed or otherwise vacant lands, and 11,616 acres are mapped as grazing land by the FMMP. Although the Project is located entirely within the West EOA, where growth is anticipated and focused in accordance with the AVAP Rural Preservation Strategy, approximately 5,624 acres (approximately 45.6 percent) of the Project site would be designated as open space, including natural resource protection, greenways, parks for active and passive recreational use, and the continuation of grazing in certain areas.[1993] In addition, as discussed on Draft EIR page 4-45, on June 17, 2008 the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy that preserves approximately 90 percent of the 270,000-acre Ranch. The Project also includes 39,213 acres of offsite open space preserves within Tejon Ranch lands, including 8,973 acres in Los Angeles County.[1994] Further, PDF 5-1 allows for continued grazing operations on portions of the Open Space preserve areas and the inclusion of a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses) within the Project.[1995] Consequently, the Project will result in substantial preservation of mapped grazing land, the continuation of grazing, and continued agriculture within the West EOA in addition to the significant conservation of natural and open space that will occur under the Conservation and Land Use Agreement and in the Project offsite open space preserves.

Consistent with State CEQA Guidelines Appendix G, the discussion in Threshold 5-1 of the Draft EIR discloses that Project development will directly impact 642 acres of mapped Prime Farmland within the site.[1996] The Draft EIR states that the Project impacts to Prime Farmland are included in the 6,169 total acres of farmland impacts, including 5,968 acres of mapped Prime Farmland, considered in the AVAP EIR.[1997] As discussed above, the analysis of farmland impacts in the AVAP EIR includes the conversion of all mapped Prime Farmland within and immediately adjacent to the Project and within the West EOA, as well the conversion of additional farmland to nonagricultural use notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. The Draft EIR uses these forecasts to independently determine that the Project's direct and indirect impacts of farmland conversion would be significant and unavoidable, consistent with the conclusions of the AVAP EIR.

1992 *Id.,* Section 5.2-9, Impact 5.2-5
1993 DRP 2017, Appendix 4.0-A, Section 3.13 and Table 2-16
1994 DRP 2017, Exhibit 4-12
1995 *Id.,* p. 5.5-1
1996 *Id.,* p. 5.5-12
1997 *Id.,* pp. 7-13 and -14

The Draft EIR discussion of potential indirect farmland impacts[1998] references the discussion of growth inducement in Draft EIR Section 6.0, Growth-Inducing Impacts. As shown in Draft EIR Exhibits 4-2A and 5.5-1, there are areas of mapped Prime and Unique Farmland located outside of the Project area and outside of or adjacent to the West EOA boundary that could be subject to these indirect growth-inducing impacts. The Draft EIR found that the Project would have a significant adverse growth-inducing impact due to the potential incentives to develop land outside the West EOA.[1999] In addition, the Draft EIR found that the Project would contribute to a cumulatively considerable impact related to farmland conversion even though the on-site conversion of 642 acres of Prime Farmland is part of the total of 6,169 acres of farmland considered in the AVAP EIR.[2000] The Draft EIR concludes that the Project's direct, indirect, and cumulative impacts to farmland are all significant.

As discussed on Draft EIR pages 5.5-13 and 5.5-14, the Draft EIR references and incorporates the farmland impact mitigation feasibility analysis in the AVAP EIR. The AVAP EIR found that the direct and indirect farmland impacts from the implementation of the AVAP, which includes Project development in the West EOA, would be significant and unavoidable.[2001] The County made several findings regarding the infeasibility of mitigating for farmland impacts in the AVAP EIR. First, the County found that, consistent with several, but not all court rulings (e.g., *Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956), *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) and *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) as cited in the AVAP EIR), the preservation of offsite farmland in a mitigation bank, by easement or other means does not mitigate for the onsite conversion of farmland to non-agricultural uses. The County also found that farmland impact mitigation is infeasible because most of Los Angeles County outside of the AVAP area is urbanized, mountainous, or has other constraints, such as lack of water supply or lack of soil suitability that make commercial agriculture infeasible, and the use of mitigation banks or other programs to preserve offsite agriculture mitigation would require acquisition of land outside of Los Angeles County.[2002] The Draft EIR further discussed the feasibility of mitigating for Project impacts to onsite Prime Farmland by establishing 642 acres of new farming areas on Tejon Ranch. As discussed on Draft EIR page 5.5-14, such mitigation would be infeasible due to the implementation of the Tejon Ranch Conservation and Land Use Agreement, which preserves over 90 percent of Tejon Ranch, and the lack of sufficient locations on the remaining portions of the Ranch that could be cultivated to meet prime farmland standards. Consequently, consistent with the AVAP EIR, the Project EIR determined that Project impacts to farmland, including direct, indirect and cumulative impacts, would remain significant and unavoidable.

The infeasibility of mitigating for agricultural impacts related to the Project and the implementation of the AVAP as discussed in the Draft EIR and the AVAP EIR is further supported by a Court-approved Adjudication Judgment and Physical Solution for the

1998 DRP 2017, p. 5.5-18
1999 *Id.,* p. 6-9
2000 *Id.,* pp. 7-13 and -14
2001 DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5
2002 *Id.,* p. 5.2-24

Antelope Valley Groundwater Basin entered in December 2015. As discussed in Draft EIR Section 5.18, Water Resources, a physical solution refers to agreed-upon or judicially imposed resolution of conflicting groundwater claims. The Adjudication Judgment and Physical Solution adopted for the Antelope Valley establishes a regional watermaster to regulate groundwater use consistent with applicable law and the total sustainable yield of the basin under the auspices of the court. As of January 2016, all groundwater users in the basin are required to begin a 7-year rampdown period during which groundwater production will be reduced to levels consistent with the total sustainable yield of approximately 110,000 afy. Among other provisions, the Adjudication Judgment and Physical Solution allows for interbasin groundwater transfers subject to Watermaster approval.[2003]

As discussed on Draft EIR page 5.5-6, over time agriculture and military uses have declined and urban land uses have emerged as the primary economic driver in the region. As discussed on Draft EIR page 6-8, the AVAP EIR projects that the full buildout of the AVAP in 2035 would result in 311,920 new residents and 81,441 new dwelling units in the Antelope Valley. The current Urban Water Management Plan adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site states that although land uses within the Antelope Valley have historically focused primarily on agriculture, the Antelope Valley is in transition from predominantly agricultural uses to predominantly residential and industrial uses.[2004] As a result, since the 1980s there has been a rapid increase in the demand for municipal and industrial (M&I) water. In the 1990s, however, certain agricultural interests, including commercial carrot and onion farming entities, began operating in the Antelope Valley and significantly increased groundwater production demand in the region. Increased agricultural and M&I groundwater use reduced groundwater levels across the Antelope Valley basin and, starting in 1999, generated a legal conflict that resulted in the December 2015 Adjudication Judgment and Physical Solution.[2005]

The Adjudication Judgment and Physical Solution requires that all groundwater users in the Antelope Valley basin reduce production to levels determined by the Court to be sustainable over a seven-year rampdown period starting in 2016. As shown in Exhibit 4 of Draft EIR Appendix 5.18-D, groundwater use by Antelope Valley senior rights holders (groundwater users with overlying production rights) will be reduced by over 40 percent at the end of the rampdown period. Two of the largest agricultural interests in the region, Bolthouse Properties LLC and Diamond Farming Co. LLC/Crystal Organic LLC/Grimmway/Lapis, will be required to reduce groundwater production from a pre-rampdown total of 20,160 afy to just 11,931 afy in accordance with the Adjudication Judgment and Physical Solution. As a result, agricultural production is anticipated to be significantly reduced in the Antelope Valley due to groundwater use limitations. In addition, the groundwater transfer provisions of the Adjudication Judgment and Physical Solution will allow agricultural users to sell groundwater rights with the approval of the Watermaster to M&I and other users in the basin that are likely to value such supplies above the economic rates of return that can be

[2003] DRP 2017, Section 5.18.3 and Appendix 5.18-D
[2004] Los Angeles County Waterworks District 40 2017, p. 2-1
[2005] *Id.,* p. 5-5

obtained from water use for farming. The economic incentives to transfer groundwater rights would further reduce farming in the region.

In August 2017, the Antelope Valley Watermaster filed the first annual report required by the Adjudication Judgment and Physical Solution.[2006] The report states that the acreage of Antelope Valley under cultivation in the region has fallen by 32 percent from the levels reported in a 2010 expert report prepared in support of the adjudication.[2007] This result is consistent with the anticipated decline in Antelope Valley agriculture from continued urban growth, the significant reduction in groundwater production allowed by the Adjudication Judgment and Physical Solution, including groundwater use by agricultural producers, and economic incentives to transfer groundwater from agricultural to more highly-valued M&I uses over time.

In addition to the cases cited by the County in support of a CEQA lead agency's findings that agricultural preservation does not mitigate for onsite agricultural conversion, other cases have upheld CEQA findings that agricultural mitigation is infeasible in rapidly urbanizing regions, such as the AVAP area, due to economic factors. In *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 350-351 ("*Beaumont*"), the California Court of Appeals upheld a determination by a CEQA lead agency that, due to continuing urban and suburban development, agricultural land values were increasing and agricultural landowners were under pressure to sell or convert their lands for development. As a result, the Court found that the CEQA lead agency "reasonably concluded that any measures to reduce the [project's] direct and cumulative adverse impacts on agricultural land uses ... would not have been economically feasible." The *Beaumont* court cited *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1269-1271, in which the appellate court upheld a CEQA lead agency's decision that a significant adverse impact to agricultural lands could not be feasibly mitigated due to the "negative economics" of long-term agriculture in the region, including "increasing land prices and environmental regulation, higher water and labor costs, higher property taxes, competition from other parts of the state and foreign countries, and growing urbanization." In *Masonite Corp. v. County of Mendocino*, (2013) 218 Cal. App. 4th 230, the appellate court held that while a CEQA lead agency cannot conclude as a matter of law that agricultural impact mitigation is infeasible, it may, as is the case in the AVAP EIR and in the Draft EIR, make such a determination based on the applicable facts.

Consistent with these cases, there is substantial evidence in California that attempts to mitigate for farmland impacts by farmland preservation, such as mitigation banks or easements, can increase the likelihood that agriculture will be abandoned in rapidly growing regions. For example, Riverside County has experienced a long-term transformation from agricultural to urban land uses that is similar to the historical land uses changes in the AVAP area. During the CEQA review process of the 2003 Riverside County General Plan, the County attempted to mitigate for impacts to agricultural uses by limiting allowable development yields on existing farmland to reduce the attractiveness of future development, and by requiring payment into a proposed mitigation bank that would purchase permanent

[2006] Final Antelope Valley Watermaster 2016 Annual Report. 2017 (August 1). http://www.avek.org/fileLibrary/file_753.pdf.

[2007] *Id.,* pp. 34-35

conservation easements on, and remove future development rights from, agricultural land. This proposed mitigation was strongly opposed by the Riverside County Farm Bureau, which submitted written comments to the County stating that "General Plan policies that the EIR states are intended to mitigate adverse impacts to agriculture would instead have the effect of driving agriculture out of business and converting agricultural resources to non-agricultural use. That is because, in urbanizing areas such as Riverside County, the viability of agriculture is dependent upon the economic value of the agricultural land. The General Plan policies and EIR MMs would substantially impact the economic value of agricultural land by, among other things, restricting development of agricultural land...and by preventing the conversion of agricultural land to other productive uses....In this way, the General Plan and EIR impair the agricultural landowner's access to capital necessary to invest in the agricultural operations, which in turn results in conversion of the agricultural resources to non- agricultural uses." The Bureau's comments concluded that the proposed bank and other measures would "have the effect of decreasing the economic base of agricultural operations and increasing the cost of community development on agricultural land with no meaningful mitigation for the impacts to agriculture within the County."[2008] Based on such evidence, Riverside County removed the proposed farmland MMs from the General Plan, and has subsequently determined that mitigation for farmland impacts in the County is infeasible.

Consequently, the Draft EIR determination that mitigation for farmland impacts is infeasible is based on substantial evidence, including Los Angeles County findings that offsite mitigation does not compensate for onsite farmland impacts, and that because the County is largely urbanized, mountainous, or has other lands that are subject to water, soil or other constraints that preclude intensive commercial agriculture in the County, mitigation for farmland impacts associated with the buildout of the AVAP, which includes the Project, is infeasible.[2009] In addition, the Draft EIR found that Project mitigation is infeasible because most of the land in the Tejon Ranch is already subject to a conservation agreement, and there is not sufficient land within the remaining development areas of the Ranch with suitable characteristics to support the establishment new Prime Farmland to compensate for onsite Project impacts.[2010] These findings are further supported by the implementation of the Antelope Valley Basin Adjudication Judgment and Physical Solution, which significantly reduces the amount of groundwater available for all users in the basin, including agriculture, and increases economic incentives for agricultural users to transfer groundwater rights to M&I users. In August 2017, the Watermaster reported that the acreage of agricultural lands under cultivation in the Antelope Valley has already declined by 32 percent from the levels in a 2010 report prepared for the adjudication process. Recent court cases and evidence from rapidly growing, former agricultural regions similar to the AVAP area further support the fact that, due to the economics of urbanization, a CEQA lead agency can reasonably conclude that mitigation in the form of offsite preservation is economically infeasible or, as in Riverside County, potentially counterproductive to the continuation of agricultural activity.

[2008] Riverside County Farm Bureau. Comments on the Draft Program Environmental Impact Report ("PEIR") No. 441. http://www.riversidecfb.com/pdf/Magazine/october02.pdf.

[2009] DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5

[2010] DRP 2017, pp. 5.5-13 and -14

In summary, the Draft EIR found that the Project's direct, indirect, and cumulative impacts to mapped farmlands in accordance with the State CEQA Guidelines Appendix G thresholds utilized by Los Angeles County would be significant and unavoidable. These findings are supported by substantial evidence in the record as prepared by the CEQA lead agency in the 2015 AVAP and Los Angeles County General Plan Update EIRs, the Adjudication Judgment and Physical Solution approved in December 2015 for the Antelope Valley Basin by the California Superior Court, evidence of significant agricultural acreage declines in the Antelope Valley reported by the Watermaster for the Antelope Valley Basin, and cases and evidence supporting CEQA determinations that agricultural mitigation is economically infeasible or may actually be counterproductive due to the economics of farming in rapidly urbanizing areas.

Response to Comment F.8-186:

The comment inaccurately indicates that the hydrology and hydromodification analysis in Draft EIR Section 5.2, Hydrology and Flood, is primarily based on an Erosion Potential (Ep) analysis. In fact, the analysis is also based on the frequency and sediment transport analyses provided in Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, Section 5.5, pages 31 to 36, conducted in accordance with the methods in the Los Angeles County Low Impact Development (LID) Manual. The frequency analysis was performed in accordance with Section 8.3 of the LID Standards Manual, and the sediment transport analysis was performed in accordance with Section 8.4 of the LID Standards Manual at the site boundaries to demonstrate that no drainage impacts would occur to off-site property. Hydrologic input data for these calculations were based on XPSWMM simulations of the existing and proposed Project conditions, including the proposed regional infiltration basins, for the LID, 2-, 5-, 10-, 25-, and 50-year storm events. Hydraulic calculations were performed using the one-dimensional HEC-RAS models (version 5.0.3) for the receiving channel locations where Project runoff discharges off-site.[2011]

As stated on page 5.2-23 of the Draft EIR, the Ep methodology is an alternative requirement for conforming with the hydromodification requirements in the County LID Manual. There is a strong correlation demonstrated in the scientific literature between calculated Ep and geomorphic channel instability, which supports the use of the Ep methodology for analyzing potential hydromodification impacts. The hydromodification control performance standard used in the Draft EIR includes the Ep methodology as well as the hydrology and hydraulic frequency analyses for the LID, 2-, 5-, 10-, 25-, and 50-year storm events in accordance with Section 8.3 of the LID Standards Manual and the sediment transport analysis of natural drainage systems with a capital flood flow rate greater than 5,000 cubic feet per second (cfs) that receive Project discharge in accordance with Section 8.4 of the LID Standards Manual.

As discussed on page 5.2-36, the Draft EIR includes an analysis of flow conditions and volumes for peak events at node locations downstream of the proposed regional infiltration basin locations, as well as at multiple nodes located at points upstream of the Project boundaries and the regional infiltration basins. This analysis integrated pre- and post-development impervious surface data into the delineation of each watershed based on

[2011] *Id.,* Figure 5.2-6

proposed land uses and the proposed grading plan. Post-development watersheds were further subdivided as necessary to meet the County 40- to 60-acre analysis size requirement. The hydrology analysis method and pre-and post-development analysis results area described in more detail in the Centennial Master Plan Hydrology, Draft EIR Appendix 5.2-A. Appendix 3 of the study provides representative maps of the pre-development watersheds, subareas, channel reaches, and flow analysis points used in the analysis. Appendix 4 of the study provides representative maps of the post-development (proposed conditions) watersheds, subareas, channel reaches, and flow analysis points. The detailed results for these upstream and internal Project nodes are included in Draft EIR Appendix 5.2-A, Appendix 3, Existing Conditions XPSWMM Model Summary and Results, and Appendix 4, Proposed Conditions XPSWMM Model Summary and Results. The results of this analysis show that post-development flow discharges and runoff volumes for the vast majority of upstream in-stream locations will decrease and not increase compared with existing conditions. The table below summarizes the pre- and post-development analysis results for nodes located upstream and within the Project based on the calculations provided in Draft EIR Appendix 5.2-A, Appendices 3 and 4. As discussed on Draft EIR pages 5.2-31 to 5.2-33 and in Section 5.3, Mitigation and Sediment Management Measures, of Draft EIR Appendix 5.18-A, instream drop structures/grade controls would be used as control measures to reduce or maintain the overall erosive work of the stream at the few upstream locations where post-development flow and runoff volume would increase.

Pre- and Post-Development Flow Comparison

Location	Pre-development Flow (cfs)	Post-development Flow (cfs)
Oso Creek XS-1	2446.4	2446.3
Oso Creek XS-2	8902.5	8844.1
Tentrock XS-3	9884.5	9433.1
Tentrock/Horsecamp XS-4	9143.2	2484.6
Cow Springs XS-7	4547.9	2104.9
East Tributary XS-5	468.3	42.7
East Tributary XS-6	697.4	197.5
East Tributary XS-9	680.9	315.8

Response to Comment F.8-187:

Draft EIR page 5.2-23 discloses that hydromodification impacts can cause channel erosion, migration, or sedimentation unless managed and controlled. Based on an analysis of pre- and post-development hydrological and watercourse conditions, Draft EIR Section 5.2 demonstrates that with implementation of the mitigation measures that will be included in the Mitigation Monitoring and Reporting Plan (MMRP) that will be adopted by the County, including MMs 2-1, 2-2, and 4-2, and compliance with all applicable laws and regulations, potential impacts from existing drainage pattern alterations that could result in substantial erosion or siltation on or off the site will be less than significant.

The Draft EIR evaluation of potential hydrologic or hydromodification impacts for streams in the northernmost portions of the Project referred to as East Tributary 7, East Tributary 8, and East Tributary 9 (catchments of interest) properly considers the fact that these drainages are located within the depositional alluvial fan entering the Antelope Valley floor to the northeast. The channels situated on this alluvial fan are considered to be losing streams because they disappear as channel runoff infiltrates into the permeable alluvium. These alluvial channels have also historically moved as they have filled up with deposited sediment during large magnitude storm events and flow paths in these areas are erratic and undefined. For example, the area within the East Tributary 8 catchment used to be tributary to the East Tributary 2 channel, and at another point in time drained to the Tentrock Creek channel. In the existing condition, much of the alluvial fan has been modified for agricultural use, roadways, and the California Aqueduct. Currently, the catchments of interest are not clearly associated with any particular defined channels, and thus have been distinguished individually. For the pre-developed conditions, these East Tributary watersheds 7, 8 and 9 were identified individually. However, for the post-development conditions, the areas associated with the East Tributary 7, 8, and 9 catchments have been grouped into the most appropriate watershed nearby. This more clearly reflects the post-developed drainage conditions and infiltration basins.

In the post-developed condition, the catchments of interest in these areas will be routed to Basin 24 (as shown on Draft EIR Exhibit 5.2-4) with engineered storm drains and channels and then discharged through the 292nd Street Aqueduct Crossing. Regardless of whether defined channels exist in the East Tributary 7, 8, and 9 catchment areas, these drainages are not considered receiving channels of concern because they would not be subject to Project development area runoff discharges under post-development conditions.

Response to Comment F.8-188:

This comment's assertion regarding the potential public health effects of air pollution is noted. The Draft EIR discloses and describes in detail the potential health effects of each criteria pollutant on pages 5.11-3 through 5.11-11 and analyzes the potential health impacts of criteria pollutant emissions on sensitive receptors on pages 5.11-21 through 5.11-22, 5.11-36 through 5.11-37, 5.11-63 through 5.11-64, 5.11-68 through 5.11-74, and 7-20.

This comment's assertion that, in the U.S., government estimates indicate that between 10 and 12 percent of total health costs can be attributed to air pollution is noted, as is its

assertion that many plants and trees, including agricultural crops, are injured by air pollutants. The Draft EIR discloses that the emission of certain criteria pollutants can have adverse effects on the ability of some plants to produce and store food, their aesthetic qualities, plant growth, and crop yields.[2041] This comment's assertion that wildlife and habitat is adversely impacted by air pollution, including aquatic species and habitats exposed to acid raid, is also noted. The Draft EIR discloses that the emission of certain criteria pollutants can have an adverse impact on ecosystems, making certain habitats more susceptible to certain diseases, other pollutants, harsh weather, and impacting species diversity.[2042]

In support of this comment's statement regarding acid rain, the Commenter cites a webpage hosted by the U.S. Environmental Protection Agency (EPA) that generally describes the chemical components, causes, and effects of acid rain, and which indicates that ground-borne deposits from acid rain can be flushed into aquatic environments as stormwater runoff and thereby harm fish. As discussed in Section 5.4, *Water Quality*, certain toxic pollutants from stormwater runoff can bioaccumulate in fish and other aquatic organisms at levels that are harmful to both the organism itself and the organisms that prey upon these species (including humans).[2043] However, the Draft EIR explains that the Project will not significantly contribute to bioaccumulation of pollutants in major downstream waters, including the Santa Clara River, because these waters are located several miles from the site, and constituent concentrations in Project runoff that may discharge from on-site facilities will be significantly below all applicable water quality objectives of the Lahontan and Los Angeles Basin Plans and the California Toxic Rule, 40 CFR 131.38.[2044] With mitigation identified in the EIR, potential Project bioaccumulation impacts to aquatic life or human health will be less than significant.[2045]

In support of this comment's assertion that greenhouse gas emissions contribute to human-induced climate change, the Commenter cites to a website hosted by the EPA that generally describes the causes of climate change, including greenhouse gas emissions. The Commenter's assertion is consistent with the Draft EIR, which explains that global climate change is caused in part by greenhouse gas emissions generated by human and industrial activity.[2046]

In support of this comment's assertion that "poor air quality that contributed to climate change will in turn worsen the impacts of climate and attendant air pollution problems," the Commenter cites a May 2016 document prepared by the Bay Area Air Quality Management District (BAAQMD) titled *Planning Healthy Places, A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning*. This document explains that climate change may cause increased temperatures and drought conditions which could increase the frequency of wildfires that contribute air pollution that adversely affects humans. This conclusion is consistent with Section 5.21.3 of the Draft EIR, which describes the adverse effects of climate

2041 DRP 2017, p. 5.11-5
2042 *Ibid.*
2043 *Id.*, p. 5.4-86
2044 *Id.*, p. 5.4-87
2045 *Ibid.*
2046 *Id.*, p. 5.21-4

change. BAAQMD's *Planning Health Places* document also recommends various planning "best practices" of the type that will be implemented by the Project to reduce its impacts related to climate change, including but not limited to clustered, mixed-use development patterns, transportation demand strategies, encouraging the use of construction equipment that meet CARB's Tier 4 emissions standards, and imposing buffer areas between residential uses and freeways. Thus, the Project is consistent with the cited document.

However, CEQA requires an assessment of the impacts that a project will have on the environment (*see,* e.g., CEQA §21002(a)). As the California Supreme Court recently confirmed, CEQA does not generally require an analysis of the environment's impact on a project, unless the project itself "exacerbates" this existing environmental condition.[2047] In an earlier, related appellate court decision regarding the effects of global climate change in potentially affecting sea level rise which could in turn affect the Project, CEQA was determined not to require an evaluation of climate change impacts on the Project.[2048] The Draft EIR accordingly does not address predictions by some experts of worsening air pollution conditions attributable to global warming as a potential future environmental condition that may affect the Project. The Project's GHG impacts and the correlation between GHG emissions and global climate change is addressed throughout Section 5.21, Climate Change.

The South Coast Air Quality Management District (SCAQMD) submitted a letter to the County, dated July 13, 2017, indicating that it reviewed the Draft EIR and determined that the Project "will provide a broad range of residential (including affordable housing), commercial, institutional, recreational, and employment-generating land use types, which will make nearly half of daily vehicle trips occur within the proposed project area." The SCAQMD letter goes on to state that the Project "exemplifies the [County's] leadership in promoting sustainable communities" and that it "supports the goals" of SCAQMD's 2016 Air Quality Management Plan (AQMP) and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the Basin" (*see* Comment D.4-2). In addition, the Antelope Valley Air Quality Management District (AVAQMD) submitted a letter to the County, dated May 26, 2017, indicating that it reviewed and had no comments on the Draft EIR (*see* Comment Letter D.1).

Response to Comment F.8-189:

This comment's assertion that some of the nation's most polluted counties are in Southern California is noted; however; the Commenter's claim that Los Angeles County "tops the list" is inaccurate. In support of this assertion, the Commenter cites the American Lung Association's (ALA) 2016 report State of the Air. In the ALA report's list of *People at Risk in 25 Counties Most Polluted by Short-Term Particle Pollution (24-hour PM2.5)*, Kern County is ranked first and Los Angeles County is not ranked at all. In the ALA report's list of *People at Risk in 25 Counties Most Polluted by Year-Round Particle Pollution (Annual PM2.5)*, Kern County is ranked first and Los Angeles County is ranked 16th. In the ALA report's list of *People*

[2047] *California Bldg. Indus. Ass'n. v. Bay Area Air Quality Mgmt. Dist. ("CBIA")* (2015) 62 Cal.4th 369, 386
[2048] *Ballona Wetlands Land Trust et al. v. City of Los Angeles* (2011) 201 Cal.App.4th 455 ("Ballona")

at Risk in 25 Most Ozone-Polluted Counties, San Bernardino County is ranked first and Los Angeles County is ranked 4th.

It should also be noted that the ALA report states that over half of the nation's citizens live in counties that have unhealthful levels of either ozone or particulate pollution. Given that Los Angeles County is by far the most populated county in the United States (with nearly twice the population of Cook County, IL, the nation's next largest county), its unique air quality challenges are common knowledge and well documented. However, the ALA report cited by the Commenter confirms that air quality in the Los Angeles metropolitan area is significantly improving over time, with the City of Los Angeles reporting its lowest pollution levels ever in 2016. Nevertheless, as disclosed in Section 5.11, *Air Resources*, the Project site straddles the South Coast and Mojave Desert air basins and both basins are designated as non-attainment for certain state and federal air quality standards, including standards for particulate matter and ozone.[2049]

This comment's assertion that air pollution and its impacts are felt most heavily by sensitive receptors (e.g., children, the elderly) is accurate and was disclosed in the Draft EIR on page 5.11-29. This comment's assertion that very low-income populations are more susceptible to adverse health effects related to air pollution is also correct. Low income populations tend to live in areas with lower housing costs, which tend to be areas with higher rates of pollution, as discussed in response to Comment F.8-20. These same populations are also susceptible to displacement caused by land use policy that directs new housing development to infill urban locations near transit infrastructure, as demonstrated by SCAG's 2012 RTP/SCS EIR, and those who are not displaced will likely face increased adverse air quality impacts as neighborhoods densify.[2050] Indeed, housing insecurity of the type caused by California's current housing shortage – is closely associated with poor health among low income populations. Research demonstrates that housing and economic insecurity is correlated with cost-related prescription drug and healthcare nonadherence, as well as a host of physical and mental illnesses, including hypertension, arthritis, and depression, among other adverse health effects.[2051],[2052] The adverse public health effects associated with California's current housing crisis will likely continue because the state is already building 100,000 fewer units annually than are needed to provide adequate affordable housing.[2053] The Project contributes to the County's effort to address its share of the statewide housing crisis.

As this comment correctly notes, and as explained on the Draft EIR page 5.11-3, emission sources include transportation, industry and manufacturing, construction, goods movement,

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2049 *Id.,* pp. 5.11-24 and -25

2050 Garzon, C. 2011. *At a Crossroads in Our Region's Health: Freight Transport and the Future of Community Health in the San Francisco Bay Area*. Pacific Institute. Oakland, CA: http://pacinst.org/wp-content/uploads/2013/02/at-a-crossroads-for-health-full-report.pdf.

2051 Pollack, C., Griffin, B., Lynch, J., 2010, *Housing Affordability and Health Among Homeowners and Renters*, American Journal of Preventive Medicine, doi: 10.1016/j.amepre.2010.08.002.

2052 Osypuk, T., Caldwell, C., Platt, R., Misra, D., 2012, *The Consequences of Foreclosure for Depressive Symptomatology*, Elsevier Inc., doi:10.1016/j.annepidem.2012.04.012.

2053 Gamboa, J., Gallegos, H. 2017 (July 7). *Opinion: We must build more affordable homes in California.* East Bay Times. Walnut Creek, CA: http://www.eastbaytimes.com/2017/07/07/opinion-we-must-build-more-affordable-homes-in-california/.

and energy generation and use. This comment also correctly notes that transportation is one of the most significant sources of urban pollution, as discussed in response to Comment F.8-20.

With regards to transportation emissions, particulate matter is the primary source of localized air quality impacts associated with transportation emissions. Existing emissions generated by non-Project-related traffic traveling along SF-138 present the biggest potential risk to Project residents and visitors. In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 269 (*CBIA v. BAAQMD*), the California Supreme Court held that CEQA generally does not require the Draft EIR to analyze how existing environmental conditions (*e.g.*, existing air pollutants generated by SR-138 traffic) might impact the Project's future users or residents. Nevertheless, the Draft EIR does analyze the potential impacts of air pollutants generated by off-site sources on people who will live and work at the proposed Project site. Though not legally required to do so, per *CBIA v. BAAQMD*, in the interest of full disclosure, the Draft EIR evaluates the potential adverse impacts of toxic air contaminants (TACs) and particulate matter exposure generated by existing off-site sources at pages 5.11-71 through 5.11-74. In addition, Draft EIR Appendix 5.11-C includes an HRA that assesses the potential health risks for new and existing sensitive receptors near SR-138.

The HRA used the Centennial Specific Plan's land use plan to determine the Project-site location of all future sensitive receptors that would be located within 500 feet of SR-138, and evaluated cancer risk from particulate matter using a receptor grid with 40-meter spacing.[2054] The 500-foot buffer was selected on the basis of the California Air Resources Board's (CARB) 2005 guidance manual on land use development, *Air Quality and Land Use: A Community Perspective*.[2055] The CARB guidance manual recommends a 500-foot buffer between freeways and sensitive receptors, indicating that further analysis may be in order if the proposed sensitive receptor is located within this buffer.[2056]

With respect to diesel particulate matter exposure from vehicles traveling on SR-138, the HRA shows that incremental cancer risks for the 70-year exposure duration are below 10 in 1 million at locations greater than 150 feet from the travel lanes and thus would not exceed applicable thresholds of significance.[2057] The estimated hazard index for all proposed sensitive receptors would be significantly less than one at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.[2058] This determination is consistent with the Antelope Valley Area Plan EIR, which concluded that potential adverse effects to sensitive receptors located in proximity to SR-138 would be less than significant with mitigation.[2059] Moreover, as more stringent vehicular greenhouse gas emissions and criteria air pollution standards take effect, and as transportation fuels and vehicles become cleaner over time, the number of diesel powered

2054 DRP 2017, Appendix 5.11-C, pp. 2 and 3
2055 *Id.,* p. 1
2056 *Ibid.*
2057 *Id.,* p. 5.11-73; *Id.,* Appendix 5.11-C, p. 4
2058 *Ibid.*
2059 DRP 2014a, p. 5.3-43

vehicles on roadways as well as emissions from remaining newer diesel engines are expected to further reduce diesel-related health risks at the Project site.[2060]

To address the potential impact to sensitive receptors located within 150 feet of the SR-138 travel lanes, MM 11-10 imposes a 150-foot buffer from such travel lanes within which the Project will be prohibited from siting new sensitive receptor uses. As an added layer of protection, MM 11-11 further requires that prior to future tract map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138 or a high-volume roadway, an additional dispersion modeling study must be conducted to estimate diesel PM air concentrations. If the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then effective TAC reduction measures must be implemented to mitigate for interior air quality, such as filtration technologies or equivalent protections against TACs from mobile emissions.

In addition, MM 11-11 has been revised in response to Comment D.4-8 to further ensure that TAC exposure to sensitive receptors are minimized at the Project site, as follows:

MM 11-11 Prior to the approval of any tract map that includes an air quality sensitive receptor (e.g. residential, day care, schools, hospital) located within 500 feet of the SR-138 and/or any "high volume roadway" (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), the Project Applicant/Developer shall provide to the Air Pollution Control District(s) with jurisdiction over the mapped area a dispersion analysis prepared in accordance with each applicable Air District's methodological requirements to calculate the health risks from vehicle emissions from SR-138 and/or high volume roadway, as relevant. If the study concludes that ~~health risks would be significant at the location of a proposed sensitive receptor~~ any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices (or future more stringent thresholds as may be adopted by the applicable Air District(s) and approved by the County for use on projects subject to the County's lead agency authority under the California Environmental Quality Act)(District TAC Thresholds), then the applicant shall submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of District TAC Thresholds, shall be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan,

[2060] DRP 2017, pp. 5.21-7, -8, -23

> TAC exposure reduction measures shall be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed District TAC Thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map. ~~effective design measures must be implemented into the structures to mitigate for interior air quality, such as ventilation systems that include MERV13 filters or equivalent protections against TACs from vehicle emissions. Confirmation of compliance shall be provided to the County prior to occupancy that include sensitive receptors within 500 feet of the SR-138.~~

As shown above, MM 11-11 has been revised to, among other things, require preparation of a dispersion analysis to calculate the health risks from mobile emissions whenever the Project proposes a tentative map that would locate sensitive receptors within 500 feet of a "high-volume" roadway (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), in addition to SR-138.

The Project site is located approximately one mile east of Interstate 5.[2061] Thus, the Project site falls well beyond the outer boundary of every buffer area recommended by CARB to protect sensitive receptors from existing sources of emissions, including but not limited to the CARB-recommended 500-foot buffer for high-volume roadways.[2062] Accordingly, emissions associated with vehicle travel on I-5 would not pose a significant health risk to sensitive receptors within the Project site.

Localized impacts related to CO emissions (CO "hotspots") are also analyzed when there is a potential for severe traffic congestion at high-volume, signalized intersections, as analyzed in Section 5.11.7 of the Air Resources chapter.[2063] Based on the data in the Project's Traffic Study, under 2035 With Project conditions, traffic volumes at affected high-volume, signalized intersections are substantially below the daily traffic volumes that would be expected to generate CO exceedances and this potential impact would be less than significant.[2064]

Unlike air quality impacts related to particulate matter and CO hotspots, impacts related to other non-attainment pollutants in the South Coast and Mojave Desert air basins are regional in nature, rather than localized concerns. Information about these pollutants is set forth in

[2061] *Id.,* p. 1-5
[2062] CARB 2005, Table 1-1
[2063] DRP 2017, pp. 5.11-40 to -78
[2064] *Id.,* p. 5.11-62

Section 5.11.4[2065] and in Section 5.11.7.[2066] As discussed in Section 5.8.2 of the Land Use chapter[2067] and within Section 5.8.6 of the Land Use chapter,[2068] the SCAG 2016 RTP/SCS and accompanying EIR, the Project site has been reviewed and designated for new urbanized growth as part of a comprehensive regional planning process that takes into consideration compliance with criteria pollutant ambient air quality standards, GHG emission reduction mandates, as well as all other environmental impact factors. The SCAG 2016 RTP/SCS and its accompanying certified EIRs were included as references in the Draft EIR and it has remained available on the SCAG website. As discussed in response to Comment F.8-20, the 2016 RTP/SCS was approved by CARB as meeting applicable legal mandates in 2016. The RTP/SCS is also incorporated into the mobile source components of SCAQMD's Air Quality Management Plan (AQMP) and the State Implementation Plan.

In 2016, the Federal Highway Administration and the Federal Transit Administration, in consultation with the U.S. Environmental Protection Agency, CARB and the regional Air Quality Management Districts, determined that the 2016 RTP/SCS was in conformance with the applicable State Implementation Plan (SIP) prepared in accordance with the Clean Air Act to establish control measures necessary to achieve attainment of certain National Ambient Air Quality Standards (NAAQS) in the SCAG region. Accordingly, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG region have determined that, if implemented, the 2016 RTP/SCS, which assumes development of the Project with urban uses commensurate with the *Centennial Specific Plan*, would achieve targeted per capita GHG emission reductions from passenger vehicles and will not impede or conflict with regional efforts to reduce criteria air pollutants to acceptable levels.

As discussed in Comment D.4-2, SCAQMD has reviewed the Draft EIR and determined that the Project "supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin." As discussed in Comment D.1-1, the Antelope Valley Air Quality Management District has reviewed, and has no comments on, the Draft EIR.

In response to this comment, the following references are added to the administrative record:

Arcaya, M., Glymour, M., Chakrabarti, P., Christakis, N., Kawachi, I., and Subramanian, S., 2014 (June) *Effects of Proximate Foreclosed Properties on Individuals' Systolic Blood Pressure in Massachusetts*, 1987–2008, American Heart Association, doi:10.1161/CIRCULATIONAHA.113.006205.

Barnes MC, Gunnell D, Davies R, et al., 2015 (December), *Understanding vulnerability to self-harm in times of economic hardship and austerity: a qualitative study*. BMJ Open 2016;6:e010131. doi:10.1136/bmjopen-2015-010131.

2065 *Id.,* pp. 5.11-22 to -29
2066 *Id.,* pp. 5.11-40 to -78
2067 *Id.,* pp. 5.8-4 to -13
2068 *Id.,* pp. 5.8-73 to -74

Berger, L., Collins, J., Font, S., Gjertson, L., Slack, K., Smeeding, T., 2015 (August), *Home Foreclosure and Child Protective Services Involvement*, Pediatrics, www.pediatrics.org/cgi/doi/10.1542/peds.2014-2832.

Burgard, S., Seefeldt, K., Zelner, S., 2012 (December), *Housing instability and health: Findings from the Michigan recession and recovery study*, Social Science & Medicine https://doi.org/10.1016/j.socscimed.2012.08.020.

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Response to Comment F.8-190:

This comment correctly notes that there are many different types of air pollution, of which ozone, particulate matter (PM) and toxic air contaminants (TACs) are of particular concern in Southern California's urban areas, as discussed in Sections 5.11.1 and 5.11.4 of the EIR's Air Resources chapter.[2069] This comment's description of ozone and particulate matter, including fugitive dust, and their sources and associated health risks (as discussed in the Commenter's cited documents: Laurent 2016; ALA 2016; VCAQR 2003; BAAQMB 2016; Bailey; Betancourt 2012) is also generally accurate and is consistent with the information disclosed in Section 5.11.1 of the Air Resources chapter.

As discussed in response to Comment F.8-189, per the Supreme Court's holding in *CBIA v. BAAQMD*, the EIR is not required to analyze the potential impacts of existing TAC emissions from regional shipping activities on the Project or its residents/visitors. Moreover, the largest regional and intra- and inter-state shipping route in the vicinity of the Project is Interstate 5, which is located a mile from the Project boundary. This distance is well beyond the outer boundary of every TAC buffer area recommend by CARB to protect sensitive receptors from existing sources of emissions. Please see response to Comment F.8-189 regarding the Draft EIR's analysis of the potential impact of TACs generated by existing vehicle traffic on SR-138.

As with existing TAC sources, per the Supreme Court's holding in *CBIA v. BAAQMD*, the EIR is not required to analyze the potential impact of particulate matter generated from forest fires on Project residents or visitors. Nevertheless, as discussed in Chapter 5.2, H*ydrology and Flood*, the Project will provide up to four new fire stations staffed by a minimum four-person engine company. In Village 1, one fire station is proposed east of the National Cement Plant Road. The second fire station is proposed in Village 4, and the third fire station is proposed in Village 7, with the location of a potential fourth station to be determined. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department's (LACFD's) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Applicant would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project. Moreover, per MM 3-7, the Project must prepare an Emergency Response Plan for LACFD approval and, per MM 3-8, the Project must prepare a Traffic Control Plan in accordance with the California Manual on Uniform Traffic Control Devices for Caltrans approval. Consequently, access to, from, and in the vicinity of the Project site will be substantially improved from the existing condition.

With respect to fire flows, the Draft EIR explains that the Project would construct a Fire Code compliant water system to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires (refer to Section 5.18, Water Resources, for further discussion of the water system; see also

[2069] DRP 2017, pp. 5.11-1 to -10, -22 to -29

the Water Service Plan described in Section 3.5 of the proposed Specific Plan.[2070] The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and LACFD's fire-suppression standards for improved property and development. These standard requirements must be met prior to the approval of building permits; therefore, the Project would implement a water system that would meet all County requirements in support of fire-suppression activities so that less than significant water-related fire hazards would occur. Under Project conditions, fire flows at the Project site will be substantially improved as compared to existing conditions.

Thus, under Project conditions, there will be far greater access to fire protection and emergency services in the vicinity of the Project site than currently exists. Such access will contribute to LACFD's performance of its obligations under the *Cooperative Fire Protection Agreement Between The County of Los Angeles Fire Department and The U.S. Forest Service Angeles National Forest* approved by the Los Angeles County Board of Supervisors on December 20, 2016 (Mutual Aid Agreement). The purpose of the Mutual Aid Agreement is to provide for cooperation between LACFD and U.S. Forest Service Angeles National Forest (ANF) in the prevention, detection, and suppression of wildland fires, fuels treatment and prescribed fires with both agencies' respective fire protection areas. The Mutual Agreement also describes the conditions in which "mutual aid" periods are established to provide resources to each on a non-reimbursable basis, as well as the conditions of "Assistance by Hire" on a reimbursable basis. The Project's fire service improvements described above will significantly enhance the LACFD's ability to perform its obligations under the Mutual Aid Agreement to the benefit of the Angeles Forest, further reducing the risk of forest fires in the vicinity of the Project site.

Finally, as discussed in Section 5.3, *Hazards and Fire Safety*, government agencies in California have adopted fire prevention and response strategies to address wildfire risks, including wildfire risks associated with climate change. For example, the California Building Standards Commission adopted revised statewide building standards in 2010 to require residential fire sprinklers in all new one and two family and town-home constructions. In 2012 the State Legislature required city and county general plans to address the risk of fire in state responsibility areas and very high fire hazard severity zones, taking into account detailed considerations including the Office of Planning and Research's "Fire Hazard Planning" document.[2071]

This response cites Laurent et al. (2016) to support its claim that certain air pollutants, including PM, have been linked to adverse health effects, including birth defects.[2072] The referenced document is a study that demonstrates an association between low birth weight and mobile PM emissions in California. The conclusions of the referenced document are consistent with the determinations of the Draft EIR which discloses on page 5.11-9 and

[2070] Final EIR Appendix 4.0-A.Rev

[2071] Stats. 2012, Ch. 311

[2072] Laurent, O. et al., *Low birth weight and air pollution in California: which sources and components drive the risk?*, Environment International 92-93:471-477 (2016).

5.11-10 that TAC emissions are known or suspected to cause cancer and other serious health effects.

Response to Comment F.8-191:

This comment promotes the environmental benefits associated with infill development, citing planning guidelines published by the Bay Area Air Quality Management District. The Project site is not located within the jurisdiction of that agency. Rather, it is located within the jurisdictional boundaries of the County, the South Coast Air Quality Management District (SCAQMD), the Antelope Valley Air Quality, Management District (AVAQMD), and the Southern California Association of Governments (SCAG), as discussed in Section 5.11.2 of the Air Resources chapter.

The Project has been situated and designed to promote regional "smart growth" planning principles established by SCAG's 2016 RTP/SCS and the County's AVAP for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. Indeed, both the AVAP and the 2016 RTP/SCS designate the Project site for urban growth commensurate with the *Centennial Specific Plan*.

Please see response to Comment F.8-20 for a detailed discussion of the Project's consistency with the 2016 RTP/SCS and the AVAP growth projections. As discussed in that response, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG region have determined that, if implemented, the 2016 RTP/SCS would achieve targeted per capita GHG emission reductions from passenger vehicles and will not impede or conflict with regional efforts to reduce criteria air pollutants to acceptable levels.

As further discussed in response to Comment F.8-20, SCAG has carefully considered land use policies that would promote aggressive regional infill development, but ultimately determined that the balanced land use plan described in the 2016 RTP/SCS better protects low income populations from the adverse effects associated with aggressive infill development, most notably gentrification while also achieving the region's GHG emissions reduction targets. SCAG's findings regarding the adverse environmental, social and economic impacts of aggressive infill development are consistent with recent research on the subject. For example, the Urban Displacement Project, a research initiative of UC Berkeley and UCLA, developed a neighborhood database for the Los Angeles County region that compiles demographic, socio-economic, and housing data in both transit and non-transit neighborhoods, which was analyzed to understand local gentrification effects.[2073] It's analysis of regional changes from 2000 to 2014, found that "relative to non-transit areas, transit neighborhoods are more associated with higher increases in whites, college educated, higher income households and greater increases in the cost of rent. Conversely, transit neighborhoods are associated with greater losses in disadvantaged populations including

[2073] Urban Displacement Project (UDP). 2017. *Mapping Neighborhood Change In Los Angeles County.* University of California, Berkeley; University of California, Los Angeles. Los Angeles, CA: http://www.urbandisplacement.org/map/la.

individuals with less than a high school diploma and lower income households".[2074] The Urban Displacement Project also found that the biggest displacement impacts occur around downtown Los Angeles infill areas "where transit-oriented development interacts with other interventions aiming to revitalize the urban form".[2075] In any case, statewide GHG emissions from passenger vehicles are on the rise, despite regional land use policies that focus most new development in infill locations.[2076]

While infill development is an important component of regional land use policy designed to achieve mandated emissions reductions, the environmental impact reports for the 2012 and 2016 RTP/SCS documents demonstrate that too much infill development risks significant adverse environmental and social impacts within the communities targeted for such development, as discussed further in response to Comment F.8-20.

In support of its claim that the County should perform a life cycle assessment (LCA) of the entire project to "inspect the totality of the resultant air pollution, from the manufacturing of materials to their transport to the site, and beyond," the Commenter cites a 2013 report prepared by the Massachusetts Institute of Technology's Concrete Sustainability Hub (CSH Report) that evaluates LCAs of residential buildings published between 2008 and 2012 in order "to review different approaches to LCA in an effort to give a sense of the state of the current research in the area, as well as to identify gaps or inconsistencies that could be refined in order to provide accurate results".[2077] Since the CSH Report only concerns LCAs of residential buildings, it is of little relevance with respect to the Project-wide LCA recommended by the Commenter. Moreover, the CSH Report determined the value of an LCA depends on "understand[ing] both the embodied and use impacts of buildings constructed with energy efficiency measures in various combinations".[2078] However, the CSH Report found that "there is no common methodology to adequately address a wide range of building forms and lifetimes in various geographic regions," that "there was an overall absence of local primary data," and that "[t]his lack of data illuminates the potential for considerable uncertainty within quantitative results".[2079] Thus, the CSH Report demonstrates that there is no available methodology for performing an accurate quantitative LCA for a residential building, much less an accurate LCA for an entire master-planned community.

The EIR is required to evaluate the Project's environmental impacts only to the extent it is reasonably feasible to do so and it is not required to engage in speculation, particularly when there is no standard, accepted methodology to assess a significant impact.[2080,2081] The CSH Report cited by the Commenter demonstrates that there is no standard, accepted methodology for performing an accurate quantitative LCA for an entire master-planned community and such a study would, at best, require the Lead Agency to engage in uncertain

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2074 *Ibid.*
2075 *Ibid.*
2076 Thornberg, C., Chong, H., Fowler, A. 2017. *2017 California Green Innovation Index.* Next 10. San Francisco, CA: Next 10.
2077 Ghattas, R. et al. 2013. *Life Cycle Assessment for Residential Buildings: a literature review and gap analysis* (p. 5), Concrete Sustainability Hub, MIT.
2078 *Id.,* p. 12
2079 *Ibid.*
2080 CEQA Guidelines §§ 15151, 15144-15145
2081 *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs* (2001) 91 Cal.App.4th 1344, 1370

speculation. Moreover, the California Supreme Court has expressly found that CEQA does not require EIRs to include a life cycle analysis of a project's potential environmental effects [*Save the Plastic Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 173 (CEQA does not require an agency "to conduct an exhaustive analysis of all conceivable impacts a project may have in areas outside its geographical boundaries")]. Here, the EIR evaluates the potential environmental effects of the whole Project, but CEQA does not require the EIR to also analyze the environmental effects of manufacturing a light switch in Maine that may one day be installed in a California home. As stated by the Supreme Court, "common sense … is an important consideration at levels of CEQA review" and "the product 'life cycle' must be kept in proper perspective and not be allowed to swamp the evaluation of actual impacts attributable to the project at hand".[2082]

In support of its claim that the County should perform an LCA of the entire project, the Commenter also cites a May 2016 document prepared by the Bay Area Air Quality Management District (BAAQMD) titled *Planning Healthy Places, A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning*. This BAAQMD document does not, however, recommend the inclusion of an LCA in CEQA documents, nor does it discuss LCAs at all.

In response to this comment, the following references are added to the administrative record:

Urban Displacement Project (UDP). 2017. *Mapping Neighborhood Change In Los Angeles County.* University of California, Berkeley; University of California, Los Angeles. Los Angeles, CA: http://www.urbandisplacement.org/map/la.

Thornberg, C., Chong, H., Fowler, A. 2017. *2017 California Green Innovation Index.* Next 10. San Francisco, CA: Next 10. file:///C:/Users/bbbrownlow/Documents/Centennial%20RTC/2017-CA-Green-Innovation-Index-Final.pdf.

Response to Comment F.8-192:

This comment's statement that the Project would affect certain air basins that have been designated nonattainment for certain NAAQS is correct, as disclosed in section 5.11.2 of the Air Resources chapter. This comment also correctly states that the South Coast air basin is currently designated as extreme nonattainment for the 2008 8-hour ozone NAAQS, moderate nonattainment for the 2012 PM 2.5 NAAQS, serious nonattainment for the 2006 PM 2.5 NAAQS, and moderate nonattainment for the 1997 PM 2.5 NAAQS, as discussed in EIR pages 5.11-15 and 5.11-25. This comment's statement that the San Joaquin Valley air basin is currently designated as extreme nonattainment for 2008 8-hour ozone NAAQS, moderate nonattainment for 2012 PM 2.5 NAAQS, and serious non-attainment for 2006 and 1997 PM 2.5 NAAQS is also accurate. This comment also correctly states that the Mojave Desert air basin is currently designated as severe nonattainment for 2008 8-hour ozone NAAQS, as discussed on Draft EIR page 5.11-14. This comment's assertion that the Mojave

[2082] *Save the Plastic Coalition v. City of Manhattan Beach* at p. 175

Desert air basin is currently designated as moderate nonattainment for the 1997 PM 10 NAAQS is inaccurate. Rather, the Mojave Desert air basin is currently designated as moderate nonattainment for the 1987 PM 10 NAAQS and only within San Bernardino County (the Project site is located in Los Angeles County). The USEPA has designated the portion of the Mojave Desert air basins within the Antelope Valley Air Quality Management District as "unclassifiable," as discussed on Draft EIR page 5.11-23.

As explained in Section 5.11.2 of the Air Resources chapter, the Project site lies in two different air districts and two different air basins.[2083] The northern 91 percent of the site lies within the boundary of the Antelope Valley Air Quality Management District (AVAQMD), while the remaining 9 percent lies within the boundary of the County Coast Air Quality Management District (SCAQMD).[2084] The portion of the site under the jurisdiction of the AVAQMD lies within the Mojave Desert Air Basin (MDAB).[2085] The portion of the site under the jurisdiction of the SCAQMD lies within the South Coast air basin.[2086]

As explained in Section 5.11.2, the Antelope Valley has not yet demonstrated attainment status for ozone (O_3), largely due to the transport of pollutants from the Los Angeles Basin and San Joaquin Valley. In 2008, the AVAQMD prepared the *Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)* to replace or update all previously submitted federal ozone plans for the Antelope Valley. The plan (1) demonstrates that the AVAQMD will meet the primary required federal O_3 planning milestones and will attain the 1997 8-hour O_3 NAAQS by June 2021; (2) presents the progress the AVAQMD will make towards meeting all required O_3 planning milestones; and (3) discusses the 2008 0.075 part per million (ppm) 8-hour O_3 NAAQS, preparatory to an expected nonattainment designation for the new NAAQS.[2087] The AVAQMD is not proposing to adopt any additional control measures for direct O_3 precursor reduction purposes. However, the AVAQMD is committed to having all applicable Federal Reasonably Available Control Technology (RACT) rules as specified in the *Federal 8-Hour Ozone Attainment Plan*, and is currently performing analyses on the feasibility of adopting additional rules under the State of California "all feasible measures" mandate, which requires air districts to adopt rules that achieve the maximum degree of O_3 precursor emissions reduction, taking into account technology considerations and economic impacts. In addition, the AVAQMD will experience additional future emission reductions from existing and proposed federal and State control measures that affect mobile and area sources. In June 2008, the CARB approved a SIP revision for the Western Mojave Desert Ozone Nonattainment Area; the SIP revision includes the *AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)*. The SIP revision was submitted to the USEPA in July 2008. As of the preparation of this EIR, the SIP revision has not been approved.

2083 DRP 2017, pp. 5.11-11 to -17
2084 *Id.,* p. 5.11-13
2085 *Id.,* p. 5.11-14
2086 *Id.,* p. 5.11-15
2087 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

The AVAQMD adopted the *List and Implementation Schedule for District Measures to Reduce PM Pursuant to Health & Safety Code §39614(d)* on August 16, 2005. The list was prepared in response to the code which requires CARB, in consultation with local air pollution management districts, to develop and adopt a list of the most readily available, feasible, and cost-effective control measures that could be employed by CARB and the air districts to reduce PM10 and PM2.5.[2088]

With respect to the South Coast air basin (SoCAB), Section 5.11.2 of the Air Resources chapter explains that, on November 28, 2007, CARB submitted a State Implementation Plan (SIP) revision to the USEPA for O_3, PM2.5 (1997 Standard), CO, and NO_2 in the SoCAB. This revision is identified as the "2007 South Coast SIP". The 2007 South Coast SIP demonstrates attainment of the federal PM2.5 standard in the SoCAB by 2014 and attainment of the federal 8-hour O_3 standard by 2023. This SIP also includes a request to reclassify the O_3 attainment designation from "severe" to "extreme". The USEPA approved the redesignation effective June 4, 2010. The "extreme" designation requires the attainment of the 8-hour O_3 standard in the SoCAB by June 2024. CARB approved PM2.5 SIP revisions in April 2011 and the O_3 SIP revisions in July 2011. The USEPA approved the PM2.5 SIP on September 25, 2013 and has approved 47 of the 62 1997 8-hour O_3 SIP requirements. On November 30, 2014, the USEPA proposed a finding that the SoCAB has attained the 1997 PM2.5 standards. The comment period closed on January 22, 2015; no subsequent action has been taken.[2089]

On September 30, 2015, the USEPA proposed to approve elements of the South Coast 2012 PM2.5 Plan and 2015 Supplement, which addresses Clean Air Act requirements for the 2006 PM2.5 NAAQS, and proposed to reclassify the area as a 'serious' nonattainment area for the 2006 PM2.5 standard. The reclassification is based on the determination that the area cannot practicably attain the 2006 PM2.5 NAAQS by the moderate area attainment date (December 31, 2015). On December 22, 2015, the EPA reclassified the South Coast area as a "Serious" nonattainment area for the 2006 PM2.5 standard. The final reclassification requires the State to submit a "serious area" plan that provides for attainment of the 2006 PM2.5 NAAQS as expeditiously as practicable and no later than December 31, 2019.[2090]

On December 7, 2012, the SCAQMD adopted the 2012 AQMP, which is a regional and multi-agency effort (SCAQMD, CARB, SCAG, and USEPA). The 2012 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2012 RTP/SCS; updated emission inventory methods for various source categories; and SCAG's latest growth forecasts. The primary purposes of the 2012 AQMP are to demonstrate attainment of the federal 24-hour PM2.5 standard by 2014 and to update the USEPA-approved 8-hour Ozone Control Plan. On December 20, 2012, the 2012 AQMP was submitted to CARB and the USEPA for concurrent review and approval for inclusion in the SIP (SCAQMD 2013). The 2012 AQMP was approved by the CARB on January 25, 2013.[2091]

2088 DRP 2017, p. 5.11-15
2089 *Id.,* p. 5.11-15
2090 *Id.,* pp. 5.11-15 and -16
2091 *Id.,* p. 5.11-16

On March 3, 2017, the SCAQMD Governing Board adopted the final 2016 AQMD.[2092] The 2016 AQMP describes integrated strategies and measures to meet the following NAAQS:

1. 8-hour O_3 (75 parts per billion [ppb]) by 2031[2093]
2. Annual PM2.5 (12 micrograms per cubic meter [$\mu g/m^3$]) by 2025
3. 8-hour O_3 (80 ppb) by 2023
4. 1-hour O_3 (120 ppb) by 2022
5. 24-hour PM2.5 (35 $\mu g/m^3$) by 2019

As discussed in Comment D.4-2, SCAQMD has reviewed the Draft EIR and determined that the Project "supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin". As discussed in Comment D.1-1, the Antelope Valley Air Quality Management District has reviewed, and has no comments on, the Draft EIR.

With regard to this comment's inaccurate claim that the EIR fails to adequately address Project emissions than may affect the San Joaquin, South Coast and Mojave Desert Air Basins, or conflict with the State Implementation Plan, please see responses to Comments F.8-193, F.8-194, and F.8-195.

Response to Comment F.8-192A:

This comment is a citation to a website maintained by the U.S. Environmental Protection Agency (EPA) that provides state information for designated nonattainment areas for criteria pollutants. The cited website supports the Commenter's assertion that the U.S. EPA currently designates the South Coast air basin as extreme nonattainment for the 2008 8-hour ozone standard, moderate nonattainment for the 2012 PM 2.5 standard, serious nonattainment for the 2006 PM 2.5 standard, and moderate nonattainment for the 1997 PM 2.5 standard.

Response to Comment F.8-192B:

This comment is a citation to a website maintained by the U.S. Environmental Protection Agency (EPA) that provides state information for designated nonattainment areas for criteria pollutants. The cited website supports the Commenter's assertion that the U.S. EPA currently designates the San Joaquin Valley air basin as extreme nonattainment for 2008 8-hour ozone standard, moderate nonattainment for 2012 PM 2.5 standard, and serious non-attainment for 2006 and 1997 PM 2.5 standards.

2092 *Ibid.*

2093 On October 1, 2015, the USEPA lowered the 8-hour O_3 standard to 0.070 ppm (70 ppb). The SIP (or AQMP) for the 70 ppb standard will be due 4 years after the attainment/non-attainment designations are issued by the USEPA, which is expected next year in 2017. Thus, meeting the 70 ppb standard will be addressed in a 2021 AQMP.

Response to Comment F.8-192C:

This comment is a citation to a website maintained by the U.S. Environmental Protection Agency (EPA) that provides state information for designated nonattainment areas for criteria pollutants. The cited website supports the Commenter's assertion that the U.S. EPA currently designates the Mojave Desert air basin as severe nonattainment for 2008 8-hour ozone standard. The cited website does not, however, support this comment's assertion that the U.S. EPA currently designates the Mojave Desert air basin as moderate nonattainment for the 1997 PM 10 standard. Rather, it shows the Mojave Desert air basin as moderate nonattainment for the 1987 PM 10 standard and only in San Bernardino County, California. The Project site, however, is located in Los Angeles County, California.

Response to Comment F.8-193:

The Commenter's opinion that the Draft EIR fails to adequately analyze the Project's air quality impacts because of the purported difficulty of determining whether the Project, in combination with other named projects (i.e., Grapevine, Newhall Ranch, Tejon Mountain Village) have the potential to interfere with applicable Air Quality Management Plans and/or the State Implementation Plan (SIP), is noted. This comment is not supported by the facts.

As discussed in Section 5.8.2 of the Land Use chapter,[2094] Section 5.8.6 of the same chapter,[2095] and in the SCAG 2016 RTP/SCS and accompanying EIR, the Project site has been reviewed and designated for new urbanized growth as part of the RTP/SCS's comprehensive regional planning process that takes into consideration compliance with criteria pollutant ambient air quality standards, GHG emission reduction mandates, as well as all other environmental impact factors. The SCAG 2016 RTP/SCS also includes the Newhall Ranch project in its growth projections and balanced land use plan.[2096] Likewise, the Kern County Council of Governments' (KernCOG) *2014-2040 Regional Transportation/Sustainable Communities Strategy* assumes all urban development proposed by Tejon Mountain Ranch and Grapevine Projects and includes both projects in its growth projections (KernCOG 2014 RTP/SCS).[2097] Indeed, the KernCOG 2014 RTP/SCS explains that KernCOG and SCAG meet regularly to coordinate land and use transportation planning strategies and to share data regarding large development projects in their respective jurisdictions, expressly citing the Centennial project as an example.[2098] Moreover, the KernCOG 2014 RTP/SCS expressly describes the *Tejon Ranch Conservation and Land Use Agreement*, including its identification of the Tejon Mountain Village and Grapevine project sites as future master-planned communities, as "a major regional sustainability success story".[2099]

2094 DRP 2017, pp. 5.8-6 and -7
2095 *Id.,* pp. 5.8-73 and -74
2096 SCAG 2012, p. 145; SCAG 2015b, p. 10, 11
2097 Kern Council of Governments (KernCOG). 2014a (June). *2014 Regional Transportation Plan/Sustainable Communities Strategy. Kern Council of Governments* (p. 4-25, -27). Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2017/08/2014_RTP.pdf.
2098 *Id.,* p. 5-125
2099 *Id.,* p. E-38

On July 23, 2015, CARB adopted Resolution 15-38 certifying that implementation of the KernCOG 2014 RTP/SCS would achieve the per capita GHG reduction targets for the KernCOG region, in accordance with SB 375. The following year, CARB also certified that implementation of the SCAG 2016 RTP/SCS would achieve the SCAG region's GHG reduction targets, as discussed in response to Comment F.8-20. The Federal Highway Administration and the Federal Transit Administration, in consultation with the U.S. Environmental Protection Agency, CARB and the regional Air Quality Management Districts, have determined that the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS are both in conformance with the State Implementation Plan (SIP) and applicable Air Quality Management Plans prepared in accordance with the Clean Air Act to establish control measures necessary to achieve attainment of National Ambient Air Quality Standards (NAAQS) in the SCAG and KernCOG regions.[2100,2101] Accordingly, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG and KernCOG regions have determined that, if implemented, the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS would achieve targeted per capita GHG emission reductions from passenger vehicles and will not impede or conflict with federal, state and regional efforts to reduce criteria air pollutants to acceptable levels in the South Coast, Mojave Desert, and San Joaquin Valley air basins.

In analyzing the Project's potential effects on natural resources, the County is entitled to rely on the determinations of, and relevant information and data prepared by, expert agencies with jurisdiction over such resources (*see, e.g.,* CEQA Guidelines §§ 15086(a), 15384(b); *Berkeley Keep Jets over the Bay Committee v. Board of Port Com'rs* (2001) 91 Cal.App.4th 1344, 1370 (CEQA requirement that EIR include "good faith reasoned analysis" obligates lead agency to collect and consider data prepared by regulatory agencies having jurisdiction in the matter); *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928 (Lead agency may rely on "expert opinion if supported by facts, even if not based on specific observations as to the [project] under review")). Thus, the County is entitled to rely on federal, state and local air resource agency determinations that implementation of the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS (which collectively assume development of the Centennial, Newhall Ranch, Grapevine and Tejon Mountain Ranch project sites with urban uses commensurate with each project's specific plan) would not impede or conflict with applicable air quality management plans.

Moreover, as discussed in Comment D.4-2, SCAQMD has reviewed the Draft EIR and determined that the Project "supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin." As discussed in Comment D.1-1, the Antelope Valley Air Quality Management District has reviewed, and has no comments on the Draft EIR.

2100 UDOT 2012, 2013, 2016, 2017

2101 Kern Council of Governments (KernCOG). 2014b (June). *Conformity Analysis For the 2015 Federal Transportation Improvement Program and 2014 Regional Transportation Plan*. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2009/10/conformity_2014_FTIP-RTP.pdf.

In response to this comment, the following documents are added to the administrative record:

Kern Council of Governments (KernCOG). 2014a (June). *2014 Regional Transportation Plan/Sustainable Communities Strategy. Kern Council of Governments*. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2017/08/2014_RTP.pdf.

Kern Council of Governments (KernCOG). 2014b (June). *Conformity Analysis For the 2015 Federal Transportation Improvement Program and 2014 Regional Transportation Plan*. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2009/10/conformity_2014_FTIP-RTP.pdf.

Kern Council of Governments (KernCOG). 2014c (June). *2014 Regional Transportation Plan for Kern County Program Environmental Impact Report (SCH No. 2013012067).* Kern Council of Governments. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2017/08/2014_RTP_EIR_Final.pdf.

Response to Comment F.8-194:

The comment's observation that the EIR must include substantial evidence that the Project would not conflict with applicable air quality management plans (AQMPs) is noted. There is substantial evidence in the administrative record that cumulative development within the South Coast, Mojave Desert, and San Joaquin Valley Air Basins, combined with the Project, conform to the growth projections, assumptions and mitigations underlying or incorporated into the AQMPs and RTP/SCS's applicable to those basins.

As discussed in more detail in responses to Comments F.8-20 and F.8-193, the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS, and their accompanying EIRs, take into account cumulative regional growth projections, including the Centennial, Newhall Ranch, Tejon Mountain Village and Grapevine projects, as required by CEQA and SB 375. Both plans have been reviewed by all federal, state and regional expert agencies with jurisdiction over the air basins within the planning areas of the SCAG 2016 RTP/SCS and KernCOG 2014 RTP/SCS and both plans have been determined to be in conformity with the State Implementation Plan (which incorporates all applicable AQMPs) to achieve and maintain air quality standards. This is explained in detail in the EIR, with analysis specific to the applicable AQMPs and RTP/SCS documents.[2102] The County is entitled to rely on these determinations, as discussed in response to Comment F.8-193. Thus, contrary to the Commenter's stated opinion (which has no evidentiary support), the Draft EIR's determination that the Project will not conflict with the SCAG RTP/SCS and applicable AQMPs is not based on conclusory statements.

With regards to this comment's characterization of the Project as "leapfrog" development, please see response to Comment F.8-20. With regards to this comment's reference to the "Antelope Valley Air Basin," no such air basin exists. However, the Antelope Valley Air Quality

[2102] DRP 2017, p. 5.11-13 to -17, -74, -75; 7-3 to 7-9, -20

Management District is located within a portion of the Mojave Desert Air Basin, as explained in the Draft EIR at page 5.11-14.

Response to Comment F.8-195:

Contrary to this comment's inaccurate claim, the EIR does not segment its air quality analysis to avoid analyzing the whole of the Project, nor does it minimize Project impacts by not accounting for Project emissions in all affected air basins. As explained in Section 5.11, Air Resources, the Project's total construction and operational emissions were calculated by using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 and assessed against CEQA significance thresholds and air quality management plans (AQMPs) adopted by the Antelope Valley Air Quality Management District (AVAQMD) and the South Coast Air Quality Management District (SCAQMD), the two air districts with jurisdiction over the Project.[2103]

As explained in Section 5.11.3 of the Air Resources chapter, the Project's CalEEMod includes construction and operational inputs for all Project land uses and acreages.[2104] Construction input data also includes but is not limited to the start and finish dates of construction phases; inventories of all construction equipment to be used during each phase of construction; the volumes of structures to be demolished; the volumes of materials to be imported to and exported from the Project site; the total areas to be paved and to be painted.[2105] Construction emissions output data are provided for all off-road equipment, all on-road vehicles, all fugitive dust from grading, and all VOCs from asphalt off-gas and architectural coatings.[2106] Operational inputs also include the year of analysis and vehicle trip generation rates.[2107] Output operational emissions data categories included mobile sources, area sources (e.g., landscape maintenance, consumer products, architectural coatings), and energy sources (e.g., emissions for natural gas consumption).[2108] Thus, the EIR accounts for all direct and indirect Project emissions and analyzes the whole of the Project's potential air quality impacts.

This comment's assertion that the total emissions from the Project must be analyzed against the thresholds and air quality management plans for the South Coast Air Basin (SoCAB) and "Antelope Valley air basin" is noted. As an initial matter, with respect to this comment's reference to the "Antelope Valley air basin," no such air basin exists. The EIR assesses the significance of the Project's total emissions using the thresholds of significance recommended by AVAQMD and SCAQMD, the two air districts with jurisdiction over the Project site, which straddles the SoCAB and the Mojave Desert Air Basin (MDAB), as described in EIR Section 5.11.7.[2109] The EIR also considers whether the Project would

2103 *Id.,* p. 5.11-18 to -22, -36 to -83
2104 *Id.,* Appendix 5.11-A
2105 *Ibid.*
2106 *Ibid.*
2107 *Ibid.*
2108 *Ibid.*
2109 *Id.,* pp. 5.11-40 to -74

conflict or obstruct implementation of the applicable air quality plans adopted by AVAQMD and SCAQMD, and determined that this impact would be less than significant.[2110]

This comment's assertion that the EIR must prepare modeling to analyze the potential for drift and project emissions from mobile sources as they would be affecting the MDAB and the San Joaquin Valley Air Basin (SJVAB) is noted. In Kern County, the air district with jurisdiction over the SJVAB is the San Joaquin Valley Air Pollution Control District (SJVAPCD), while the Eastern Kern Air Pollution Control District (EKAPCD) has jurisdiction over the Kern County portion of the MDAB. This comment's reference to "drift" emissions is assumed to refer to the potential for Project emissions to be transported by wind from the air basin in which they are emitted to other air basins. However, neither the SCAQMD, AVAQMD, SJVAPCD or EKAPCD require a project-level analysis of pollutant transport between air basins as part of the California Environmental Quality Act process, and any such analysis would be speculative as to where the air pollutants emitted by any single project would travel by wind. Such analysis is instead performed at the air-district-level for inclusion in applicable AQMPs.[2111,2112]

Pollution transport studies prepared by CARB demonstrate that, while there is potential for pollutants to be transported by wind from the SoCAB to the MDAB, neither of those basins transport pollutants by wind to the SJVAB.[2113] Thus, the only emissions that the Project is expected to contribute to the SJVAB would be generated by Project vehicle trips occurring within the SJVAB. Total Project-related vehicle trips are described in Section 5.10, Traffic and Circulation, and in the TIS. The Project will generate trips with destinations in Los Angeles, Ventura, and Kern Counties, as shown on Draft EIR Exhibit 5.10-7, which areas overlap with portions of the SoCAB, the South Coast Air Basin (SCCAB), the SJVAB, and the MDAB, although the vast majority of such trips will occur in the Los Angeles County portions of the SoCAB and MDAB. Average daily trip (ADT) generation rates from the TIS, were entered into the appropriate land use categories in CalEEMod to determine total vehicle trips, vehicle miles traveled, and associated emissions by land use unit type. Thus, the EIR does account for the Project's total emissions, including those generated by Project vehicle trips with destinations in air basins beyond those in which the Project site is located.

All vehicle trips associated with the Project are incorporated into the KernCOG 2014 RTP/SCS and its accompanying EIR, and related mobile emissions are included in the emissions budgets assumed by the SJVAPCD's AQMPs, including its *2016 Ozone Plan for 2008-Hour Ozone Standard* and *2015 Plan for the 1997 PM2.5 Standard*, and the EKAPCD's

2110 *Id.,* pp. 5.11-74 and -75

2111 California Air Resources Board (CARB). 2001. *Assessment of the Impacts of Transported Pollutants on Ozone Concentrations in California*. Sacramento, CA: https://www.arb.ca.gov/regact/trans01/isor.pdf.

2112 California Health & Safety Code §39610

2113 14 California Code of Regulations (CCR) §70500

2017 Ozone Attainment Plan for 2008 Federal 75 ppb 8-Hour Ozone Standard.[2114,2115,2116,2117] Moreover, as discussed in response to Comment F.8-193, all state, federal and regional regulatory agencies with jurisdiction over air resources have determined that the KernCOG 2014 RTP/SCS is in conformance with the State Implementation Plan (SIP) and applicable AQMPs. Accordingly, Project vehicular emissions would not conflict with applicable AQMPs or delay timely attainment of air quality standards within the Kern County portions of the SJVAB and MDAB.

CARB has determined that pollution is not transported by wind from the MDAB to the SoCAB or SCCAB, but the SoCAB does transport emissions to the MDAB and SCCAB.[2118] As explained in 5.11.7, *Air Resources*, population associated with the Project was not included in the 2004 SCAG growth forecasts, upon which the AVAQMD *Federal 8-Hour Ozone Attainment Plan* was based. However, the 2008, 2012, and 2016 SCAG growth forecasts have accounted for the Project and, therefore, emissions associated with the Project will be accounted for in future AVAQMD AQMPs, which updates are required at least once every three years. Therefore, revised AVAQMD AQMP's, which would include the Project's population and emission forecasts are expected to be in place prior to the initial occupation of Project facilities.[2119]

In addition, all Project trips and their emissions were incorporated into the SCAG 2016 RTP/SCS and accompanying EIR, which applies to the SoCAB, the Los Angeles County portion of the MDAB and the Ventura County portions of the SCCAB, and were included in the motor vehicle emissions budgets assumed by the SCAQMD's 2016 AQMP, as well as the Ventura County Air Pollution Control District's (VCAPCD) 2016 AQMP.[2120,2121] Moreover, as discussed in response to Comment F.8-193, and all state, federal and regional regulatory agencies with jurisdiction over air resources have determined that the SCAG 2016 RTP/SCS is in conformance with the State Implementation Plan (SIP) and applicable AQMPs. Accordingly, Project vehicular emissions would not conflict with applicable AQMPs or impede timely attainment of air quality standards within the SoCAB, SCCAB and Los Angeles County portion of the MDAB.

2114 Kern Council of Governments (KernCOG). 2014c (June). *2014 Regional Transportation Plan for Kern County Program Environmental Impact Report (SCH No. 2013012067)* (p. 4.3-31)*.* Kern Council of Governments. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2017/08/2014_RTP_EIR_Final.pdf.

2115 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2016. *2016 Ozone Plan for 2008 8-Hour Ozone Standard* (p. B-31). Fresno, CA. SJVAPCD: http://www.valleyair.org/Air_Quality_Plans/Ozone-Plan-2016/Adopted-Plan.pdf.

2116 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. *2015 Plan for the 1997 PM2.5 Standard* (pp. B-31, B-32). Fresno, CA. SJVAPCD: http://www.valleyair.org/Air_Quality_Plans/docs/PM25-2015/2015-PM2.5-Plan_Bookmarked.pdf.

2117 Eastern Kern Air Pollution Control District (EKAPCD). 2017. 2017 Ozone Attainment Plan For 2008 Federal 75 ppb 8-Hour Ozone Standard (p. 20). Bakersfield, CA: http://www.kernair.org/Documents/Announcements/Attainment/2017%20Ozone%20Plan_EKAPCD_Adopted_7-27-17.pdf.

2118 CARB 2001; 14 CCR §70500

2119 *Ibid.*

2120 South Coast Air Quality Management District (SCAQMD). 2016. Final 2016 Air Quality Management Plan (p. ES-6). Diamond Bar, CA: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

2121 Ventura County Air Pollution Control District (VCAPCD). 2016. Final 2016 Ventura County Air Quality Management Plan (p. 65). Ventura, CA: http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/Final-2016-Ventura-County-AQMP.pdf.

CEQA does not require speculation (e.g., creation of a novel new multi-project, multi-air-basin attainment model), but does allow lead agencies to rely on available analytical methodologies established by expert air quality agencies to assess air quality impacts. As discussed above, each affected air district, SCAG and KernCOG takes into account population, on- and off-road vehicle, industrial processes, and other sources of air pollutants into numerous documents which include air quality management plans and Regional Transportation Plan\Sustainable Community Strategy (RTP\SCS). Basin-wide air pollutant dispersion modeling for all existing and projected emission sources are conducted to determine their effect on air quality within the air basin, and account for potential transport to other air basins. The quantified effect of projects on the air quality of an air basin is accounted for in these macro level documents and not in project-level environmental assessments. Use of the plan conformity approach that is included in regional air quality attainment models to assess cumulative impacts from plans that include projected regional growth, including the project under consideration, has been determined to be compliant with CEQA. Accordingly, the EIR is not required to prepare a multi-project, multi-air-basin modeling to analyze the potential for inter-basin pollution transport from Project-related mobile sources that may affect various regional air basins, as this comment incorrectly claims.

Please also see response to Comment F.8-199.

In response to this comment, the following documents are added to the administrative record:

California Air Resources Board (CARB). 2001. *Assessment of the Impacts of Transported Pollutants on Ozone Concentrations in California*. Sacramento, CA: https://www.arb.ca.gov/regact/trans01/isor.pdf.

Eastern Kern Air Pollution Control District (EKAPCD). 2017. 2017 Ozone Attainment Plan For 2008 Federal 75 ppb 8-Hour Ozone Standard. Bakersfield, CA: http://www.kernair.org/Documents/Announcements/Attainment/2017%20Ozone%20Plan_EKAPCD_Adopted_7-27-17.pdf.

San Joaquin Valley Air Pollution Control District (SJVAPCD). 2016. *2016 Ozone Plan for 2008 8-Hour Ozone Standard*. Fresno, CA. SJVAPCD: http://www.valleyair.org/Air_Quality_Plans/Ozone-Plan-2016/Adopted-Plan.pdf.

San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. *2015 Plan for the 1997 PM2.5 Standard*. Fresno, CA. SJVAPCD: http://www.valleyair.org/Air_Quality_Plans/docs/PM25-2015/2015-PM2.5-Plan_Bookmarked.pdf.

South Coast Air Quality Management District (SCAQMD). 2016. Final 2016 Air Quality Management Plan. Diamond Bar, CA: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

Ventura County Air Pollution Control District (VCAPCD). 2016. Final 2016 Ventura County Air Quality Management Plan. Ventura, CA: http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/Final-2016-Ventura-County-AQMP.pdf.

Response to Comment F.8-196:

The Lead Agency disagrees with this comment's assertion that the Draft EIR did not fully or adequately analyze or describe the potential health effects of the Project's air emissions. As described below, Section 5.11, *Air Resources*, comprehensively analyzed the potential adverse public health effects of the Project's construction and operational criteria and toxic air contaminant (TAC) emissions[2122] and incorporated detailed health risk assessments that consider all applicable Project sources of stationary and mobile operational TAC emissions.[2123]

Draft EIR Appendix 5.11-C, *Centennial Supplemental Air Quality Analysis*, evaluates in detail potential localized air quality impacts related to both criteria and toxic emissions generated by the Project, with a focus on how sensitive residential land uses would be affected by mobile emissions and stationary sources proximate to the Project site.

This study included the following components:

1. An evaluation of the potential health risks resulting from mobile emissions generated by increased traffic due to the project for new and existing residences located near California State Route 138;
2. An evaluation of ambient air quality impacts resulting from construction and comparison to the South Coast Air Quality Management District (SCAQMD) Localized Source Thresholds;
3. A review of a health risk assessment for the National Cement facility located north of the Project site; and
4. A review of consistency with air district plans and California Air Resources Board (CARB) land use guidelines.

Specifically, Appendix 5.11-C and the Draft EIR evaluates the potential adverse impacts of toxic air contaminants (TACs) and diesel particulate matter exposure generated by traffic traveling along SR-138 and the offsite National Cement factory.[2124]

To assess the health risks associated with SR-138 vehicle emissions, Appendix 5.11-C used the Centennial Specific Plan's land use plan to determine the Project-site location of all future sensitive receptors that would be located within 500 feet of SR-138, and evaluated cancer risk from diesel exhaust using a receptor grid with 40-meter spacing.[2125] The 500-foot buffer was selected on the basis of the California Air Resources Board's (CARB) 2005 guidance

[2122] DRP 2017, pp. 5.11-63 to -74; *Id.,* Appendix 5.11-A
[2123] *Id.,* Appendices 5.11-B and 5.11-C
[2124] *Id.,* pp. 5.11-71 to -74
[2125] *Id.,* Appendix 5.11-C, pp. 2, 3

manual on land use development, *Air Quality and Land Use: A Community Perspective*.[2126] The CARB guidance manual recommends a 500-foot buffer between freeways and sensitive receptors, indicating that further analysis may be in order if the proposed sensitive receptor is located within this buffer.[2127] The Appendix 5.11-C modeling confirms that incremental cancer risks for the 70-year exposure duration are below 10 in 1 million at locations greater than 150 feet from the travel lanes and thus would not exceed applicable thresholds of significance.[2128] The estimated hazard index for all proposed sensitive receptors would be significantly less than one in a million at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.[2129] This determination is consistent with the Antelope Valley Area Plan EIR, which concluded that potential adverse effects to sensitive receptors located in proximity to SR-138 would be less than significant with mitigation.[2130]

TACs are a class of air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may post a present or potential hazard to human health.[2131] Mobile Source Air Toxics are subset of TACs emitted by mobile sources, such as diesel particulate matter (DPM).[2132] DPM is that portion of diesel fueled engine exhaust that is collected via a particulate matter sampling method and which contains many of the toxic components of diesel exhaust, including acrolein, benzene, 1,3-butadiene, formaldehyde, napthalene, and polycyclic organic matter.[2133,2134] Appendix 5.11-C provides an analysis of potential health risk impacts associated with diesel exhaust which represents the primary cause of health risk within the South Coast Air Basin (air basin). The SCAQMD MATES-IV Study states that diesel particulates represent approximately 80 percent of health risk in the SoCAB.[2135] Of the other TACs specifically identified by the Commenter - acrolein and polycyclic organic matter did not make the list of the top 25 TACs that contribute to overall health risk in the basin. Based on data provided within the MATES-IV study, it can be concluded that each of these pollutants contribute less than 0.00001 percent risk within the air basin. The other TACs identified within the comment – 1, 3-butadiene, benzene, formaldehyde and naphthalene result in a combined risk of approximately 11 percent within the air basin. Because 92 percent of risk levels occurring within the air basin are due to mobile sources, the proportion of risks from diesel exhaust and the other TACs would be comparable to those discussed in the MATES-IV Study. As such, the other TACs identified by the comment (1, 3-butadiene, benzene, formaldehyde and naphthalene) would contribute marginally (approximately

2126 *Id.,* p. 1
2127 *Ibid.*
2128 *Id.,* p. 5.11-73; *Id.,* Appendix 5.11-C, p. 3
2129 *Ibid.*
2130 DRP 2014a, p. 5.3-43
2131 California Health & Safety Code §39655(a); 14 CCR §§ 93000, 93001
2132 United States Environmental Protection Agency (USEPA). 2016. Gasoline Mobile Source Air Toxics. Washington DC: USEPA. https://www.epa.gov/gasoline-standards/gasoline-mobile-source-air-toxics.
2133 California Air Resources Board (CARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Sacramento, CA: CARB. https://www.arb.ca.gov/diesel/documents/rrpapp.htm.
2134 California Air Resources Board (CARB). 1998. Report to the Air Resources Board on the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant. CARB Scientific Review Panel. Sacramento, CA: CARB. https://www.arb.ca.gov/toxics/dieseltac/part_a.pdf.
2135 South Coast Air Quality Management District. 2015. Final Report Multiple Air Toxics Exposure Study in the South Coast Air Basin. Diamond Bar, CA: USEPA. http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv.

11 percent) to the health risks identified for the Project site exposure to emissions from SR-138.

As shown in Exhibit Response F.8-196, Sheets A through C, the 70-year cancer risks at the proposed residential uses range from 4 to 5 in a million. As shown in Table 5.11-24 of the Draft EIR, existing residential uses were exposed to less than 1 in a million for cancer risk due to the Project. The addition of 11 percent to these risk values would still result in health risks which are substantially below the significance threshold of 10 in a million. Because the HRA assessed the primary cause of health risk exposure to existing and proposed residential uses, and because the additional risk associated with the other TACs identified in the comment would not result in combined risk levels that would exceed the significance threshold of 10 in a million, the impacts findings disclosed in Section 5.11 of the Draft EIR would remain unchanged – i.e., the estimated hazard index for all proposed sensitive receptors would be significantly less than one in a million at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.

To address the potential impact to sensitive receptors located within 150 feet of the SR-138 travel lanes, MM 11-10 imposes a 150-foot buffer from such travel lanes within which the Project will be prohibited from siting new sensitive receptor uses. As an added layer of protection, MM 11-11 further requires that prior to future tract map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138, an additional dispersion modeling study must be conducted to estimate diesel PM air concentrations. If the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then effective TAC reduction measures must be implemented to mitigate for interior air quality, such as filtration technologies or equivalent protections against TACs from vehicle emissions.

In addition, MM 11-11 has been revised in this Final EIR to further insure that sensitive receptors are protected at the Project site from emissions generated by high-volume roadways, as discussed in response to Comment F.8-189. Specifically, MM 11-11 has been revised to, among other things, require preparation of a dispersion analysis to calculate the health risks from vehicle emissions whenever the Project proposes a tentative map that would locate sensitive receptors within 500 feet of a "high-volume" roadway (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), in addition to SR-138. Moreover, as more stringent vehicular greenhouse gas emission and criteria air pollution standards take effect, and as transportation fuels and vehicles become cleaner over time, the number of diesel powered vehicles on roadways as well as emissions from remaining newer diesel engines are expected to further reduce diesel-related health risks at the Project site.[2136]

Draft EIR Appendix 5.11-B, *Air Quality Analysis for Stationary Sources*, further evaluates Project air quality impacts of stationary sources of emissions that are permitted to be located on the Project in accordance with the Centennial Specific Plan. This analysis addressed

[2136] DRP 2017, pp. 5.21-7, -8, -23

health risks associated with TACs and characterizes the sources of criteria pollutants to quantify their emissions.[2137]

This study included the following components:

1. An evaluation of the Project's TAC emissions to ensure that the health risks posed to sensitive receptors by stationary sources located in the Project's Business Park area are not in excess of applicable significance thresholds;
2. An evaluation of the Project's TAC emissions to ensure that the health risks posed to sensitive receptors by discrete stationary sources that may located in the Project's Commercial and Institutional areas are not in excess of applicable significance thresholds;
3. An evaluation of the TAC emissions that would be generated by the Project's two wastewater reclamation facilities (WRF) to ensure that the health risks posed to adjacent stationary sources are not in excess of applicable thresholds; and
4. An evaluation of stationary sources that emit criteria pollutants having ambient air quality standards to assess the potential of violating these standards.

As explained in the Draft EIR, modeling described in Appendix 5.11-B confirms that none of the sensitive receptors located adjacent to the Project's Business Park areas would be exposed to TAC emissions that exceed a cancer of risk of 10 in 1 million or have a chronic non-cancer hazard index of 1.0, provided there is minimum buffer area between the sensitive receptor and the Business Park area.[2138] In order to ensure that the Project's future tract maps incorporate this required buffer area, MM 11-7 requires the establishment of buffer areas in the Project equivalent to those used for the TAC modeling. Moreover, per MM 11-8, no sensitive use (e.g., school, hospital, day care center) may be located within a Business Park area unless the Project Applicant/Developer provides written evidence to the County that sensitive use would not be exposed to TAC with pollutant concentrations resulting in a cancer risk greater than or equal to 10 in 1 million for health risks and 1.0 for non-cancer chronic and acute hazard indices.

There are several discrete types of equipment with TAC emissions levels less than those described previously for stationary sources that would be permitted in the Commercial and Institutional areas on the Project site, including natural gas-fired boilers, emergency generators, gas stations, spray booths, storage tanks, dry cleaners, and small-source particulate matter (PM) generators.[2139] The Appendix 5.11-B modeling analysis confirms that the aggregate risk from these TAC-emitting sources would be below significance thresholds with implementation of MM 11-1, which requires all such stationary sources to comply with the parameters stated in the Stationary Source Types, Size Limits, and Quantity Estimates set forth in Draft EIR Table 5.11-5 and which is included as Attachment A to the Project's Mitigation Monitoring and Reporting Program.[2140] Should there be a need or

[2137] *Id.,* Appendix 5.11-B, p. 4
[2138] *Id.,* p. 5.11-69
[2139] *Id.,* p. 5.11-70
[2140] *Ibid.*

request for a stationary source exceeding the prescribed limits, MM 11-1 requires the Project Applicant/Developer to apply for a source-specific permit from the AVAQMD or the SCAQMD, as applicable.

Draft EIR Appendix 5.11-B also includes a screening health risk assessment conducted to evaluate the air concentration at the nearest sensitive receptors to the WRFs. The results of the screening analysis demonstrate that the estimated incremental cancer risk, chronic and acute health indexes from all WRFs would be less than the significance thresholds at the maximally exposed sensitive receptor location and thus impacts from TAC emissions generated by the WRFs would be less than significant.[2141]

Although not required by CEQA, as confirmed by the Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Appendix 5.11-C also evaluates the estimated cancer risks and chronic and acute non-cancer hazard indices at the future Project residences and other sensitive uses (after Centennial Buildout) caused by emissions generated by offsite National Cement Lebec Plant and determined that any related health risk are below the AVAQMD's and SCAQMD's thresholds if significance (i.e., 10 in 1 million for cancer risk and 1.0 for HI). The cancer risk at the northernmost portion of the Project site was estimated to be 0.15 in 1 million; the chronic and acute non-cancer hazard indices estimated for this location were 0.01 and 0.12, respectively. Based on the results presented in Draft EIR Appendix 5.11-C, the Draft EIR determined that the cement plant is not expected to cause unacceptable risks to future residents at Centennial.[2142]

The Commenter cites *San Joaquin Raptor Rescue Center v. County of Merced* (2010) 149 Cal.App.4th 645 ("*San Joaquin Raptor*") to support its claim that the EIR does not include sufficient information to enable the public or County decision makers to meaningfully consider the potential public health impacts of the Project's air emissions. In San Joaquin Raptor, the court determined that an EIR for the expansion of an aggregate mining operation was inadequate because it assumed that the project would not substantially increase annual production, but also admitted that the expanded mine would have a maximum annual production level twice the size of the baseline average annual production level. In contrast, here, the Draft EIR accurately describes the Project's scope of development and Section 5.11 provides a full accounting of the Project's estimated construction and operational emissions and sets forth a comprehensive analysis of the potential health impacts associated with Project emissions that relies on multiple Project-specific health risk assessments that go beyond the requirements of CEQA. Indeed, this comment's claim that the Draft EIR simply provides emission levels and a general description of health impacts misrepresents the extensive administrative record and is not supported by the facts. Thus, the Commenter's reliance on *San Joaquin Raptor* is misplaced.

[2141] *Ibid.*; *Id.,* Appendix 5.11-B, p. 19-22
[2142] *Id.,* p. 5.11-71; *Id.,* Appendix 5.11-C, p. 9

In response to this comment, the following document is hereby added to the administrative record:

California Air Resources Board (CARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Sacramento, CA: CARB. https://www.arb.ca.gov/diesel/documents/rrpapp.htm.

California Air Resources Board (CARB). 1998. Report to the Air Resources Board on the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant. CARB Scientific Review Panel. Sacramento, CA: CARB. https://www.arb.ca.gov/toxics/dieseltac/part_a.pdf.

South Coast Air Quality Management District. 2015. Final Report Multiple Air Toxics Exposure Study in the South Coast Air Basin. Diamond Bar, CA: USEPA. http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv.

United States Environmental Protection Agency (USEPA). 2016. Gasoline Mobile Source Air Toxics. Washington DC: USEPA. https://www.epa.gov/gasoline-standards/gasoline-mobile-source-air-toxics.

Response to Comment F.8-197:

As this comment accurately states, the EIR estimates that the Project would create 23,675 permanent jobs and have a maximum resident population of 57,150 persons at buildout.[2143] This comment claims that, according to the latest US census figures, the average percent of the U.S. population in the civilian workforce is 63.3 percent. The U.S. Bureau of Labor Statistics indicates that, between January and October 2017, the U.S. civilian labor force participation rate has ranged between 62.7 percent and 63.0 percent, which is comparable to the 63.3 percent figure cited by the Commenter.[2144] Thus, the Commenter's claim that the employed population of the proposed Project is approximately 36,176 is a reasonable estimation.

However, as discussed in response to Comment F.8-82, the Draft EIR never claims or assumes that all jobs created by the Project will be filled by Project residents, as this comment implies. Rather, the Draft EIR and the Centennial Specific Plan Traffic Study, Appendix 5.10-A, *Centennial Traffic Study,* rely on the North County Sub-Area Traffic Demand Forecasting Model (North County Sub-Area Model) to estimate the volume of external and internal trips within the Project area based on parameters such as regional population and employment projections and the relative distances between areas for which trips will be made.[2145] The North County Sub-Area Model was originally developed for use in the Northwest 138 Corridor Improvement Project in conjunction with the Los Angeles County

2143 *Id.,* p. 5.9-1

2144 United States Bureau of Labor Statistics (USBLS). 2017, November 7. Labor Force Statistics from the Current Population Survey. Washington DC: USBLS. https://data.bls.gov/timeseries/LNS11300000.

2145 DRP 2017, p. 5.10-49; DRP 2014a, p. 5.16-25

Metropolitan Transportation Authority (Metro) and Caltrans.[2146] The model is a derivative of the SCAG 2012 RTP/SCS traffic model and is consistent with SCAG's regional population and employment forecasts.[2147] The model was refined for use in the *Antelope Valley Area Plan* (AVAP), which was adopted by the County in June 2015.

As shown in Draft EIR Table 5.10-19 and Traffic Study Table 3-3, the North County Sub-Area Model determined that 52 percent of the average daily total trips generated by the Project would occur external to the Project site. As shown on Traffic Study Table 3-5,[2148] the average external trip generated by the Project would be 45.9 miles in length. Thus, the modeled average external trip length extends to the major employment areas in the vicinity of the Project site, including the City of Bakersfield (approximately 50 miles north), the City of Santa Clarita (approximately 35 miles south), the City of Lancaster (approximately 36 miles east), and the City of Palmdale (approximately 43 miles east).[2149] Indeed, as shown on Draft EIR Exhibit 5.10-7, the vast majority of the Project's external trips will be distributed south to Santa Clarita or east to Lancaster/Palmdale, all of which are well within 45.9 miles of the Project site. As explained in Section 5.11, Air Resources,[2150] vehicle use emissions were calculated on the basis of the traffic data included in the Traffic Study. Accordingly, the EIR's mobile emissions calculations take into account all of the Project's external trips to off-site employment uses, despite this comment's claim to the contrary.

The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[2151] This comment does not question the accuracy of the North County Sub-Area Traffic Model, nor does it provide evidence that the model is unreliable. Please see response to Comment F.8-23 for a more detailed discussion regarding the reliability of the North County Sub-Area Model.

With regard to this comment's claim that the Project would only provide jobs to workers with a specific research and development (R&D) skill set, many of the Project's onsite jobs will be located in areas designated in the Specific Plan as Business Park.[2152] This land use designation provides for a variety of commercial uses in addition to research and development (R&D), including light industrial, manufacturing, professional office, private educational and trade schools and smaller commercial services required to support these uses.[2153] Moreover, the full range of jobs associated with Specific Plan's Business Park, Commercial, Mixed Use, Institutional/Civic, School, and Utility land use designations would provide for a variety jobs that require both skilled and non-skilled workers and which could be filled by residents of the Project with a variety of skill sets and educational backgrounds.

2146 DRP 2017, p. 5.10-3
2147 *Ibid.*
2148 *Id.,* Appendix 5.10-A, p. 3.9
2149 *Id.,* p. 1-2
2150 *Id.,* p. 5.11-18
2151 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362
2152 DRP 2017, p. 5.9-29
2153 *Id.,* Appendix 4.0-A, p. 2-31

With regard to this comment's assertion that the EIR does not propose meaningful air quality mitigation measures, please see response to Comment F.8-198.

In response to this comment, the following document is hereby added to the administrative record:

United States Bureau of Labor Statistics (USBLS). 2017, November 7. Labor Force Statistics from the Current Population Survey. Washington DC: USBLS. https://data.bls.gov/timeseries/LNS11300000.

Response to Comment F.8-198:

This comment's opinion that MMs 11-4, 11-5, and 11-6 are inadequate and fail to address the Project's potential air quality impacts related to external automobile trips is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As this comment accurately notes, and as disclosed in Section 5.11, Air Resources,[2154] the Draft EIR determined that the Project's long-term operational emissions would exceed the AVAQMD annual emissions thresholds and the SCAQMD daily emissions thresholds for VOC, NOx, CO, PM10 and PM2.5. As disclosed in the Draft EIR,[2155] mobile emissions would be the dominant source of NOx, CO, PM10, and PM2.5 emissions, as this comment correctly notes. However, the EIR determined that the dominant source of Project-related VOC emissions would be consumer products, not mobile emissions.[2156]

This comment correctly notes that the Draft EIR identifies MMs 11-4, 11-5, and 11-6 as mitigation measures that would reduce the Project's long-term operational emissions by ensuring that the Project is required to provide adequate bicycle parking, preferential parking for alternative-fueled vehicles, and EV charging infrastructure to serve Project parking lots, parking structures, and residential and non-residential buildings.[2157] For a more detailed discussion of the EV charging infrastructure to be provided by the Project, please see response to Comment F.8-95, which revises MMs 11-4 and 11-6 to clarify their applicability to the Project consistent with the CALGreen Tier 1 voluntary measures.

However, this comment incorrectly claims that the Draft EIR only relies on MMs 11-4, 11-5, and 11-6 to address Project impacts related to mobile emissions. As discussed in response to Comment F.8-96, the Draft EIR also includes 13 additional mitigation measures that will reduce Project mobile emissions, including MM 10-1 (Project intranet to promote carpooling and transit use), MM 10-25 (Mobility Plan), MM 10-26 (Transportation Demand Management), MM 11-2 (off-road emission control equipment requirements), MM 14-1 (complete streets, bicycle rack, and trails requirements), MM 21-4 (off-road equipment idling restrictions), MM 21-14 (affordable housing requirements), MM 21-15 (residential EV charging), MM 21-16 (EV charging infrastructure), MM 21-17 (ZEV preferential parking requirements), MM 21-18 (bicycle parking requirements), MM 21-19 (EV charging

2154 *Id.,* pp. 5.11-52 to -54
2155 *Id.,* p. 5.11-53
2156 *Ibid*.
2157 *Id.,* p. 5.11-54

infrastructure), and MM 21-20 (compliance with regulatory programs). See also response to Comment F.8-204 for a detailed a discussion of the various measures the Project will undertake to reduce its overall emissions profile.

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

Consistent with Smart Growth principles, Medium- to Very High-Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center.[2158] The Town Center of the Project is located in Village 3, and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center.[2159] An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[2160] Moreover, to reduce vehicle miles traveled, the Project includes an integrated network of roadways, walking and biking trails to reduce automobile use and facilitate safe and efficient travel. An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas.[2161] One hundred percent (100 percent) of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[2162]

2158 *Id.,* p. 4-16
2159 *Ibid.*
2160 *Id.,* pp. 4-16 and -17
2161 *Id.,* p. 4-6
2162 *Id.,* Id., pp. 4-16 and -17

Finally, as discussed in response to Comment F.8-79, the Project is required to comply with a variety of legal mandates to reduce project-related mobile emissions, as identified in the following table:

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Building Components/Facility Operations		
Roofs/Ceilings/Insulation	CALGreen Building Code (Title 24, Part 11, "CALGreen") Building Energy Efficiency Standards (Title 24, Part 6)	The Project must comply with efficiency standards regarding roofing, ceilings, and insulation. For example: Roofs/Ceilings: New construction must reduce roof heat island effects per CALGreen Building Code section 106.11.2, which requires use of roofing materials having a minimum aged solar reflectance, thermal emittance complying with section A5.106.11.2.2 and A5.106.11.2.3 or a minimum aged Solar Reflectance Index (SRI) as specified in Tables A5.106.11.2.2, or A5.106.11.2.3. Roofing materials must also meet solar reflectance and thermal emittance standards contained in Title 20 Standards. Roof/Ceiling Insulation: There are also requirements for the installation of roofing and ceiling insulation. (See Title 24, Part 6 Compliance Manual at Section 3.2.2.)
Flooring	CALGreen	The Project must comply with efficiency standards regarding flooring materials. For example, for 80 percent of floor area receiving "resilient flooring," the flooring must meet applicable installation and material requirements contained in CALGreen section 5.504.4.6.
Window and Doors (Fenestration)	Title 24, Part 6	The Project must comply with fenestration efficiency requirements. For example, the choice of windows, glazed doors, and any skylights for the Project must conform to energy consumption requirements affecting size, orientation, and types of fenestration products used. (See Title 24, Part 6 Compliance Manual, Section 3.3.)
Building Walls/Insulation	CALGreen California Energy Code Title 24, Part 6	The Project must comply with efficiency requirements for building walls and insulation. Exterior Walls: Must meet requirements in current edition of California Energy Code, and comply with sections A5.106.7.1 or A5.106.7.2 of CALGreen Building code for wall surfaces, as well as section 5.407.1, which required weather-resistant exterior wall and foundation envelope as required by California Building Code section 1403.2. Construction must also meet requirements contained in Title 24, Part 6, which vary by material

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		of the exterior walls. (See Title 24, Part 6 Compliance Manual, Part 3.2.3.) Demising (Interior) Walls: Mandatory insulation requirements for demising walls (which separate conditioned from non-conditions space) differ by the type of wall material used. (*Id.,* at 3.2.4.) Door Insulation: There are mandatory requirements for air infiltration rates to improve insulation efficiency; they differ according to the type of door. (*Id.,* at 3.2.5.) Flooring Insulation: There are mandatory requirements for insulation that depend on the material and location of the flooring. (*Id.,* at 3.2.6.)
Finish Materials	CALGreen	The Project must comply with pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen section 5.504.4.)
Wet Appliances (Toilets/Faucets/Urinals, Dishwasher/Clothes Washer, Spa and Pool/Water Heater)	CALGreen California Energy Code Title 24, Part 6 Appliance Efficiency Regulations ("Title 20 Standards")	Wet appliances associated with the Project must meet various efficiency requirements. For example: Spa and Pool: Use associated with the Project is subject to appliance efficiency requirements for service water heating systems and equipment, spa and pool heating systems and equipment. (Title 24, Part 6, Sections 110.3, 110.4, 110.5; Title 20 Standards, Sections 1605.1(g), 1605.3(g); see also California Energy Code.) Toilets/Faucets/Urinals: Use associated with the Project is subject to new maximum rates for toilets, urinals, and faucets effective January 1, 2016: • Showerheads maximum flow rate 2.5 gpm at 80 psi • Wash fountains 2.2 x (rim space in inches/20) gpm at 60 psi • Metering faucets 0.25 gallons/cycle • Lavatory faucets and aerators 1.2 gpm at 60 psi • Kitchen faucets and aerators 1.8 gpm with optional temporary flow of 2.2 gpm at 60 psi • Public lavatory faucets 0.5 gpm at 60 psi • Trough-type urinals 16 inches length • Wall mounted urinals 0.125 gallons per flush • Other urinals 0.5 gallons per flush

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		(Title 20 Standards, Sections 1605.1(h),(i) 1065.3(h),(i).) Water Heaters: Use associated with the Project is subject to appliance efficiency requirements for water heaters. (Title 20 Standards, Sections 1605.1(f), 1605.3(f).) Dishwasher/Clothes Washer: Use associated with the Project is subject to appliance efficiency requirements for dishwashers and clothes washers. (Title 20 Standards, Sections 1605.1(o), (p), (q), 1605.3(o), (p), (q).)
Dry Appliances (Refrigerator/Freezer, Heater/Air Conditioner, Clothes Dryer)	Title 20 Standards CALGreen	Dry appliances associated with the Project must meet various efficiency requirements. For example: Refrigerator/Freezer: Use associated with the Project is subject to appliance efficiency requirements for refrigerators and freezers. (Title 20 Standards, Sections 1605.1(a), 1605.3(a).) Heater/Air Conditioner: Use associated with the Project is subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) Clothes Dryer: Use associated with the Project is subject to appliance efficiency requirements for clothes dryers. (Title 20 Standards, Section 1605.1(q).)
	CALGreen	Installations of HVAC, refrigeration and fire suppression equipment must comply with CALGreen Sections 5.508.1.1 and 508.1.2, which prohibits CFCs, halons, and certain hydrochlorofluorocarbons and hydrofluorocarbons.
Lighting	Title 20 Standards	Lighting associated with the Project will be subject to energy efficiency requirements contained in Title 20 Standards. General Lighting: Indoor and outdoor lighting associated with the Project must comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) Emergency lighting and self-contained lighting associated with the Project must also comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(l), 1605.3(l).)

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		Traffic Signal Lighting: For any necessary Project improvements involving traffic lighting, traffic signal modules and traffic signal lamps will need to comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(m), 1605.3(m).)
	Title 24, Part 6	Lighting associated with the Project will also be subject to energy efficiency requirements contained in Title 24, Part 6, which contains energy standards for non-residential indoor lighting and outdoor lighting. (See Title 24 Part 6 Compliance Manual, at Sections 5, 6.) Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation. (*Id.,* at Section 5.) Regulations for outdoor lighting include, for example, creation of lighting zones, lighting power requirements, a hardscape lighting power allowance, requirements for outdoor incandescent and luminaire lighting, and lighting control functionality. (*Id.,* at Section 6.)
	Assembly Bill 1109	Lighting associated with the Project will be subject to energy efficiency requirements adopted pursuant to AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting.
Bicycle and Vehicle Parking	CALGreen	The Project will be required to provide compliant bicycle parking, fuel-efficient vehicle parking, and electric vehicle charging spaces (CALGreen Sections 5.106.4, 5.106.5.1, 5.106.5.3)
	Title 24, Part 6	The Project is also subject to parking requirements contained in Title 24, Party 6. For example, parking capacity is to meet but not exceed minimum local zoning requirements, and the Project should employ approved strategies to reduce parking capacity (Title 24, Part 6, Section 106.6.)
Landscaping	CALGreen	The CALGreen Building Code requires and has further voluntary provisions for: • A water budget for landscape irrigation use; • For new water service, separate meters or submeters must be installed for indoor and

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		outdoor potable water use for landscaped areas of 1,000- 5,000 square feet; • In, non-residential projects with 1,000-2,000 square feet of landscaped areas, install irrigation controllers and sensors that follow specified criteria; • Provide water-efficient landscape design that reduces use of potable water beyond initial requirements for plant installation and establishment.
	Executive Order B-29-15	The Project is also subject to emissions reduction requirements to be achieved by implementation of Executive Order B-29-15. This emergency executive order directs the Department of Water Resources to lead a statewide initiative to replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes. The order also directed the departments to update the Model Water Efficient Landscaping Ordinance, which they did in 2015.
	Model Water Efficient Landscaping Ordinance	The model ordinance promotes efficient landscaping in new developments and establishes an outdoor water budget for new and renovated landscaped areas that are 500 square feet or larger. (California Code of Regulations, Title 23, Division 2, Chapter 2.7.)
	Cap-and-Trade Program	Transportation fuels used in landscape maintenance equipment (e.g., gasoline) would be subject to the Cap-and-Trade program. (See "Energy Use," below.)
Refrigerants	CARB Management of High Global Warming Potential Refrigerants for Stationary Sources	Any refrigerants associated with the Project will be subject to CARB standards. CARB's Regulation for the Management of High Global Warming Potential Refrigerants for Stationary Sources 1) reduces emissions of high-Global Warming Potential refrigerants from leaky stationary, non-residential refrigeration equipment; 2) reduces emissions resulting from the installation and servicing of stationary refrigeration and air conditioning (R/AC) appliances using high-GWP refrigerants; and 3) requires verification of greenhouse gas (GHG) emission reductions. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.)

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Consumer Products	CARB High-Global Warming Potential Greenhouse Gases in Consumer Products	All consumer products associated with the project will be subject to CARB standards. CARB's consumer products regulations set volatile organic compound (VOC) limits for numerous categories of consumer products, and limits the reactivity of the ingredients used in numerous categories of aerosol coating products (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 8.5.)
Construction		
Use of Off-Road Diesel Engines, Vehicles, and Equipment	CARB In-Use Off-Road Diesel Vehicle Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits). The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.
	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in equipment operation would be subject to the Cap-and-Trade Program. (See "Energy Use," below.)
Pollutant Control	CALGreen	If an HVAC system is used during construction, the Project must use return air filters with a MERV of 8, based on ASHRAE 52.2-1999, or an average efficiency of 30 percent based on ASHRAE 5.2.1-1992. All filters must be replaced immediately prior to occupancy. (CALGreen Section A5.504.1.3.)
Greening New Construction	CALGreen	All new construction, including the Project, must comply with the California Green Building Code, or "CALGreen", as discussed in more detail throughout this table. Adoption of the mandatory CALGreen standards for commercial construction has been essential for improving the overall environmental performance of new commercial buildings; it also sets voluntary targets for builders to exceed the mandatory requirements.

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Construction Waste	CALGreen	The Project will be subject to CALGreen requirements for construction waste reduction, disposal, and recycling, such as a requirement to recycle and/or salvage for reuse a minimum of 50 percent of the non-hazardous construction waste in accordance with Section 5.408.1.1, 5.408.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
Worker, vendor and truck vehicle trips (on-road vehicles)	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in worker, vendor and truck vehicle trips would be subject to the Cap-and-Trade Program. (See "Energy Use," below.)
Solid Waste		
Solid Waste Management	Landfill Methane Control Measure	Waste associated with the Project will be disposed per state requirements for landfills, material recovery facilities, and transfer stations. Per the statewide GHG emissions inventory, the largest emissions from waste management sectors come from landfills, and are in the form of methane. In 2010, CARB adopted a regulation that reduces emissions from methane in landfills, primarily by requiring owners and operators of certain uncontrolled municipal solid waste landfills to install gas collection and control systems, and requires existing and newly installed gas and control systems to operate in an optimal manner. The regulation allows local air districts to voluntarily enter into a memorandum of understanding with CARB to implement and enforce the regulation and to assess fees to cover costs of implementation.
	Mandatory Commercial Recycling (AB 341)	AB 341 will require the Project, if it generates four cubic yards or more of commercial solid waste per week, to arrange for recycling services, using one of the following: self-haul; subscribe to a hauler(s); arranging for pickup of recyclable materials; subscribing to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation. The Project will also be subject to local commercial solid waste recycling program required to be implemented by each jurisdiction under AB 341.
	CALGreen	The Project will be subject to CALGreen requirement to provide areas that serve the entire building and are identified for the depositing, storage and collection of nonhazardous materials for recycling (CALGreen Section 5.410.1.)

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Energy Use		
Electricity/Natural Gas Generation	Cap-and-Trade Program	Electricity and natural gas usage associated with the Project will be subject to the Cap-and-Trade Program. The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO2e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.
Energy Efficiency	Zero Net Energy Buildings (Title 24, Part 6)	The Project will be subject to net energy construction requirements contained in Title 24, Part 6. California revised building energy efficiency requirements contained in Title 24 in 2014 to require that all residential buildings be Zero Net Energy by 2020, and all commercial buildings must follow suit by 2030. MMs 21-2 and 21-3 further obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent.
Renewable Energy	California Renewable Portfolio Standards (RPS) (Senate Bill X1-2 and 350)	Energy providers associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350. SB X1-2 requires IOUs, POUs, and ESPs to increase purchases of renewable energy such that at least 33 percent of retail sales are procured from renewable energy resources by December 31, 2020. In the interim each entity was required to procure an average of 20 percent of renewable

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		energy for the period of January 1, 2011 through December 31, 2013; and will be required to procure an average of 25 percent by December 31, 2016, and 33 percent by 2020. Senate Bill 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030.
	Million Solar Roofs Program (Senate Bill 1)	The Project will participate in California's energy market, which is affected by implementation of the Million Solar Roofs Program. As part of Governor Arnold Schwarzenegger's Million Solar Roofs Program, California has set a goal to install 3,000 megawatts of new, solar capacity by 201. The Million Solar Roofs Program is a ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time.
	California Solar Initiative - Thermal Program	The Project will participate in California's energy market, which is affected by implementation of the California Solar Initiative -Thermal Program. The program offers cash rebates of up to $4,366 on solar water heating systems for single-family residential customers. Multifamily and Commercial properties qualify for rebates of up to $800,000 on solar water heating systems and eligible solar pool heating systems qualify for rebates of up to $500,000. Funding for the CSI-Thermal program comes from ratepayers of PG&E, SCE, SoCalGas, and SDG&E. The rebate program is overseen by the California Public Utilities Commission as part of the California Solar Initiative.
	Waste Heat and Carbon Emissions Reduction Act (AB 1613, AB 2791)	The Project will participate in California's energy market, which is affected by implementation of the Waste Heat and Carbon Emissions Reduction Act. Originally enacted in 2007 and amended in 2008, this act directed the CEC, PUC, and CARB to implement a program that would encourage the development of new combined heat and power systems in California with a generating capacity of not more than 20 megawatts, to increase combined heat and power use by 30,000 GWh. The CPUC publicly owned electric utilities, and CEC duly established policies and procedures for the purchase of electricity from eligible combined heat and power systems. CEC guidelines require combined heat and power systems to be designed to reduce waste energy;

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		have a minimum efficiency of 60 percent; have NOx emissions of no more than 0.07 pounds per megawatt-hour; be sized to meet eligible customer generation thermal load; operate continuously in a manner that meets expected thermal load and optimizes efficient use of waste heat; and be cost effective, technologically and feasible, environmentally beneficial.
Vehicular/Mobile Sources		
General	SB 375 and SCAG RTP/SCS	The Project complies with, and is subject to, the SCAG adopted RTP/SCS, which CARB approved as meeting its regional GHG targets in 2016.
Fuel	Low Carbon Fuel Standard (LCFS)/ Executive Order S-01-07	Auto trips associated with the Project will be subject to LCFS (Executive Order S-01-07), which requires a 10 percent or greater reduction in the average fuel carbon intensity by 2020 with a 2010 baseline for transportation fuels in California regulated by CARB. The program establishes a strong framework to promote the low carbon fuel adoption necessary to achieve the Governor's 2030 and 2050 greenhouse gas goals.
	Cap-and-Trade Program	Use of gasoline associated with the Project will be subject to the Cap-and- Trade Program. The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO2e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.
Automotive Refrigerants	CARB Regulation for Small Containers of Automotive Refrigerant	Vehicles associated with the project will be subject to CARB's Regulation for Small Containers of Automotive Refrigerant. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		95360 et seq.) The regulation applies to the sale, use, and disposal of small containers of automotive refrigerant with a GWP greater than 150. The regulation achieves emission reductions through implementation of four requirements: 1) use of a self-sealing valve on the container, 2) improved labeling instructions, 3) a deposit and recycling program for small containers, and 4) an education program that emphasizes best practices for vehicle recharging. This regulation went into effect on January 1, 2010 with a one-year sell-through period for containers manufactured before January 1, 2010. The target recycle rate is initially set at 90 percent and rises to 95 percent beginning January 1, 2012.
Light-Duty Vehicles	Assembly Bill 1493 (or the Pavley Standard)	Cars that drive to and from the Project will be subject to AB 1493, which directed the Air Resources Board (CARB) to adopt a regulation requiring the maximum feasible and cost-effective reduction of greenhouse gas (GHG) emissions from new passenger vehicles. Pursuant to AB 1493, CARB adopted regulations that establish a declining fleet average standard for carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), and hydrofluorocarbons (air conditioner refrigerants) in new passenger vehicles and light-duty trucks beginning with the 2009 model year and phased-in through the 2016 model year. These standards are divided into those applicable to lighter and those applicable to heavier portions of the passenger vehicle fleet. The regulations will reduce "upstream" smog-forming emissions from refining, marketing, and distribution of fuel.
	Advanced Clean Car and Zero Emissions Vehicle (ZEV) Programs	Cars that drive to and from the Project will be subject to the Advanced Clean Car and Zero Emissions Vehicle Programs. In January 2012, the Air Resources Board approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards called Advanced Clean Cars. By 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. The ZEV program will act as the focused technology of the Advanced Clean Cars program by requiring

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018-2025 model years.
	Tire Inflation Regulation	Cars that drive to and from the Project will be subject to the CARB Tire Inflation Regulation, which took effect on September 1, 2010, and applies to vehicles with a gross vehicle weight rating (GVWR) of 10,000 pounds or less. Under this regulation, automotive service providers must, inter alia, check and inflate each vehicle's tires to the recommended tire pressure rating, with air or nitrogen, as appropriate, at the time of performing any automotive maintenance or repair service, and to keep a copy of the service invoice for a minimum of three years, and make the vehicle service invoice available to the CARB, or its authorized representative upon request.
	EPA and NHTSA GHG and CAFE standards.	Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles. (75 FR 25324–25728 and 77 FR 62624–63200.)
Medium- and Heavy-Duty Vehicles	CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation (Truck and Bus Regulation)	Any heavy-duty trucks associated with the Project will be subject to CARB standards. The regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet PM filter requirements. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. The regulation applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds.
	CARB In-Use Off-Road Diesel Vehicle Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits). The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.
	Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation applies to heavy-duty tractors that pull 53-foot or longer box- type trailers. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.) Fuel efficiency is improved through improvements in tractor and trailer aerodynamics and the use of low rolling resistance tires.
	EPA and NHTSA GHG and CAFE standards.	Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for medium- and heavy-duty vehicles. (76 FR 57106–57513.)
Water Use		
Water Use Efficiency	Emergency State Water Board Regulations	Water use associated with the Project will be subject to recent emergency regulations. On May 18, 2016, partially in response to Executive Order B-27-16, the State Water Board adopted emergency water use regulations (California Code of Regulations, title 23, section 864.5 and amended and re-adopted sections 863, 864, 865, and 866). The regulation directs the State Water Board, Department of Water Resources, and Public Utilities Commission to implement rates and pricing structures to incentivize water conservation, and calls upon water suppliers, homeowners' associations, California businesses, landlords and tenants, and wholesale water agencies to take stronger conservation measures.
	Executive Order B-37-16	Water use associated with the Project will be subject to Emergency Executive Order B-37-16, issued May 9, 2016, which directs the State Water Resources Control Board to adjust emergency water conservation regulations through the end of January 2017 to reflect differing water supply conditions across the state.

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		The Water Board must also develop a proposal to achieve a mandatory reduction of potable urban water usage that builds off the mandatory 25 percent reduction called for in Executive Order B-29-15. The Water Board and Department of Water Resources will develop new, permanent water use targets to which the Project will be subject. The Water Board will permanently prohibit water-wasting practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non- recirculated water in a fountain or other decorative water feature; watering lawns in a manner that causes runoff, or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians.
	Executive Order B-40-17	Executive Order B-40-17 lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. It also rescinds Executive Order B-29-15, but expressly states that Executive Order B-37-16 remains in effect and directs that State Water Resources Control Board to continue development of permanent prohibitions on wasteful water use to which the Project will be subject.
	Senate Bill X7-7	Water provided to the Project will be affected by Senate Bill X7-7's requirements for water suppliers. Senate Bill X7-7, or the Water Conservation Act of 2009, requires all water suppliers to increase water use efficiency. It also requires, among other things, that the Department of Water Resources, in consultation with other state agencies, develop a single standardized water use reporting form, which would be used by both urban and agricultural water agencies.
	CALGreen	The Project is subject to CALGreen's water efficiency standards, including a required 20 percent mandatory reduction in indoor water use. (CALGreen, Division 4.3.)
	California Water Code, Division 6, Part 2.10, Sections 10910–10915.	Development and approval of the project requires the development of a project-specific Water Supply Assessment.
	Kern County Landscaping	The project would be subject to Kern County's Landscaping Requirements and Water Efficient

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	Requirements and Water Efficient Landscaping.	Landscaping ordinances. (Kern County Code of Ordinances, Title 19, Chapter 19.86, Sections 19.86.050 and 19.86.060.)
	Cap-and-Trade Program	Electricity usage associated with water and wastewater supply, treatment and distribution would be subject to the cap-and-trade program.
	California Renewable Portfolio Standards (RPS) (Senate Bill X1-2 and 350)	Electricity usage associated with water and wastewater supply, treatment and distribution associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350.
Water Recycling	Water Reclamation Requirements for Recycled Water Use. SWRCB Order WQ 2016-0068- DDW	These requirements replace 2014-0090-DWQ General Waste Discharge Requirements for Recycled Water Use and establish standard conditions for recycled water use and conditionally delegates authority to an Administrator to manage a Water Recycling Program and issue Water Recycling Permits to recycled water users. Only treated municipal wastewater for non-potable uses can be permitted, such as landscape irrigation, crop irrigation, dust control, industrial/commercial cooling, decorative fountains, etc. Potable reuse is not covered.
	Regulations for Groundwater Replenishment Using Recycled Water	This emergency rulemaking by the California Department of Public Health (California Title of Regulations, Title 22, Sections 60301.050 et seq.), effective June 18, 2014, applied to Groundwater Replenishment Reuse Projects (GRRPs) utilizing surface application, which received initial permits from the Regional Board. The regulations address permitting and plan approval, sampling requirements, operation requirements, and ongoing reporting requirements.
	Policy for Water Quality Control for Recycled Water. SWRCB Resolution No. 2009-, as amended by Resolution No. 2013-0003	The project would be subject to the State Water Resources Control Board statewide mandate to increase recycled water usage by 0.2 million acre-feet per year by 2020.

Response to Comment F.8-199:

The Commenter's observation that the Project impacts area where attainment planning for air quality standards is challenging is noted. This comment's assertion that the EIR understates "the magnitude of problem and impacts" is not supported by the facts. Indeed, Section 5.11.2, Air Resources,[2163] discloses that the Western MDAB, over which the AVAQMD has jurisdiction, has not yet demonstrated attainment for O3, but explains that the AVAQMD's Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area) demonstrates that the AVAQMD will attain the 1997 8-hour O3 NAAQS by 2021. Moreover, Section 5.11.2[2164] also discloses that the SoCAB, over which the SCAQMD has jurisdiction, has been designated nonattainment for various O3 and PM2.5 NAAQS, but explains that the SCAG 2016 AQMP sets forth measures to attain such standards as follows: 8-hour O3 (75 parts per billion [ppb]) by 2031; Annual PM2.5 by 2025; 8-hour O3 (80 ppb) by 2023; 1-hour O3 (120 ppb) by 2022; 24-hour PM2.5 by 2019.

The Commenter's request states that the "The EIR must also prepare proper modeling to analyze the potential for drift and project emissions from mobile sources as they would be affecting the Mojave Desert and San Joaquin Valley Air Basin". The Commenter's request for air basin scale modeling for an individual project is not consistent with the assessment recommendations established by air districts within the State of California for project-level analyses, as discussed in response to Comment F.8-195. This comment accurately notes that ozone and particulate matter are capable of being transported between air basins, as discussed in response to Comment F.8-195. This comment also accurately notes that the Project has the potential to generate emissions in the South Coast, Mojave Desert and San Joaquin Air Basins, as disclosed in Section 5.11, Air Resources, and as discussed in response to Comment F.8-195. With regard to this comment's assertion that the EIR needs to fully analyze the Project's potential impacts on adjacent air basins, please see response to Comment F.8-195. Contrary to this comment's claim, the Draft EIR does not simply assert that the Project will only affect air basins where the Project is physically located, as explained in response to Comment F.8-195.

The Draft EIR takes a conservative approach to analyzing the Project's overall emissions against the AVAQMD's and SCAQMD's thresholds of significance. Specifically, in both cases, the Draft EIR assumes that all of the Project's vehicle miles traveled (VMT) would occur in the air basin over which the relevant air district has jurisdiction. Thus, when assessing the significance of Project air emissions against the SCAQMD thresholds, the Draft EIR assumes that the Project's total VMT would occur in the SoCAB. Likewise, when assessing the significance of Project emissions against the AVAQMD's threshold, the Draft EIR assumes that the Project's total VMT would occur in the MDAB.

In response to this comment, for informational purposes only, Project vehicle miles traveled (VMT) has been disaggregated by the air district where such VMT is projected to occur, as

[2163] *Id.,* p. 5.11-14
[2164] *Id.,* pp. 5.11-15 and -16

set forth in Final EIR Appendix 5.11-E, Supplemental Information Concerning Centennial Air Quality Analysis. Of this total VMT, 43.11 percent would occur in the portion of the MDAB under the jurisdiction of the AVAQMD, and 44.37 percent would occur within the portion of the SoCAB under the jurisdiction of the SCAQMD. The remaining Project VMT is distributed as follows: 11.26 percent within the portion of the SJVAB under the jurisdiction of the SJVAPCD; 0.89 percent within the portion of the MDAB under the jurisdiction of the EKAPCD; 0.37 percent within the portion of the SCCAB under the jurisdiction of the VCAPBD. Project mobile emissions occurring within each air district are set forth in Tables 7 and 8 of Final EIR Appendix 5.11-E.

Response to Comment F.8-200:

Without explanation or supporting evidence, this comment claims that the EIR air quality analysis overestimates the internal traffic capture rate and fails to project an accurate trip length. As discussed in responses to Comments F.8-82 and F.8-197, the Draft EIR and its Traffic Study rely on the North County Sub-Area Model to estimate the volume and length of the Project's external and internal vehicle trips based on parameters such as regional population and employment projections and the relative distances between areas for which trips will be made.[2165] The North County Sub-Area Model was originally developed for use in the Northwest 138 Corridor Improvement Project in conjunction with Los Angeles County Metropolitan Transportation Authority (Metro) and Caltrans.[2166] The model is a derivative of the SCAG 2012 RTP/SCS traffic model and is consistent with SCAG's regional population and employment forecasts.[2167] The model was refined for use in the *Antelope Valley Area Plan* (AVAP), which was adopted by the County in June 2015. The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[2168] This comment does not question the accuracy of the North County Sub-Area Traffic Model, nor does it provide evidence that the model is unreliable. Please see response to Comment F.8-23 for a more detailed discussion of the reliability of the North County Sub-Area Traffic Model.

As shown in Draft EIR Table 5.10-19 and Traffic Study Table 3-3, the North County Sub-Area Model determined that 52 percent of the average daily total trips generated by the Project would occur external to the Project site and 48 percent would occur internal to the site. As shown on Traffic Study Table 3-5,[2169] the average external trip generated by the Project would be 45.9 miles long, whereas the average internal trip would be 3.4 miles long. Thus, the modeled average external trip length extends to the major employment areas in the vicinity of the Project site, including the City of Bakersfield (approximately 50 miles north), the City of Santa Clarita (approximately 35 miles south), the City of Lancaster (approximately 36 miles east), and the City of Palmdale (approximately 43 miles east).[2170] Indeed, as shown on Draft EIR Exhibit 5.10-7, the of vast majority of the Project's external trips will be

2165 *Id.*, p. 5.10-49; DRP 2014a, p. 5.16-25
2166 DRP 2017, p. 5.10-3
2167 *Ibid.*
2168 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362
2169 DRP 2017, Appendix. 5.10-A, p. 3.9
2170 *Id.,* p. 1-2

distributed south to Santa Clarita or east to Lancaster/Palmdale, all of which are well within 45.9 miles of the Project site. As explained in Section 5.11, Air Resources,[2171] vehicle use emissions were calculated on the basis of the traffic data included in the Traffic Study. Accordingly, the EIR's mobile emissions calculations take into account all of the Project's external trips to off-site employment uses, despite this comment's claim to the contrary.

The Lead Agency disagrees with this comment's assertion that the Draft EIR ignores the existing jobs/housing imbalance in the Project area, and it disagrees that the region will be unable to provide jobs for Project residents. As an initial matter, the jobs/housing balance in the AVAP planning area was 1.3 before the AVAP was adopted and the jobs/housing balance upon buildout of the AVAP planning area is projected to be 1.3.[2172] This ratio is within the range for an ideal jobs-housing balance, as determined by leading experts.[2173] Thus, the County does not agree with this comment's claim that there is an existing jobs/housing imbalance in the Project area.

The County also disagrees with this comment's claim that the region will be unable to provide jobs to Project residents. As discussed in Section 5.9, *Population, Housing, and Employment*, SCAG projects that regional employment between 2012 and 2040 will increase by approximately 2.432 million jobs or at a rate of 1.17 percent per year to 2040.[2174] SCAG projects that the North Los Angeles County Subregion will experience a higher job growth rate than the County as a whole.[2175] As shown in Draft EIR Table 5.9-19 between 2020 and 2035, the North Los Angeles County Subregion is projected to experience a 22.1 percent increase in employment, compared to an 8.6-percent increase in the County as a whole.[2176] Between 2035 and 2040, the job base in this Subregion would increase by another 8.7 percent.[2177] This Subregion is projected to account for 12.3 percent of the County's new job growth between 2020 and 2040.[2178] At the TAZ level, SCAG projects a 6,643-job increase from 2012 to 2020 for TAZ 202800000 (which includes the Project site north of SR-138) and a 2,855-job increase for TAZ 20281000 (which includes the Project site south of SR-138) for the same time period.[2179] An increase of 16,766 jobs for TAZ 202800000 but 468 new jobs for TAZ 20281000 are expected from 2012 to 2040.[2180] A total of 23,931 jobs in both TAZs is projected by 2040.[2181] The Project's 23,675 jobs would represent 98.93 percent of the projected 2040 jobs base of 23,931 jobs in both TAZs.[2182]

As discussed in response to Comment F.8-20, the AVAP establishes a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs. The Project would implement this strategy

2171 *Id.,* p. 5.11-18
2172 DRP 2014a, p. 5.13-6
2173 *Ibid.*
2174 DRP 2017, p. 5.9-18
2175 *Id.,* p. 5.9-19
2176 *Id.,* p. 5.9-20
2177 *Ibid.*
2178 *Ibid.*
2179 *Id.,* p. 5.9-29
2180 *Ibid.*
2181 SCAG 2012e, 2015d
2182 *Ibid.*

through the development of commercial and business park uses on the site and along SR-138, for use by high-tech manufacturing, transportation, and logistics companies. In addition, commercial areas, schools, and institutional uses are proposed within the residential villages, which would also increase the employment base at the site and in the area. The Project's 23,675 new jobs would expand the employment base in an area that is largely rural residential in land use and would improve the jobs-housing ratio in the Antelope Valley. While the Project would have an on-site jobs-housing ratio of 1.22 at buildout, the Project would create jobs in the West EOA where job growth is planned by the County and in areas that are designated for non-residential development on the AVAP's Land Use Policy Map. Thus, the Project would positively contribute to the attainment of the target jobs/housing ratio of 1.3 jobs per dwelling unit for the unincorporated area of the Antelope Valley.

The Commenter cites *Kings County Farm Bureau v. City of Hanford* ("*Kings County*") to support its claim that the EIR's air quality analysis is inadequate for purportedly underestimating average Project vehicle trip lengths. In that case, however, the Court rejected an EIR for coal-fired cogeneration plan for improperly limiting the scope of its cumulative air quality impact analysis to only considering the cumulative impacts of the Project and other coal-fired cogeneration plants located in a small portion of the San Joaquin Valley Air Basin, rather than considering all 116 cogeneration plants located in the entire Air Basin.[2183] Kings County, however, is inapplicable to this EIR because it does not rely on the "list of projects" method of evaluating a project's cumulative impacts authorized by CEQA Guidelines §15130(b), as was the case in *Kings County*. Rather, this EIR relies on the "summary of projections" approach to cumulative impact analysis authorized by CEQA Guidelines §15130(b), having determined that the "list of projects" approach "would capture only a portion of the expected growth in the area" and would thus be insufficiently conservative [2184] This EIR thus evaluates the Project cumulative effects in a manner that accounts for the total regional growth projections described in the County's General Plan, the AVAP, and the SCAG 2016 RTP/SCS.[2185] Thus, unlike the EIR in *Kings County*, this EIR did not artificially narrow the scope of its cumulative impact analysis by only considering a list of projects confined to a small geographic area.

In support of its claim that Los Angeles County, Kern County, and San Bernardino County rank among the nation's worst in overall ozone and PM 2.5 pollution, the Commenter cites to *State of the Air 2016*, a document prepared by the American Lung Association. This document is addressed in response to Comment F.8-189. It should be noted, however, that the cited document confirms the ALA's determination that that Southern California shows a "continued reduction in ozone and particle pollution as well as other pollutants for decades" thanks to stronger regulatory standards for pollutants and pollution sources.[2186]

[2183] 221 Cal.App.3d 692, 722-72
[2184] DRP 2017, p. 7-3
[2185] *Id.*, p. 7-3 to -5
[2186] American Lung Association 2016, p. 4

Please see response to Comments F.8-189 for a discussion of the Project's potential air quality impacts on Southern California air basins, including the South Coast Air Basin, South Coast Air Basin, San Joaquin Valley Air Basin, and Mojave Desert Air Basin.

With regard to this comment's assertion that the Project constitutes "leapfrog development," please see response to Comments F.8-20.

Response to Comment F.8-201:

With regard to this comment's concerns regarding MM 11-4, please see response to Comment F.8-95, which revises MM 11-4 to specify the conditions under which multiple charging spaces will be required, consistent with 2016 CALGreen Code Tier 1 voluntary measures.

With regard to this comment's concerns regarding MM 11-6, please see response to Comment F.8-95, which revises MM 11-6 to specify the conditions under which multiple charging spaces will be required in parking structures with 20 or more parking spaces and multifamily residential buildings, consistent with 2016 CALGreen Code Tier 1 voluntary measures.

With regard to this comment's claim that the Draft EIR makes no mention of making electric charging stations accessible to residential buildings, please see response to Comment F.8-95, which revises MMs 11-6 and 21-19 to specify the conditions under which multiple charging spaces will be required in multifamily residential buildings, consistent with 2016 CALGreen Code Tier 1 voluntary measures. Response to Comment F.8-95 also revises MM 21-15 to clarify that the Project shall install one 208/240 VAC receptacle that may be used for charging electric vehicles in each detached and attached single-family home in a manner consistent with 2016 CALGreen Code Tier 1 voluntary measures.

As this comment correctly explains, CEQA Guidelines §15126.4(a)(2) requires that Project mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. All mitigation measures adopted for the Project will be included in the Project's enforceable Mitigation Monitoring and Reporting Program (MMRP) and Project compliance with the MMRP will be incorporated as an enforceable condition of Project approval, including approval of all Project tentative subdivision maps.

The Lead Agency disagrees with this comment's claim that the Draft EIR does almost nothing to facilitate the use of electric vehicles. Indeed, the mitigation measures described above go well beyond the mandatory regulatory requirements with respect to the provision of EV charging infrastructure, as discussed in detail in response to Comment F.8-95.

Response to Comment F.8-202:

This comment accurately states that MM 11-5 requires the Project's plans and specifications for residential, hotel and motel buildings to provide adequate short-term and long-term bicycle parking to promote bicycle use. This comment is also correct that MM 11-5 supplements other proposed measures that would promote bicycle use in the Centennial

Specific Plan area, such as the Project's proposed multi-modal trails network and its "smart growth" land use plan, which sites commercial and civic uses in close proximity to residential uses and bicycle infrastructure. As this comment accurately notes, such measures should be encouraged as they will reduce vehicle trips and related mobile emissions.

The County disagrees with this comment's speculation that the occasional heat wave presents a significant obstacle to widespread adoption of bicycle use by Specific Plan residents and visitors. As explained on page 3-2 of the Draft EIR, temperatures in the area rarely exceed 100 degrees Fahrenheit (°F) and the average temperature in the vicinity between 2012 and 2014 was 67 °F. Indeed, the average temperatures of Neenach, CA, just east of the Project site, are similar to the average temperatures of Davis, CA.[2187,2188] According to CARB, the City of Davis has the highest per capita rate of bicycling in the United States due to its land use and transportation policies that place a strong emphasis on the provision of adequate and safe bicycle facilities similar to those that would be provided by the Project.[2189] Accordingly, the occasional heat wave is not expected to present a significant obstacle to the use of bicycle transportation by Project residents and visitors.

This comment's concerns related to bicycle use for trips external to the Project site are noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. As explained in Section 5.10, Traffic Access and Circulation, as part of the Project's overall transportation demand management (TDM) strategy to reduce the dependence on the private automobile, which would result in a consequential reduction in overall volume of Project-generated trips off site, the Project Applicant will be required to participate in or form a Transportation Management Association (TMA) to serve the residents and employees of businesses within the Project area or will be organized in conjunction with an existing organization in the Antelope Valley or Santa Clarita area. If the former, the Centennial TMA will specifically develop strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. Such coordination will also help match ride sharers and provide information on transit options. The TMA's purpose will be to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. Commuter buses that may be utilized by Project residents to travel to and from the Santa Clarita Valley, Antelope Valley and the Tejon Ranch Commerce Center are expected to lead to 100 less vehicle trips to and from the Santa Clarita Valley and 50 less vehicle trips to and from the Antelope Valley during peak hours on weekdays.

Rideshare programs are also expected to lead to a net reduction of single occupancy vehicle trips to (AM) and from (PM) the Santa Clarita Valley and a net reduction of single occupancy vehicle trips from (AM) and to (PM) the Antelope Valley. A total of 200 vehicle trips to and from the Santa Clarita Valley and 110 trips to and from the Antelope Valley would be reduced

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2187 Weatherbase.com. 2017a. *Metrological Data for Neenach, California*. http://www.weatherbase.com/weather/weather.php3?s=221640.

2188 Weatherbase.com. 2017b. *Metrological Data for Davis, California*. http://www.weatherbase.com/weather/weather.php3?s=492240&cityname=Davis-California-United-States-of-America.

2189 California Air Resources Board (CARB). 2017. *ARB Bicycle Awareness Program*. Sacramento, CA: CARB. https://www.arb.ca.gov/planning/tsaq/bicycle/factsht.htm.

by commuter buses and rideshare programs. Under MM 10-26, TDM measures such as the transit and rideshare program will be implemented at the onset of Project development, although conceivably on a smaller scale and expanded as demand increases through buildout.

In response to this comment, the following documents are added to the administrative record:

California Air Resources Board (CARB). 2017. *ARB Bicycle Awareness Program*. Sacramento, CA: CARB. https://www.arb.ca.gov/planning/tsaq/bicycle/factsht.htm.

Weatherbase.com. 2017a. *Metrological Data for Neenach, California*. http://www.weatherbase.com/weather/weather.php3?s=221640.

Weatherbase.com. 2017b. *Metrological Data for Davis, California*. http://www.weatherbase.com/weather/weather.php3?s=492240&cityname=Davis-California-United-States-of-America.

Response to Comment F.8-203:

This comment accurately quotes Public Resources Code §21100(b)(3) and its requirement that the EIR set forth feasible mitigation measures to minimize significant environmental effects of the Project. This comment also accurately quotes CEQA Guidelines §15126.4(a)(1)(B) and its requirement that the EIR discuss mitigation options and the basis for selecting a particular mitigation measure. Finally, this comment accurately quotes Public Resources Code §21002 and its statement that lead agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures that will avoid or substantially lessen the significant environmental effects of such projects.

Please see response to Comment F.8-204, which addresses mitigation measures proposed by the Commenter for inclusion in the EIR.

Response to Comment F.8-204:

This response addresses the Commenter's suggestion for the addition of mitigation for air quality and greenhouse gas impact suggested by: (1) the San Joaquin Valley Air Pollution Control District in 2006-2012 ("SJVAPCD List"); (2) the Bay Area Air Quality Management District in 2011 ("BAAQMD List"); (3) the Sacramento Metropolitan Air Quality Management District in 2016 ("SMAQMD List"); (4) the San Luis Obispo County Air Pollution Control District in 2012 ("SLOAPCD List"); (5) the California Air Pollution Control Officers' Association list in 2008 ("CAPCOA List"); and (6) the California Attorney General's Office in 2010 ("AG List"). Further information about each of these lists follows, and each listed measure and a corresponding response is included in the tables that follow.

- The SJVAPCD List includes clusters of GHG measures by topic (e.g., transit infrastructure, rideshare operational, etc.). All of these topical clusters are reprinted and responded to in the table below. Following the clusters of identified measures by

topic, the SJVAPCD provides a long list of individual, uncategorized mitigation measures, many of which overlap with measures included in the topical clusters. To the extent they overlap, they have not been reproduced twice, but all new measures that appear in the individual list are reprinted and responded to in the tables below. Per the website at which the list is available, the SJVAPCD last updated the list in 2012.[2190] The Project is not located within the jurisdictional boundaries of the SJVAPCD, and the SJVAPCD list is an advisory guidance for consideration by lead agencies within the SJVAPCD that is not required to be implemented even within the SJVAPCD by law or regulation, or SJVAPCD rule.

- The BAAQMD List includes GHG measures to reduce operational-related emissions of criteria air pollutants, precursors, and GHGs from mobile, area, and stationary sources.[2191] Each of these is reprinted and responded to in the tables, below. The Project is not located within the jurisdictional boundaries of the BAAQMD, and the BAAQMD list is an advisory guidance for consideration by lead agencies within the BAAQMD that is not required to be implemented even within the BAAQMD by law or regulation, or BAAQMD rule.
- The SMAQMD List includes measures available to reduce ozone precursor, particular matter and GHG emissions from project.[2192] The Project is not located within the jurisdictional boundaries of the SMAQMD, and the BAAQMD list is an advisory guidance for consideration by lead agencies within the SMAQMD that is not required to be implemented even within the SMAQMD by law or regulation, or SMAQMD rule.
- The SLOAPCD List includes measures available to reduce ozone precursor, particulate, diesel particular, and GHG emissions from residential, commercial, and industrial land uses.[2193] The Project is not located within the jurisdictional boundaries of the SLOAPCD, and the SLOAPCD list is an advisory guidance for consideration by lead agencies within the SLOAPCD that is not required to be implemented even within the SLOAPCD by law or regulation, or SLOAPCD rule.
- The CAPCOA List identifies measures to reduce a project's GHG emissions.[2194] CAPCOA is not a public agency, and its list is advisory. The CAPCOA list is included in

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2190 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2017 (November, accessed). San Joaquin Valley Air Pollution Control District Mitigation Measures. http://www.valleyair.org/transportation/Mitigation-Measures.pdf.

2191 Bay Area Air Quality Management District (BAAQMD). 2011 (May). California Environmental Quality Act Air Quality Guidelines. San Francisco, CA: BAAQMD. http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines%20May%202011.ashx?la=en.

2192 BAAQMD. 2016 (September 26). *Recommended Guidance for Land Use Emission Reductions Version 3.3 (for Operational Emissions)*. San Francisco, CA: BAAQMD. http://www.airquality.org/LandUseTransportation/Documents/SMAQMD%20Land-Use-Emission-Reductions-FINALv3-3.pdf.

2193 San Luis Obispo County Air Pollution Control District (SLOAPCD). 2012 (April). CEQA Air Quality Handbook: A Guide for Assessing the Air Quality Impacts for Projects Subject to CEQA Review. San Luis Obispo, CA: SLOAPCD. http://www.slocleanair.org/images/cms/upload/files/CEQA_Handbook_2012_v2%20%28Updated%20November%202017%29_LinkedwithMemo%281%29.pdf.

2194 California Air Pollution Control Officers Association (CAPCOA). 2008 (January). CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. Sacramento, CA: CAPCOA. http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf.

an informational report that expressly clarifies that it is not intended to, and has no, regulatory or legal status.

- The Commenter provided a 2010 list prepared by the Attorney General (AG). The AG List is advisory, and listed measures are not required to be implemented by law or statute. The AG list no longer appears on the AG's GHG or CEQA website. Instead, the AG website identifies and links to a separate report prepared in 2008 by the California Office of Planning & Research, which includes a list of GHG measures as Attachment 3 ("2008 OPR List").[2195] The 2008 list is advisory, and listed measures are not required to be implemented by law or statute. This response considers all measures in both the AG List and 2008 OPR List.

Although not specifically identified by the Commenter, two additional lists of GHG measures were issued following publication of the Draft EIR. The measures on these two new lists are likewise addressed in the tables that follow:

- The 2017 Office of Planning and Research General Plan Guidelines, Appendix A: Example Model Goals, Objectives, and Policies and Programs ("2017 OPR List"), contains examples of mitigation measures that lead agencies could require of individual projects. These are organized into construction and operations related measures.[2196] The 2017 OPR List is advisory, and listed measures are not required to be implemented by law or statute.
- The CARB 2017 Draft Scoping Plan, Appendix B: Local Action ("CARB List"), contains examples of potentially feasible mitigation measures that could be considered for individual projects when a local jurisdiction is the lead agency. These are organized into construction and operations related measures.[2197] CARB's list is likewise advisory,

The tables below address each suggested mitigation measure in these lists.

As background, the Draft EIR includes many mitigation measures, which would reduce GHG emissions beyond those already inherent in the Project site and land use plan (e.g., balance mix of residential, employment, school, retail, parking and other uses; distributed village core areas with neighborhood serving uses and schools to encourage walking and biking; tertiary wastewater treatment and site-wide reuse of reclaimed water for outdoor irrigation, etc.), and project features included in the Specific Plan (e.g., comprehensive transportation management program to encourage multi-modal transportation and discourage single-occupancy offsite automobile commute trips; Green Development Program). The list of mitigation measures in Draft EIR Sections 5.11, Air Resources, and 5.21, Climate Change, go beyond the GHG reductions mandated by existing laws and regulations. Responses to the lists considered in the table below describe the extent to which listed measures are already

[2195] State of California Department of Justice (CADOJ). 2017. Mitigation for Greenhouse Gas Emissions. Sacramento, CA: CADOJ. https://oag.ca.gov/environment/ceqa/measures.

[2196] OPR. 2017. Appendix A: Example Model Goals, Objectives, and Policies and Programs. Sacramento, CA: OPR. http://opr.ca.gov/docs/OPR_Appendix_A_final.pdf.

[2197] CARB. 2017 (January). Appendix B: Local Action. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf.

incorporated into the project site and design and/or Project Design Features ("PDFs"), are already required by law, or are already required by the mitigation measures included in the Draft EIR. For listed measures that are not already applicable to the project, the response includes either acceptance of the suggested new mitigation measure as feasible and applicable, acceptance of a modified form of the suggested new mitigation measure as feasible and applicable, or an explanation as to why the suggested new measure is either not applicable or not feasible (in whole or in part). It is also important to note that California's GHG reduction laws[2198,2199] and regulations continue to evolve, as do technologies and services that reduce energy consumption or GHG. Predicted GHG reduction consequences also continue to be refined based on the increasing availability of actual data and behaviors. For example in the transportation sector, older lists cited by the Commenter such as the 2008 CAPCOA list included a broad range of estimated quantitative GHG reduction measures that could be achieved from the implementation of suggested measures, but in subsequent evaluations the actual quantitative values of suggested GHG measures in some cases could not be quantified (e.g., inclusion of bike racks as a standalone measure could not be shown to result in a measurable GHG reduction), was not achieved in practice (e.g., the effect of fixed route bus services in reducing GHG was uncertain since even with billions invested in recent public transit improvements, transit ridership of buses actually fell nationally as well as within the Los Angeles metropolitan area), or conflicted with emerging technologies and services (e.g., estimated GHG reductions from the 2008 correlation between GHG and reducing vehicle miles travelled (VMT) grew weaker as vehicular fleets burned less fossil fuels as a result of better gas mileage in standard and hybrid cars, and increasing numbers of cars using electric and other non-petroleum fuels). Predicted VMT reductions from substantially enhanced transit services in the region were also not achieved, and regional VMT actually increased by approximately three percent, based on the emergence of new transportation services such as Lyft and Uber, increased population and employment, issuance of drivers' licenses for undocumented immigrants, lower than predicted gasoline prices, and an extreme housing crisis that prompted much lengthier commutes as workers live further from coastal employment centers and caused criteria emissions from the transportation sector to actually increase statewide in 2016. Outside the transportation sector, GHG reduction efforts have also evolved over time. For example, much more electricity is being produced from wind and solar sources[2200] than was legally required as of the 2008-2010 lists cited by the Commenter, but storage and interstate grid integration challenges have prevented California from fully utilizing current renewable energy supplies under some circumstances. Similarly, numerous new GHG reduction statutes,[2201] as well as new regulations such as those prompted by the recent California drought restricting water use (e.g., for ornamental landscaping including turf) and new energy conservation Building Code upgrades (CALGreen),[2202] have reduced GHG through a variety of measures that deviate from measures on the advisory measure lists provided by the Commenter but are described

2198 S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).

2199 See, e.g., California Air Resource Board Scoping Plans for achieving greenhouse gas reduction targets, available here: AB 32 Scoping Plan, CALIFORNIA AIR RESOURCES BOARD (July 14, 2017)

2200 STEPHANIE M. DEHERRERA, DAVID FRIEDMAN, JENNIFER L. HERNANDEZ, In the Name of the Environment: Litigation Abuse Under CEQA, HOLLAND & KNIGHT, August 2015, https://perma.cc/SV3V-F5L2.

2201 S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).

2202 CCR, Title 24, Part 11,

in the Regulatory Setting and elsewhere in the Draft EIR's Climate Change section and in the Specific Plan Green Program.

Finally, because there is considerable overlap between the lists of mitigation measures prepared by other agencies, these measures have been organized by topical section in Tables 1 through 9 below, so that similar or overlapping measures are grouped together for the convenience of the reader. Because the CARB List and 2017 OPR List were not suggested by the Commenter but rather were identified by the Lead Agency for consideration, they appear separately in Table 10 below. All measures in this response are quoted verbatim unless otherwise indicated, and for measures with longer text or subparts, numbers and/or bullets have been inserted for ease of reference in responses.

Based on an assessment of all suggested measures, the following mitigation measures have been added to the Draft EIR, as shown in double underlined text:

MM 21-21 The Project Applicant/Developer shall require contractors to use locally available and recycled building materials, provided such materials meet all applicable Building Code and other requirements, and are readily available and comparably priced to assure that such materials do not increase the cost and decrease the affordability of housing or community infrastructure.

MM 21-22 The Project parking lots shall be designed to reduce vehicle queuing and improve pedestrian safety. Parking lot access designs shall include self-enforcement features for reducing the speeds on driveways, such as speed bumps or curved driveways. The parking lots shall include clearly marked pedestrian pathways connecting building entrances to parking, sidewalk, and transit drop-off/pick-up locations.

The following additions are also made to existing mitigation measures, as shown in double-underlined text:

MM 10-2529 *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs.

The Project Applicant/Developer, through the required implementation of the Mobility Plan, shall:

- Reinforce and serve the Land Use Plan;
- Provide future residents, visitors and employees with multiple modes of transit/non-single occupancy vehicle (non-SOV) accessibility for internal and external trips ~~by future residents and visitors~~;
- Provide options to reduce vehicle trips and emissions by linking effective travel demand management with transportation systems and parking policies;
- Provide residents and employees on the Project site with multiple modes of transportation options (i.e., walk, bike, public transit, private auto, car share, bike share, etc.);
- Provide for 80 percent on average, but no less than 50 percent of each Village's residential units to be located within one-half mile of a Village C~~c~~enter that includes retail and service uses;
- Provide parks within a 5-minute walk (0.25 mile) of 80 percent of all residential units;
- Provide a transit route easement no less than 25 feet wide in the Centennial Commerce District connecting the Town Center, Business Park, and Industrial/Civic areas and also northerly connecting to the Village Five Core;
- Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than ~~single-occupancy automobile~~ SOV use ~~by 30 percent in relation to standard ITE-generation rates for the overall Project~~; ~~and~~
- Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs ~~single-occupancy automobiles by 20 percent~~.;
- Require TMA implementation of a program to coordinate with automotive dealers on the Project site to promote CNG, electric, and hybrid electric vehicles~~.~~;

- Require TMA oversight of requirement for service fleet vehicles for agencies or businesses located on-site to be alternative fuel vehicles to the maximum extent feasible, as determine by the Project Applicant/Developer.; and
- Require TMA implementation of a combination of measures to provide adequate temporary bike parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure.

MM 15-2 The Project Applicant/Developer shall demonstrate to the County that they have an executed agreement with all school districts that operate within the boundaries of the Project site. The Transportation Management Association shall coordinate with local schools and school districts to establish and maintain a Safe Routes to School program to facilitate students walking and biking to schools.

Tables 1 through 9 - Responses to Suggested Additional Greenhouse Gas Mitigation Measures

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
Affordable Housing				
1	SMAQMD List, p. 9	Integrate Below Market Rate Housing. Incorporates affordable housing.	Yes	The proposed Project includes affordable housing. Per MM 21-14, "Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan..." (DRP 2017, p. 5.21-91) Per Specific Plan Section 3.13, the affordability status of homes will be annually monitored through the County of Los Angeles who shall report to the HCD and Los Angeles Community Development Commission. (*Id.,* Appendix 4.0-A, p. 3-101) The Specific Plan specifies that the units shall be constructed simultaneously with overall residential development. (*Id.,* Appendix 4.0-A, p. 3-102) The affordability breakdown will be as follows: • Very Low-Income Units. A total of 387 units (or 20 percent of the Affordable Housing Units) will be affordable to very low-income households. These units are expected to be affordable to households with a gross annual income of 50 percent or less of the Los Angeles County area median income (AMI). • Low-Income Units. A total of 483 units (or 25 percent of the Affordable Housing Units) will be affordable to low income households. These units are intended to be affordable to households with a gross annual income between 51 and 80 percent of the Los Angeles County area median income. • Moderate-Income Units. A total of 1,063 units (or 55 percent of the Affordable Housing Units) will be affordable to moderate income households. These units are planned to be affordable to households with a gross annual income between 81 and 120 percent of the Los Angeles County area median income (*Ibid.*). It is anticipated that most affordable units will be single-family attached, multifamily, and mixed-use units. Units shall be distributed throughout the communities they are in, to integrate them with

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				other market rate housing, and best efforts will be made to ensure that affordable units have similar exterior in terms of quality or appearance as other housing in the Project (*Ibid.*). The Specific Plan also includes an Affordable Housing Implementation Plan that has specific details of the implementation plan, such as a schedule for unit delivery, home ownership financing, and terms of restrictions (Final EIR, Appendix 3-C to Appendix 4.0-A.Rev).
2	CAPCOA List, pp. B-17, B-18	Affordable Housing Component: Residential development projects of five or more dwelling units provide a deed-restricted low-income housing component on-site (or as defined in the code). Developers who pay into In-Lieu Fee Programs are not considered eligible to receive credit for this measure. The award of emission reduction credit shall be based only on the proportion of affordable housing developed on-site because in-lieu programs simply induce a net increase in development. Percentage reduction shall be calculated according to the following formula: % reduction = % units deed-restricted below market rate housing * 0.04	Yes	The proposed Project includes the construction of affordable housing, as discussed in more detail in row 1. Legally binding documents shall establish the affordability of the units, and they shall be deed-restricted. (DRP 2017, Appendix 4.0-A., p. 3-103) The following Affordable Housing categories are allowed under the Centennial Affordable Housing Program: (1) Deed-restricted single-family detached units: a stand-alone, for sale or for rent single housing unit that is made affordable in perpetuity through a legally binding document; (2) Deed-restricted single-family attached: For sale or for rent housing unit that is attached to at least one other housing unit and is made affordable through a legally binding document; and (3) Deed-restricted multifamily: a multifamily building is one with more than four attached residential rental units. A legally binding document establishes the affordability for the entire building for a select number of units within the building in perpetuity (*Ibid.*). See row 1 for further discussion.
3	BAAQMD List, p. 4-13	Affordable Housing	Yes	The proposed Project includes the construction of affordable, deed-restricted housing distributed throughout the community. See rows 1 and 2 for further discussion.
4	SJVAPCD List, p. 12	Designate a portion of residential units as deed-restricted below-market-rate (BMR) housing; Affordable Housing.	Yes	The proposed Project includes the construction of affordable, deed-restricted housing distributed throughout the community. See rows 1 and 2 for further discussion.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
5	SJVAPCD List, p. 10	Integrate affordable and below market rate housing.	Yes	The proposed Project includes the construction of affordable, deed-restricted housing distributed throughout the community. See rows 1 and 2 for further discussion.
Site Proximity to Uses				
6	CAPCOA List, p. B-15	Density (Employ Sufficient Density for New Residential Development to Support the Use of Public Transit): Project provides high-density residential development. Transit facilities must be within one-quarter mile of project border. Project provides safe and convenient bicycle/pedestrian access to all transit stop(s) within one-quarter mile of project border.	Yes	The Project would develop a diverse range and density of uses within close proximity to each other, including 6,048 medium density residential units, 2,055 high density residential, and 300 very high-density residential units (DRP 2017, pp. 4-19 to 4-21). See rows 14 through 35, below, for further information regarding mix and density of uses. Residential, recreational, and commercial uses have been strategically located to provide superior access, multi-modal design, and ultimately to reduce the number of vehicle on the road (*Id.,* Appendix 4.0-A, p. 1-7). MMs 10-25 and 10-26 require the implementation of on-site programs to reduce vehicle trips, including the formation of a Transportation Management Association (TMA) that would coordinate and manage a Ride Share Program, Transit Program, and Commuter Bus Program (*Id.,* p. 5.10-104). MM 10-25 requires implementation of the Mobility Plan, which includes two transit hubs to serve as alternative means of transportation on the Project site and requires the creation and ongoing operation of the TMA (*Id.,* p. 5.10-153). These mandatory measures require the reduction of single-occupancy automobile use for off-site commutes by 20 percent and require the reduction of single occupancy automobile uses within the Project site by 30 percent (*Ibid*.). MM 10-26 lays out key Transportation Demand Management (TDM) elements that are key to the Mobility Plan and specifies that the TMA will fund and manage ongoing operation of transportation programs, including but not limited to transit and on-demand services (*Id.,* p. 5.10-154). The TMA will partner with multiple transit authorities to provide bus service within the Project site and connecting to neighboring communities (*Id.,* Appendix 4.0-A, p. 1-7). Street network transit facilities will be developed in conjunction with the Project's TDM

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				program and will include the following: Partner with Antelope Valley Transit Authority to provide bus service within the Project and to the rest of the Antelope Valley; Partner with Santa Clarita Transit Authority to provide bus service within the Project and to the rest of the Santa Clarita Valley; Partner with Kern Transit to provide bus service between the Project and neighboring communities of Tejon Mountain Village, Tejon Ranch Commerce Center, and Grapevine, to the north; Provide ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial, and residential areas of the Project; Identify locations for transit centers in proximity to village cores and employment centers such as business parks and institutional/civic land uses (*Id.,* pp. 4-36, 4-37). The following metrics also ensure that the Project can accommodate a community transit system: A transit route easement no less than 25 feet wide shall be reserved in the CCD (connecting the Town Center, BP and I/C areas) and also run northerly connecting to the Village Five Core; If a transit system is implemented, transit stop easements shall be reserved in all Village Cores, the Town Center, and CCD, as well as other areas where necessary, efficient, and beneficial to provide transit access (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 9). Project development will also include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes (*Id.,* p. 4-38). The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses (*Ibid*.). See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				By providing a mix of both residential and employment-generating development on site, and in consideration of the Project's location in the vicinity of the Tejon Industrial Complex along the I-5, the Project would capitalize on the existing regional transportation network and would serve to implement regional policies aimed at environmental protection and the location of housing near job opportunities, thus reducing vehicle trips and related emissions (*Id.,* pp. 3-19, 3-20). The Project site is adjacent to, and will be served by the SR-138, and is close to the I-5. See also rows 113 through 127 regarding *Transit Infrastructure and Service*, for further discussion of the Project's contributions toward promoting alternative travel modes and increasing public transit use.
7	SMAQMD List, p. 9	Increase Transit Accessibility. Project near high-quality transit.	Yes	The Project promotes increased use of alternative travel modes, including public transit, and will increase transit accessibility and connections, as discussed in row 6. Notably, the TMA will partner with local transit authorities to provide bus service within the Project and connecting to surrounding areas, and the Project will identify locations for transit centers in proximity to village cores and employment centers such as business parks and institutional/civic land uses (DRP 2017, pp. 4-36, 4-37).
8	SLOAPCD List, p. 3-17	Development is within 1/4 mile of transit centers and transit corridors.	Yes	The Project promotes increased use of alternative travel modes, including public transit, and will increase transit accessibility and connections, as discussed in row 6. Notably, the TMA will partner with local transit authorities to provide bus service within the Project and connecting to surrounding areas, and the Project will identify locations for transit centers in proximity to village cores and employment centers such as business parks and institutional/civic land uses (DRP 2017, pp. 4-36, 4-37).
9	SJVAPCD List, p. 12	1. Project is located within ½ mile of existing or planned Class I or II bike lanes	Yes	1. Project buildout would result in the provision of a network of bike paths, lanes, and routes connecting all Project uses, and two underpasses and one overpass bridge crossing will be constructed across the SR-138 to facilitate bicycle access to employment centers

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
		on arterial/collector streets, or where a suitable parallel route exists. 2. Project is located within ¼- ½ mile of a transit stop. 3. Project is located within one miles of a park and ride lot operated by a transportation agency. 4. Other trip reduction services on site or within ¼ mile of site. 5. Projects that minimize the need for trips that are located near residential, mixed, or retail/commercial use areas that are located within a ¼ mile.		(DRP 2017, pp. 4-35 to 4-36, Exhibit 4-8). See rows 89 through 112 for further discussion regarding bicycle infrastructure. 2. The Project promotes increased use of alternative travel modes, including public transit, and will increase transit accessibility and connections, as discussed in row 6. Notably, the TMA will partner with local transit authorities to provide bus service within the Project and connecting to surrounding areas, and the Project will identify locations for transit centers in proximity to village cores and employment centers such as business parks and institutional/civic land uses (*Id.,* pp. 4-36, 4-37). 3. Project transit centers will provide options for park and ride facilities, shuttle stops, bike rental, and other options for public transit services (*Id.,* Appendix 4.0-A, p. 1-7). The installation of Park-And-Ride Lots near transit stops and carpool lanes that will attract commuters is also included in the roster of potential transportation and vehicle demand measures to be implemented by the TMA to meet transportation demand performance standards articulated in MMs 10-25 and 10-26, as indicated in Table 2-C-2 of the Project's Mobility Plan (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 14). 4. Project buildout would result in consistency with this measure. In addition to the requirements listed in row 6 and in the remainder of this row, the Project will implement numerous trip reduction services, including the measures included in Table 2-C-1 of the Project's Mobility Plan, and a selection from the roster of measures determined appropriate to meet performance standards articulated in MMs 10-25 and 10-26, as listed in Table 2-C-2 in the Mobility Plan (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 5 - 7, 11 - 16). 5. Project buildout would result in consistency with this measure. Its design integrates a wide variety of uses into each of 9 villages. An 80 percent average, but not less than 50 percent of all residential uses will be located within ½ mile of a Village Core of Town Center that includes retail and services uses; all neighborhoods within each village will connect to each other via a network of trails; an extensive

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				network of sidewalks, greenway trails (approximately 13 miles) and community trails (approximately 60 miles) will link residential, schools, shopping, and employment areas; and high-density residential uses will be located adjacent to commercial centers and Mixed-Use Overlay areas will permit the interweaving of residential and commercial uses within very close proximity (*Id.,* pp. 4-34, 4-35).
10	BAAQMD List, p. 4-12	Local serving retail within ½ mile of project	Yes	Project buildout would result in consistency with this measure as part of the Project. The Project provides for a variety of retail and other commercial uses, and has a goal that an 80 percent average, but no less than 50 percent, of all project dwelling units shall be located within a ½ mile walking distance of a Village Core or the Town Center (DRP 2017, p. 4-34; *Id.,* Appendix 4.0-A, p. 3-3). The Project's circulation network, including the extensive network of sidewalks, greenway trails, and community trails, will link residential, schools, shopping, and employment areas for easy and safe access for pedestrians and bicyclists (*Id.,* p. 4-34).
11	CAPCOA List, pp. B-13, B-14	Office/Mixed Use Density: Project provides high density office or mixed-use proximate to transit. Project must provide safe and convenient pedestrian and bicycle access to all transit stops within one-quarter mile.	Yes	Project buildout would result in consistency with this measure. The Project's extensive network of sidewalks, greenway trails, and community trails, will link residential, schools, shopping, and employment areas within the Project site (DRP 2017, p. 4-34). High-density residential uses will be located adjacent to commercial centers and a Mixed-Use Overlay will create areas of mixed residential and commercial center uses (*Id.,* p. 4-35). The Project would also develop a diverse range and density of uses within close proximity to each other and to transit options – see rows 14 through 35, below, for further information.
12	SJVAPCD List, p. 15	Improve destination accessibility such as locating the project within 12 miles from downtown or a job center.	Yes	The Project is bisected by SR-138 and is located approximately one mile east of I-5 for easy access to the highway (DRP 2017, p. 3-1). It is also approximately 1.2 miles west of the community of Neenach, and the community of Gorman is approximately 4 miles north of the I-5/SR-138 junction (*Ibid*.). The Project would include up to 19,333 housing units and an estimate 23,675 permanent jobs in a region of

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				Los Angeles County projected to experience a substantial population growth through 2040, in accordance with Project site location in the AVAP's West EOA, where future growth is planned (*Id.,* p. 3-19). By providing a mix of both residential and employment-generating development on site, and in consideration of the Project's location in the vicinity of the Tejon Industrial Complex along the I-5, the Project would capitalize on the existing regional transportation network and would serve to implement regional policies aimed at environmental protection and the location of housing near job opportunities, thus reducing vehicle trips and related emissions. (*Id.,* pp. 3-19, 3-20) Two underpasses and one overpass over SR-138 will facilitate pedestrian and bicycle access to employment centers, and the trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Id.,* Appendix 4.0-A, p. 3-3; *Id.,* p. 4-38)
13	SMAQMD List, p. 9	Improve Destination Accessibility. Project close to regional employment or destination center.	Yes	The Project is bisected by SR-138 and is located approximately one mile east of I-5 for easy access to the highway. (DRP 2017, p. 3-1) It is also approximately 1.2 miles west of the community of Neenach, and the community of Gorman is approximately 4 miles north of the I-5/SR-138 junction. (*Ibid*.) The Project would include up to 19,333 housing units and an estimate 23,675 permanent jobs in a region of Los Angeles County projected to experience a substantial population growth through 2040, in accordance with Project site location in the AVAP's West EOA, where future growth is planned. (*Id.,* p. 3-19) By providing a mix of both residential and employment-generating development on site, and in consideration of the Project's location in the vicinity of the Tejon Industrial Complex along the I-5, the Project would capitalize on the existing regional transportation network and would serve to implement regional policies aimed at environmental protection and the location of housing near job opportunities, thus reducing vehicle trips and related emissions. (*Id.,* pp. 3-19, 3-20) Two underpasses and one overpass over SR-138 will facilitate pedestrian and bicycle access to employment centers, and the trails system would connect residential neighborhoods to

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				commercial, employment, schools, parks, civic, and institutional land uses. (*Id.,* Appendix 4.0-A, p. 3-3; *Id.,* p. 4-38)
Density and Diversity of Use				
14	SJVAPCD List, p. 12	Increase residential density. Density is measured in terms of dwelling units or jobs per acre.	Yes	The Project would provide residential land uses at varied densities to meet the needs of different segments of the population, consistent with the AVAP. As identified in Draft EIR Table 4-1, Centennial Project Overview, the Project site would allow up to 19,333 dwelling units on 4,987 gross acres of land designated for residential uses. (DRP 2017, p. 4-6) Of the 19,333 dwelling units, 5,175 are Medium Density, 2,055 High Density, and 300 Very High Density units (*Id.,* Table 4-2, Centennial Specific Plan Statistical Table). Consistent with Smart Growth principles, Medium- to Very High Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center. (*Id.,* p. 4-16) The Town Center of the Project is located in Village 3 and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center. (*Ibid*.) An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17) The Project would also provide an anticipated 23,675 permanent jobs. (*Id.,* p. 3-19)
15	SMAQMD List, p. 9	Increase Density. Project more dense than typical developments.	Yes	The Project would provide residential land uses at varied densities to meet the needs of different segments of the population, consistent with the AVAP. As identified in Draft EIR Table 4-1, Centennial Project Overview, the Project site would allow up to 19,333 dwelling units on 4,987 gross acres of land designated for residential uses. (DRP 2017, p. 4-6) Of the 19,333 dwelling units, 5,175 are Medium Density, 2,055 High Density, and 300 Very High Density units (*Id.,* Table 4-2, Centennial Specific Plan Statistical Table).

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
16	BAAQMD List, p. 4-17	100 percent increase in density.	Yes	The Project would provide residential land uses at varied densities to meet the needs of different segments of the population, consistent with the AVAP. As identified in Draft EIR Table 4-1, Centennial Project Overview, the Project site would allow up to 19,333 dwelling units on 4,987 gross acres of land designated for residential uses. (DRP 2017, p. 4-6) Of the 19,333 dwelling units, 5,175 are Medium Density, 2,055 High Density, and 300 Very High Density units (*Id.,* Table 4-2, Centennial Specific Plan Statistical Table).
17	SLOAPCD List, p. 3-17	Design and build compact communities in the urban core to prevent sprawl.	Yes	The Project includes the development of nine planned Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project does not create sprawl. The Project site is entirely within the AVAP's West EOA, which is a cluster of land planned for higher development densities along the I-380. (DRP 2017, p. 4-4) The Project is consistent with this plan to accommodate anticipated regional growth sustainably while achieving the overall goal of rural preservation in the Antelope Valley. (*Ibid*.) The Project is also situated and designed to promote regional "smart growth" planning principles established by the SCAG 2016-2040 RTP/SCS, Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's specific plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2). In making this determination, SCAQMD evaluated the Project from a "regional perspective" (see Comment D4-1). See further discussion regarding the Project's smart growth, see response to Comment F.8-20.
18	SLOAPCD List, p. 3-17	Increase density within the urban core and urban reserve lines.	Yes	The Project site is not located in the urban core. However, the Project provides a denser, mixed-use development pattern in an area specifically planned to accommodate anticipated regional growth in the AVAP and SCAG 2012-2035 RTP/SCS and 2016-2040 RTP/SCS, and it exemplifies sustainable community development, as

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Row	Source	Measure	Included	Response
				discussed in row 17 and in response to Comment F.8-20. As explained in response to Comment F.8-20, the Project will implement regional plans to reduce GHG emissions generated by the land use sector in a manner that balances increased development in the urban core with strategically located suburban development so as to maximize emissions reductions without disproportionately burdening existing urban core residents with the adverse public health and environmental effects of excessive infill development. The Project achieves the primary goal of increased urban core development – i.e., reducing reliance on single occupancy vehicle use – by including the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers.
19	2008 OPR List p. 18	Encourage infill, redevelopment, and higher density development, whether in incorporated or unincorporated settings	Yes	The Project site in not an infill site. However, it provides dense development on a site planned to accommodate projected growth in a manner consistent with regional strategies for achieving mandatory reductions in GHG emissions attributable to the land use sector, as explained in response to Comment F.8-20. The Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2) See response to

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				Comment F.8-20 for further discussion. Consistent with Smart Growth principles, Medium- to Very High Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center. (DRP 2017, p. 4-16) The Town Center of the Project is located in Village 3 and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center. (*Ibid*.) An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17)
20	SMAQMD List, p. 9	Increase Diversity. Different types of land uses are near each other.	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4-17, 4-18) The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. (*Id.,* p. 4-6) Proposed sites for major Utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass about 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on about 145 acres. (*Ibid*.) About 5,624 acres (or 45.6 percent) of the Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use. (*Ibid*.) The Project also

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				includes a vehicular and non-vehicular circulation system; the Project includes an integrated network of roadways, walking and biking trails to reduce automobile use and facilitate safe and efficient travel. (*Ibid*.) An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (*Ibid*.) 100 percent of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17)
21	BAAQMD List, p. 4-12	Mix of Uses	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4.17, 4-18)
22	CAPCOA List, p. B-18	Urban Mixed-Use: Development of projects predominantly characterized by properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with functional	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
		interrelationships and a coherent physical design.		(DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4.17, 4-18)
23	CAPCOA List, p. B-18	Suburban Mixed-Use: Have at least three of the following on site and/or offsite within one-quarter mile: Residential Development, Retail Development, Park, Open Space, or Office.	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, Appendix 4.0-A., p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/ recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* Appendix 4.0-A., pp. 4-17, 4-18) An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (*Id.,* Appendix 4.0-A., p. 4-6) 100 percent of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* Appendix 4.0-A., pp. 4-16, 4-17)
24	CAPCOA List, p. B-18	Other Mixed-Use: All residential units are within one-quarter mile of parks, schools or other civic uses.	Yes	An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (DRP 2017, p. 4-6.) 100 percent of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17)
25	OPR List p. 18	Implement land use strategies to encourage jobs/housing proximity, promote transit-oriented development, and encourage high density development along transit corridors. Encourage compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of public transit systems	Yes	The location of the Project and the proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trips. The Project would also provide an anticipated 23,675 permanent jobs. (DRP 2017, p. 3-19) The Project includes residential development to create a mixed-use community within the West EOA, consistent with the Land Use Policy Map in the AVAP. The Project would contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production to meet regional housing needs. (*Id.,* pp. 5.9-2, -3) The AVAP intends to provide a jobs/housing ratio of 1.3 jobs per dwelling unit in the unincorporated area of the Antelope Valley. The Economic Development Element of the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs; The Project would implement this strategy, and would provide an estimated jobs/ housing ratio of 1.22, through the development of commercial and business park uses on the site, for use by high-tech manufacturing, transportation, and logistics companies. (*Id.,* p. 5.9-3) The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (*Id.,* Appendix 4.0-A, p. 4-10) The Land Use Matrix permits a wide variety

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/ recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4-17, 4-18) The Project's proposed circulation network and transit program provide and support multi-modal transit solutions and emerging transit technologies and services, including in perpetuity funding and governance via the Transit Management Association and Transportation Demand Management. See rows 146 through 209 for further discussion. The Project also includes affordable housing, as discussed in rows 1 through 5.

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Row	Source	Measure	Included	Response
26	OPR List, p. 18	Encourage new developments to integrate housing, civic and retail amenities (jobs, schools, parks, shopping opportunities) to help reduce VMT resulting from discretionary automobile trips.	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/ recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4-17, 4-18) An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (*Id.,* p. 4-6) 100 percent of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17)
27	BAAQMD List, p. 4-17	100 percent increase in diversity of land use mix	Yes	The Project would include construction of a wide variety of diverse uses. The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/ recreation, manufacturing,

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Row	Source	Measure	Included	Response
				light industrial, accessory, interim, and temporary. (*Id.,* pp. 4-17, 4-18)
28	BAAQMD List, p. 4-17	Jobs housing balance	Yes	The location of the Project and the proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trips. The Project would also provide an anticipated 23,675 permanent jobs, many of which are anticipated to be filled by future Project residents. (DRP 2017, p. 3-19) The Project includes residential development to create a mixed-use community within the West EOA, consistent with the Land Use Policy Map in the AVAP. The Project would contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production to meet regional housing needs. (*Id.,* pp. 5.9-2, -3) The AVAP intends to provide a jobs/housing ratio of 1.3 jobs per dwelling unit in the entire unincorporated area of the Antelope Valley. The Economic Development Element of the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs; The Project would implement this strategy, and would provide an estimated jobs/ housing ratio of 1.22, through the development of commercial and business park uses on the site, for use by high-tech manufacturing, transportation, and logistics companies. (*Id.,* p. 5.9-3)
29	SLOAPCD List, p. 3-17	Improve job/housing balance opportunities within communities.	Yes	The location of the Project and the proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trips. The Project would also provide an anticipated 23,675 permanent jobs, many of which are anticipated to be filled by future Project residents. (DRP 2017, p. 3-19) The Project includes residential development to create a mixed-use community within the West EOA, consistent with the Land Use Policy Map in the AVAP. The Project would contribute to meeting the

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production to meet regional housing needs. (*Id.,* pp. 5.9-2, -3) The AVAP intends to provide a jobs/housing ratio of 1.3 jobs per dwelling unit in the unincorporated area of the Antelope Valley. The Economic Development Element of the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs; The Project would implement this strategy, and would provide an estimated jobs/ housing ratio of 1.22, through the development of commercial and business park uses on the site, for use by high-tech manufacturing, transportation, and logistics companies. (*Id.,* p. 5.9-3)
30	SLOAPCD List, p. 3-19	Develop recreational facilities (e.g., parks, gym, pool, etc.) within one-quarter mile from site.	Yes	The proposed Project includes the construction of approximately 130,680 square feet or recreation/entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. (DRP 2017, p. 4-6) Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resources protection and greenways, and parks for active and passive recreational use. (*Ibid*.) 100 percent of all residential development will be located within ¼ miles walking distance of a park no less than 10,000 square feet, trailhead, club house or other public amenity. (*Id.,* pp. 4-16, 4-17; *Id.,* Appendix 4.0-A, p. 3-3) No less than 80 percent of Project dwelling units shall be located within ¼ mile walking distance of a public-accessible park space that is no less than 1 acre in size. (*Ibid.*)
31	SLOAPCD List, p. 3-20	Develop core commercial areas within ¼ to ½ miles of residential housing or industrial areas.	Yes	High-density residential areas are located adjacent to commercial centers and allowed within Mixed-Use Overlay zones, which permits residential uses within commercial centers. (DRP 2017, Appendix 4.0-A, p. 3-3) An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* p. 4-17) The Town Center is located in Village 3 and is the "downtown" of the Project. (*Id.,* p. 4-16) Per the

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				Centennial Specific Plan, it will include a vibrant mix of uses, and ground floor commercial will activate the center, with a concentration of more dense housing to support retail and other commercial and service-oriented uses. (*Id.,* Appendix 4.0-A, p. 2-2) The Town Center is an activity center for each village, and they are designed to provide goods and services, recreational amenities, and mixed-use development is encouraged. (*Ibid*.) These core activity centers are pedestrian friendly and designed so that a mix of land uses are typically located within a quarter-mile radius. This ensures that even outside of mixed-use developments, pedestrians will have easy access to a wide range of goods and services. (*Ibid*.)
32	CAPCOA List, p. B-19	Infill Development: Project site is on a vacant infill site, redevelopment area, or brownfield or greyfield lot that is highly accessible to regional destinations, where the destinations rating of the development site (measured as the weighted average travel time to all other regional destinations) is improved by 100 percent when compared to an alternate greenfield site.	Yes	While the Project site is not an infill site, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2) See response to Comment F.8-20 for further discussion.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
33	AG List, p. 10	Ensure consistency with "smart growth" principles – mixed-use, infill, and higher density projects that provide alternatives to individual vehicle travel and promote the efficient delivery of services and goods. Meet recognized "smart growth" benchmarks. Educate the public about the benefits of well-designed, higher density development. Develop "brownfields" and other underused or defunct properties near existing public transportation and jobs.	Yes	The Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2) See response to Comment F.8-20 for further discussion. Consistent with Smart Growth principles, Medium- to Very High Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center. (DRP 2017, p. 4-16) The Town Center of the Project is located in Village 3 and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center. (*Ibid*.) An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17) While the Project site is not a "brownfield" site, it is underused and has been determined to be appropriate for dense development to accommodate anticipated regional growth, as discussed above in this row. The Project site is in close proximity to the I-5 and is adjacent to the I-380.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
34	CAPCOA List, p. B-21	Local Farmer's Market: Project shall dedicate space in a centralized, accessible location for a weekly farmers' market.	Yes	The Project will include a weekly Farmer's Market sponsored by the HOA or other entity selected by the Master Applicant/Developer. (DRP 2017, p. 5.21-84)
35	CAPCOA List, p. B-22	Community Gardens: Project shall dedicate space for community gardens.	Yes	Per PDF 5-1, the Project would accommodate 50 acres of small-scale agriculture and related uses, including, but limited to community gardens, farmers markets/produce stands, growing and sales of nursery stock, and commercial greenhouses. (DRP 2017, p. 5.5-12)
Building Orientation				
36	CAPCOA List, p. B-10	Off-Street Parking**:** Parking facilities are not adjacent to street frontage.	Yes	Non-motorized transportation planning elements are key parts of the Centennial Circulation Plan, and they include locating parking behind buildings to encourage walking in retail areas along street frontage. (DRP 2017, p. 4-31) The Centennial Specific Plan contains specific building orientation requirements for various land use types that also promote this for residential uses. To provide just two examples, single-family dwellings will orient the front door to the street and pedestrian access will be via street frontage or open space frontage, while vehicular access will be via street or alley access. (*Id.,* Appendix 3-A to Appendix 4.0-A, p. 5) In the single-family cottage homes, primary rooms and entrances are oriented towards the street, open space or a green court, while automobile access is from a rear lane/alley. (*Id.,* p. 6) Further, more dense housing provides underground or partial underground parking, which allows a more pedestrian-friendly environment.
37	SLOAPCD List, p. 3-17	Orient buildings toward streets with automobile parking in the rear to promote a pedestrian-friendly environment.	Yes	Non-motorized transportation planning elements are key parts of the Centennial Circulation Plan, and they include locating parking behind buildings to encourage walking in retail areas along street frontage. (DRP 2017, p. 4-31) The Centennial Specific Plan contains specific building orientation requirements for various land use types that also promote this for residential uses. To provide just two examples, single-family dwellings will orient the front door to the street and pedestrian access will be via street frontage or open space frontage, while vehicular access will be via street or alley access. (*Id.,*

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				Appendix 3-A to Appendix 4.0-A, p. 5) In the single-family cottage homes, primary rooms and entrances are oriented towards the street, open space or a green court, while automobile access is from a rear lane/alley. (*Id.,* p. 6) Further, more dense housing provides underground or partial underground parking, which allows a more pedestrian-friendly environment.
38	CAPCOA List, p. B-14	Orientation to Existing/Planned Transit, Bikeway, or Pedestrian Corridor: Project is oriented towards existing transit, bicycle, or pedestrian corridor. Setback distance between project and existing or planned adjacent uses is minimized or nonexistent. Setback distance between different buildings on project site is minimized. Setbacks between project buildings and planned or existing sidewalks are minimized. Buildings are oriented towards existing or planned street frontage. Primary entrances to buildings are located along planned or existing public street frontage. Project provides bicycle access to any planned bicycle corridor(s). Project provides pedestrian access to any planned pedestrian corridor(s).	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers, which will be accessible by to pedestrians and bike riders. See also rows 63 through 112, below, regarding bicycle and pedestrian infrastructure, access, and circulation. The Project will provide a pedestrian-oriented environment that reduces barriers such as walls, closed streets or landscaping. (DRP 2017 Appendix 2-A to Appendix 4.0-A, p. 6) The Project provides for minimum setbacks appropriate for the range of land use designations allowed. The Project would provide residential land uses at varied densities to meet the needs of different segments of the population, consistent with the AVAP. As identified in Draft EIR Table 4-1, Centennial Project Overview, the Project site would allow up to 19,333 dwelling units on 4,987 gross acres of land designated for residential uses. (*Id.,* p. 4-6) Of the 19,333 dwelling units, 5,175 are Medium Density, 2,055 High Density, and 300 Very High Density units. (*Id.,* Table 4-2, Centennial Specific Plan Statistical Table) Buildings would be oriented toward street frontages, as explained in row 37. The Project also includes an extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) that would link residential, schools, shopping, and employment areas. (*Id.,* p. 4-6) The Project provides for small- to medium-sized blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, and streetscapes designed as public spaces to promote social interaction and physical

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				activity. (*Id.,* p. 4-31) All neighborhoods within a village connect to each other via network of trails. (*Id.,* p. 4-34)
39	SLOAPCD List, p. 3-18	Tract maps resulting in parcels of one-half acre or less shall orient at least 75 percent of all lot lines to create easy due south orientation of future structures.	Yes – Functional Equivalent Required	Energy conservation is an integral part of Centennial's overall orientation and design. Per MM 21-3, all commercial buildings shall be oriented for north-south panel orientation on buildings. (DRP 2017, p. 5.21-89) The Project site also lends itself naturally to an east-west street orientation, allowing the majority of buildings to provide a north-south orientation. (*Id.,* Appendix 4.0-A, pp. M-6, 1-8) With the goal of maximizing solar input, roads are oriented slightly counterclockwise of an east–west direction in harmony with site topography and in accordance with the Los Angeles County Solar Subdivision Guidelines for inland subdivisions. (*Id.,* Appendix 4.0-A, p. 3-62) Per the Green Development Program, most larger private sector employers are located along SR-138 and have an east-west elongation to facilitate the design of north–south oriented buildings that incorporate passive solar design. (Final EIR, Appendix 2-A to Appendix 4.0-A.Rev) The Project has also committed to meeting CALGreen Voluntary Measure requirements, which encourages the maximization of solar exposure. Further, Project commitments to provide solar panels for generation of on-site renewable energy exceed the suggested requirement to merely provide for building orientation that would allow efficient solar panel use. The Project commits to a minimum of 50 percent renewable energy generation, as provided in MM 21-1, with the following more specific relevant commitments included in the Centennial Green Development Program with regard to solar panels: • A minimum of 30 percent of all single-family detached and attached residential units at buildout shall have solar panel systems installed on roof areas or on top of other structures on the site (for example, patio covers or pergolas). Such systems shall be installed on roof areas facing within 30 degrees of true south.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				• A minimum of 30 percent of all multi-family residential units at buildout shall have solar panel systems on roof areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 60 percent of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • All residential buildings will be compatible with solar panel systems giving home buyers the option to include a photovoltaic array system as a home design system. • All commercial and residential structures include passive solar design techniques as a design guideline. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15)
40	CAPCOA List, p. B-24	Solar Orientation**.** Project orients 75 percent or more of homes and/or buildings to face either north or south (within 30° of N/S). Building design includes roof overhangs that are sufficient to block the high summer sun, but not the lower winter sun, from penetrating south facing windows. Trees, other landscaping features and other buildings are sited in such a way as to maximize shade in the summer and maximize solar access to walls and windows in the winter.	Yes – Functional Equivalent Required	The Project maximizes solar orientation and provides solar panels, as discussed in row 39. The Project also takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5)

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
41	SLOAPCD List, p. 3-18	Orient 75 percent or more of homes and/or buildings to be aligned north/south to reduce energy used to cool buildings in summer.	Yes – Functional Equivalent Required	The Project maximizes solar orientation and provides solar panels, as discussed in row 39. The Project also incorporates other measures to maximize natural cooling, as discussed in row 40.
42	SLOAPCD List, p. 3-17	For projects adjacent to high-volume roadways or railroad idling zones, design project to include effective buffer zone between the source and the receptor.	Yes	Per PDF 11-6, the Project prohibits residences, schools, day care centers or other land uses involving public congregation from being built within 150 feet of the near edge of the SR-138 traffic lanes. This requirement would ensure that risk of exposure to diesel particular matter is less than what is allowed by the AVAQMD and SCAQMD guidelines. (DRP 2017, p. 5.11-31) This requirement has been incorporated into MM 11-10. (*Id.,* p. 5.11-82) Moreover, MM 11-11 requires that, prior to approval of any tract map that includes a sensitive receptor located within 500 feet of SR-130 or a high-volume roadway, the Project Applicant/Developer must provide the Air Pollution Control District with jurisdiction over the mapped area a dispersion analysis to calculate the health risks from the relevant roadway. If the analysis concludes that any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices, then the Project Developer/Applicant must submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable air district for review and concurrence. Following review and concurrence by the applicable air district, a copy of the TAC Emission Reduction Plan confirming that no sensitive receptor on the Project site will be exposed to TAC risks in excess of applicable district thresholds must be provided to the County before County approval of the tentative map. In the TAC Emission Reduction Plan, TAC exposure reduction measures must be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed applicable district TAC thresholds, which measures may include, but are not limited to, setbacks, vegetative barriers, heating, ventilations and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of map approval and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map. These

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				requirements would ensure that risk of exposure to TACs, including diesel particular matter, is less than what is allowed by the AVAQMD and SCAQMD guidelines. (*Id.,* p. 5.11-31)
43	SLOAPCD List, p. 3-17	For projects adjacent to high-volume roadways, plant vegetation between receptor and roadway.	Yes	The Centennial Specific Plan includes a comprehensive Landscape Plan to ensure that the community is developed with a new, water wise regionally appropriate landscape. The Landscape Plan includes detailed streetscape programming to ensure vegetation planting along all high-volume roadways. (DRP 2017, Appendix 4.0-A, pp. 3-37 to 3-41). Please also note the requirements of MMs 11-10 and 11-1, as described above in row 42.

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
44	SJVAPCD List, p. 3	Regulation VIII Control Measures for Construction Emissions of PM-10	Yes - Functional Equivalent Required	SVJAPCD Regulation VIII Control Measures and BAAQMD Rules are inapplicable to the proposed Project because it is located in the jurisdictions of the AVAQMD and SCAQMD, and is instead subject to their rules. However, the AVAQMD and SCAQMD Rules and the Project's PDFs and MMs contain identical and/or functionally equivalent requirements to which the Project is subject, and which will ensure achievement of the type of emissions reductions that would be achieved through implementation of suggested measures. See rows 45 through 53, below, for more details.
45	SJVAPCD List, p. 4	Enhanced Control Measures for Construction Emissions of PM-10: 1) Limit traffic speeds on unpaved roads to 15 mph; 2) Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. 3) Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site; 4) Install wind breaks at windward side(s) of construction areas; 5) Suspend excavation and grading activity when winds exceed 20 mph; and 6) Limit area subject to excavation, grading, and other construction activity at any one time.	Yes - Functional Equivalent Required	The Project Applicant/Developer is required to implement dust-control measures as prescribed in AVAQMD Rule 403, Fugitive Dust, and SCAQMD Rule 403, Fugitive Dust. AVAQMD Rule 403 and SCAQMD Rule 403 require that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Two options are presented in SCAQMD Rule 403: monitoring of particulate concentrations or active control. The exact method would be determined at the time of the preparation of the Dust Control Plan. Monitoring involves a sampling network around the Project site with no additional control measures unless specified concentrations are exceeded. The active control option does not require any monitoring, but requires that a list of measures be implemented starting with the first day of construction. Basic measures include pre-watering of grading sites, watering during grading, and watering or chemical treatment of stockpiles. Compliance with these rules will result in reducing short-term particulate pollutant emissions. SCAQMD Rule 403 also requires that "Large Operations" implement additional measures. A Large Operation is defined as "any active operations on a property that contain 50 or more acres of disturbed surface area or any earth-moving operation with a daily earth-moving or throughput volume of 3,850 cubic meters (5,000 cubic yards) or more 3 times during the most recent 365 day period" (SCAQMD 1976b). Grading of the Project would be considered a Large Project under Rule 403. Therefore, the Project shall be required to implement the applicable actions

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				specified in Table 2 of the Rule, which is included in Draft EIR Appendix 5.11-D. Any active operation with a disturbed surface area of 5 or more acres or with a daily import or export of 100 cubic yards or more of bulk materials must utilize at least one of the measures listed in Table 3 of SCAQMD Rule 403 at each vehicle egress from the site to a paved public road. Rule 403 measures include regular watering of active grading areas and unpaved roads, limiting vehicle speeds on unpaved surfaces, stabilizing stockpiled earth, and curtailing grading operations during high wind conditions. (DRP 2017, pp. 5.11-41, -42) Further, SCAQMD Rule 403 requires that the Project not "allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation" (SCAQMD 1976b). All track-out from an active operation is required to be removed at the conclusion of each workday or evening shift. See also the new MM 3-11 added in this Final EIR, which requires the Project Applicant/Developer to be responsible for creating and regularly updating a website on the proposed Project internet that provides public information regarding dust-generating activities and Valley Fever risk, throughout the Project construction period. The Project Applicant/Developer must also send a one-time notice to surrounding communities and schools of the website's existence and contents. With regard to the specifically suggested measures in this row: 1. This speed restriction for staging areas is incorporated in to the Best Available Control Measures in Table 1 of the SCAQMD Rule 403, which is applicable to all construction activity. (SCAQMD Rule 403, p. 403-16) The Project shall be required to implement the applicable actions specified in Table 2 of SCAQMD Rule 403, as discussed above in this row. This speed restriction measure is included as a potential measure in Table 2. (SCAQMD Rule 403, p. 403-23) 2-5. A SWPPP must be prepared and implemented that includes BMPS that meet or exceed state Construction General Permit requirements. (DRP 2017, p. 5.4-53) Construction period BMPs may include erosion controls that prevent erosion; sediment controls that trap sediment

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				carried in runoff; or BMPs that control other potential construction-related pollutants. (*Ibid*.) Types of BMPs that would implemented during construction of the Project and would meet the standards to comply with the Construction General Permit relevantly include: • Physically stabilizing the area through hydraulic mulch, soil binders, straw mulch, bonded fiber matrices, and erosion-control blankets (*Ibid*.); • Protecting perimeters through silt fences, fiber rolls, gravel bag berms, gravel bag barriers, sand bag barriers, and compost stocks to prevent discharges (*Ibid*.); • Containing and securely protecting stockpiled materials from wind at all times, unless actively being used, and controlling wind-erosion through the application of water or other dust palliatives as necessary to prevent and alleviate dust nuisance (*Ibid*.); • Reducing off-site tracking through stabilized construction entrances/exits, construction road stabilization, and entrance/exit tire wash. (*Id.,* p. 5.4-54) 6. The Project will require construction contractors to delineate and flag the smallest site disturbance area possible in areas not subject to mass grading. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17)
46	BAAQMD List, p. 8-3	<u>Basic Construction Mitigation Measures Recommended for All Proposed Projects:</u> 1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.	Yes, and/or Functional Equivalent Required	The Project must comply with dust control measures required by SCAQMD and AVAQMD, as discussed further in rows 44 and 45, above. With regard to the specifically suggested measures in this row: 1. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include mixing backfill soil with water prior to moving, applying water in sufficient quantities to prevent generation of dust plumes during clearing and grading and to all disturbed soil; pre-watering materials prior to loading into crushing equipment; pre-watering soils prior to cut and fill activities; pre-application of water to the depth of proposed cuts

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4) All vehicle speeds on unpaved roads shall be limited to 15 mph. 5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall		during earth-moving activities and reapplication of water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction. (SCAQMD Rule 403, pp. 403-13, -14) A SWPPP must also be prepared and implemented that includes BMPS that meet or exceed state Construction General Permit requirements, as discussed in row 45. Types of BMPs that would be implemented during construction of the Project include controlling wind-erosion through the application of water or other dust palliatives as necessary to prevent and alleviate dust nuisance. (DRP 2017, p. 5.4-53) 2. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include using tarps or other suitable enclosures on haul trucks. (SCAQMD Rule 403, p. 403-15) 3. As discussed in row 45, SCAQMD Rule 403 requires that the Project not "allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation" (SCAQMD 1976b). All track-out from an active operation is required to be removed at the conclusion of each workday or evening shift. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include compliance with track-out prevention/mitigation measures and use of water spray to clear forms; or use sweeping and water spray to clear forms; or use vacuum system to clear forms. (SCAQMD Rule 403, pp. 403-13, -15) 4. This speed restriction for staging areas is incorporated in to the Best Available Control Measures in Table 1 of the SCAQMD Rule 403, which is applicable to all construction activity. (SCAQMD Rule 403, p. 403-16) The Project shall be required to implement the applicable actions specified in Table 2 of SCAQMD Rule 403, as discussed above in row 45. This speed restriction measure is included as a potential measure in Table 2. (SCAQMD Rule 403, p. 403-23) 5. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include applying

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		be checked by a certified visible emissions evaluator. 8) Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.		gravel/paving to roadways as soon as possible. (SCAQMD Rule 403, p. 403-17) 6. Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes. (DRP 2017, pp. 5.11-79, 5.21-89) As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) 7. MM 11-2 requires that all construction contractors shall ensure construction equipment is properly maintained to the manufacturer's standards. (DRP 2017, p. 5.11-79) A copy of each unit's certified tier specification, BACT documentation, and CARB or District operating permit shall be provided to the County at the first occurrence of mobilization of each applicable unit of equipment. (*Ibid*.) 8. Please see the new MM 3-11 added in this Final EIR, which requires the Project Applicant/Developer to be responsible for creating and regularly updating a website on the proposed Project internet that provides public information regarding dust-generating activities and Valley Fever risk, throughout the Project construction period. The Project Applicant/Developer must also send a one-time notice to surrounding communities and schools of the website's existence and contents. Per MM 3-1, the Project Applicant/Developer "shall employ a Dust-Control Supervisor who will be on the site within 30 minutes of the start of work taking place each morning; will have the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Antelope Valley Air Quality Management District (AVAQMD) Rule 403 and South Coast Air Quality Management District (SCAQMD) Rule 403 requirements; and will have completed the SCAQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class. Contact information for the Project's Dust Control Supervisor shall be posted on-site to ensure that the public has a means of providing complaints regarding fugitive dust. The Dust Control Supervisor shall be responsible for tracking complaints, conducting corrective action, as necessary, and for

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				maintaining an up-to-date log of complaints and responses for periodic County review." (*Id.,* p. 5.3-26)
47	BAAQMD List, p. 8-4	Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold: 1) All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3) Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. 4) Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5) The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall	Yes, and/or Functional Equivalent Required	The Project must comply with equivalent dust control measures required by SCAQMD and AVAQMD, as discussed further in rows 44 and 45, above. With regard to the specifically suggested measures in this row: 1. The Project shall be required to implement the applicable actions specified in Table 2 of SCAQMD Rule 403, as discussed above in row 45. Measures for earth-moving include maintaining soil moisture content at a minimum of 12 percent. (SCAQMD Rule 403, p. 403-19) 2, 6, 7, 8. A SWPPP must be prepared and implemented that includes BMPS that meet or exceed state Construction General Permit requirements. (DRP 2017, p. 5.4-53) Construction period BMPs may include erosion controls that prevent erosion; sediment controls that trap sediment carried in runoff; or BMPs that control other potential construction-related pollutants. (*Ibid*.) Types of BMPs that would implemented during construction of the Project and would meet the standards to comply with the Construction General Permit relevantly include: • Physically stabilizing the area through hydraulic mulch, soil binders, straw mulch, bonded fiber matrices, and erosion-control blankets (*Ibid*.); • Protecting perimeters through silt fences, fiber rolls, gravel bag berms, gravel bag barriers, sand bag barriers, and compost stocks to prevent discharges (*Ibid*.); • Containing and securely protecting stockpiled materials from wind at all times, unless actively being used, and controlling wind-erosion through the application of water or other dust palliatives as necessary to prevent and alleviate dust nuisance (*Ibid*.);

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time 6) All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7) Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel. 8) Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. 9) Minimizing the idling time of diesel powered construction equipment to two minutes. 10) The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOX reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels,		• Reducing off-site tracking through stabilized construction entrances/exits, construction road stabilization, and entrance/exit tire wash. (*Id.,* p. 5.4-54) 3. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include upwind fencing to prevent material movement on site. (SCAQMD Rule 403, p. 403-14) For screening, it also includes a measure to "install wind barrier with a porosity of no more than 50 percent upwind of screen to the height of the drop point." (*Id.,* p. 403-16) 4. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include maintaining live perennial vegetation where possible during clearing and grubbing. (SCAQMD Rule 403-13) Table 2 of SCAQMD Rule 403 includes a measure for inactive disturbed surface areas, to establish a vegetative ground cover within 21 days after active operations have ceased, of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting and at all times thereafter. (*Id.,* p. 403-20) 5. Project construction will be phased over an approximately 20-year buildout period. The Project will require construction contractors to delineate and flag the smallest site disturbance area possible in areas not subject to mass grading. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) 9. Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes, which exceeds state requirements. (*Id.,* pp. 5.11-79, 5.21-89) As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) 10, 12, 13. Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available. 11) Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). 12) Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. 13) Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.		Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) 11. The Project must comply with state pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen Section 5.504.4.) The Project Applicant/Developer is also required to use architectural coatings compliant with AVAQMD Rule 1113 and SCAQMD Rule 1113, which limit the VOC content of architectural coatings. Based on these rules, it was assumed that the average VOC content of architectural coatings would not exceed 50 grams per liter (g/L) for all interior surfaces, 100 g/L for residential exterior surfaces, and 150 g/L for non-residential exterior surfaces. It was also assumed that 50 percent of the non-residential exterior surface would be painted. (DRP 2017, p. 5.11-43) Further, this Final EIR revises MM 11-2 to add an additional bullet point requiring construction contractors to use Super-Compliant Architectural/Industrial (AIM) Coatings that are

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				commercially available and certified to meet the applicable requirements of AVAQMD Rule 1113 and SCAQMD Rule 1113.
48	SJVAPCD List, p. 4	For heavy duty construction equipment (scrapers, graders, trenchers, earth movers, etc.): 1. Minimize idling time (e.g., 5 minute maximum) 2. Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use 3. Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways 4. Implement activity management (e.g. rescheduling activities to reduce short-term impacts)	Yes, and/or Functional Equivalent Required	1. Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes, which exceeds state requirements. (DRP 2017, pp. 5.11-79, 5.21-89) As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) 2-4. The Project will require construction contractors to delineate and flag the smallest site disturbance area possible in areas not subject to mass grading. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) To avoid traffic disruption during the construction phases of each development MM 10-5 requires that temporary traffic controls in accordance with the Green and Graybook and a Transportation Management Plan be prepared and implemented during Project construction activities. (*Id.,* p. 5.10-53) The Traffic Management Plans shall identify the following: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan shall be implemented during all stages of Project construction that generate traffic impacts. (*Id.,* p. 5.10-145) See also rows 45 through 47 regarding dust control measures.
49	AG List, p. 16	Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.	Yes	Under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes, which exceeds state requirements. (DRP 2017, pp. 5.11-79, 5.21-89)

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
50	2008 OPR List p.18	Limit idling time for commercial vehicles, including delivery and construction vehicles.	Yes	Under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes, which exceeds state requirements. (DRP 2017, pp. 5.11-79, 5.21-89)
51	SLOAPCD List, p. 3-17	Use of an APCD-approved suppressant on private unpaved roads leading to the site, unpaved driveways and parking areas; applied at a rate and frequency that ensures compliance with APCD Rule 401, visible emissions and ensures offsite nuisance impacts do not occur.	Yes, and/or Functional Equivalent Required	The Project is not subject to SLOAPCD Rules, but would implement equivalent AVAQMD and SCAQMD Rules, and the Project's PDFs and MMs contain identical and/or functionally equivalent requirements to which the Project is subject, as discussed above in row 44. The Project shall be required to implement the applicable actions specified in Table 2 of SCAQMD Rule 403, as discussed above in row 45. For unpaved roads, application of a chemical stabilizer in a sufficient quantity and frequency to maintain a stabilized surface is included as a potential measure in Table 2. (SCAQMD Rule 403, p. 403-23) This measure is also applicable to open storage piles. (*Ibid*.)
52	CAPCOA List, pp. B-31, B-32	ARB-Certified Diesel Construction Equipment: Use ARB-certified diesel construction equipment. Increases CO2 emissions when trapped CO and carbon particles are oxidized (Catalyst Products 2007, ETC 2007).	Yes	Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) MM 11-2 also requires the use of 2010 or newer diesel haul trucks. (*Id.,* p. 5.11-79)
53	SJVAPCD List, p. 15-16	Use of a "Construction Clean Fleet" that will reduce construction emissions by 20 percent for oxides of nitrogen (NOx) and 45 percent for particulate matter of 10 microns or less in size (PM10) from the statewide average as estimated by the Air Resource Board (ARB). A Construction Clean Fleet for a project includes all the pieces of construction equipment that are greater than 50 horse power and generate emissions from the use of an internal combustion engines related to construction activity.	Yes – Functional Equivalent Required	Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) MM 11-2 also requires the use of 2010 or newer diesel haul trucks. (*Id.,* p. 5.11-79)
54	SJVAPCD List, p. 4	For heavy duty construction equipment (scrapers, graders, trenchers, earth movers, etc.): Use of alternative fueled or catalyst equipped diesel construction equipment.	Yes – Functional Equivalent Required	As discussed above in row 47, Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		Or Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set)		devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) Construction equipment used by the Project is also subject to CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation.
55	CAPCOA List, p. B-32	Alternative Fuel Construction Equipment: Use alternative fuel types for construction equipment.	Yes – Functional Equivalent Required	As discussed above in row 47, Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) Construction equipment used by the Project is also subject to CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation.
56	SMAQMD List, p. 11	Use Low VOC Cleaning Supplies. Project utilizes only low VOC cleaning supplies in perpetuity.	Yes	This is already legally required. CARB limits VOCs for numerous product types, including cleaning products. See Final Regulation for Reducing Emissions from Consumer Products, Article 2, Subchapter 8.5 available at: https://www.arb.ca.gov/consprod/regs/2015/article_2_final_1-22-15.pdf.
57	BAAQMD List, p. 4-14	Low VOC architectural coatings	Yes	The Project must comply with state pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen Section 5.504.4.) The Project Applicant/Developer is also required to use architectural coatings compliant with AVAQMD Rule 1113 and SCAQMD Rule 1113, which limit the VOC content of architectural coatings. Based on these rules, it was assumed that the average VOC content of architectural coatings would not exceed 50 grams per liter (g/L) for all interior surfaces, 100 g/L for residential exterior surfaces, and 150 g/L for non-residential exterior surfaces. It was also assumed that 50 percent of the non-residential exterior surface would be painted. (DRP 2017, p. 5.11-43) Further, this Final EIR revises MM 11-2 to require construction contractors to use Super-Compliant Architectural/Industrial (AIM) Coatings that are commercially available and certified to meet the applicable requirements of AVAQMD Rule 1113 and SCAQMD Rule 1113.

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
58	SMAQMD List, p. 11	Use low VOC Paint. Project utilizes low VOC Paint in perpetuity.	Yes	The Project must comply with state pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen Section 5.504.4.) The Project Applicant/Developer is also required to use architectural coatings compliant with AVAQMD Rule 1113 and SCAQMD Rule 1113, which limit the VOC content of architectural coatings. Based on these rules, it was assumed that the average VOC content of architectural coatings would not exceed 50 grams per liter (g/L) for all interior surfaces, 100 g/L for residential exterior surfaces, and 150 g/L for non-residential exterior surfaces. It was also assumed that 50 percent of the non-residential exterior surface would be painted. (DRP 2017, p. 5.11-43) Further, this Final EIR revises MM 11-2 to require construction contractors to use Super-Compliant Architectural/Industrial (AIM) Coatings that are commercially available and certified to meet the applicable requirements of AVAQMD Rule 1113 and SCAQMD Rule 1113.
59	CAPCOA List, p. B-32	Local Building Materials**:** Use locally made building materials for construction of the project and associated infrastructure.	Yes	The Centennial Green Development Program's Green Building component requires all residential and nonresidential development to comply with CALGreen Code Mandatory Measures, Required Measures for the voluntary 2016 CALGreen Tier 1 Measures, and to comply with the Los Angeles Green Building Ordinances Additional measures to further improve material conservation and efficiency, and assure healthy building materials and designs. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 4) The Green Development Program also has a requirement for using recycled materials wherever possible for Project streets, sidewalks, and parking lots. (*Id.,* p. 10) Additionally, the following mitigation measure is hereby added as MM 21-21: **MM 21-21** The Project Applicant/Developer shall require contractors to use locally available and recycled building materials, provided such materials meet

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				all applicable Building Code and other requirements, and are readily available and comparably priced to assure that such materials do not increase the cost and decrease the affordability of housing or community infrastructure.
60	SLOAPCD List, p. 3-18	Utilize green building materials (materials which are resource efficient, recycled, and sustainable) available locally if possible.	Yes	The Centennial Green Development Program's Green Building component requires all residential and nonresidential development to comply with CALGreen Code Mandatory Measures, Required Measures for the voluntary 2016 CALGreen Tier 1 Measures, and to comply with the Los Angeles Green Building Ordinances Additional measures to further improve material conservation and efficiency, and assure healthy building materials and designs. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 4). Additionally, see the new MM 21-21 set forth in row 59.
61	CAPCOA List, p. B-29	Green Building Materials**.** Project uses materials which are resource efficient, recycled, with long life cycles and manufactured in an environmentally friendly way.	Yes	The Centennial Green Development Program's Green Building component requires all residential and nonresidential development to comply with CALGreen Code Mandatory Measures, Required Measures for the voluntary 2016 CALGreen Tier 1 Measures, and to comply with the Los Angeles Green Building Ordinances Additional measures to further improve material conservation and efficiency, and assure healthy building materials and designs. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 4) Additionally, see the new MM 21-21 set forth in row 59.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
Mobility Design; Pedestrian and Bicycle Infrastructure				
62	SLOAPCD List, p. 3-17	Pave and maintain the roads and parking areas.	Yes	The Project will use durable paving materials that will be determined upon consideration of aggregates, asphalt materials, cementitious materials, recycled materials, and other roadway materials that are commonly used in pavement construction in order to assess from a lifecycle perspective the role they play in contributing to the sustainability of the Project's pavement system; "Cool" pavements will be used to reduce heat island effects. (DRP 2017, p. 5.21-79)
63	SLOAPCDList, p. 3-18	Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.	Yes	The Project does incorporate features to reduce vehicle queuing and improve the pedestrian environment. Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) With regard to parking lot and driveway design standards specifically, the following mitigation measure is hereby added as MM 21-22: **MM 21-22** The Project parking lots shall be designed to reduce vehicle queuing and improve pedestrian safety. Parking lot access designs shall include self-enforcement features for reducing the speeds on driveways, such as speed bumps or curved driveways. The parking lots shall include clearly marked pedestrian pathways connecting building entrances to parking, sidewalk, and transit drop-off/pick-up locations.
64	SLOAPCD List, p. 3-17	Driveway design standards (e.g., speed bumps, curved driveway) for self-enforcing of reduced speed limits for unpaved driveways.	Yes	The Project does incorporate features to reduce vehicle queuing and improve the pedestrian environment, as discussed in row 63. With regard to parking lots and driveway design standards specifically, see MM 21-22 as set forth in row 63.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
65	SJVAPCD List, p. 13	Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.	Yes	This requirement has been incorporated into the Project in MM 21-22 – see row 63.
66	CAPCOA List, p. B-9	Pedestrian Pathway Through Parking**:** Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.	Yes	This requirement has been incorporated into the Project in MM 21-22 – see row 63.
67	SJVAPCD List, p. 13	Provide pedestrian access between bus service and major transportation points and to destination points within the project.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) See also MM 21-22 in row 63.
68	BAAQMD List, p. 4-17	100 percent increase in design (i.e., presence of design guidelines for transit oriented development, complete streets standards)	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) Pedestrian amenities throughout the community include specific allocations of land to greenway and community trails (described in the Trails Plan, Specific Plan Section 3.11.7) so that pedestrians can circulate throughout the community safely and efficiently. The pedestrian system is designed to avoid roadway crossings to the extent feasible. Consistent with complete streets planning, sidewalks are planned for all public streets. (*Id.,* Appendix 4.0-A, p. 3-6) The Project includes an extensive network of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				employment areas. (*Id.,* p. 3-3) It also includes two underpasses and one overpass over SR-138 to facilitate access to employment centers. (*Ibid*.) Per the Specific Plan, all neighborhoods within each village shall connect to each other via a network of local streets and trails. The Project will locate 50 percent or more of all residential units and non-residential buildings in a grid pattern block structure while considering environmental or other land form constrains. In areas, outside of the Village Cores and Town Center, block size shall be no greater than 1,980 feet (1/3 mile) in perimeter with an intersection or trail connection every 800 feet. Within a ¼ mile walking distance of the Village Cores and the Town Center (including inside the Center/Cores), and within the Centennial Commerce District, block size shall be no greater than an average of 1,320 to 1,600 feet (approximately 1/4 mile) in perimeter and where feasible with no more than 500 feet of spacing distance between intersections. Multi-family residential and commercial/mixed uses in the Town Center or a Village Core shall maximize the use of public alleys or private lanes located in the rear of the lots or buildings, and principally used for parking access, loading, deliveries, trash, and utilities. Buildings shall front the street with limited to no curb cuts, allowing direct pedestrian access from building entrances to the public sidewalk. Residential blocks in these areas should utilize alleys or private rear lanes for parking access and other services states above. (*Id.,* Appendix 4.0-A, p. M-9) Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (*Id.,* Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8) In addition to all of the above, the Project promotes travel by foot or on bicycle by providing extensive pedestrian and bicycle infrastructure, a transit program and incentives to use transit, and charging facilities for electric vehicles, as discussed throughout this response
69	CAPCOA List, pp. B-15, B-16	Street Grid**:** Multiple and direct street routing (grid style). This measure only applies to projects with an internal CF >/= 0.80, and average of one-quarter mile or less between external connections along perimeter of project. [CF= # of intersections /(# of cul-de-sacs + intersections)]. Cul-de-sacs with bicycle/ pedestrian through access may be considered "complete intersections" when calculating the project's internal connectivity factor. External connections are bike/pedestrian pathways and access points, or streets with safe and convenient bicycle and pedestrian access that connect the project to adjacent streets, sidewalks, and uses. If project site is adjacent to undeveloped land; streets, pathways, access points, and right-of-ways that provide for future access to adjacent uses may count for up to 50 percent of the external connections. Block perimeter (the sum of the measurement of the length of all block sides) is limited to no more than 1,350 feet. Streets internal to the project should connect to streets external to the project whenever possible.	Yes – Functional Equivalent Required	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DPR 2017, Appendix 4.0-A, p. 3-2) Residential, recreational, and commercial uses have been strategically located to provide superior access, multi-modal design, and ultimately to reduce the number of vehicles on the road. (*Id.,* p. 1-7) The metrics of the Centennial Specific Plan require 50 percent or more of all residential units and non-residential buildings to be sited in a grid pattern block structure that is considerate of environmental or other land form constraints. (*Id.,* p. 2-38) Consistent with the County of Los Angeles's Model Design Manual for Living Streets (2011), additional metrics establish the criteria for a grid pattern network and increase connectivity within these areas: • All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.) • Locate 50 percent or more of all residential units and non-residential buildings in a grid pattern block structure while considering environmental or other land form constraints. In areas outside of the Village Cores and Town Center, block size shall be no greater than 1,980 feet (1/3 mile) in perimeter with an intersection or trail connection every 800 feet. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				• Within a ¼ mile walking distance of the Village Cores and the Town Center (including inside the Center/Cores), and within the Centennial Commerce District, block size shall be no greater than an average of 1,320 to 1,600 feet (approximately 1/4 mile) in perimeter and where feasible with no more than 500 feet of spacing distance between intersections. (*Ibid*.) • Multi-family residential and commercial/mixed uses in the Town Center or a Village Core shall maximize the use of public alleys or private lanes located in the rear of the lots or buildings, and principally used for parking access, loading, deliveries, trash and utilities. Buildings shall front the street with limited to no curb cuts, allowing direct pedestrian access from building entrances to the public sidewalk. Residential blocks in these areas should utilize alleys or private rear lanes for parking access and other services stated above. (*Ibid*.) See also row 68.
70	BAAQMD List, p. 4-18	Complete streets (i.e., bike lanes and pedestrian sidewalks on both sides of streets, traffic calming features such as pedestrian bulb-outs, cross-walks, traffic circles, and elimination of physical and psychological barriers (e.g., sound walls and large arterial roadways, respectively).)	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) The Project also incorporates features to reduce vehicle queuing and improve the pedestrian environment. Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (*Id.,* Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				network of local streets and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8)
71	SJVAPCD List, p. 13	Project design uses models by the Local Government Commission (LGC) in the "'Smart Growth Guidebook," such as: street block patterns that form an interconnected grid, short block faces, numerous alleys and narrow streets.	Yes – Functional Equivalent Required	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) The metrics of the Centennial Specific Plan require 50 percent or more of all residential units and non-residential buildings to be sited in a grid pattern block structure that is considerate of environmental or other land form constraints. (*Id.,* p. 2-38) Consistent with the County of Los Angeles's Model Design Manual for Living Streets (2011), additional metrics establish the criteria for a grid pattern network and increase connectivity, as set forth in row 69.
72	SLOAPCD List, p. 3-17	Incorporate traffic calming modifications to project roads, such as narrower streets, speed platforms, bulb-outs and intersection designs that reduce vehicles speeds and encourage pedestrian and bicycle travel.	Yes	Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (DRP 2017, Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8)
73	SMAQMD List, p. 9	Provide Traffic Calming Measures. Projects streets and intersections feature traffic calming features.	Yes	The Project incorporates traffic calming measures, as discussed in row 72.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
74	2008 OPR List, p. 18	Implement street improvements that are designed to relieve pressure on a region's most congested roadways and intersections.	Yes	Per MM 10-3, the Project Applicant/Developer shall seek to enter into a Traffic Mitigation Agreement with Caltrans and shall comply with its terms if approved and implemented; Compliance with the Traffic Mitigation Agreement constitutes compliance for mitigation of the Project's traffic impacts on the State highway system. (DRP 2017, p. 5.10-145) Per MM 10-4, the Project Applicant/Developer will also work with the County and/or Caltrans to establish a Traffic Mitigation Fee Program or assessment district, or other equivalent program, to mitigate vehicular trips related to new development accessing SR-138 corridor between I-5 and SR-14. (*Ibid*.) MMs 10-6 through 10-41 identify specific improvements. (See response to Comment F.8-17 for text of existing and revised mitigation measures).
75	CAPCOA List, pp. B-6, B-7	Traffic Calming**:** Project design includes pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways are designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips by featuring traffic calming features. All sidewalks internal and adjacent to project site are minimum of five feet wide. All sidewalks feature vertical curbs. Roadways that converge internally within the project are routed in such a way as to avoid "skewed intersections;" which are intersections that meet at acute, rather than right, angles. Intersections internal and adjacent to the project feature one or more of the following pedestrian safety/traffic calming design techniques: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, and roundabouts or mini-circles. Streets internal and adjacent to the project feature	Yes – Functional Equivalent Required	Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (DRP 2017, Appendix 2-C to Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8) The Centennial roadway network would consist of small to medium-size streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations. (*Id.,* Appendix 4.0-A, p. 3-1) A variety of intersection controls will efficiently manage vehicular and non-vehicular traffic throughout Centennial to facilitate safe and efficient mobility; these include traditional stop signs on smaller streets, traffic signals at the intersections of larger project thoroughfares, grade separations and intersection designs that promote safety for all users of the street (*Id.,* p. 3-19) Additionally,

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Row	Source	Measure	Included	Response
		pedestrian safety/traffic calming measures such as on-street parking, planter strips with street trees, and chicanes/chokers (variations in road width to discourage high-speed travel).		modern roundabouts will be located at certain secondary and collector-road intersections where four-lane and two-lane or two two-lane roadways connect, to expiate traffic and intersect with the trails and bikeways paths to ensure the safe communion between cyclists, pedestrians, and motorists. (*Ibid*.)
76	SLOAPCD List, p. 3-17	Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel to adjacent land uses.	Yes	Project development will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes. (DRP 2017, p. 4-38) The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. The Specific Plan also specifies that trails can be connected to local streets and parks through openings in cul-de-sacs. (*Id.,* Appendix 4.0-A, p. 3-88)
77	SMAQMD List, p. 9	Improve Walkability Design. Walkable street network.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) See rows 78 and 81 for further discussion.
78	AG List, p. 14	Ensure that the project enhances, and does not disrupt or create barriers, to non-motorized transportation.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) Project development

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes. (*Id.,* p. 4-38) The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (*Id.,* Appendix 4.0-A, p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are shown on Specific Plan Figure 3-3, *Bicycle Network*.
79	AG List, p. 13	Promote "least polluting" ways to connect people and goods to their destinations.	Yes	The Project incorporates numerous design features and measures that reduce single-occupancy vehicle travel and promote alternative modes of travel, including public transit, walking and biking, and alternative fueled vehicles. See rows 6 through 13 regarding accessibility to transit and regarding connectivity and density/intensity increases to reduce trip length and encourage biking and walking to destinations; rows 14 through 33 regarding smart growth, compact development, and density and diversity of use, all of which shorten Project-related trips length and encourage biking and walking; rows 68 through 71 regarding smart street design and complete streets; rows 77 and 78 immediately above regarding walkability and connectivity; rows 80 through 93 regarding pedestrian and bicycle friendly infrastructure and design; Rows 94-109 regarding end-of-trip facilities and bicycle parking and infrastructure; rows 110 through 112 regarding safe and efficient non-motorized travel to schools; rows 113 through 128 regarding transit infrastructure and service; rows 129 through 145 regarding electric vehicle and alternative fuel options; and rows 146 through 209 regarding Transportation Demand Management.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
80	AG List, p. 14	Connect parks and open space through shared pedestrian/bike paths and trails to encourage walking and bicycling. Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.	Yes	Per the Specific Plan, all neighborhoods within each village shall connect to each other via a network of local streets and trails. Pedestrian amenities throughout the community include specific allocations of land to greenway and community trails (described in the Trails Plan, Specific Plan Section 3.11.7) so that pedestrians can circulate throughout the community safely and efficiently. The pedestrian system is designed to avoid roadway crossings to the extent feasible. Consistent with complete streets planning, sidewalks are planned for all public streets. (DRP 2017, Appendix 4.0-A, p. 3-6) The Project includes an extensive network of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas. (*Id.,* Appendix 4.0-A, p. 3-3; *Id.,* p. 4-34) It also includes two underpasses and one overpass over SR-138 to facilitate access to employment centers. (*Ibid*.) The following design criteria also apply to the Project, and reinforce the Mobility Plan contained in the Specific Plan: • An 80 percent average, but no less than 50 percent of all residential units located within ½ mile of a Village Core or Town Center that includes retail and services uses; • All residential units within a 5-minute walk (1/4 mile) of a park of 10,000 square feet or more, trailhead, clubhouse, or other public amenity; • Parks located within a 5-minute walk (1/4 mile) of 80 percent of all residential units; • All neighborhoods within each village connect to each other via a network of trails; • An extensive network of sidewalks, greenway trails (approximately 13 miles), and community trails (approximately 60 miles) that link residential, schools, shopping, and employment centers. (*Id.,* p. 4-34) Sidewalks widths will be compliant with the Americans with Disabilities Act and be consistent with the Specific Plan. (*Id.,* Appendix

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				2-A to Appendix 4.0-A, p. 10) Bicycle infrastructure is addressed below in rows 89 through 112. Traffic calming measures are addressed above in rows 69 through 75.
81	AG List, p. 11	Include pedestrian and bicycle facilities within projects and ensure that existing non-motorized routes are maintained and enhanced.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) Project development will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes. (*Id.,* p. 4-38) The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (*Id.,* Appendix 4.0-A, p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are shown on Specific Plan Figure 3-3, *Bicycle Network*. See also rows 89 through 112 regarding bicycle infrastructure.
82	SLOAPCD List, p. 3-17	Provide a pedestrian-friendly and interconnected streetscape to make walking more convenient, comfortable and safe (including appropriate signalization and signage).	Yes	Per the Specific Plan, all neighborhoods within each village shall connect to each other via a network of local streets and trails. Pedestrian amenities throughout the community include specific allocations of land to greenway and community trails (described in the Trails Plan, Specific Plan Section 3.11.7) so that pedestrians can circulate throughout the community safely and efficiently. The Project includes an extensive network of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				employment areas. (*Id.,* Appendix 4.0-A, p. 3-3; *Id.,* p. 4-34) It also includes two underpasses and one overpass over SR-138 to facilitate access to employment centers. (*Ibid*.) See also row 81 regarding pedestrian-friendly Project design.
83	SMAQMD List, p. 9	Improve Pedestrian Network. On-site pedestrian access network links all of project internally and externally	Yes	A pedestrian network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. See also the discussion regarding complete streets and connectivity in rows 68 through 71 and 76 through 80.
84	SLOAPCD List, p. 3-17	Provide good access to/from the development for pedestrians, bicyclists, and transit users.	Yes	A pedestrian- and bicycle-friendly network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. See also the discussion regarding complete streets and connectivity in rows 68 through 71 and 76 through 80.
85	BAAQMD List, p. 4-13	Bike and Pedestrian	Yes	A pedestrian- and bicycle-friendly network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. The Project also provides extensive bicycle-related infrastructure, as addressed more fully in rows 89 through 112. See also the discussion regarding complete streets and connectivity in rows 68 through 71 and 76 through 80.
86	SJVAPCD List, p. 12-13	<u>Other Pedestrian Mitigation Measures</u>**:** 1) Provide building access paths which are physically separated from street parking lot traffic and that eliminate physical barriers such as walls, berms, landscaping and slopes that impede the use of pedestrians, bicycle facilities, or public transportation vehicles. 2) Provide continuous sidewalks separated from the roadway by landscaping and on-street parking.	Yes	1. Parking areas will be fully accessible in accordance with the Americans with Disabilities Act. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 10) Centennial will also implement a system of complete streets consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies, which would provide safe and efficient access to all Project-related areas, including buildings. (*Id.,* Appendix 4.0-A, p. 3-2) See also MM 21-22 in row 63. 2. Continuous sidewalks are planned for both sides of all public streets. (*Id.,* p. 8) Sidewalks widths will be compliant with the Americans with Disabilities Act and be consistent with the Specific Plan. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 10) 3. An extensive network of sidewalks, greenway trails (approximately 13 miles), and community trails (approximately 60 miles) link

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Row	Source	Measure	Included	Response
		3) Provide on and off-site pedestrian facility improvements such as trails linking them to designated pedestrian commuting routes and/or on-site overpasses and wider sidewalks. 4) Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel. 5) Improve walkability design and provide traffic reduction modifications to project roads, such as: narrower streets, speed platforms, bulb-outs and intersection modifications designed to reduce vehicle speeds and to encourage pedestrian and bicycle travel.		residential, schools, shopping, and employment centers. (*Id.,* p. 4-34) Sidewalks will be separated from streets by a parkway containing landscaping such as swales and canopy trees. (*Id.,* Appendix 4.0-A, p. 1-5) 4. Project development will include a safe and convenient, interconnected trails system to connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. The Specific Plan also specifies that trails can be connected to local streets and parks through openings in cul-de-sacs. (*Id.,* Appendix 4.0-A, p. 3-88) All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 4) 5. A pedestrian- and bicycle-friendly network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (*Id.,* Appendix 2-C to Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.)

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Row	Source	Measure	Included	Response
87	CAPCOA List, p. B.4	Pedestrian Network**:** The project provides a pedestrian access network that internally links all uses and connects to all existing/planned external streets and pedestrian facilities contiguous with the project site. Project design includes a designated pedestrian route interconnecting all internal uses, site entrances, primary building entrances, public facilities, and adjacent uses to existing external pedestrian facilities and streets. Route has minimal conflict with parking and automobile circulation facilities. Streets (with the exception of alleys) within the project have sidewalks on both sides. All sidewalks internal and adjacent to project site are minimum of five feet wide. All sidewalks feature vertical curbs. Pedestrian facilities and improvements such as grade separation, wider sidewalks, and traffic calming are implemented wherever feasible to minimize pedestrian barriers. All site entrances provide pedestrian access.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) Project development will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The Specific Plan also specifies that trails can be connected to local streets and parks through openings in cul-de-sacs. (*Id.,* Appendix 4.0-A, p. 3-88) All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 4) In addition to the trails and paths, sidewalks connecting to the trail system will be provided on all public streets. (*Id.,* Appendix 4.0-A, p. 3-2) Sidewalks are planned for both sides of all public streets. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 4) A variety of intersection controls will efficiently manage vehicular and non-vehicular traffic throughout Centennial to facilitate safe and efficient mobility; these include traditional stop signs on smaller streets, traffic signals at the intersections of larger project thoroughfares, grade separations and intersection designs that promote safety for all users of the street (*Id.,* p. 3-19) Additionally, modern roundabouts will be located at certain secondary and collector-road intersections where four-lane and two-lane or two two-lane roadways connect, to expiate traffic and intersect with the trails and bikeways paths to ensure the safe communion between cyclists, pedestrians, and motorists. (*Ibid*.) Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (*Id.,* Appendix 4.0-A,

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Row	Source	Measure	Included	Response
				Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8)
88	CAPCOA List, pp. B-4, B-5	Pedestrian Barriers Minimized**:** Site design and building placement minimize barriers to pedestrian access and interconnectivity. Physical barriers such as walls, berms, landscaping, and slopes between residential and nonresidential uses that impede bicycle or pedestrian circulation are eliminated.	Yes	The Project minimizes pedestrian barriers and creates a safe, efficient pedestrian network connecting the entire site, and includes many site design features to encourage walking and to improve walkability, as discussed more fully in rows 63 through 86.
89	CAPCOA List, pp. B-2, B-3	Proximity to Bike Path/Bike Lanes: Entire project is located within one-half mile of an existing/planned Class I or Class II bike lane and project design includes a comparable network that connects the project uses to the existing offsite facility. Project design includes a designated bicycle route connecting all units, onsite bicycle parking facilities, offsite bicycle facilities, site entrances, and primary building entrances to existing Class I or Class II bike lane(s) within one-half mile. Bicycle route connects to all streets contiguous with project site. Bicycle route has minimum conflicts with automobile parking and circulation facilities. All streets internal to the project wider than 75 feet have Class II bicycle lanes on both sides.	Yes	Buildout of the Project would result in consistency with this requirement. As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (DRP 2017, Appendix 4.0-A, p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are described below and shown on Specific Plan Figure 3-3, *Bicycle Network*. (*Ibid*.) **Bike Path (Class I Multi-use trail).** Class I multi-use trail bikeways provide a completely separated travel way for the exclusive use of bicyclists and pedestrians, with crossflow minimized. These bikeways are generally located in community trails and greenways. (*Ibid*.) **Bike Lane (Class II bikeway).** Class II bikeways include a striped lane for one-way bike travel on a street or highway. When roadways contain additional rights-of-way, a painted buffer may be included to buffer bicyclists from automobiles and transit. This buffered design is commonly referred to as an Enhanced Class II Bikeway. (*Ibid*.) **Bike Route (Class III bikeway).** Class II bikeways provide for shared use with motor vehicle traffic, and routes are marked with appropriate signage. Painted shared lane markings on pavement, commonly referred to as sharrows, may also be incorporated into Class III

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				bikeways, further identifying shared use between motorists and bicyclists. (*Ibid*.) **Protected Bike Lane (Class IV bikeway).** A protected bikeway, commonly referred to as a cycle track, combines the user experience of a separated path with the on-street infrastructure of a conventional bike lane. Cycle tracks vary in configuration. Cyclists could be separated from motor vehicle traffic through such means as raised medians, on-street parking, bollards, or elevated pathways. They may be one-way (one direction on each side of the street) or two-way (both directions side-by-side on one side of the street). The buffers shown for Class IV bikeways in Specific Plan Figures 3-6, 3-7, and 3-11 may be raised to provide additional safety for cyclist and vehicular traffic. (*Ibid*.) **Trails.** Community, Greenway, and Regional trails within Centennial also provide for shared use pathways by bicycle, pedestrian, and in some cases equestrian activities. (*Ibid*.) All major Project roadways would include bicycle infrastructure, as can be seen on Specific Plan Figures 3-2 and 3-3. See also Figures 3-6: Six-Lane Major Highway, 3-7: Four-Lane Secondary Highway, 3-8: Collector 1 – with Median, 3-9 Collector 2- without Median, and 3-10: Collector 3 – with Parking, 3-11 Industrial Collector for illustrations of bike lanes incorporated into rights-of-way. (*Id.,* Appendix 4.0-A, pp. 3-10 to 3-16).
90	AG List, p. 13	Incorporate bicycle lanes, routes, and facilities into street systems, new subdivisions, and large developments.	Yes	Project development will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes. (DRP 2017, p. 4-38) The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (*Id.,* Appendix 4.0-A,

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are described below and shown on Specific Plan Figure 3-3, *Bicycle Network*. (*Ibid*.) See row 89 for further discussion.
91	SLOAPCD List, p. 3-17	Increase number of connected bicycle routes/lanes in the vicinity of the project.	Yes	The Project provides an extensive, interconnected network of bike-accessible and dedicated bicycle-only infrastructure, as discussed more fully in rows 89 and 90, above.
92	SLOAPCD List, p. 3-17	Provide easements or land dedications and construct bikeways and pedestrian walkways.	Yes	The Project provides an extensive, interconnected network of bike-accessible and dedicated bicycle-only infrastructure, as discussed more fully in rows 89 and 90, above. The Project also provides an extensive, interconnected pedestrian network, as more fully discussed in rows 76 through 87.
93	SJVAPCD List, p. 13	Install Class I or Class II bike lanes on arterial/collector streets, or where suitable route exists.	Yes	The Project provides an extensive, interconnected network of bike-accessible and dedicated bicycle-only infrastructure, as discussed more fully in rows 89 and 90, above. This includes bicycle lanes on collector streets, as indicated in Specific Plan Figures 3-3 and 3-8 through 3-11. (*Id.,* Appendix 4.0-A, pp. 3-8, 3-13 to 3-16).
94	SLOAPCD List, p. 3-19	Provide secure on-site bicycle indoor storage, lockers, or racks.	Yes	Per MM 11-4 (as updated in response to Comment F.8-95), for nonresidential buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupants. (DRP 2017, p. 5.11-79) This standard regarding showers per tenant-occupants is consistent with CALGreen requirements and is sufficient. Per the Centennial Green Development Program, nonresidential buildings in the Business Park and Commercial areas with 75,000 or more square feet of gross floor area shall provide locker rooms and

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				shower facilities of a size and at a location deemed appropriate by the County to encourage commuters to ride to work. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16) There are no existing park and ride lots, but the Project would provide for two transit hubs, which would provide secure and convenient bike storage facilities. (*Id.,* p. 17)
95	CAPCOA List, p. B-1	End of Trip Facilities**:** Nonresidential projects provide "end-of-trip" facilities including showers, lockers, and changing space (e.g., four clothes lockers and one shower provided for every 80 employee parking spaces, separate facilities for each gender for projects with 160 or more employee parking spaces).	Yes – Functional Equivalent Required	Per MM 11-4 (as updated in response to Comment F.8-95), for nonresidential buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupants. (DRP 2017, p. 5.11-79) This standard regarding showers per tenant-occupants is consistent with CALGreen requirements and is sufficient.
96	SLOAPCD List, p. 3-18	Provide employee lockers and showers. One shower and 5 lockers for every 25 employees are recommended.	Yes – Functional Equivalent Required	Per MM 11-4 (as updated in response to Comment F.8-95), for nonresidential buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupants. (DRP 2017, p. 5.11-79) This standard regarding showers per tenant-occupants is consistent with CALGreen requirements and is sufficient.
97	SLOAPCD List, p. 3-19	Provide bicycle lockers for existing 'Park and Ride' lots where absent or insufficient.	Yes – Functional	The Project does not propose park and ride lots, but it would provide for two transit hubs, which would provide secure and convenient bike storage facilities. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
			Equivalent Required	
98	SJVAPCD List, p. 12	Provide shower and locker facilities to encourage employees to bike and/or walk to work, typically one shower and three lockers for every 25 employees.	Yes – Functional Equivalent Required	Per MM 11-4 (as updated in response to Comment F.8-95), for nonresidential buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupants. (DRP 2017, p. 5.11-79) This standard regarding showers per tenant-occupants is consistent with CALGreen requirements and is sufficient.
99	SLOAPCD List, p. 3-19	Provide on-site bicycle parking both short term (racks) and long term (lockers, or a locked room with standard racks and access limited to bicyclist only) to meet peak season maximum demand. One bike rack space per 10 vehicle/employee space is recommended.	Yes – Functional Equivalent Required	Sufficient and appropriate amounts of safe and convenient bicycle parking is included in the Project, and provide the functional equivalent with regard to emissions reductions, as discussed below: For nonresidential uses, bicycle parking shall be provided as specified in MM 21-17: Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for non-residential land uses. (DRP 2017, p. 5.21-91) Further, for residential and nonresidential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the 2016 CALGreen Code or County Code Section 22.52.1225B, whichever is more stringent. (*Id.,* 5.11-81, 5.21-92.)
100	AG List, p. 13	Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.	Yes	Sufficient and appropriate amounts of safe and convenient bicycle parking and end-of-trip facilities are included in the Project, for both residential and nonresidential use, as specified in MMs 11-4, 11-5, 11-6, 21-17, 21-18, and 21-19, and as further discussed in rows 94 through 99 above and 101 through 109 below.

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Row	Source	Measure	Included	Response
101	CAPCOA List, p. B-10	Garage Bicycle Storage**:** Provide storage space in one-car garages for bicycles and bicycle trailers.	Yes	Single-family homes will be constructed with garages which have adequate space for bicycle storage. (DRP 2017, Appendix 3-C to Appendix 4.0-A, Housing Glossary).
102	CAPCOA List, p. B-1	Bike Parking**:** Nonresidential projects provide plentiful short- and long-term bicycle parking facilities to meet peak season maximum demand (e.g., one bike rack space per 20 vehicle/employee parking spaces.	Yes – Functional Equivalent Required	For nonresidential uses, bicycle parking shall be provided as specified in MM 21-17: Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for non-residential land uses. (DRP 2017, p. 5.21-91) Further, for residential and nonresidential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or County Code Section 22.52.1225B, whichever is more stringent. (*Id.,* 5.11-81, 5.21-92.)
103	CAPCOA List, pp. B-1, B-2	Bike-Parking at Multi-Unit Residential**:** Long-term bicycle parking is provided at apartment complexes or condominiums without garages (e.g., one longterm bicycle parking space for each unit without a garage). Long-term facilities shall consist of one of the following: a bicycle locker, a locked room with standard racks and access limited to bicyclists only, or a standard rack in a location that is staffed and/or monitored by video surveillance 24 hours per day.	Yes – Functional Equivalent Required	As noted in MM 11-5, the Project shall provide permanently anchored bicycle racks within 100 feet of visitor's entrances of residential buildings, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. With regard to long-term bicycle parking for multifamily buildings, the Project shall provide on-site and convenient parking for at least one bike per every two dwelling units, which may include, but is not limited to: 1) Covered, lockable enclosures with permanently anchored racks for bicycles; 2) Lockable bicycle rooms with permanently anchored racks; 3) Lockable, permanently anchored bicycle lockers. (DRP 2017, p. 5.11-80)
104	SLOAPCD List, p. 3-20	Provide storage space in garage for bicycle and bicycle trailers, or covered racks / lockers to service the residential units.	Yes	With regard to long-term bicycle parking for multifamily buildings, the Project shall provide on-site and convenient parking for at least one bike per every two dwelling units, which may include, but is not limited to: 1) Covered, lockable enclosures with permanently anchored racks for bicycles; 2) Lockable bicycle rooms with permanently anchored racks; 3) Lockable, permanently anchored bicycle lockers. (DRP 2017, p. 5.11-80) Single-family homes will be constructed with garages which are anticipated to have adequate space for bicycle storage. (*Id.,* Appendix 3-C to Appendix 4.0-A, Housing Glossary).

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Row	Source	Measure	Included	Response
105	SJVAPCD List, p. 12	Provide Class I or Class II bicycle parking/storage facilities on-site. Bicycle parking facilities should be near destination points and easy to find. At least one bicycle parking space for every 20 vehicle parking spaces.	Yes	Sufficient and appropriate amounts of safe and convenient bicycle parking is included in the Project, and provide the functional equivalent with regard to emissions reductions, as discussed below: As noted in MM 11-5, the Project shall provide permanently anchored bicycle racks within 100 feet of visitor's entrances of residential buildings, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. With regard to long-term bicycle parking for multifamily buildings, the Project shall provide on-site and convenient parking for at least one bike per every two dwelling units, which may include, but is not limited to: 1) Covered, lockable enclosures with permanently anchored racks for bicycles; 2) Lockable bicycle rooms with permanently anchored racks; 3) Lockable, permanently anchored bicycle lockers. (*Id.,* p. 5.11-80) For hotel and motel buildings, the requirement is one on-site space for every 25,000 square feet, but not less than two spaces – they may be of the same type, but not limited to, as those for multifamily buildings. (*Id.,* p. 5.11-81) See also the Centennial Green Development Program at page 16. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16). For nonresidential uses, bicycle parking shall be provided as specified in MM 21-17: Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for non-residential land uses. (*Id.,* p. 5.21-91) Further, for residential and nonresidential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or County Code Section 22.52.1225B, whichever is more stringent. (*Id.,* 5.11-81, 5.21-92.)
106	SJVAPCD List, p. 12	Provide Class I bicycle parking at apartment complexes or condos without garages.	Yes	As noted in MM 11-5, the Project shall provide permanently anchored bicycle racks within 100 feet of visitor's entrances of residential buildings, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. With regard to long-term bicycle parking for multifamily buildings, the Project shall provide on-site and convenient parking for at least one bike per every two dwelling units, which may include, but is not limited to: 1) Covered, lockable enclosures with permanently anchored racks for bicycles; 2)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				Lockable bicycle rooms with permanently anchored racks; 3) Lockable, permanently anchored bicycle lockers. (DRP 2017, p. 5.11-80) For hotel and motel buildings, the requirement is one on-site space for every 25,000 square feet, but not less than two spaces – they may be of the same type, but not limited to, as those for multifamily buildings. (*Id.,* p. 5.11-81) See also the Centennial Green Development Program at page 16. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16).
107	SLOAPCD List, p. 3-20	At community event centers (i.e., amphitheaters, theaters, and stadiums) provide valet bicycle parking.	Yes, Functional Equivalent Required and MM Added	The Centennial Green Development Program specifies that the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following relevant bicycle parking features have been incorporated into building designs or specifications: Provide permanently anchored bicycle racks within 200 feet of visitors' entrances of nonresidential buildings, readily visible to passerby, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of two-bike capacity rack. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) In addition, the following is added to the end of the bullet point list in MM 10-25 as one of the measures required for implementation of the Mobility Plan: • <u>Require TMA implementation of a combination of measures to provide adequate temporary bike parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure.</u>

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Row	Source	Measure	Included	Response
108	CAPCOA List, p. B-10	Valet Bicycle Parking**:** Provide spaces for the operation of valet bicycle parking at community event "centers" such as amphitheaters, theaters, and stadiums.	Yes, Functional Equivalent Required and MM Added	The Centennial Green Development Program specifies that the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following relevant bicycle parking features have been incorporated into building designs or specifications: Provide permanently anchored bicycle racks within 200 feet of visitors' entrances of nonresidential buildings, readily visible to passerby, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of two-bike capacity rack. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) Please also see the addition to MM 10-25 made in row 107, immediately above.
109	SJVAPCD List, p. 6	Bicycle Infrastructure-Based Mitigation Measures Provide bicycle enhancing infrastructure that includes: bikeways/paths connecting to a trail system; secure bicycle parking; and/or employee lockers and showers	Yes	Bikeways and paths, bicycle parking, and employee facilities are provided, as discussed in rows 89 through 106.
110	AG List, p. 14	Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.	Yes	Non-motorized transportation planning elements are integrated into the Centennial Mobility Plan to encourage non-automotive transit modes and provide safe routes to school. An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (DRP 2017, p. 4-6) The community trail system (described in Specific Plan Section 3.11.7, Trails Plan) provides shared-use pathways for bicycles, pedestrian and, in some cases, equestrian activities. Bikeways are classified into four categories that are described in Specific Plan Section 3.2.4 and shown on Specific Plan Figure 3-3, *Bicycle Network*. These passageways are designed to avoid roadway crossings to the extent feasible and to give easy access to retail, jobs and other amenities. With their safe design that encourages "eyes on trails," families will be able to walk to school while enjoying the natural open spaces set aside throughout Centennial. In addition to the trails and paths, sidewalks connecting to the trail system will be provided on all public streets. (*Id.,* Appendix 4.0-A, p. 3-2)

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Row	Source	Measure	Included	Response
				The following addition is also hereby made to MM 15-2: **MM 15-2** The Project Applicant/Developer shall demonstrate to the County that they have an executed agreement with all school districts that operate within the boundaries of the Project site. <u>The Transportation Management Association shall coordinate with local schools and school districts to establish and maintain a Safe Routes to School program to facilitate students walking and biking to schools.</u>
111	2008 OPR p. 20	Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.	Yes	An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (DRP 2017, p. 4-6) See also row 110.
112	2008 OPR List, p. 20	Develop a Safe Routes to School program that allows and promotes bicycling and walking to school.	Yes	See the addition to MM 15-2, set forth in row 110, above.
Transit Infrastructure and Service				
113	Ag List, p. 12	Build or fund a major transit stop within or near the development.	Yes – Functional Equivalent Required	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. (DRP 2017, p. 4-37) A transit route easement no less than 25 feet wide shall be reserved in the CCD (connecting the Town Center, BP and I/C areas) and also running northerly connecting to the Village 5 Core. At buildout, a local backbone route along the major north/south collectors would be provided connecting from SR-138 to the northern end of the Project site. (*Ibid*.) This backbone route would be supplemented by feeder lines that loop through the Project (local transit routes). (*Ibid*.) The transfer locations along the backbone route would provide connectivity to the local system (*Id.,* Exhibit 4-7). Transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. At

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Row	Source	Measure	Included	Response
				Centennial, two transit centers are proposed in locations strategic to job sites, retail and Centennial's extensive trails system, encouraging residents to ride share and providing a dedicated location for public transit drop-off and pick-up. (*Id.,* Appendix 4.0-A, p. 3-2) The centers will also be close to SR-138 to allow quick and easy freeway access. (*Ibid*.) The centers would provide convenient access to public bus transportation, carpooling, park and ride, special charter operations, and/or similar types of activities related to local or off-site transit usage. (*Id.,* p. 4-37) The centers' design will incorporate information stations with real-time updates, well-lit and safe parking lots, adequate cover from the elements, and waiting areas with restroom and shower facilities to encourage use by cyclists. (*Id.,* Appendix 4.0-A, p. 3-2.) To accommodate residents during their commuting downtime, each transit center will also offer free wifi connections. (*Ibid*.) As noted above, a key Transportation Demand Management (TDM) element of the Project's Mobility Plan is the "Creation and ongoing operation of a Transportation Management Association (TMA) to fund and manage the operation of ongoing transportation programs, including but not limited to transit and on-demand services." (*Id.,* p. 5.10-37.) With regard to transit, relevant TMA activities include: • Coordinate with regional and local transit providers to develop transit service for Centennial; • Conduct transit network meetings/workshops; and • Monitor transportation-related technological developments for potential deployment in Centennial. • Partner with Antelope Valley Transit Authority to provide bus service within Centennial and to the rest of the Antelope Valley. (*Id.,* p. 4-36) • Partner with Santa Clarita Transit Authority to provide bus service within Centennial and to the rest of the Santa Clarita Valley.

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Row	Source	Measure	Included	Response
				• Partner with Kern Transit to provide bus service between Centennial and the neighboring communities of Tejon Mountain Village, Tejon Ranch Commerce Center and Grapevine to the north. • Provide ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. • Identify locations for transit centers in proximity to village cores and employment centers such as business park and institutional/civic land uses. (*Id.,* p. 4-37) Per the Centennial Mobility Plan, the TMA will adaptively manage compliance with the Centennial internal and external mobility performance standards by conducting transit mode surveys and other appropriate monitoring activities. TDM measures will implemented by the TMA as may be required to ensure that minimum of 20 percent of total daily peak morning and afternoon external trips and a minimum of 30 percent of total daily internal trips are completed by using non-SOV transit modes. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 1) The TMA shall evaluate the feasibility and effectiveness of the TDM measures included in Mobility Plan Table 2-C-2, which includes various measures discussed in more detail within rows 147 through 156 and 160 through 199, below. (*Id.,* Appendix 2-C to Appendix 4.0-A, Table 2-C-2, pp. 11 to 16). See Row 11 for further discussion.
114	AG List, p. 11	Incorporate public transit into project design.	Yes – Functional Equivalent Required	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.

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Row	Source	Measure	Included	Response
115	BAAQMD List, p. 4-12	Transit Service	Yes – Functional Equivalent Required	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.
116	2008 OPR List, p. 18	Incorporate features into project design that would accommodate the supply of frequent, reliable and convenient public transit.	Yes	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.
117	SJVAPCD List, p. 5	Transit-Infrastructure Based Mitigation Measures: Provide transit enhancing infrastructure that includes: transit shelters, benches, etc.; street lighting; route signs and displays; and/or bus turnouts/bulbs. Provide a Bus Rapid Transit (BRT) System	Yes – Functional Equivalent Required	With regard to the Bus Rapid Transit System, see rows 113 and 118. With regard to transit service infrastructure, the Project proposes to provide two Transit Hubs to improve the efficiency of matching localized trips with regional (off-site) trips, and connect to multi-modal transportation options such as local and regional bus services, on-demand car services, carpools and vanpools, and that provides secure and convenient bike storage for cyclists. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) Transit Hubs shall provide a minimum of one alternative energy vehicle charging stations with multiple outlets, free wifi, and real time tracking of transit. (*Ibid*.) It would be the responsibility of the TMA to provide transit route maps and schedules. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Transit Hubs shall have adequate pedestrian, bicycle, and parking facilities for off-site transit connection service. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17) The centers would provide convenient access to public bus transportation, carpooling, park and ride, special charter operations, and/or similar types of activities related to local or off-site transit usage. (*Id.,* p. 4-37). An information center would be an important part of the services

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Row	Source	Measure	Included	Response
				offered, and the primary objective of such centers is to provide focal and gathering points for a variety of private and public transportation activities, all of which reduce dependency on the private automobile. (*Ibid*.) Commuter service may be provided by Santa Clarita Transit, Antelope Valley Transit, or a combination of both, and it is envisioned that commuter service from Centennial would be integrated with existing services provided by these operators and would connect Centennial to existing Metrolink service, future high-speed rail service, and employment centers throughout the region. (*Id.,* p. 4-38) These centers would, at least initially, be used to promote carpooling and vanpooling until such time as ridership justifies commuter service. (*Ibid*.)
118	SMAQMD List, p. 10	Provide BRT System. Establish a Bus Rapid Transit line with permanent operational funding stream.	Yes – Functional Equivalent Required	Providing a Bus Rapid Transit System is a transportation and vehicle demand measure included on the potential roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) See row 146 regarding implementation of the TMA program and consideration of the measures included in Mobility Plan Table 2-C-2 to meet performance standards. As part of the Project's overall transportation demand management (TDM) strategy to reduce the dependence on the private automobile, which would result in a consequential reduction in overall volume of Project-generated trips off site, the Project Applicant will participate in or form a Transportation Management Association (TMA) to serve the residents and employees of businesses within the Project area or will be organized in conjunction with an existing organization in the Antelope Valley or Santa Clarita area. (*Id.,* p. 5.10-141) If the former, the Centennial TMA will specifically develop strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. (*Ibid*.) Such coordination will also help match ride sharers and provide information on transit options; The TMA's purpose will be to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. (*Ibid*.) The Project's TMA would coordinate with public transportation providers to provide transit service, special charter

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Row	Source	Measure	Included	Response
				operations, and other similar types of transit to reduce vehicle trips. (*Id.,* p. 5.10-143) Commuter buses that may be utilized by Project residents to travel to and from the Santa Clarita Valley, Antelope Valley and the Tejon Ranch Commerce Center are expected to lead to 100 less vehicle trips to and from the Santa Clarita Valley and 50 less vehicle trips to and from the Antelope Valley during peak hours on weekdays. (*Id.,* p. 5.10-141.) Specifically, the TMA would: • Coordinate with regional and local transit providers to develop transit service for Centennial; • Conduct transit network meetings/workshops; and • Monitor transportation-related technological developments for potential deployment in Centennial. • Partner with Antelope Valley Transit Authority to provide bus service within Centennial and to the rest of the Antelope Valley. (*Id.,* p. 4-36) • Partner with Santa Clarita Transit Authority to provide bus service within Centennial and to the rest of the Santa Clarita Valley. • Partner with Kern Transit to provide bus service between Centennial and the neighboring communities of Tejon Mountain Village, Tejon Ranch Commerce Center and Grapevine to the north. • Provide ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. • Identify locations for transit centers in proximity to village cores and employment centers such as business park and institutional/civic land uses. (*Id.,* p. 4-37) A bus storage and maintenance facility would also be provided in future phases of the development, if necessary. (*Id.,* p. 4-38)

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Row	Source	Measure	Included	Response
119	SMAQMD List, p. 10	Expand Transit Network. Established or enhances bus line with permanent operational funding stream.	Yes – Functional Equivalent Required	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.
120	SMAQMD List, p. 10	Increase Transit Frequency. Reduces headways of existing transit.	Yes – Functional Equivalent Required	While the Project does not include the provision of a new fleet of buses, the Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.
121	SLOAPCD List, p. 3-19	If the project is located on an established transit route, provide improved public transit amenities (i.e., covered transit turnouts, direct pedestrian access, covered bench, smart signage, route information displays, lighting etc.).	Yes – Functional Equivalent Required	The Project proposes to provide two Transit Hubs, as discussed further in row 121. to improve the efficiency of matching localized trips with regional (off-site) trips and connect to multi-modal transportation options such as local and regional bus services, on-demand car services, carpools and vanpools, and that provides secure and convenience bike storage for cyclists. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) Transit Hubs shall provide a minimum of one alternative energy vehicle charging stations with multiple outlets, free wifi, and real time tracking of transit. (*Ibid*.) It would be the responsibility of the TMA to provide transit route maps and schedules. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Transit Hubs shall have adequate pedestrian, bicycle, and parking facilities for off-site transit connection service. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17) The centers would provide convenient access to public bus transportation, carpooling, park and ride, special charter operations, and/or similar types of activities related to local or off-site transit usage. (*Id.,* p. 4-37). An information center would be an important part of the services offered, and the primary objective of such

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				centers is to provide focal and gathering points for a variety of private and public transportation activities, all of which reduce dependency on the private automobile. (*Ibid.*) Commuter service may be provided by Santa Clarita Transit, Antelope Valley Transit, or a combination of both, and it is envisioned that commuter service from Centennial would be integrated with existing services provided by these operators and would connect Centennial to existing Metrolink service, future high-speed rail service, and employment centers throughout the region. (*Id.,* p. 4-38) These centers would, at least initially, be used to promote carpooling and vanpooling until such time as ridership justifies commuter service. (*Ibid*.)
122	SLOAPCDList, p. 3-17	Project is located within one-half mile of a 'Park and Ride' lot or project installs a 'Park and Ride' lot with bike lockers in a location of need defined by SLOCOG.	Yes – Functional Equivalent Required	The Project does not propose park and ride lots, but it proposes to provide for two transit hubs, which would provide secure and convenient bike storage facilities. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) See row 121 for further discussion.
123	CAPCOA List, p. B-5	Bus Shelter for Existing/Planned Transit Service**:** Bus or streetcar service provides headways of one hour or less for stops within one-quarter mile; project provides safe and convenient bicycle/pedestrian access to transit stop(s) and provides essential transit stop improvements (i.e., shelters, route information, benches, and lighting).	Yes – Functional Equivalent Required	While the Project does not include the provision of a new fleet of buses, the Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See row 113 and 118 for further discussion. The Project proposes to provide two Transit Hubs with convenient access throughout the Project site, as discussed further in row 121.
124	SJVAPCD List, p. 9	Transit Operational Mitigation Measures: Provide transit incentives. 1. Transit use incentives for employees, e.g., on-site distribution of passes, subsidized transit passes, etc.	Yes	1. This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations.

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Row	Source	Measure	Included	Response
		2. Transit route maps and schedules posted at worksite. 3. Design and locate buildings to facilitate transit access, e.g., locate building entrances near transit stops, eliminate building setbacks, etc.		Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.) See row 146 regarding implementation of TMA measures. 2. MM 10-1 requires a community intranet that would provide access to information regarding carpooling and local transit services. (*Id.,* p. 5.10-144; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 4; *Id.,* Appendix 4.0-A, p. 3-3) It would also be the responsibility of the TMA to provide transit route maps and schedules at the Transit Hubs. (*Id.,* p. 4-36; Appendix 2-C to Appendix 4.0-A, p. 10) 3. Pedestrian-oriented design features encourage people to use public transit and therefore reduce traffic volume. Centennial is pedestrian-oriented and will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (*Id.,* Appendix 4.0-A, p. 3-2)
125	SLOAPCD List, p. 3-19	Project provides a display case or kiosk displaying transportation information in a prominent area accessible to employees or residents.	Yes	MM 10-1 requires a community intranet that would provide access to information regarding carpooling and local transit services. (DRP 2017, p. 5.10-144; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 4; *Id.,* Appendix 4.0-A, p. 3-3) It would also be the responsibility of the TMA to provide transit route maps and schedules at the Transit Hubs. (*Id.,* p. 4-36; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 10)
126	SJVAPCD List, p. 13	Provide a display case or kiosk displaying transportation information in a prominent area accessible to employees, residents, or visitors.	Yes	MM 10-1 requires a community intranet that would provide access to information regarding carpooling and local transit services. (DRP 2017, p. 5.10-144; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 4; *Id.,* Appendix 4.0-A, p. 3-3) It would also be the responsibility of the TMA to provide transit route maps and schedules at the Transit Hubs. (*Id.,* p. 4-36; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 10)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
127	SJVAPCD List, p. 13	Display Bike Route Maps, Bus Schedules, and any other transportation information such as carpooling, car sharing.	Yes	MM 10-1 requires a community intranet that would provide access to information regarding carpooling and local transit services. (DRP 2017, p. 5.10-144; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 4; *Id.,* Appendix 4.0-A, p. 3-3) It would also be the responsibility of the TMA to provide transit route maps and schedules at the Transit Hubs. (*Id.,* p. 4-36; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 10)
128	CAPCOA List, p. B-31	Goods Transport by Rail**:** Provide a spur at nonresidential projects to use nearby rail for goods movement.	No. Not feasible.	The Project site is not proximate to rail facilities. This measure is not feasible.
Electric Vehicle/Alternative Fuel Options and Emissions Reductions				
129	AG List, p. 15	Purchase, or create incentives for purchasing, low or zero-emission vehicles	Yes	The Project provide incentives for purchasing zero-emission electric and other alternative-fueled vehicles by incorporating preferential parking for alternative fueled vehicles into Project uses, and providing extensive electric vehicle charging infrastructure throughout the Project site. Per MM 21-15 (as updated in response to Comment F.8-95), the Project will provide one 208/240 VAC receptacle for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. (DRP 2017, p. 5.21-91) Per MM 21-16 (as updated in response to Comment F.8-95), "alternative energy fueling stations" shall be installed as follows, and each provide for the charging of two electric vehicles: • Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least 17 residential units shall provide a minimum of one alternative energy vehicle fueling station for the first 17 residential units and an additional

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Row	Source	Measure	Included	Response
				alternative energy vehicle fueling station for each additional 17 residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station. • Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station. (*Id.,* p. 5.21-91) MM 21-17 requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles. (*Id.,* pp. 5.21-91, -92) MM 21-18 requires that for multi-family residential buildings, visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles. (*Id.,* p. 5.21-92) MMs 11-6 and 21-19 (as updated by response to Comment F.8-95) require that for parking structures and lots with more than 20 spaces that serve uses other than residential or nonresidential buildings (e.g., trailheads, parks), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, they shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles; five percent of the total number of parking spaces in parking facility (but in no case less than one) shall be Electric Vehicle Parking Spaces consistent with CALGreen requirements and specifications articulated in MMs 21-19 and 11-6, and bike parking for residential facilities must be provided as specified in Section A.4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent. (*Id.,* pp. 5.21-92, 5.11-81) See also MM 11-4, as updated by response to Comment F.8-95, regarding the installation of Electric Vehicle Supply Equipment as defined by CALGreen Code Section 202, in nonresidential buildings. See also the Centennial Green Development Program specifications regarding electric vehicle infrastructure. (*Id.,* Appendix 2-A to Appendix

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Row	Source	Measure	Included	Response
				4.0-A, p. 14) See below under *Transportation Demand Management* with regard to car-sharing.
130	SJVAPCD List, p. 14	Install electric vehicle recharging station with both conductive and inductive charging capabilities in residential garages / parking lots.	Yes	The Project provides extensive electric vehicle charging facilities, as required in MMs 21-16, 21-19, 11-4, and 11-6, discussed further in row 129. As indicated in Table 2-C-1 of the Mobility Plan, facilities could accommodate inductive and conductive charging. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 7).
131	Ag List, p. 16	Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.	Yes	The Project encourages the use of zero-emission electric and other alternative-fueled vehicles by incorporating preferential parking for alternative fueled vehicles into Project uses, and providing extensive electric vehicle charging infrastructure throughout the Project site. These requirements are incorporated into MMs 11-4, 11-6, 21-15, 21-16, 21-17, and 21-19, as further discussed in row 129.
132	SLOAPCD List, p. 3-19	Provide preferential parking/no parking fee for alternative fueled vehicles or vanpools.	Yes	MMs 11-6 and 21-19 (as updated by response to Comment F.8-95) require that for parking structures and lots with more than 20 spaces that serve uses other than residential or nonresidential buildings (e.g., trailheads, parks), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, they shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles. (DRP 2017, pp. 5.21-92, 5.11-81) MM 21-17 requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles. (*Id.,* pp. 5.21-91, -92) MM 21-18 requires that for multi-family residential buildings, visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles. (*Id.,* p. 5.21-92)

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Row	Source	Measure	Included	Response
133	SLOAPCD List, p. 3-19	Provide neighborhood electric vehicles/car share program for the development.	Yes – Functional Equivalent Required	Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) It will also promote alternative fuels for transit systems, if available, and will encourage the use of best feasible alternative fuel technology to be used in homeowners associations, refuse fleet, and other community service vehicles. (*Ibid*.) Providing a car-sharing program is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 13) The text of the measure is as follows: "Implement Car-Sharing Program (e.g. Zipcar, Car2Go) - either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based programs encourage carpooling and therefore reduce traffic volumes." (*Ibid*.) See also row 136 with regard to Neighborhood Electric Vehicles (NEV).
134	SLOAPCD List, p. 3-20	Require the installation of electrical hookups at loading docks and the connection of trucks equipped with electrical hookups to eliminate the need to operate diesel-powered TRUs at the loading docks.	Yes	Loading docks shall provide a 240-kV outlet in the vicinity of the loading dock. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14)
135	CAPCOA List, p. B-11	Preferential Parking for EVs/CNG Vehicles. Provide preferential parking space locations for EVs/CNG vehicles. Or Reduced/No Parking Fee for EVs/CNG Vehicles. Provide a reduced/no parking fee for EVs/CNG vehicles.	Yes	MMs 11-6 and 21-19 (as updated by response to Comment F.8-95) require that for parking structures and lots with more than 20 spaces that serve uses other than residential or nonresidential buildings (e.g., trailheads, parks), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, they shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles. (DRP 2017, pp. 5.21-92, 5.11-81) MM 21-17 requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				vehicles. (*Id.,* pp. 5.21-91, -92) MM 21-18 requires that for multi-family residential buildings, visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles. (*Id.,* p. 5.21-92)
136	SJVAPCD List, p. 10	Implement NEV network. (Create local 'light' vehicle network such as NEV networks. NEV are classified as 'low speed vehicles' and are electric powered and must conform to applicable federal automobile safety standards. NEV offer an alternative to traditional vehicle trips and can legally be used on roadways with speed limits of 35 mph or less, ideal for short trips up to 30 miles in length. Project will implement necessary infrastructure, including NEV parking, charging facilities, striping, and educational tools. NEV routes will be implemented throughout the project and will double as bicycle routes.	Yes	Per the Specific Plan Table 2-16 Land Use Matrix, NEV trails are permitted uses in all residential land use designations, park, R/E, OS, U, and I/C designations, and permitted in the School designation with discretionary review. (DRP 2017, Appendix 4.0-A, p. 2-48) This will allow for the use of NEVs on compatible trails. The Project's commitment to providing complete streets also includes NEVs. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 11) Per Mobility Plan Table 2-C-1: *Vehicle Use Reduction Land Use and Planning Measures Included in Transportation Plans and Agency Guidance and Research Publications and Implemented by Centennial*, the Project will "Provide EV Parking – for electric vehicles with conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles at convenient and accessible locations. The favorable parking encourages the usage of ownership of NEVs and results in a decrease of traditional vehicle trips." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 7) Implementation of an NEV network is also included as a measure included in Table 2-C-2, *Transportation and Vehicle Demand Measures Included in Transportation Plans and Agency Guidance and Research Publications Included on Roster of TMA Measures At Centennial*, which may be included in the mixture of measures implemented to achieve the performance standards identified in MMs 10-25 and 10-26, as discussed further in rows 146 through 156 and 160 through 199. (*Id.,* p. 11) Per Table 2-C-2, "a NEV network includes roadways, parking, charging stations, striping, signs, and educational tools and can double as bicycle routes." (*Ibid*.)

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Row	Source	Measure	Included	Response
137	SMAQMD List, p. 9	Implement NEV Network. Project provides a viable NEV network.	Yes	Per the Specific Plan Table 2-16 Land Use Matrix, NEV trails are permitted uses in all residential land use designations, park, R/E, OS, U, and I/C designations, and permitted in the School designation with discretionary review. (DRP 2017, Appendix 4.0-A, p. 2-48) This will allow for the use of NEVs on compatible trails. The Project's commitment to providing complete streets also includes NEVs. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 11) Per Mobility Plan Table 2-C-1: *Vehicle Use Reduction Land Use and Planning Measures Included in Transportation Plans and Agency Guidance and Research Publications and Implemented by Centennial*, the Project will "Provide EV Parking – for electric vehicles with conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles at convenient and accessible locations. The favorable parking encourages the usage of ownership of Neighborhood Electric Vehicles (NEV) and results in a decrease of traditional vehicle trips." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 7) Implementation of an NEV network is also included as a measure included in Table 2-C-2, *Transportation and Vehicle Demand Measures Included in Transportation Plans and Agency Guidance and Research Publications Included on Roster of TMA Measures At Centennial*, which may be included in the mixture of measures implemented to achieve the performance standards identified in MMs 10-25 and 10-26, as discussed further in rows 146 through 156 and 160 through 199. (*Id.,* p. 11) Per Table 2-C-2, "a NEV network includes roadways, parking, charging stations, striping, signs, and educational tools and can double as bicycle routes." (*Ibid*.)
138	CAPCOA List, p. B-17	NEV Access**:** Make physical development consistent with requirements for neighborhood electric vehicles. Current studies show that for most trips, NEVs do not replace gas-fueled vehicles as the primary vehicle.	Yes	Per the Specific Plan Table 2-16 Land Use Matrix, NEV trails are permitted uses in all residential land use designations, park, R/E, OS, U, and I/C designations, and permitted in the School designation with discretionary review. (DRP 2017, Appendix 4.0-A, p. 2-48) This will allow for the use of NEVs on compatible trails. The Project's commitment to providing complete streets also includes NEVs. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 11) Per Mobility Plan Table 2-C-1: *Vehicle Use Reduction Land Use and Planning Measures Included in Transportation Plans and Agency Guidance and Research Publications and Implemented by Centennial*, the Project will "Provide EV Parking –

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Row	Source	Measure	Included	Response
				for electric vehicles with conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles at convenient and accessible locations. The favorable parking encourages the usage of ownership of Neighborhood Electric Vehicles (NEV) and results in a decrease of traditional vehicle trips." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 7) Implementation of an NEV network is also included as a measure included in Table 2-C-2, *Transportation and Vehicle Demand Measures Included in Transportation Plans and Agency Guidance and Research Publications Included on Roster of TMA Measures At Centennial*, which may be included in the mixture of measures implemented to achieve the performance standards identified in MMs 10-25 and 10-26, as discussed further in rows 146 through 156 and 160 through 199. (*Id.,* p. 11) Per Table 2-C-2, "a NEV network includes roadways, parking, charging stations, striping, signs, and educational tools and can double as bicycle routes." (*Ibid*.)
139	AG List, p. 16	Create local "light vehicle" networks, such as neighborhood electric vehicle systems.	Yes	Per the Specific Plan Table 2-16 Land Use Matrix, NEV trails are permitted uses in all residential land use designations, park, R/E, OS, U, and I/C designations, and permitted in the School designation with discretionary review. (DRP 2017, Appendix 4.0-A, p. 2-48) This will allow for the use of NEVs on compatible trails. The Project's commitment to providing complete streets also includes NEVs. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 11) Per Mobility Plan Table 2-C-1: *Vehicle Use Reduction Land Use and Planning Measures Included in Transportation Plans and Agency Guidance and Research Publications and Implemented by Centennial*, the Project will "Provide EV Parking – for electric vehicles with conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles at convenient and accessible locations. The favorable parking encourages the usage of ownership of Neighborhood Electric Vehicles (NEV) and results in a decrease of traditional vehicle trips." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 7) Implementation of an NEV network is also included as a measure included in Table 2-C-2, *Transportation and Vehicle Demand Measures Included in Transportation Plans and Agency Guidance and Research Publications Included on Roster of TMA Measures At Centennial*, which may be included in the mixture of measures

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Row	Source	Measure	Included	Response
				implemented to achieve the performance standards identified in MMs 10-25 and 10-26, as discussed further in rows 146 through 156 and 160 through 199. (*Id.,* p. 11) Per Table 2-C-2, "a NEV network includes roadways, parking, charging stations, striping, signs, and educational tools and can double as bicycle routes." (*Ibid*.)
140	CAPCOA List, p. B-12	ULEV (Ultra-low-emission vehicle): Use of and/or provide ULEV that are 50 percent cleaner than average new model cars (e.g., natural gas, ethanol, electric).	Yes – Functional Equivalent Required	Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16) It will also promote alternative fuels for transit systems, if available, and will encourage the use of best feasible alternative fuel technology to be used in homeowners associations, refuse fleet, and other community service vehicles. (*Ibid*.) The Project also provides incentives for purchasing zero-emission electric and other alternative-fueled vehicles by incorporating preferential parking for alternative fueled vehicles into Project uses, and providing extensive electric vehicle charging infrastructure throughout the Project site, as discussed in row 129.
141	CAPCOA List, p. B-13	Flex Fuel Vehicles**:** Use of and/or provide vehicles that utilize gasoline/ethanol blends (e.g., E85).	Yes – Functional Equivalent Required	Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) It will also promote alternative fuels for transit systems, if available, and will encourage the use of best feasible alternative fuel technology to be used in homeowners associations, refuse fleet, and other community service vehicles. (*Ibid*.) Gasoline/ethanol blends are one type of alternative fuel.

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Row	Source	Measure	Included	Response
142	SJVAPCD List, p. 15	1. Replace diesel fleet with alternative fuel engine technology and infrastructure. 2. Retrofit existing equipment to reduce emissions using methods such as particulate filters, oxidation catalysts, or other approved technologies. 3. Adopt a Vehicle Idling Policy requiring all vehicles under company control to adhere to a 5 minute idling policy. 4. Add-on control devices, e.g., particulate traps, catalytic oxidizers on construction equipment. 5. Repower/Retrofit heavy-duty diesel fleet with cleaner diesel engine technology and/or diesel particulate filter after-treatment technology. 6. Replace auxiliary power units with cleaner engine technology, alternative fuels, or require electric connection while at loading dock. 7. Replace diesel fleet vehicles with cleaner fueled low emission vehicles (i.e. school buses, buses, on- and off- road heavy duty vehicles, lighter duty trucks and passenger vehicles).	Yes	1. Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) It will also promote alternative fuels for transit systems, if available, and will encourage the use of best feasible alternative fuel technology to be used in homeowners associations, refuse fleet, and other community service vehicles. (*Ibid*.) 2. The Project would not require retrofitting of existing equipment. Rather, see equipment requirements under 4-7, below. 3. As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 also require the limitation of construction equipment idling time to 3 minutes, which exceeds the standard in the suggested measure. (DRP 2017, pp. 5.11-79, 5.21-89) 4.-7. The CARB On-Road Heavy-Duty Diesel Vehicle regulation requires the use of PM filter requirements, as of 2012. Lighter and older heavier trucks were required to be replaced starting January 1, 2015, and by January 1, 2012, nearly all trucks and buses need to have 2010 model year engines or equivalent. (See https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.) In 2007, CARB adopted its In-Use Off-Road Diesel-Fueled Fleets Regulation, which adopted regulations to reduce diesel particular matter and oxides of nitrogen emissions from off-road heavy-duty diesel vehicles in California. Starting January 1, 2018, large and medium fleets must meet emission performance requirements and are prohibited from adding any tier 2 engine vehicles to their fleet. Per MM 11-2 (as revised in response to Comment F.2-5), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control

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Row	Source	Measure	Included	Response
				Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79)
143	SLOAPCD List, p. 3-20	If not required by other regulations (ARB's on-road or off-road diesel), restrict operation to trucks with 2007 model year engines or newer trucks.	Yes	MM 11-2 requires the use of 2010 or newer diesel haul trucks. (DRP 2017, p. 5.11-79) If the Project Applicant/Developer determines that 2010 model year or newer diesel trucks cannot be obtained, trucks that meet USEPA 2007 model year NOx emissions requirements shall be required. If 2010 model year or newer diesel trucks are not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. (*Ibid*.)
144	SLOAPCD List, p. 3-20	If not required by other regulations (ARB's on-road or off-road diesel), require or provide incentives to use diesel particulate filters for truck engines.	Yes	As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 also require the limitation of construction equipment idling time to 3 minutes. (DRP 2017, pp. 5.11-79, 5.21-89) 4.-7. The CARB On-Road Heavy-Duty Diesel Vehicle regulation requires the use of PM filter requirements, as of 2012. Lighter and older heavier trucks were required to be replaced starting January 1, 2015, and by January 1, 2012, nearly all trucks and buses need to have 2010 model

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				year engines or equivalent. (See https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm) In 2007, CARB adopted its In-Use Off-Road Diesel-Fueled Fleets Regulation, which adopted regulations to reduce diesel particular matter and oxides of nitrogen emissions from off-road heavy-duty diesel vehicles in California. Starting January 1, 2018, large and medium fleets must meet emission performance requirements and are prohibited from adding any tier 2 engine vehicles to their fleet. Per MM 11-2 (as revised in response to Comment F.2-5), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) MM 11-2 requires the use of 2010 or newer diesel haul trucks. (*Id.,* p. 5.11-79) If the Project Applicant/Developer determines that 2010 model year or newer diesel trucks cannot be obtained, trucks that meet USEPA 2007 model year NOx emissions requirements shall be required. If 2010 model year or newer diesel trucks are not available, the Project

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Row	Source	Measure	Included	Response
				Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. (*Ibid*.)
145	SLOAPCD List, p. 3-20	Implement a "No Idling" program for heavy-duty diesel vehicles, which includes signage, citations, etc.	Yes – Functional Equivalent Required	As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 also require the limitation of non-essential construction equipment idling time to 3 minutes, which exceeds the legal requirement and achieves desired emissions reductions. (DRP 2017, pp. 5.11-79, 5.21-89)
Transportation Demand Management				
146	AG List, p. 12	Meet an identified transportation-related benchmark.	Yes	MM 10-25 requires implementation of the Project's Mobility Plan, which includes creation, funding, and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs. (DRP 2017, pp. 5.10-152, -153) Per PDF 21-9, and MMs 10-25 and 10-26, the Project will require TMA implementation of a combination of transit and transportation-related measures to meet a specified performance standard, which is to reduce on-site single-occupancy vehicle use by 30 percent in relation to standard ITE-generation rates for the overall Project, and to reduce off-site peak hour commutes to and from the Project site in single-occupancy automobiles by 20 percent. (*Id.,* p. 5.21-66) Per the Centennial Mobility Plan, the TMA will adaptively manage compliance with the Centennial internal and external mobility performance standards by conducting transit mode surveys and other appropriate monitoring activities. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Transportation Demand Management (TDM) measures will be implemented by the TMA required to meet the specified performance standard described above in this row. (*Ibid*.) Rather than proscribe the exact mixture of measures to be implemented at this early stage in Project development, pursuant to CEQA, the Project builds in flexibility by including a specific performance standard and a menu of potential measures for TMA consideration to achieve compliance. This is an appropriate approach for a large specific plan project with a diverse

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Row	Source	Measure	Included	Response
				mixture of uses and approximately 20-year buildout period, particularly because it will allow for the incorporation of new and emerging technologies over time, and given the lack of Project Applicant ability to control the actions of all on-site employers and their relationships with their employees. Accordingly, the TMA shall evaluate the feasibility and effectiveness of the TDM measures included in Mobility Plan Table 2-C-2 to ensure compliance with the specified performance standard, and these measures for consideration in Table 2-C-2 include many of the suggested measures contained below and discussed in rows 147 through 156 and 160 through 199. Transit mode surveys and other appropriate monitoring activities will be conducted to verify the effectiveness of any TDM measures implemented for the Project, and the monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the internal and external mobility performance standards. (*Ibid*.) To the extent any of the measures suggested in rows 147 through 156 and 160 through 199 are not included in the roster to consider in Table 2-C-2 or otherwise required of the Project, Table 2-C-2 has been revised below to add the potential measures as appropriate and feasible.
147	SMAQMD List, p. 10	Implement School Bus Program. Restore or expand school bus program or provide safe routes to school.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 13) The text included in Table 2-C-2 says: "Implement School Bus Program – that works with the school district to restore or expand school bus services in the project area and local community." (*Ibid*.) As noted above, a mitigation measure has also been added that will require a Safe Routes to School Program. See also the "School Pool Program" to be considered as a measure in Mobility Plan Table 2-C-2. (*Ibid.*)

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Row	Source	Measure	Included	Response
148	SJVAPCD List, p. 10	Implement school bus program (Restore or expand bus service in project area and local community by working with school districts)	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 13) The text included in Table 2-C-2 says: "Implement School Bus Program – that works with the school district to restore or expand school bus services in the project area and local community." (*Ibid*.) As noted above, a mitigation measure has also been added that will require a Safe Routes to School Program. See also the "School Pool Program" to be considered as a measure in Mobility Plan Table 2-C-2. (*Ibid*.)
149	SJVAPCD List, p. 10	Implement compressed work week schedule (e.g., 4/40, 9/80, 3/36); (Consult with employees prior to program implementation) Implement home-based telecommuting program (Participation increased if employer provides/assists with provision of equipment like modem, computer, etc.; Especially effective if employee commute trips are long).	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017. Appendix 2-A to Appendix 4.0-A, p. 12.) The text included in Table 2-C-2 says: "Telecommuting and Alternative Work Schedules – will allow residents within a community to either work from home or only have to be at work four days instead of five." (*Ibid*.) Technology-oriented infrastructure will also be available throughout the community and cater to the growing number of companies and employees who are no longer dependent on physical proximity to business markets, natural resources, or transit. Advanced information and communication services utilizing fiber-optic line, wireless technology, or other forthcoming technology infrastructure will enable employers, particularly corporate headquarters, employees, and the self-employed to locate in Centennial based on its "connection" to the larger region. (*Id.,* Appendix 4.0-A, p. 1-5) Per MM 10-1, the Project shall provide internet infrastructure and a community intranet with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. (*Id.,* p. 5.10-144) To accommodate residents during their commuting downtime, each transit center will also offer free wifi connections. (*Id.,* Appendix 4.0-A, p. 3-2) The Centennial Technology Plan requires the Master Developer

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				to engage providers of integrated systems of technology and communication services to provide world-class, customer-driven communications, entertainment, and home and business automation services. For residential and commercial buildings, both wired and wireless technologies will be considered, leveraging the unique strengths and qualities of each. Cost-efficient, market-driven solutions will be pursued for both residential and commercial services. (*Id.,* p. 3-64) The Master Developer is required to prepare a Wireless Community Master Plan that is consistent with the goals and policies of the Specific Plan. The Plan must be prepared in cooperation with one or more wireless service providers, demonstrate emergency coverage, and include preferred sites and designs for wireless facilities for a defined geographic area within the Specific Plan Boundaries. (*Id.,* pp. 3-64, -65)
150	SLOAPCD List, p. 3-19	Implement compressed work schedules (i.e., 9–80s or 4–10s).	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12.) See row 149 for further discussion.
151	SLOAPCD List, p. 3-19	Implement a telecommuting program.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12.) See row 149 for further discussion.
152	SLOAPCD List, p. 3-20	Develop satellite work sites.	Yes – Functional Equivalent Required	The Project includes features that would allow for work without travel out of the Project site, as discussed below. Technology-oriented infrastructure will be available throughout the community and cater to the growing number of companies and employees who are no longer dependent on physical proximity to business markets, natural resources, or transit. Advanced information and communication services utilizing fiber-optic line, wireless technology, or other forthcoming technology infrastructure will enable employers, particularly corporate headquarters, employees, and the self-employed to locate in Centennial based on its "connection" to the larger region. (DRP 2017, Appendix 4.0-A, p. 1-5) Per MM 10-1, the Project shall provide internet infrastructure and a community intranet with access

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. (*Id.,* p. 5.10-144) To accommodate residents during their commuting downtime, each transit center will also offer free wifi connections. (*Id.,* Appendix 4.0-A, p. 3-2) The Centennial Technology Plan requires the Master Developer to engage providers of integrated systems of technology and communication services to provide world-class, customer-driven communications, entertainment, and home and business automation services. For residential and commercial buildings, both wired and wireless technologies will be considered, leveraging the unique strengths and qualities of each. Cost-efficient, market-driven solutions will be pursued for both residential and commercial services. (*Id.,* p. 3-64) The Master Developer is required to prepare a Wireless Community Master Plan that is consistent with the goals and policies of the Specific Plan. The Plan must be prepared in cooperation with one or more wireless service providers, demonstrate emergency coverage, and include preferred sites and designs for wireless facilities for a defined geographic area within the Specific Plan Boundaries. (*Id.,* pp. 3-64, -65)
153	BAAQMD List, p. 4-13	<u>Telecommuting:</u> 1) Employee telecommuting program 2) Compressed work schedule 3/36 3) Compressed work schedule 4/40 4) Compressed work schedule 9/80	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12.) See row 149 for further discussion. See also row 152 regarding telecommuting.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
154	SMAQMD List, p. 10	Encourage Telecommuting and Alternative Work Schedules. Allow/require 9/80s, 4/10, and telecommuting	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12.) See row 149 for further discussion. See also row 152 regarding telecommuting.
155	AG List, p. 15	Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.	Yes – Functional Equivalent Required	The Project will include communication capabilities and potential TMA measures that allow employees to attend meetings without requiring travel. See rows 149 and 152 for further discussion.
156	SLOAPCD List, p. 3-20	Include teleconferencing capabilities, such as web cams or satellite linkage, which will allow employees to attend meetings remotely without requiring them to travel out of the area.	Yes – Functional Equivalent Required	The Project will include communication capabilities and potential TMA measures that allow employees to attend meetings without requiring travel. See rows 149 and 152 for further discussion.
157	SLOAPCD List, p. 3-20	Provide free-access telework terminals and/or wi-fi access in multi-family projects.	Yes	Technological advances such as wifi connectivity have become part of everyday life via smart phones, tablets, computers and the like. Being "connected" has become a necessity for businesses and residents. The technology vision for Centennial is to connect the community, businesses, and homes with advanced but economically feasible infrastructure and services that are seamless, transparent, and easy to use. Just like infrastructure needs such as water and sewer utilities, services such as internet and telecom will be available to residents and businesses from day one and will continue to be connected through each phase of development. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 3-64)
158	SLOAPCD List, p. 3-17	Provide onsite housing for employees.	Yes	The Project provides up to 19,333 dwelling units and approximately 7,363,818 square feet of Business Park uses and 1,034,550 square feet of Commercial uses, with 1,568,160 square feet of Institutional/Civil land uses. This would provide on-site housing and employment within the same Project.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
159	SJVAPCD List, p. 9	Provide preferential parking (e.g., near building entrance, sheltered area, etc.) for carpool and vanpool vehicles and provide signage (Most effective if parking supply is limited and/or located far from building entrance)	Yes	Per MM 21-17, preferential parking for low-emitting, fuel-efficient, and carpool/vanpool vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code. (DRP 2017, pp. 5.21-91, -92) Per MM 11-4 (as updated in response to Comment F.8-95), it shall be as follows: two for 10 to ~~15~~ 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces. (*Id.,* p. 5.11-79)
160	SMAQMD List, p. 10	Workplace Parking Charge. Charge employees for their parking.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, pp. 11, 13) The language of the measures is as follows: • Parking Policy/Pricing Measures changes the parking requirements and supply within the project site to encourage alternative transportation choices by residents and employees. Examples include reducing the minimum/maximum amount of parking spots, shared parking and cost of parking by time of day. By having limited parking, along with the cost of parking and fuel, people are encouraged to use public transit, bike or walk, thereby reducing vehicle trips. (*Id.,* p. 11) • Implement Market Price Public Parking (On-Street) – is a strategy that assigns a cost to parking at areas with employment or at shopping centers where parking demand is high and encourages people to "park once" and walk to all destinations. Vehicle trips are reduced from people parking once and encourage people to use public transit to avoid parking costs. (*Ibid*.) • Price Workplace Parking – at employment centers that may include charging employee parking, high-cost parking, validating parking only for invited guests, providing allowances for using the bus, and education on alternatives. The price drives employees to consider

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				alternative modes for their work commute thereby reducing traffic volumes. (*Id.,* p. 13)
161	SJVAPCD List, p. 13	Develop and implement parking pricing strategies, such as charging parking lot fees to low occupancy (single occupant vehicles) vehicles, implement workplace parking at its employee centers, or increase the on-street public parking.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, pp. 11, 13) The language of the measures is contained in row 160.
162	SJVAPCD List, p. 9	Implement parking fees for single occupancy vehicle commuters (Reduced or waived fees for carpools and vanpools; Complemented by transit, ridesharing programs; other commute alternatives; Revenues used to support commute alternatives; Provisions in place to avoid off-site parking spillover)	Yes – Functional Equivalent Required	This measure is reflected in transportation and vehicle demand measures included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, pp. 11-12, 15) • Preferential parking or parking subsidies for carpoolers – at convenient locations near bus stops or building front doors, given to people with three or more employees car-pooling, van-pooling or using ride-share to commute to work. This program encourages commuters to find another way to work besides a personal vehicle, thereby reducing traffic volumes on the roadway. (*Id.,* p. 15) • Implement Preferential Parking Permit Program – that provides special parking at convenient locations near bus stops or in front of building doors, given to employees car-pooling, van-pooling or using ride-share to commute to work. This program encourages commuters to find another way to work besides a personal vehicle, thereby reducing traffic volumes. (*Id.,* p. 12) • Implement Voluntary Commute Trip Reduction (CTR) Programs – with employers to discourage employees from using their personal vehicle and instead carpool, ride-share, take the bus, walk or bike. CTR provides assistance through ride-matching, special parking spots, and flexible work hours. Traffic volume is reduced by encouraging other ways to get to work besides a personal vehicle. (*Id.,* p. 11)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				• Implement Mandatory CTR Programs – through an ordinance with the intent to reduce the number of people driving alone and encourage carpooling, taking the bus, walking or biking. The program requires established performance standards, implementation and regular monitoring and reporting. Traffic volume is reduced by encouraging other ways to get to work besides a personal vehicle. (*Id.,* p. 12) The following potential measure is also added to Table 2-C-2: • **Single-Occupancy Vehicle Parking Charge: Vehicle Parking Charge** - Implement parking fees for single occupancy vehicle commuters, with reduced or waived fees for car-pools and van-pools.
163	SMAQMD List, p. 10	Implement Employee Parking "Cash-Out"	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is as follows: "Implement Employee Parking "Cash-Out" – where employers offer their employee parking "cash-out" that gives an employee a choice of forgoing their current free parking for a cash payment equivalent to the cost of the parking space to the employer. The price drives employees to consider alternative modes for their work commute thereby reducing traffic volumes." (*Ibid*.)
164	SJVAPCD List, p. 9	Implement parking cash-out program for employees (i.e., nondriving employees receive transportation allowance equivalent to value of subsidized parking; Complemented by transit, ridesharing programs, other commute alternative; Implement at worksites not subject to state parking cash-out requirements; Tax benefits if travel allowance offered as	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is provided in row 163.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
		transit/ridesharing subsidy; and Provisions in place to avoid off-site parking spillover)		
165	CAPCOA List, p. B-7	Paid Parking (Parking Cash Out): Project provides employee and/or customer paid parking system. Project must have a permanent and enforceable method of maintaining user fees for all parking facilities. The facility may not provide customer or employee validations. Daily charge for parking must be equal to or greater than the cost of a transit day/monthly pass plus 20 percent.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is provided in row 163. The following language is hereby added to the measure as follows: "Implement Employee Parking "Cash-Out" – where employers offer their employee parking "cash-out" that gives an employee a choice of forgoing their current free parking for a cash payment equivalent to the cost of the parking space to the employer. The price drives employees to consider alternative modes for their work commute thereby reducing traffic volumes. Consider requiring that the facility may not provide customer of employee validations, and/or requiring that the daily charge for parking must be equal to or greater than the cost of a transit day/monthly pass plus 20 percent"
166	BAAQMD List, p. 4-13	Transportation Demand Management Parking, Transit Passes: 1) Daily parking charge 2) Parking cash-out 3) Free transit passes	Yes – Functional Equivalent Required	1) This is a potential TMA measure included in Mobility Plan Table 2-C-2 – see rows 160 through 162. 2) This is a potential TMA measure included in Mobility Plan Table 2-C-2 – see rows 163 through 165. 3) This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) • Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
167	CAPCAO List, p. B-8	Minimum Parking**:** Provide minimum amount of parking required. Once land uses are determined, the trip reduction factor associated with this measure can be determined by utilizing the ITE parking generation publication. The reduction in trips can be computed as shown below by the ratio of the difference of minimum parking required by code and ITE peak parking demand to ITE peak parking demand for the land uses multiplied by 50 percent. Percent Trip Reduction = 50 * [(min parking required by code – ITE peak parking demand)/ (ITE peak parking demand)]	Yes – Functional Equivalent Required	The Project will provide a framework for a community-wide parking plan that is based only on parking demand and need. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14) Potential parking supply reductions are also accounted for in transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 11) • Parking Policy/Pricing. Measures changes the parking requirements and supply within the project site to encourage alternative transportation choices by residents and employees. Examples include reducing the minimum/maximum amount of parking spots, shared parking and cost of parking by time of day. By having limited parking, along with the cost of parking and fuel, people are encouraged to use public transit, bike or walk, thereby reducing vehicle trips. (*Ibid*.) • Limit Parking Supply – changes parking requirements and supply within the project site such as reducing the minimum and creating a maximum amount of parking spots. The limited areas to park, along with the cost of parking and fuel, encourage people to change from personal vehicle to public transit, bicycling and walking, thereby reducing vehicle trips. (*Ibid*.)
168	CAPCOA List, p. B-9	Parking Reduction Beyond Code/Shared Parking**:** Provide parking reduction less than code. This measure can be readily implemented through a shared parking strategy, wherein parking is utilized jointly among different land uses, buildings, and facilities in an area that experience peak parking needs at different times of day and day of the week.	Yes – Functional Equivalent Required	The Project will provide parking based on need and demand, and incorporates these measures into the list of potential measures considered by the TMA to meet performance standards. See row 167.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
169	SLOAPCD List, p. 3-18	Parking space reduction to promote bicycle, walking, and transit use.	Yes – Functional Equivalent Required	The Project will provide parking based on need and demand, and incorporates these measures into the list of potential measures considered by the TMA to meet performance standards. See row 167.
170	SMAQMD List, p. 10	Limit Parking Supply. Parking supply below ITE rates.	Yes – Functional Equivalent Required	The Project will provide parking based on need and demand, and incorporates these measures into the list of potential measures considered by the TMA to meet performance standards. See row 167.
171	SMAQMD List, p. 10	Unbundle Parking Costs. Parking cost separate from property costs.	Yes – Functional Equivalent Required	This measure is hereby added to the measures for TMA consideration to meet mobility performance standards, as laid out in Table 2-C-2, as follows: **Unbundle Parking Costs** - Separate parking costs from property costs, requiring those who wish to purchase parking to do so at an additional cost from the property cost.
172	SJVAPCD List, p. 10	Unbundle parking costs from property costs (Separate parking from property costs to requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. This removes the burden from those who do not wish to utilize a parking space)	Yes – Functional Equivalent Required	This measure has been added to Table 2-C-2 of the Project's Mobility Plan, as laid out in row 171.
173	SJVAPCD List, p. 10	Implement market price public parking on street (Implement pricing strategy for parking by pricing all central business district/employment center/retail center on street parking. It will be priced to encourage 'park once' behavior. The benefit of this measure above that of paid parking at the project only is that it deters parking spillover from project-supplied parking to other public parking nearby, which undermine the	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is as follows: • Implement Market Price Public Parking (On-Street) – is a strategy that assigns a cost to parking at areas with employment or at shopping centers where parking demand is high and encourages people to "park once" and walk to all destinations. Vehicle trips are reduced from people parking once and encourage people to use public transit to avoid parking costs. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
		vehicle miles traveled benefits of project parking.)		
174	SMAQMD List, p. 10	On-Street Parking Market Pricing. On-street parking utilizes market-rate pricing (such as meters)	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is as follows: Implement Market Price Public Parking (On-Street) – is a strategy that assigns a cost to parking at areas with employment or at shopping centers where parking demand is high and encourages people to "park once" and walk to all destinations. Vehicle trips are reduced from people parking once and encourage people to use public transit to avoid parking costs. (*Ibid*.)
175	2008 OPR p. 20	Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14), as follows: • Provide Employer-Sponsored Vanpool/ Shuttle – that provides employees a ride to work through van pool and shuttles commuters to nearby transit stations and shopping centers. This program provides commuter another option to get to work besides a personal vehicle, thereby reducing traffic volumes. (*Id.,* p. 13) • Provide Local Shuttles – through coordination with the local transit operator that will provide shuttles to stations, shopping centers and homes. By providing reliable connections people are encouraged to use public transit, bike or walk, thereby reducing vehicle trips. (*Id.,* p. 14)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
176	SJVAPCD List, p. 8	Shuttle Operational Mitigation Measures: Establish mid-day shuttle service from worksite to food service establishments/commercial areas. Provide shuttle service to transit stations/multimodal centers.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
177	SJVAPCD List, p. 15	Operation of a shuttle bus to shopping, heath care, public service sites, etc. to reduce automobile use.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
178	SJVAPCD List, p. 14	Provide an employer subsidized shuttle service to connect to existing transit sites.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
179	SMAQMD List, p. 10	Employee Vanpool/Shuttle. Provide employer-sponsored vanpool or shuttle program	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
180	SLOAPCD List, p. 3-19	Provide vanpool, shuttle, mini bus service (alternative fueled preferred).	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
181	SLOAPCD List, p. 3-19	Implement a lunchtime shuttle to reduce single occupant vehicle trips.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
182	AG List, p. 13	Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
183	SLOAPCD List, p. 3-19	Provide incentives (e.g., bus pass, "Lucky Bucks", etc.) to employees to carpool/vanpool, take public transportation, telecommute, walk bike, etc.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)
184	SJVAPCD List, p. 14	Provide incentives to employees to carpool/vanpool, take public transportation, telecommute, walk, bike, etc.	Yes – Functional Equivalent Required	Subsidized or discounted transit passes are a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) "Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle." (*Ibid*.) Many other measures in Mobility Plan Table 2-C-2 encourage carpool/vanpool use, public transportation use, telecommuting, walking, biking, etc., as discussed in rows 160 through 199.
185	SMAQMD List, p. 10	Transit Subsidy. Proponent subsidizes sustainable modes of transportation.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
186	SJVAPCD List, p. 14	Participate in an employee "flash-pass" program, which provides free travel on transit buses.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)
187	SJVAPCD List, p. 14	Provide transit pass subsidy (100 percent) and/or commute alternative allowance.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)
188	SMAQMD List, p. 10	Market Commute Trip Reduction Option. Market sustainable travel options.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) The language is as follows: "Implement Commute Trip Reduction Marketing – involves educating the public and sharing information on carpooling, van-pooling, ride-sharing and public transit through new employee orientations, event promotions, and publications. The marketing reduces traffic volumes by encouraging other ways to get to work in place of a personal vehicle." (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
189	SLOAPCD List, p. 3-19	Provide bicycle-share program for development.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13). Measure language is as follows: "Implement Bike-Sharing Program – that includes stations/kiosk at regular intervals throughout the project with the number of bike stations increasing around shopping centers and transit stations. Traffic volumes are reduced by encouraging bicycling as opposed to a personal vehicle." (*Ibid*.)
190	SMAQMD List, p. 10	Provide Ride Sharing Program. Establish and carpooling program with associated infrastructure.	Yes – Functional Equivalent Required	Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is as follows: • Provide Ride-Sharing Programs (e.g. Uber Pool, Lyft Line) – that gives people a way to commute to work besides their personal vehicle by the sharing of a vehicle and costs with other people headed in the same direction. Traffic volume is reduced by encouraging carpooling and rideshare passengers tend to have relatively long commutes which reduce more vehicle miles because the trips that are reduced are twice as long on average. (*Id.,* p. 12) • Implement Car-Sharing Program (e.g. Zipcar, Car2Go) – either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based programs encourage carpooling and therefore reduce traffic volumes. (*Id.,* p. 13) • Implement School Pool Program – similar to a ride-sharing program for school children and differs from bussing services to public schools since the program helps match parents to take students to private schools, or to schools where students cannot

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				walk or bike but do not meet the requirements for bussing. Traffic volume is reduced by encouraging parents to share their vehicle. (*Ibid*.) • Ridesourcing [or Transportation Network Companies (TNC)] (e.g. Uber, Lyft) arranges rides for passengers with drivers that use their privately-owned vehicle for a fee and can provide rides to and from stations and help with first/last mile situations. Ridesourcing helps reduce vehicle trips by providing a different way to get to the destination besides a personal vehicle. (*Id.,* p. 16)
191	SJVAPCD List, p. 7 (and p. 14)	Rideshare Operational Mitigation Measures**:** Implement carpool/vanpool program e.g., carpool ridematching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc. Limited parking supply and/or implementation of parking fees or parking cash-out	Yes – Functional Equivalent Required	Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is included in row 190.
192	2008 OPR p. 20	Create an online ridesharing program that matches potential carpoolers immediately through email.	Yes – Functional Equivalent Required	Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is included in row 190.
193	AG List, p. 16	Create a ride sharing program. Promote existing ride sharing programs e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.	Yes – Functional Equivalent Required	Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is included in row 190.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
194	AG List, p. 16	Provide a vanpool for employees.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14), as follows: • Provide Employer-Sponsored Vanpool/ Shuttle – that provides employees a ride to work through van pool and shuttles commuters to nearby transit stations and shopping centers. This program provides commuter another option to get to work besides a personal vehicle, thereby reducing traffic volumes. (*Id.,* p. 13) • Provide Local Shuttles – through coordination with the local transit operator that will provide shuttles to stations, shopping centers and homes. By providing reliable connections people are encouraged to use public transit, bike or walk, thereby reducing vehicle trips. (*Id.,* p. 14)
195	Ag List, p. 16	Create or accommodate car sharing programs, e.g., provide parking spaces for car share vehicles at convenient locations accessible by public transportation.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13). The measure language is as follows: • Implement Car-Sharing Program (e.g. Zipcar, Car2Go) – either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based programs encourage carpooling and therefore reduce traffic volumes. (*Id.,* p. 13)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
196	AG List, p. 12	Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation	Yes – Functional Equivalent Required	The Project will provide a framework for a community-wide parking plan that is based only on parking demand and need. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14) Potential parking supply reductions are also accounted for in transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 11) Potential TMA measures include a wide array of parking-related measures described in this group of measures 160-199.
197	SJVAPCD List, p. 5	VMT Infrastructure-Based Mitigation Measures Provide park and ride lots and/or satellite telecommuting centers Market commute trip reduction options.	Yes – Functional Equivalent Required	The Project includes features that would allow for work without travel out of the Project site, as discussed below. Technology-oriented infrastructure will be available throughout the community and cater to the growing number of companies and employees who are no longer dependent on physical proximity to business markets, natural resources, or transit. Advanced information and communication services utilizing fiber-optic line, wireless technology, or other forthcoming technology infrastructure will enable employers, particularly corporate headquarters, employees, and the self-employed to locate in Centennial based on its "connection" to the larger region. (DRP 2017, Appendix 4.0-A, p. 1-5) Per MM 10-1, the Project shall provide internet infrastructure and a community intranet with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. (*Id.,* p. 5.10-144) To accommodate residents during their commuting downtime, each transit center will also offer free wifi connections. (*Id.,* Appendix 4.0-A, p. 3-2) The Centennial Technology Plan requires the Master Developer to engage providers of integrated systems of technology and communication services to provide world-class, customer-driven communications, entertainment, and home and business automation services. For residential and commercial buildings, both wired and wireless technologies will be considered, leveraging the unique strengths and qualities of each. Cost-efficient, market-driven solutions will be pursued for both residential and commercial services. (*Id.,* p. 3-

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				64) The Master Developer is required to prepare a Wireless Community Master Plan that is consistent with the goals and policies of the Specific Plan. The Plan must be prepared in cooperation with one or more wireless service providers, demonstrate emergency coverage, and include preferred sites and designs for wireless facilities for a defined geographic area within the Specific Plan Boundaries. (*Id.,* pp. 3-64, -65) The marketing of trip reduction options is also included as a potential TMA measures in Mobility Plan Table 2-C-2, as follows: "Implement Commute Trip Reduction Marketing – involves educating the public and sharing information on carpooling, van-pooling, ride-sharing and public transit through new employee orientations, event promotions, and publications. The marketing reduces traffic volumes by encouraging other ways to get to work in place of a personal vehicle." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 12)
198	SLOAPCD List, p. 3-19	On-site eating, refrigeration, and food vending facilities	Yes – Functional Equivalent Required	The following is hereby added to the potential TMA measures to meet performance standards as provided in Mobility Plan Table 2-C-2: **Employee Meal Facilities** - Provide on-site eating, refrigeration, and food vending facilities.
199	SLOAPCD List, p. 3-20	If the development is or contains a grocery store or large retail facility, provide customers home delivery service in clean fueled vehicles.	Yes – Functional Equivalent Required	The following is hereby added to the potential TMA measures to meet performance standards as provided in Mobility Plan Table 2-C-2: **Delivery Services** - Consider providing grocery and large retail store customers with home delivery service in clean fueled vehicles.
200	SLOAPCD List, p. 3-19	For large developments, provide day care facility on site.	Yes	Group day care facilities for 6 or less people are permitted in all residential land use designations, and for 7 or more people, are permitted with a conditional use permit in the MDR, HDR, VHDR, and MU designations. Both types are permitted with a conditional use permit in the I/C designation. (DRP 2017, Appendix 4.0-A, p. 2-45)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
201	CAPCOA List, p. B-14	Services Operational**:** Project provides on-site shops and services for employees.	Yes	The Project will include on-site retail and services that would serve employees at the Project. The Project provides for a variety of retail and other commercial uses, and has a goal that an 80 percent average, but no less than 50 percent, of all project dwelling units shall be located within a ½ mile walking distance of a Village Core or the Town Center. (DRP 2017 p. 4-34; *Id.,* Appendix 4.0-A, p. 3-3) The Project's circulation network, including the extensive network of sidewalks, greenway trails, and community trails, will link residential, schools, shopping, and employment areas for easy and safe access for pedestrians and bicyclists. (*Id.,* p. 4-34)
202	SJVAPCD List, p. 7	Services Operational Mitigation Measures: 1) Provide on-site shops and services for employees such as cafeteria, bank/ATM, dry cleaners, convenience market, etc. 2) Provide on-site childcare, or contribute to off-site child care within walking distance.	Yes	1. The Project will include on-site retail and services that would serve employees at the Project. The Project provides for a variety of retail and other commercial uses, and has a goal that an 80 percent average, but no less than 50 percent, of all project dwelling units shall be located within a ½ mile walking distance of a Village Core or the Town Center. (DRP 2017, p. 4-34; *Id.,* Appendix 4.0-A, p. 3-3) The Project's circulation network, including the extensive network of sidewalks, greenway trails, and community trails, will link residential, schools, shopping, and employment areas for easy and safe access for pedestrians and bicyclists. (*Id.,* p. 4-34) 2. Group day care facilities for 6 or less people are permitted in all residential land use designations, and for 7 or more people, are permitted with a conditional use permit in the MDR, HDR, VHDR, and MU designations. Both types are permitted with a conditional use permit in the I/C designation. (*Id.,* Appendix 4.0-A, p. 2-45)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
203	BAAQMD List, p. 4-13	Other Transportation Demand Measures: 1) Secure Bike Parking (at least 1 space per 20 vehicle spaces) 2) Showers/Changing Facilities Provided 3) Guaranteed Ride Home Program Provided 4) Car-Sharing Services Provided 5) Information Provided on Transportation Alternatives (Bike Schedules, Maps) 6) Dedicated Employee Transportation Coordinator 7) Carpool matching program 8) Preferential carpool/vanpool parking	Yes, and/or Functional Equivalent Required	1-2. The Project meets these requirements, as discussed in bicycle infrastructure rows 94 through 102. 3, 4, 7, 8. Functionally equivalent measures will be implemented by the TMA as necessary to meet articulated mobility performance standards, as discussed in more detail in rows 146 through 156 and 160 through 199. Specifically, with regard to these suggested measures: • Mobility Plan Table 2-C-2 includes a measure for a guaranteed ride home program, as follows: "Promotion and expansion of Guaranteed Ride Home program provides transportation for carpoolers and transit users in emergency situations. Providing a reliable service for emergency situations encourages carpooling and reduces traffic volumes. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 15) • Car-sharing and carpooling service measures are also provided in Mobility Plan Table 2-C-2, as discussed in rows 190 through 195. • Preferential carpool/vanpool parking measures are also provided in Mobility Plan Table 2-C-2, as discussed in row 162. MM 21-17 also requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles. (*Id.,* pp. 5.21-91, -92) 5. It would also be the responsibility of the TMA to provide transit route maps and schedules. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) 6. The TMA is responsible for and will regularly monitor programs to provide transit fare media for all transit service providers and ends users, developing transit affordability measures and/or incentives, and requiring employee commute reduction programs for employers with 250 or more employees. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) The potential TMA measures to meet articulated performance standards also include a variety of programs to reduce employee commute trips, as addressed in rows 146 through 156 and 160 through 199, above. The monitoring and adaptive management process will be a continuing

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				obligation of the TMA to verify compliance with the Centennial internal and external mobility performance standards.
204	2008 OPR List, p. 18	Apply advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services.	Yes	Per the Centennial Mobility Plan, the TMA will adaptively manage compliance with the Centennial internal and external mobility performance standards expressed in MMs 10-25 and MM 10-26 and discussed in row 146 by conducting transit mode surveys and other appropriate monitoring activities. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Transportation Demand Management (TDM) measures will implemented by the TMA required to meet the specified performance standard described above in this row. (Ibid.) Rather than proscribe the exact mixture of measures to be implemented at this early stage in Project development, pursuant to CEQA, the Project builds in flexibility by including a specific performance standard and a menu of potential measures for TMA consideration to achieve compliance. This is an appropriate approach for a large specific plan project with a diverse mixture of uses and approximately 20-year buildout period, particularly because it will allow for the incorporation of new and emerging technologies and management strategies over time.
205	SMAQMD List, p. 10	Implement Trip Reduction Program. TMA membership or other comprehensive services.	Yes	As discussed in the Centennial Green Development Program, the Master Developer shall establish a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible, to promote multi-modal transportation services and options, and to reduce resident and employee use of single-occupancy automobiles for offsite commuting and for internal travel within the Specific Plan. Potential TDM measures to be implemented by the TMA to achieve articulated performance standards are addressed more fully in rows 146 through 156 and 160 through 199, above.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
206	CAPCOA List, p. B-12	TMA Membership**:** Include permanent TMA membership and funding requirement. Funding to be provided by Community Facilities District or County Service Area or other nonrevocable funding mechanism. TDMs have been shown to reduce employee vehicle trips up to 28 percent with the largest reductions achieved through parking pricing and transit passes. The impact depends on the travel alternatives.	Yes	As discussed in the Centennial Green Development Program, the Master Developer shall establish a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible, to promote multi-modal transportation services and options, and to reduce resident and employee use of single-occupancy automobiles for offsite commuting and for internal travel within the Specific Plan. Potential TDM measures to be implemented by the TMA to achieve articulated performance standards are addressed more fully in rows 146 through 156 and 160 through 199, above.
207	SJVAPCD List, p. 14	Employ or appoint an Employee Transportation Coordinator to work with the TMA and the District.	Yes – Functional Equivalent Required	The TMA will work directly with local agencies and employers. TMA is responsible for and will regularly monitor programs to provide transit fare media for all transit service providers and ends users, developing transit affordability measures and/or incentives, and requiring employee commute reduction programs for employers with 250 or more employees. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) The potential TMA measures to meet articulated performance standards also include a variety of programs to reduce employee commute trips, as addressed in rows 146 through 156 and 160 through 199, above. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the Centennial internal and external mobility performance standards.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
208	2008 OPR p. 20	Encourage large businesses to develop commute trip reduction plans that encourage employees who commute alone to consider alternative transportation modes.	Yes	TMA activities include required employee commute reduction programs for employers with 250 or more employees. (DRP 2017, Appendix 2-C to Draft EIR Appendix 4.0-A, p. 10) The Project TDM program encourages ride-sharing and employer-sponsored vanpools, and will be managed by the TMA. (*Id.,* p. 5.21-77) The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. (*Ibid*.) It also includes formation of strategic partnerships with car sharing services (e.g., Uber or Lyft) and other innovation/technology approach to increase transportation efficiency. (*Ibid*.)
209	SLOAPCD List, p. 3-19	Implement a Transportation Choice Program to reduce employee commute trips. The applicant shall work with Rideshare for free consulting services on how to start and maintain a program.	Yes – Functional Equivalent Required	TMA activities include required employee commute reduction programs for employers with 250 or more employees. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) The potential TMA measures to meet articulated performance standards also include a variety of programs to reduce employee commute trips, as addressed in rows 146 through 156 and 160 through 199, above.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
Heating and Cooling				
210	SLOAPCD List, p. 3-17	No residential wood burning appliances.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
211	SMAQMD List, p. 10	Only Natural Gas Hearth. Project restricts hearths to Natural Gas Only. Or No Hearth. Project contains no hearths.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
212	CAPCOA List, p. B-22	Wood Burning Fireplaces/Stoves**.** Project does not feature fireplaces or wood burning stoves.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
213	SJVAPCD List, p. 14	Reduce Wood Burning Fireplaces and/or Woodstoves above that required by District Rule 4901.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
214	CAPCOA List, p. B-22	Natural Gas Stove**.** Project features only natural gas or electric stoves in residences.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
215	CAPCOA List, p. B.28	Solar Water Heaters**.** Project provides solar water heaters.	Yes	Uses associated with the Project are subject to appliance efficiency requirements for water heaters. (California Appliance Efficiency Regulations (Title 20 Standards), Sections 1605.1(f), 1605.3(f).) Consistent with the Los Angeles County Community Climate Action Plan, a minimum of 10 percent of all single-family detached residential units at Project buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) Further, Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. (*Ibid*.) Further, per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (*Id.,* p. 5.21-89) The

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				Centennial Green Development Program requires the use of removable covers for pools and spas, which are the functional equivalent on automatic covers with regard to efficiency. (*Id.,* Appendix 2.0-A to Appendix 4.0-A, p. 20) Automatic covers may result in accidental drownings or other injuries. Efficient pumps and motors for pools and spas are already required under applicable Building Energy Efficiency Standards.
216	SJVAPCD List, p. 11	Residential Water Heaters 1. Use solar or low-emission water heaters (beyond Rule 4902) 2. Use central water heaters Commercial Water Heaters 1. Use solar or low-emission water heaters 2. Use central water heating systems	Yes	Residential Water Heaters: Consistent with the Los Angeles County Community Climate Action Plan, the Project's Green Development Program requires that a minimum of 10 percent of all single-family detached residential units at Project buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) Further, Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. (*Ibid*.) Commercial Water Heaters: Per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (*Id.,* p. 5.21-89)
217	SLOAPCD List, p. 3-18	Utilize high efficiency gas or solar water heaters.	Yes	The Project provides for solar, tank-less, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) See further discussion in rows 215 through 216.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
218	BAAQMD List, p. 4-16	Install solar water heaters	Yes – Functional Equivalent Required	The Project provides for solar, tank-less, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) See further discussion in rows 215 through 216.
219	BAAQMD List, p. 4-16	Install tank-less water heaters	Yes – Functional Equivalent Required	The Project provides for solar, tank-less, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) See further discussion in rows 215 through 216.
220	AG List, p. 4	Use automatic covers, efficient pumps and motors, and solar heating for pools and spas.	Yes	Per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (DRP 2017, p. 5.21-89) The Centennial Green Development Program requires the use of removable covers for pools and spas, which are the functional equivalent on automatic covers with regard to efficiency. (*Id.,* Appendix 2.0-A to Appendix 4.0-A, p. 20) Automatic covers may result in accidental drownings or other injuries. Efficient pumps and motors for pools and spas are already required under applicable Building Energy Efficiency Standards. And Title 20 Standards.
221	AG List, p. 3	Use passive solar design, e.g., orient buildings and incorporate landscaping to maximize passive solar heating during cool seasons, minimize solar heat gain during hot seasons, and enhance natural ventilation. Design buildings to take advantage of sunlight.	Yes	Many of the streets in the Project will follow a general east-west orientation, providing optimal solar orientation, reducing energy demand and providing more shade on east-west streets to make them more enjoyable for pedestrians and cyclists. (DRP 2017, Appendix 4.0-A, p. M-6) The Project also takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				air flow into buildings. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5)
222	SJVAPCD List, p. 11	Commercial Energy Efficiency 1. Orient Buildings to take advantage of solar heating and mineral cooling and use passive solar designs 2. Increase wall and attic insulation beyond [2012] Title 24 requirements	Yes	Since the SJVAPCD list was last updated in 2012, energy efficiency standards have been made more stringent by 2016 Title 24 requirements. For example, Title 24 standards set minimum energy-saving requirements for new buildings and renovations that will reduce energy used for lighting, heating, cooling, ventilation, and water heating, and the project is required to comply with these stringent more current building code requirements. Further, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) Specifically, with regard to the suggested measures here: 1. Many of the streets in the Project will follow a general east-west orientation, providing optimal solar orientation, reducing energy demand and providing more shade on east-west streets to make them more enjoyable for pedestrians and cyclists. (Draft EIR Appendix 4.0-A, p. M-6) The Project also takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) It

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) 2. Efficiency standards regarding roofing, ceilings, and insulation are as follows: Roofs/Ceilings and Insulation: New construction must reduce roof heat island effects per CALGreen Building Code section 106.11.2, which has requirements for the solar reflectance and thermal emittance of materials. Roofing materials must also meet solar reflectance and thermal emittance standards contained in Title 20 Standards. There are also requirements for the installation of roofing and ceiling insulation. (See Title 24, Part 6 Compliance Manual at Section 3.2.2.) Exterior Walls: Must meet requirements in current edition of California Energy Code and comply with sections A5.106.7.1 or A5.106.7.2 of CALGreen Building code for wall surfaces, and section 5.407.1, requiring weather-resistant exterior wall and foundation envelope. Must also meet requirements contained in Title 24, Part 6, which vary by material of the exterior walls. (See Title 24, Part 6 Compliance Manual, Part 3.2.3.) Demising (Interior) Walls: Mandatory insulation requirements for demising walls (which separate conditioned from non-conditions space). (*Id.,* at 3.2.4.) Door Insulation: There are mandatory requirements for air infiltration rates to improve insulation efficiency. (*Id.,* at 3.2.5.) Flooring Insulation: There are mandatory requirements for insulation that depend on the material and location of the flooring. (*Id.,* at 3.2.6.)

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Row	Source	Measure	Included	Response
223	SJVAPCD List, p. 11	Industrial Heating 1. Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs	Yes	MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (DRP 2017, p. 5.21-88) The Project takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) The Project maximizes solar orientation, as further described in rows 39 through 41.
224	SJVAPCD List, p. 11	Residential Energy Efficiency 1. Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs 2. Increase wall and attic insulation beyond [2012] Title 24 requirements	Yes	Since the SJVAPCD list was last updated in 2012, energy efficiency standards have been made more stringent by Title 24 requirements. For example, Title 24 standards set minimum energy-saving requirements for new buildings and renovations that will reduce energy used for lighting, heating, cooling, ventilation, and water heating, and the project is required to comply with these stringent current building code requirements. In fact, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Specifically, with regard to these suggested measures: 1. The Project maximizes solar orientation to provide natural heating and cooling, as described in rows 39 through 41, 223, 225, and 226. 2. 2016 Title 24 requirements are more stringent than 2012 requirements, and the Project has committed to exceeding 2016 Title

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				24 requirements by 15 percent for residential buildings. (*Id.,* p. 5.21-88) For details regarding 2016 Title 24 insulation requirements, see row 222.
225	SLOAPCD List, p. 3-18	Design building to include roof overhangs that are sufficient to block the high summer sun, but not the lower winter sun, from penetrating south facing windows (passive solar design).	Yes	The Project takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) The Project maximizes solar orientation, as further described in rows 39 through 41.
226	CAPCOA List, p. B-29	Shading Mechanism**.** Install energy-reducing shading mechanisms for windows, porch, patio and walkway overhangs.	Yes	The Project takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) The Project maximizes solar orientation, as further described in rows 39 through 41.

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Row	Source	Measure	Included	Response
227	CAPCOA List, p. B-30	Passive Heating and Cooling Systems. Install energy-reducing passive heating and cooling systems (e.g., insulation and ventilation).	Yes	The Project takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) The Project maximizes solar orientation, as further described in rows 39 through 41. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (*Id.,* p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) For details regarding 2016 Title 24 insulation requirements, see row 222.
228	CAPCOA List, p. B-26	Low-Energy Cooling. Project optimizes building's thermal distribution by separating ventilation and thermal conditioning systems.	Yes – Functional Equivalent Required	Uses associated with the Project are subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) MM 21-8 requires that Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission requirements or ENERGY STAR requirements, or equivalent, shall be exclusively offered by residential builders, and this includes room air conditioners. (DRP 2017, p. 5.21-90) See also the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18) Buildings will also be required to use timed or smart remote communicating thermostats in residential and

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				nonresidential buildings, including meeting applicable integration requirements for response signals from the electric utility. (Id., p. 20) All Project buildings will include appropriately sized and high-efficiency heating and cooling systems. (*Id.,* Appendix 4.0-A, p. 3-62) The Project incorporates passive and energy-efficient cooling and heating systems, as described in rows 221 through 227. The Project maximizes solar orientation, as further described in rows 39 through 41.
229	BAAQMD List, p. 4-19	Increase roof/ceiling insulation	Yes	MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) For details regarding 2016 Title 24 insulation requirements, see row 222.
230	SJVAPCD List, p. 14	Install "whole-house" or "fresh-air" ventilation system.	Yes – Functional Equivalent Required	MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) The Project incorporates passive and energy-efficient cooling and heating systems, as described in rows 221 through 227. The Project maximizes solar orientation, as further described in rows 39 through 41.
231	BAAQMD List, p. 4-18	HVAC duct sealing	Yes	Title 24 requires duct sealing, and the Project must legally comply with this requirement. All Project buildings will include appropriately sized and high-efficiency HVAC systems with sealed ducts. (DRP 2017, Appendix 4.0-A, p. 3-62)

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Row	Source	Measure	Included	Response
232	SLOAPCD List, p. 3-18	Install high efficiency heating and cooling systems.	Yes	Uses associated with the Project are subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) MM 21-8 requires that Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission requirements or ENERGY STAR requirements, or equivalent, shall be exclusively offered by residential builders, and this includes room air conditioners. (DRP 2017, p. 5.21-90) See also the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18) Buildings will also be required to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for response signals from the electric utility. (*Id.,* p. 20) All Project buildings will include appropriately sized and high-efficiency heating and cooling systems. (*Id.,* Appendix 4.0-A, p. 3-62)
233	CAPCOA List, p. B-30	Ceiling/Whole-House Fans**.** Install energy-reducing ceiling/whole-house fans.	Yes – Functional Equivalent Required	The Project includes bathroom exhaust fans and kitchen fans for gas ranges, which shall comply with California efficiency standards and be vented or ducted to the outdoors. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 26) The Project is also required to comply with various energy efficiency, passive cooling, and insulation requirements, as discussed in rows 222 through 232. Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The Project maximizes solar orientation, as further described in rows 39 through 41.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
234	SJVAPCD List, p. 13	Improve the thermal integrity/efficiency of buildings, and reduce the thermal load with automated and timed temperature controls or occupant sensors.	Yes	Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (DRP 2017. Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The Project maximizes solar orientation, as further described in rows 39 through 41.
235	SLOAPCD List, p. 3-18	Install energy-reducing programmable thermostats.	Yes	Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20)
236	CAPCOA List, p. B-30	Programmable Thermostats**.** Install energy-reducing programmable thermostats that automatically adjust temperature settings.	Yes	Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20)
237	BAAQMD List, pp. 4-14, -15	Require smart meters and programmable thermostats	Yes	Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20)
238	SJVAPCD List, p. 14	Install HEPA (High Efficiency Particle Arrestance) Filters.	Yes – Functional Equivalent Required	Per PDF 11-6, the Project prohibits residences, schools, day care centers or other land uses involving public congregation from being built within 150 feet of the near edge of the SR-138 traffic lanes. This requirement would ensure that risk of exposure to diesel particular matter is less than what is allowed by the AVAQMD and SCAQMD guidelines. (DRP 2017, p. 5.11-31) This requirement has been incorporated into MM 11-10. (*Id.,* p. 5.11-82) As an added layer of protection, MM 11-11 further

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Row	Source	Measure	Included	Response
				requires that prior to future tract map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138 or a high-volume roadway, an additional dispersion modeling study must be conducted to estimate diesel PM air concentrations. If the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then effective TAC reduction measures must be implemented to mitigate for interior air quality, such as filtration technologies or equivalent protections against TACs from vehicle emissions, as discussed in response to Comment F.8-189.
239	CAPCOA List, p. B-22	High-Efficiency Pumps**.** Project shall use high-efficiency pumps.	Yes	Title 24 requires high-efficiency pumps, and the Project must legally comply with relevant requirements. (See, e.g., Title 24, Table 110.2-B Unitary and Applied Heat Pumps, Minimum Efficiency Requirements.)
240	SJVAPCD List, p. 14	Install high efficiency Energy Star heating or ground source heat pump.	Yes	Title 24 requires high-efficiency pumps, and the Project must legally comply with relevant requirements. (See, e.g., Title 24, Table 110.2-B Unitary and Applied Heat Pumps, Minimum Efficiency Requirements.)
241	BAAQMD List, p. 4-15	Install green roofs	No. Not feasible.	The Specific Plan specifies that roof gardens are a potential use for some multi-family and single-family residential building types, including the MFA Wrap and SFA Motorcourt. (DRP 2017, Appendix 3-A to Appendix 4.0-A, p. 25) However, making green roofs a requirement would conflict with the Project's commitment to maximizing on-site generation of solar power as specified in MM 21-1 and the Green Development Program. It would also require extensive maintenance in the arid climate. Therefore, the Project more appropriately focuses on, and must comply with cool roofing requirements, as discussed below in rows 243 through 245.
242	CAPCOA List, p. B-26	Green Roof**.** Install a vegetated roof that covers at least 50 percent of roof area. The reduction assumes that a vegetated roof is installed on at least 50 percent of the roof area or that a combination high albedo and vegetated roof surface is installed that meets	No. Not feasible.	The Specific Plan specifies that roof gardens are a potential use for some multi-family and single-family residential building types, including the MFA Wrap and SFA Motorcourt. (DRP 2017, Appendix 3-A to Appendix 4.0-A, p. 25) However, making green roofs a requirement would conflict with the Project's commitment to maximizing on-site generation of solar power as specified in MM 21-1 and the Green Development

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Row	Source	Measure	Included	Response
		the following standard: (Area of SRI Roof/0.75)+(Area of vegetated roof/0.5) >= Total Roof Area. Water consumption reduction measures shall be considered in the design of the green roof.		Program. It would also require extensive maintenance in the arid climate. Therefore, the Project more appropriately focuses on, and must comply with cool roofing requirements, as discussed below in rows 243 through 245.
243	CAPCOA List, pp. B-27, B-28	Cool Roofs**.** Project provides cool roofs. Highly reflective, highly emissive roofing materials that stay 50-60°F cooler than a normal roof under a hot summer sun. CA's Cool Savings Program provided rebates to building owners for installing roofing materials with high solar reflectance and thermal emittance. The highest rebate went to roofs on air conditioned buildings, while buildings with rooftop ducts and other nonresidential buildings were eligible for slightly less. The program aimed to reduce peak summer electricity demand and was administered by the CEC.	Yes	The Project is already legally required to comply with this measure. The Project must comply with requirements of the Los Angeles Green Building Standards Code (Title 31). Title 31 includes measures requiring cool roofs. California's Building Energy Efficiency Standards (Title 24) also require cool roofs and has requirements for efficient insulation. Accordingly, the Project's Specific Plan specifies that all Project buildings will come standard with cool roofs. (DRP 2017, Appendix 4.0-A, p. 3-62) Per the Centennial Green Development Program, roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19)
244	BAAQMD List, pp. 4-14, 4-15	Require cool roof materials (albedo ≥30)	Yes	The Project is already legally required to comply with this measure. The Project must comply with requirements of the Los Angeles Green Building Standards Code (Title 31). Title 31 includes measures requiring cool roofs. California's Building Energy Efficiency Standards (Title 24) also require cool roofs and has requirements for efficient insulation. Accordingly, the Project's Specific Plan specifies that all Project buildings will come standard with cool roofs. (DRP 2017, Appendix 4.0-A, p. 3-62) Per the Centennial Green Development Program, roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19)

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Row	Source	Measure	Included	Response
245	AG List, p. 3	Install light colored "cool" roofs and cool pavements.	Yes	The Project will provide cool roofs, as required by law and the Centennial Green Development Program and discussed in rows 243 and 244. With regard to pavement, The Project will include installation of cool pavements if approved by Caltrans and the County for roadway uses, provided that road installation and maintenance durability and costs are comparable to existing approved roadway materials (since early replacements or more intensive repair result in higher GHG emissions). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19) It would also use light-colored, non-reflective finishes to help reduce glare for outside sidewalks, driveways, patios and parking areas. (*Ibid*.)
246	CAPCOA List, pp. B-24 through B-26	Non-roof Surfaces**.** Provide shade (within 5 years) and/or use light colored/high-albedo materials (reflectance of at least 0.3) and/or open grid pavement for at least 30 percent of the site's nonroof impervious surfaces, including parking lots, walkways, plazas, etc.; OR place a minimum of 50 percent of parking spaces underground or covered by structured parking; OR use an open-grid pavement system (less than 50 percent impervious) for a minimum of 50 percent of the parking lot area. The mitigation measure reduces heat islands (thermal gradient differences between developed and undeveloped areas to minimize impact on microclimate and human and wildlife habitats. This measure requires the use of patented or copyright protected methodologies created by the ASTM. The SRI is a measure of the constructed surface's ability to reflect solar heat, as shown by a small rise in temperature. It is defined so that a standard black (reflectance 0.05, emittance 0.90) is "0" and a standard white (reflectance 0.80, emittance 0.90) is 100. To calculate SRI	Yes	With regard to shading of non-roof areas, the Project must and will comply with the Los Angeles Tree Planting Ordinance, which ensures adequate shading of residential and nonresidential developments. (DRP 2017, p. 5.21-37) MMs 21-2 and 21-3 also include the strategic placement of trees and other shading devices. (*Id.,* p. 5.21-88) With regard to paving, the Project must comply with CALGreen paving requirements. Further, consistent with the Los Angeles CCAP, the Project will use durable paving materials that will be determined upon consideration of aggregates, asphalt materials, cementitious materials, recycled materials, and other roadway materials that are commonly used in pavement construction. (*Id.,* p. 4.21-79) The Project will include installation of cool pavements if approved by Caltrans and the County for roadway uses, provided that road installation and maintenance durability and costs are comparable to existing approved roadway materials (since early replacements or more intensive repair result in higher GHG emissions). (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19) It would also use light-colored, non-reflective finishes to help reduce glare for outside sidewalks, driveways, patios and parking areas. (*Ibid*.) The Project's Green Development Program requires that 60 percent of public and OA trails (Project Green Trails will be 80 percent) with permeable materials, which may include decomposed granite, soilcrete, gravel pavers, grass pavers, variations on different types of grids and blocks, loose aggregate, poly-pavement, permeable asphalt and concrete, and as identified in the Trails Plain in Specific Plan Section 3.11.7. (*Id.,* p. 10) For Project streets, street design proposals for County

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
		for a given material, obtain the reflectance value and emittance value for the material. SRI is calculated according to ASTM E 1980-01. Reflectance is measured according to ASTM E 903, ASTM E 1918, or ASTM C 1549. Emittance is measured according to ASTM E 408 or ASTM C 1371. Default values for some materials will be available in the LEED-NC v2.2 Reference Guide.		review will include technically feasible (given expected future uses) and legally feasible (given applicable ordinances and other requirements) street designs that include permeable pavement, groundcovers, or other measures to reduce use of concrete and asphalt. (*Ibid*.)
247	CAPCOA List, p. B-26	Light-Colored Paving**.** Project provides light-colored paving (e.g., increased albedo pavement)	Yes	The Project will include installation of cool pavements if approved by Caltrans and the County for roadway uses, provided that road installation and maintenance durability and costs are comparable to existing approved roadway materials (since early replacements or more intensive repair result in higher GHG emissions). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19) It would also use light-colored, non-reflective finishes to help reduce glare for outside sidewalks, driveways, patios and parking areas. (*Ibid*.) The Project's Green Development Program requires that 60 percent of public and OA trails (Project Green Trails will be 80 percent) with permeable materials, which may include decomposed granite, soilcrete, gravel pavers, grass pavers, variations on different types of grids and blocks, loose aggregate, poly-pavement, permeable asphalt and concrete, and as identified in the Trails Plain in Specific Plan Section 3.11.7. (*Id.,* p. 10) For Project streets, street design proposals for County review will include technically feasible (given expected future uses) and legally feasible (given applicable ordinances and other requirements) street designs that include permeable pavement, groundcovers, or other measures to reduce use of concrete and asphalt. (*Ibid*.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
248	SLOAPCD List, p. 3-18	Utilize double-paned windows.	Yes – Functional Equivalent Required	Existing requirements ensure the efficiency of Project windows, and window efficiency is already required under applicable Building Energy Efficiency Standards. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) For details regarding 2016 Title 24 insulation requirements, see row 222.
249	SLOAPCD List, p. 3-18	Install door sweeps and weather stripping (if more efficient doors and windows are not available).	Yes – Functional Equivalent Required	Existing requirements ensure the efficiency of Project doors and windows. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) For details regarding 2016 Title 24 insulation requirements, see row 222. See also row 248.
250	CAPCOA List, p. B-23	Energy Star Roof**.** Project installs Energy Star labeled roof materials.	Yes – Functional Equivalent Required	As indicated in the Centennial Green Development Program, the Project shall comply with all State Energy Efficiency Standards for Residential and Non-residential buildings (Title 24; 24 CCR Part 6) and California Building Standards Code (CALGreen; 24 CCR Par 11) requirements in effect at the time the building application is submitted. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) Additionally, the Project shall reduce energy use by 15 percent below 2016 Title 24 Standards for Residential Development and 10 Percent Below for Nonresidential Developments. (*Ibid*.) As part of this commitment, the Project will implement energy-efficient design practices such as high-performance glazing, Energy Star compliant systems and appliances, and radiant

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				heat proof barriers (including but limited to high-albedo white thermoplastic polyolefin roof membrane). (*Ibid*.) Roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 14)
251	SLOAPCD List, p. 3-20	Use roofing material with a solar reflectance values meeting the EPA/DOE Energy Star® rating to reduce summer cooling needs.	Yes – Functional Equivalent Required	As indicated in the Centennial Green Development Program, the Project shall comply with all State Energy Efficiency Standards for Residential and Non-residential buildings (Title 24; 24 CCR Part 6) and California Building Standards Code (CALGreen; 24 CCR Par 11) requirements in effect at the time the building application is submitted. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) Additionally, the Project shall reduce energy use by 15 percent below 2016 Title 24 Standards for Residential Development and 10 Percent Below for Nonresidential Developments. (*Ibid*.) As part of this commitment, the Project will implement energy-efficient design practices such as high-performance glazing, Energy Star compliant systems and appliances, and radiant heat proof barriers (including but limited to high-albedo white thermoplastic polyolefin roof membrane). (*Ibid*.) Roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 14)
252	SLOAPCD List, p. 3-18	Utilize built-in energy efficient appliances (i.e. Energy Star®).	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)

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Row	Source	Measure	Included	Response
253	CAPCOA List, p. B-28	Energy Efficient Appliance Standards. Project uses energy efficient appliances (e.g., Energy Star).	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)
254	SMAQMD List, p. 11	Energy Efficient Appliances. Use appliances more energy efficient than standard models.	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)
255	SJVAPCD List, p. 13	Install efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units beyond [2012] Title 24 requirements (see Title 24, part 6, Energy Efficiency Standards for Residential and Nonresidential Buildings: http://www.energy.ca.gov/title24/)	Yes	The Project will comply with all Title 24 standards for residential and nonresidential buildings, and with CALGreen requirements in effect at the time the building permit application is submitted. Title 24 covers the use of energy saving appliances, conditioning systems, water heating, and lighting. CALGreen covers the use of water and energy, among other issues, and requires building commissioning to verify building systems are functioning at maximum efficiency. The Project has also committed to additional requirements, as follows: 1. The Project's plans and specifications shall demonstrate that development within the Specific Plan shall reduce energy use by 15 percent below 2016 Title 24 Standards for residential developments and 10 percent below for nonresidential developments, per the CALGreen Tier 1 Voluntary Measures. 2. Implement energy-efficient design practices such as high-performance glazing, Energy Star compliant systems and appliances, radiant heat roof barriers (including but not limited to high-albedo white thermoplastic polyolefin roof membrane), high-efficient HVAC with hot-gas reheat, insulation on all pipes, programmable thermostats, solar access, shading of HVAC systems

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Row	Source	Measure	Included	Response
				from direct sunlight, use of formaldehyde-free insulation, zero use of CFC refrigerants in commercial buildings, use of recycled-content gypsum board, sealed ducts, fluorescent and LED bulbs, orientation of building and incorporation of landscaping to maximize passive solar (heating during cool seasons, and minimize heat gain during hot season), and designs that take advantage of prevailing winds. 3. The Master Developer shall use its design review process to comply with this requirement. (*Ibid*.) To ensure continued compliance with efficiency requirements, the Project includes MMs 21-6 and 21-7. MM 21-6 requires owners of single-family and multi-family residential units to present the buyer with a written energy audit checklist that certifies that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed, or if changed, that thy otherwise comply with the Centennial Green Development Program. (*Id.,* p. 5.21-89) MM 21-7 requires that for nonresidential development, the owner or tenant provides a report, at specified times, that evaluates whether all major building systems such as heat furnace, air conditioner, and other mechanisms are functioning within design standards. (*Id.,* pp. 5.21-89, -90)
256	AG List, p. 2	Install energy efficient lighting (e.g., light emitting diodes (LEDs)), heating and cooling systems, appliances, equipment, and control systems.	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The Project will also install energy efficient and environmentally sensitive lighting, as discussed in Table 2-

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Row	Source	Measure	Included	Response
				A-1 in the Green Development Program (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19), and in rows 282 through 288, below.
257	SJVAPCD List, p. 14	Install built-in energy efficient appliances.	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)
258	2008 OPR List, p. 19	Encourage public and private construction of LEED (Leadership in Energy and Environmental Design) certified (or equivalent) buildings.	Yes – Functional Equivalent Required	California is a global leader on climate policy and programs, and has adopted scores of statutes and regulations to reduce GHG across multiple sectors, which are the equivalent of or would exceed LEED standards. The "green" ranking systems, including LEED, are public and private ranking entities under no obligation to incorporate or address inconsistent applicable California standards, and generally target just a fraction of the multiple sources of GHG emissions associated with land use projects. Further, because the ranking systems, including LEED, are not part of the integrated programs, regulations, and statutes designed to achieve California's GHG reduction target, they do not have any inherent or presumptive superiority to California's legal mandates. These systems also require specialized training and expertise to monitor and certify, can change without notice to affected parties, may not remain timely based on changing technologies and laws, and provide a less stable enforcement framework than compliance with California's legally-required GHG reduction requirements and the carefully crafted Centennial Green Development Program. However, the Centennial Green Development Program does require the delivery of a third-party verification by a qualified inspector to the Department of Public Works that demonstrates that the Centennial Green Development Program has been implemented. The qualified inspector could be a LEED accredited professional. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 8)

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Row	Source	Measure	Included	Response
				It is also noted that many of the LEED design principles are consistent with Project design and principles. For example, the Project meets LEED design criteria including walkable streets, a connected and open community, mixed-use neighborhoods, a mix of housing types, transportation demand management, access to public space and recreation facilities, and visitability and universal design. (See U.S. Green Building Council, LEED credit library, available online at: www.usgbc.org/credits).
259	CAPCOA List, p. B-20	LEED Certification**:** LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.	Yes – Functional Equivalent Required	California is a global leader on climate policy and programs and has adopted scores of statutes and regulations to reduce GHG across multiple sectors, which are the equivalent of or would exceed LEED standards. The "green" ranking systems, including LEED, are public and private ranking entities under no obligation to incorporate or address inconsistent applicable California standards, and generally target just a fraction of the multiple sources of GHG emissions associated with land use projects. Further, because the ranking systems, including LEED, are not part of the integrated programs, regulations, and statutes designed to achieve California's GHG reduction target, they do not have any inherent or presumptive superiority to California's legal mandates. These systems also require specialized training and expertise to monitor and certify, can change without notice to affected parties, may not remain timely based on changing technologies and laws, and provide a less stable enforcement framework than compliance with California's legally-required GHG reduction requirements and the carefully crafted Centennial Green Development Program. However, the Centennial Green Development Program does require the delivery of a third-party verification by a qualified inspector to the Department of Public Works that demonstrates that the Centennial Green Development Program has been implemented. The qualified inspector could be a LEED accredited professional. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 8) It is also noted that many of the LEED design principles are consistent with Project design and principles. For example, the Project meets LEED design criteria including walkable streets, a connected and open

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Row	Source	Measure	Included	Response
				community, mixed-use neighborhoods, a mix of housing types, transportation demand management, access to public space and recreation facilities, and visitability and universal design. (See U.S. Green Building Council, LEED credit library, available online at: www.usgbc.org/credits).
260	BAAQMD List, p. 4-15	Meet GBC standards in all New construction	Yes	While the Project is already required to comply with Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) The Energy Plan shall also confirm that a menu of energy efficiency design elements, along with other design considerations and options, has been made available by the project proponent to builders, developers, and property owners as part of the internal design review process. (*Ibid*.) Each developer, builder, or property owner shall incorporate the design elements required to comply with 2016 Title 24 requirements and select from the menu or implement other available technologies as may be needed to reduce energy consumption by 15 percent below 2016 Title 24 requirements for residential developments and 10 percent for nonresidential developments. (*Ibid*.) All provisions outlined in the approved Energy Plan shall be either conditions of approval for any commercial/industrial site plan or included as notes on all final subdivision maps. (*Ibid*.) The Project's Green building measures are also consistent with, and based on, the current California Green (CALGreen) Building Standards Code. (*Id.,* p. 4) The Centennial Green Development Program's Green Building component requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary 2016 CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building

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Row	Source	Measure	Included	Response
				Ordinances. (*Ibid*.) Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs, as discussed throughout this response.
261	AG List, pp. 1-2	Incorporate green building practices and design elements. Meet recognized green building and energy efficiency benchmarks.	Yes	Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) The Centennial Green Development Program's Green Building component requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary 2016 CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances. (*Ibid*.) Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs, as discussed throughout this response. See row 260 for further discussion.
262	SMAQMD List, p. 11	Exceed Title 24. Use less energy than allowed by [2016] Title 24.	Yes	While the Project is already required to comply with Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.

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Row	Source	Measure	Included	Response
263	BAAQMD List, p. 4-14	Increase Energy Efficiency Beyond [2011] Title 24	Yes	Title 24 requirements have been made more stringent since 2011, when the BAAQMD list was prepared. While the Project is already required to comply with Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable 2016 Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.
264	CAPCOA List, p. B-24	Exceed Title 24**.** Project exceeds [2008] title 24 requirements by 20 percent.	Yes	Title 24 requirements have been made more stringent since 2008. While the Project is already required to comply with 2016 Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.
265	SLOAPCD List, p. 3-18	Increase the building energy rating by 20 percent above [2012] Title 24 requirements. Measures used to reach the 20 percent rating cannot be double counted.	Yes	Title 24 requirements have been made more stringent since 2012. While the Project is already required to comply with 2016 Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title

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Row	Source	Measure	Included	Response
				24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.
266	2008 OPR List, p. 19	Recognize and promote energy saving measures beyond Title 24 requirements for residential and commercial projects	Yes	While the Project is already required to comply with 2016 Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.
267	2008 OPR List, p. 19	Design, build, and operate schools that meet the Collaborative for High Performance Schools (CHPS) best practices.	No. Not feasible to require, but County encourages	The County and the Applicant do not control future school facilities on the project site and may not mandate that such schools comply with referenced CHPS practices. However, as noted in the Project's Green Development Program, in the case of all public school buildings, schools constructed within the Specific Plan boundaries will be required to meet the CALGreen Code Tier 1 requirements at the time of building permit issuance, and are encouraged, by the County, to meet additional criteria of the CHPS, with the goal of providing highly efficient and productive school environments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 4)
268	2008 OPR List, p. 19	Where feasible, include in new buildings facilities to support the use of low/zero carbon fueled vehicles, such as the charging of electric vehicles from green electricity sources.	Yes	MM 21-15 requires the installation of one 208/240 volts of alternating current (VAC) receptacle that may be used for charging electric vehicles in each detached and attached single-family residence. The installation shall comply with requirements of Section 4.106.4.1 of the 2016 CALGreen Code, or the most applicable code at the time of construction. (DRP 2017, p. 5.21-91) See response to Comment F.8-94 for updates to MM 21-15. MM 21-6 requires the Applicant/Developer to provide plans and specifications to the County demonstrating that alternative energy

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Row	Source	Measure	Included	Response
				fueling stations (a 208/240 VAC electrical station or one providing another new or improved technology) that shall provide for the simultaneous charging of two vehicles and shall be installed as follows: • Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least seventeen (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first seventeen (17) residential units and an additional alternative energy vehicle fueling station for each additional seventeen (17) residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station. • Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station. (*Ibid*.) MM 21-18 requires the incorporation of preferentially-located parking spaces for alternative-fueled parking spaces into visitor parking for multi-family residential buildings. (*Id.,* p. 5.21-92) MMs 11-6 and 21-19 (as updated in response to Comment F.8-95) contain the following relevant requirements for parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, parks) and parking structures and parking lots that serve multifamily residential buildings with 17 or more multi-family units: • The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.

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Row	Source	Measure	Included	Response
				• Five percent of the total number of parking spaces provided in the facility, but in no case less than one, shall be Electric Vehicle Parking Spaces capable of supporting future Electric Vehicle Supply Equipment, as defined in CALGreen Code Section 202, with specifications as laid forth in MM 21-19. (*Ibid*.) See also the Centennial Green Development Program at p. 14. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 14)
269	SLOAPCD List, p. 3-19	Provide electrical charging station for electric vehicles.	Yes	The Project provides electric vehicle charging stations, as discussed in row 268.
270	CAPCOA List, p. B-26	Charging Facilities**.** Project installs EV charging facilities.	Yes	The Project provides electric vehicle charging facilities, as discussed in row 268.
271	CAPCOA List, p. B-18	Recharging Areas**.** Provide residential buildings with a "utility" room or space for recharging batteries, whether for use in a car, electric lawnmower, other electric landscaping equipment, or even batteries for small items such as flashlights.	Yes – Functional Equivalent Required	The Project incorporates adequate infrastructure for Project residents to recharge electric cars and electrical equipment, including through the incorporation of 208/240 VAC receptacles at single-family homes and alternative energy fueling stations at multi-family residential buildings, electrical outlets that will be included throughout the interior of Project residential units, and exterior electrical outlets on patios and elsewhere outside residential units, as discussed in rows 268 and 274.
272	SJVAPCD List, p. 11, 15	Landscape Maintenance 1. Provide electric maintenance equipment From individual measure list: 1. Project provides and/or requires use of electric maintenance equipment; including, but not limited to electric lawn mowers, electric leaf blowers, etc. 2. Prohibit gas powered landscape maintenance equipment within developments.	Yes – Functional Equivalent Required	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration with SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) CARB also regulates emissions from landscaping equipment in its Small Off-Road Engine regulations, and landscaping equipment that does not comply with CARB requirements may not be sold in California. Further, the use of turf is restricted by the County's drought-tolerant landscaping requirements, which specify that a maximum of 25 percent of landscaped areas may be turf grass. (*Id.,* p. 5.21-36) Accordingly, per the Centennial Green Development Program, the Project will require that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf grass and that landscaped

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Row	Source	Measure	Included	Response
				commercial areas may include turf only if irrigated with recycled water. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 27) This strict limitation on turf grass would make the provision of electric lawnmowers to Project residents of very limited utility. Rather, Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios, to facilitate the use of electrical equipment (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)
273	CAPCOA List, p. B-19	Electric Landmower**.** Provide a complimentary electric lawnmower to each residential buyer.	Yes – Functional Equivalent Required	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration with SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) CARB also regulates emissions from landscaping equipment in its Small Off-Road Engine regulations, and landscaping equipment that does not comply with CARB requirements may not be sold in California. Further, the use of turf is restricted by the County's drought-tolerant landscaping requirements, which specify that a maximum of 25 percent of landscaped areas may be turf grass. (*Id.,* p. 5.21-36) Accordingly, per the Centennial Green Development Program, the Project will require that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf grass and that landscaped commercial areas may include turf only if irrigated with recycled water. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 27) This strict limitation on turf grass would make the provision of electric lawnmowers to Project residents of very limited utility. Rather, Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios, to facilitate the use of electrical equipment (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)

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Row	Source	Measure	Included	Response
274	SMAQMD List, p. 11	Electric lawnmower, leaf blower, chainsaw. Landscaping equipment and outdoor electrical plugs provided to project users.	Yes	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) See also rows 272 and 273.
275	BAAQMD List, p. 4-14	Electrically powered landscape equipment and outdoor electrical outlets	Yes	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) See also rows 272 and 273
276	SLOAPCD List, p. 3-19	Provide and require the use of battery powered or electric landscape maintenance equipment for new development.	Yes	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) See also rows 272 and 273.
277	CAPCOA List, p. B-28	Electric Yard Equipment Compatibility. Project provides electrical outlets at building exterior areas.	Yes	Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (DRP 2017, p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)
278	SLOAPCD List, p. 3-17	Incorporate outdoor electrical outlets to encourage the use of electric appliances and tools.	Yes	Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (DRP 2017, p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
279	SJVAPCD List, p. 14	Install electrical outlets on the exterior walls of both the front and back of residences or all commercial buildings to promote the use of electric landscape maintenance equipment. Install a gas outlet for use with outdoor cooking appliances, and in any proposed fireplaces, including outdoor recreational fireplaces or pits.	Yes	Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (DRP 2017, p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (*Id.,* p. 5.21-79)
280	CAPCOA List, p. B-30	Day Lighting Systems**.** Install energy-reducing day lighting systems (e.g., skylights, light shelves and interior transom windows).	Yes	Effective daylighting and maximization of natural daylight is incorporated into the Specific Plan and the principles of the Centennial Green Development Program. (DRP 2017, Appendix 4.0-A, pp. 3-62, 1-7; *Id.,* Appendix 2-A to Appendix 4.0-A, pp. 2, 5)
281	BAAQMD List, p. 4-19	Maximize interior day light	Yes	Effective daylighting and maximization of natural daylight is incorporated into the Specific Plan and the principles of the Centennial Green Development Program. (DRP 2017, Appendix 4.0-A, pp. 3-62, 1-7; *Id.,* Appendix 2-A to Appendix 4.0-A, pp. 2, 5)
282	SJVAPCD List, p. 14	Install energy efficient interior lighting.	Yes	Lighting associated with the Project is subject to energy efficiency requirements in Title 20 Standards, and is also subject to Title 24 requirements, which contain energy standards for non-residential indoor lighting. Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation. (Title 24, Part 6 Compliance Manual, at Section 5). Lighting associated with the Project will also be subject to energy efficiency requirements adopted pursuant to AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting. The Centennial Green Development Program also requires builders to use energy efficient lighting with automated controls in compliance with all applicable requirements of Title 24, Part 6, Section 150.0(k). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19)

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Row	Source	Measure	Included	Response
283	AG List, p. 3	Install efficient lighting, (including LEDs) for traffic, street and other outdoor lighting. Reduce unnecessary outdoor lighting.	Yes	Outdoor lighting associated with the Project must meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.
284	SMAQMD List, p. 11	Install High Efficiency Lighting. Make use of high-efficient outdoor and public lighting.	Yes	The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as follows: • Exterior lighting shall not cause unacceptable light trespass and shall be fully shielded. (*Ibid*.) • Outdoor lighting shall be turned off using automatic control devices or systems between the hours of 10:00 PM and sunrise of the following day in commercial, business park, and mixed-use areas, unless required by the County Building Code. If the property operates beyond 10:00 PM, then outdoor lighting shall be turned off 1 hour after the operation ends for the day. (*Ibid*.) • Outdoor lighting for safety and security reasons is allowed after 10:00 PM only if fully shielded motion sensors are used to turn lighting after 10:00 PM and the sensors turn the lighting of automatically no more than 10 minutes after the area is vacated or at least 50 percent of the total lumen levels are reduced or 50 percent of the total outdoor light fixtures are turned off between 10:00 PM and sunrise. (*Ibid*.)

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Row	Source	Measure	Included	Response
				• Outdoor lighting in residential and open space areas that are over 15 feet in height shall have an output no greater than 400 lumens. (*Ibid*.) • The maximum height of outdoor lighting fixtures shall be 20 feet in Residential and Open Space areas, 30 feet in Commercial, Mixed Use, and Public areas, and 35 feet in Business Park areas. (*Ibid*.) • The following outdoor lighting is prohibited unless mandated for health and safety reasons by a public agency: drop-down lenses, mercury vapor lights, ultraviolet lights, search lights, laser lights and any outdoor lighting that flashes, blinks, alternates or moves. (*Ibid*.) • Outdoor light fixtures in outdoor recreational areas shall be mounted, aimed, and fully shielded to that light beams fall onto activity areas and no unacceptable light trespass occurs on surrounding areas or properties. Outdoor lighting shall only provide the minimum necessary to illuminate recreational activities areas and shall be no more than 75 feet high. Preferably, these fixtures shall also use high pressure sodium or metal halide lamps. (*Ibid*.) • Outdoor advertising signs, business signs and roof and freestanding signs that are lighted shall be fully shielded. Externally mounted light fixtures shall be mounted on the top of the sign and shall be oriented downward. Externally mounted bulbs or lighting tubes for signs shall not be visible from adjoining properties or public rights-of-way, unless such bulbs or tubes are filled with neon, argon, krypton or other self-illuminating substance. (*Ibid*.) • Street lights (consistent with rural design) shall be limited to urban cross sections with sidewalks, curbs and gutters or at intersections and driveways on County roads, where necessary to alleviate traffic hazards, improve traffic flow and/or promote safety and security of pedestrians. (*Ibid*.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				• Limit the hours of community-managed lighting on public streets to midnight unless later lighting will advance public safety and walkability goals. (*Ibid*.)
285	SLOAPCD List, p. 3-18	Utilize energy efficient interior lighting.	Yes	Lighting associated with the Project is subject to energy efficiency requirements in Title 20 Standards, and is also subject to Title 24 requirements, which contain energy standards for non-residential indoor lighting. Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation. (Title 24, Part 6 Compliance Manual, at Section 5). Lighting associated with the Project will also be subject to energy efficiency requirements adopted pursuant to AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting. The Centennial Green Development Program also requires builders to use energy efficient lighting with automated controls in compliance with all applicable requirements of Title 24, Part 6, Section 150.0(k). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19)
286	2008 OPR List, p. 19	Replace traffic lights, street lights, and other electrical uses to energy efficient bulbs and appliances.	Yes	Outdoor lighting associated with the Project must meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
287	SLOAPCD List, p. 3-18	Utilize low energy street lights (i.e. sodium).	Yes – Functional Equivalent Required	Outdoor lighting associated with the Project must meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.
288	SLOAPCD List, p. 3-18	Utilize low energy traffic signals (i.e. light emitting diode).	Yes – Functional Equivalent Required	Outdoor lighting associated with the Project must meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.
289	AG List, p. 15	Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions.	Yes	The Project Applicant shall maintain a community website that includes information about: • GHG reduction opportunities to help educate project residents, as well as schools, other agencies, and businesses with facilities on the project site (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) • Rebates and low-interest loans to residents that make energy-saving improvements to their homes. (*Ibid*.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				• Energy conservation and financial incentive programs, and about potential energy technology systems that may be suitable for larger commercial and institutional users such as combined heat and power systems. (*Ibid*.) • Air quality and greenhouse gas benefits of electric landscape maintenance equipment • Recycling, and the availability of and potential uses for recycled materials, such as the use of salvaged and recycled content materials for hard surface and non-plant landscaping materials. (*Ibid*.) • Energy and water conservation and efficiency for project residents, customers, tenants and large energy users. (*Ibid*.) Per MM 10-1, the Project shall provide internet infrastructure and a community intranet with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. The intranet shall also provide education about greenhouse gas (GHG) emissions; GHG reduction opportunities; energy and water conservation opportunities; financial incentives (e.g., rebates and low-interest loans) for energy-efficiency improvements; and energy-efficiency technology systems, including those suitable for large commercial and industrial users. (*Id.,* p. 5.10-144)
290	AG List, p. 15	Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles.	Yes	The Project shall maintain a website and community intranet that provides such information, as discussed in row 289. The Project intranet shall provide education about greenhouse gas (GHG) emissions; GHG reduction opportunities; energy and water conservation opportunities; financial incentives (e.g., rebates and low-interest loans) for energy-efficiency improvements; and energy-efficiency technology systems, including those suitable for large commercial and industrial users. (DRP 2017, p. 5.10-144)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
291	AG List, p. 4	Provide education on energy efficiency to residents, customers and/or tenants.	Yes	The Project shall maintain a website and community intranet that provides such information, as discussed in rows 289 and 290.
292	2008 OPR List, p. 19	Educate the public, schools, other jurisdictions, professional associations, business and industry about reducing GHG emissions.	Yes	The Project shall maintain a website and community intranet that provides such information, as discussed in rows 289 and 290.
293	CAPCOA List, p. B-31	GHG Emissions Reductions Education. Provide local governments, businesses, and residents with guidance/ protocols/ information on how to reduce GHG emissions (e.g., energy saving, food miles).	Yes	The Project shall maintain a website and community intranet that provides such information, as discussed in rows 289 and 290.
294	SLOAPCD List, p. 3-18	Participate in and implement available energy-efficient rebate programs including air conditioning, gas heating, refrigeration, and lighting programs.	Yes – Functional Equivalent Required	Energy efficient appliances are already required for the Project. The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) The Project Applicant shall also maintain a community website that includes information about rebates and low-interest loans to residents that make additional energy-saving improvements to their homes. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 21) Further, per MM 21-6, deeds, CC&Rs, or similar legal documents shall contain a requirement for single-family and multi-family residential units to present the buyer a written energy audit checklist upon resale. (*Id.,* p. 5.21-89. It shall certify that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. (*Ibid*.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
295	BAAQMD List, p. 4-19	Create program to encourage efficiency improvements in rental units	Yes – Functional Equivalent Required	Energy efficiency is already required for multi-family Project units, and this would include rentals. The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) The Project Applicant shall also maintain a community website that includes information about rebates and low-interest loans to residents that make additional energy-saving improvements to their homes. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 21) Further, per MM 21-6, deeds, CC&Rs, or similar legal documents shall contain a requirement for single-family and multi-family residential units to present the buyer a written energy audit checklist upon resale. (*Id.,* p. 5.21-89. It shall certify that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. (*Ibid*.)
296	SLOAPCD List, p. 3-19	Use clean engine technologies (e.g., alternative fuel, electrification) engines that are not subject to regulations.	Yes	Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer, will promote alternative fuels for transit system, if available, and encourage use of best feasible alternative fuel technology to be used in homeowners association, refuse fleet, and other community service vehicles. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) Further, Project mitigation measures go well beyond the mandatory regulatory requirements with respect to the provision of EV charging infrastructure. For example, MM 11-4 requires all Project nonresidential building with 10 or more parking spaces to install Electric Vehicle Charging Spaces (EV Spaces) in accordance with CALGreen Code Section A.5.106.5.3, Nonresidential Voluntary Measures (Tier 1). This normally voluntary commitment is made a requirement of the Project by MM 11-4, thus ensuring that the Project will substantially exceed the CALGreen Code's mandatory requirements for the provision EV Spaces at nonresidential buildings. MMs 11-6 and

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				21-19 also expand on the existing legal requirement that three percent, but in no case less than one, of the parking spaces provided for multifamily residential buildings with 17 units or more must be constructed as EV Spaces; the Project requirement reflected in these mitigation measures if 5 percent, in accordance with CALGreen Code Tier 1 Residential Voluntary Measures. Indeed, MM 11-6 and MM 21-19 go even farther than the CALGreen Code Tier 1 voluntary measures by requiring the Project to also ensure that five percent of the total number of parking spaces in parking structures and parking lots that serve uses other than residential or nonresidential buildings, such as parks or trailheads, and which have 20 or more total spaces, are constructed as EV Spaces. In addition, MM 21-15 goes beyond the requirements of applicable law by requiring the Project to install a EV charging receptacle in every detached and attached single-residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A.4.106.4.1. Existing law – i.e., CALGreen Code Section 4.106.4.1 - merely requires that detached and attached single-family residences be wired to accommodate a EV charging receptacle to be install by the homeowner, if installed at all. Finally, existing law does not require any residential or nonresidential projects to provide electric vehicle charging stations or other form of alternative energy fueling station for low-emission or alternative fueled vehicles. The Project, however, will be required to go beyond the requirements of existing law by requiring the installation of alternative energy vehicle fueling stations (EVFS) (i.e., an electrical vehicle charging station or a station providing another new or improved technology) in the amounts set forth in MM 21-16, as revised in response to Comment F.8-95. (See response to Comment F.8-95.) Please see response to Comment F.8-95 for further discussion.

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
297	SJVAPCD List, p. 13	Solar design such as installing solar panels.	Yes	The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, and sufficient preparation for Project buildings to allow for generation of electricity, as follows: • A minimum of 50 percent of the Project's anticipated energy demand at buildout shall be satisfied from on-site renewable energy generation, which shall be demonstrated by plans and specifications provided by the Applicant/ Developer to the County. "Anticipated energy demand" shall be determined on the basis of the anticipated loads for each building as shown in the reports submitted at the time of building permit application pursuant to the Building Energy Efficiency Standards of Title 24. "On-site renewable energy generation" includes, but is not limited to, solar, geothermal, biofuel and hydroelectric systems. These systems shall be installed in connection with the development of one or more of the following: residential units, non-residential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity. • A minimum of 30 percent of all single-family detached and attached residential units at buildout shall have solar panel systems installed on roof areas or on top of other structures on the site (for example, patio covers or pergolas). Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 30 percent of all multi-family residential units at buildout shall have solar panel systems on roof areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 60 percent of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. This shall be demonstrated by plans and

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
				specifications provided by the Applicant/Developer to the County prior to obtaining a permit for a pool. • All residential buildings will be compatible with solar panel systems giving home buyers the option to include a photovoltaic array system as a home design system. • All commercial and residential structures include passive solar design techniques as a design guideline. • The Master Developer will request the County's support for a public financing method (e.g., PACE financing) to assist homeowners within the Specific Plan in the financing and payment of photovoltaic systems or other energy conservation improvements over time rather than as a one-time payment. If the County agrees, the Master Developer will work with County staff to implement such a program. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) The Project's wastewater reclamation facilities will also include equipment for capture and reuse of biogas for energy production. (*Id.,* p. 5.21-75) The project site does not have hydropower or geothermal resources, and these sources of power are therefore infeasible. Utility-scale wind plants present a potential hazard to sensitive biological resources such as the California Condor, and utility-scale solar plants are not an authorized use on the Project site or vicinity under the Antelope Valley Area Plan. (*Ibid*.)

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
298	SLOAPCD List, p. 3-18	Trusses for south-facing portions of roofs shall be designed to handle dead weight loads of standard solar-heated water and photovoltaic panels. Roof design shall include sufficient south-facing roof surface, based on structures size and use, to accommodate adequate solar panels. For south facing roof pitches, the closest standard roof pitch to the ideal average solar exposure shall be used.	Yes – Functional Equivalent Required	MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. Further, the Specific Plan's Green Development Program requires that all residential buildings be compatible with solar panel systems, and that all commercial and residential structures include passive solar design techniques. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) It also requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. (*Ibid*.)
299	SLOAPCD List, p. 3-19	Utilize onsite renewable energy systems (e.g., solar, wind, geothermal, low-impact hydro, biomass and bio-gas).	Yes	The Project will incorporate significant on-site generation of renewable to serve the Specific Plan, and sufficient preparation for Project buildings to allow for generation of electricity, as discussed in row 297.
300	BAAQMD List, p. 4-16	Install solar panels on residential and commercial buildings	Yes	The Project includes the installation of solar panels on residential and commercial buildings, as discussed in row 297.
301	SMAQMD List, p. 11	Onsite Renewable energy. Establish on-site renewable energy. (No Ozone Precursor reduction if NOx intensity is higher than electric utility)	Yes	The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, as discussed in row 297.

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
302	CAPCOA List, p. B-23	On-Site Renewable Energy System**:** Project provides onsite renewable energy system(s). Nonpolluting and renewable energy potential includes solar, wind, geothermal, low-impact hydro, biomass and bio-gas strategies. When applying these strategies, projects may take advantage of net metering with the local utility.	Yes	The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, as discussed in row 297.
303	2008 OPR List, p. 19	Incorporate on-site renewable energy production, including installation of photovoltaic cells or other solar options.	Yes	The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, as discussed in row 297.
304	AG List, pp. 4-7	Renewable Energy and Energy Storage 1) Meet "reach" goals for building energy efficiency and renewable energy use. (The AG identifies "zero net energy" as an example of a "reach" goal.) 2) Install solar, wind, and geothermal power systems and solar hot water heaters. 3) Install solar panels on unused roof and ground space and over carports and parking areas. 4) Where solar systems cannot feasibly be incorporated into the project at the outset, build "solar ready" structures. 5) Incorporate wind and solar energy systems into agricultural projects where appropriate.	Yes, and/or Functional Equivalent Required	1. MMs 21-2 and 21-3 further obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (DRP 2017, pp. 5.21-88, -89) It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
		6) Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use. 7) Use on-site generated biogas, including methane, in appropriate applications. 8) Use combined heat and power (CHP) in appropriate applications.		rules.[2203, 2204] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[2205,2206] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[2207] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy. 2. The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, including extensive solar generation and equipment for capture and reuse of biogas for energy production at the Projects wastewater treatment facilities, as discussed in more detail in row 297. 3. The Project's on-site renewable energy generation systems shall be installed in connection with the development of one or more of the following: residential units, non-residential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan

2203 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

2204 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

2205 *Ibid*.

2206 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

2207 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
				area or within its immediate vicinity. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 15) 4. The Project does incorporate solar generation facilities into construction at the outset, as discussed above in this row and further in row 297. Further, MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. 5. The Project is not an agricultural Project. However, it does incorporate renewable energy production as discussed in this row and in row 297. 6. Project solar generation infrastructure will provide for the collection, storage, and distribution of solar energy for heating and cooling. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19; *Id.,* Appendix 1-A to Appendix 4.0-A, p. 8) 7. The Project's two water reclamation facilities (WRF) will include equipment to capture and reuse biogas for energy production, and this shall be demonstrated by plans and specifications provided by the Applicant/Developer to the County. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16) 8. Uses associated with the Project are subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) MM 21-8 requires that Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission requirements or ENERGY STAR requirements, or equivalent, shall be exclusively offered by residential builders, and this includes room air conditioners. (DRP 2017, p. 5.21-90) See also the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18) Buildings will also be required to use timed or

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
				smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for response signals from the electric utility. (*Id.,* p. 20) All Project buildings will include appropriately sized and high-efficiency heating and cooling systems. (*Id.,* Appendix 4.0-A, p. 3-62) The Project Applicant shall also maintain a community website that includes information about energy conservation and financial incentive programs, and about potential energy technology systems that may be suitable for larger commercial and institutional users such as combined heat and power systems.

TABLE 6: WASTE MANAGEMENT MITIGATION MEASURES

Row	Source	Measure	Included	Response
305	CAPCOA List, p. B-32	Recycle Demolished Construction Material. Recycle/Reuse demolished construction material.	Yes	With regard to construction waste, the Master Developer shall provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the 2016 California Green Building Standards (CALGreen) Code. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code.
306	SMAQMD List, p. 12	Institute recycling and composting services. Project recycles, reduces, and reuses.	Yes	The Project exceeds requirements to recycle construction debris, as discussed in row 305. The Project will also implement the residential and nonresidential mandatory measures for material conservation and efficiency that are set forth in Division 4 (residential) and division 5.4 (nonresidential) of the CALGreen Code, including but not limited to: • The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on recycling and composting will be provided to Property Owners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) • Prior to the issuance of each building permit from commercial properties, including multi-family residences, schools, and places of worship, the Property Owner shall submit to the County a site plan of the property that depicts how solid wastes would be collected and stored for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.) • Prior to sale, lease, or rental of any commercial property, including multi-family residential structures or portions thereof, the Property Owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and stores recyclables, compostables, universal waste, hazardous waste, and

TABLE 6: WASTE MANAGEMENT MITIGATION MEASURES

Row	Source	Measure	Included	Response
				electronic waste for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.) The Project Applicant/Master Developer shall set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station that includes a household, hazardous waste permanent collection and reuse center and allows for mulching/composting operations. (*Ibid*.) The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Ibid*.)
307	BAAQMD List, p. 4-19	Provide composting facilities at residential uses	Yes	The Project includes provisions for composting at residential uses, as discussed in row 306. The Project Applicant/Master Developer shall also set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station that allows for mulching/composting operations. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25.)
308	BAAQMD List, p. 4-19	Create food waste and green waste curb-side pickup service	Yes	The Project includes provisions for food waste and green waste pick-up, as discussed in row 306.
309	BAAQMD List, p. 4-19	Require the provision of storage areas for recyclables and green waste in new construction	Yes	The Project includes provisions for storage areas for recyclable and green waste, as discussed in row 306.
310	2008 OPR List, p. 20	Create incentives to increase recycling and reduce generation of solid waste by residential users. Implement a Construction and Demolition Waste Recycling Ordinance to reduce the solid waste created by new development. Add residential/commercial food waste collection to existing greenwaste collection programs.	Yes	The County of Los Angeles does require construction and demolition waste recycling, and the Project exceeds these requirements. The Master Developer shall provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code.

TABLE 6: WASTE MANAGEMENT MITIGATION MEASURES

Row	Source	Measure	Included	Response
				The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on recycling and composting will be provided to Property Owners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Ibid*.)
311	AG List, p. 9	<u>Solid Waste Measures</u> 1. Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). 2. Integrate reuse and recycling into residential industrial, institutional and commercial projects. 3. Provide easy and convenient recycling opportunities for residents, the public, and tenant businesses. 4. Provide education and publicity about reducing waste and available recycling services.	Yes	1. The County of Los Angeles does require construction and demolition waste recycling, and the Project exceeds these requirements. The Master Developer shall provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code. 2-3 The Project will incorporate easy and accessible recycling opportunities, as discussed in row 306. AB 341 also mandates commercial recycling for some uses. 4. The Project requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 25) Prior to sale, lease, or rental of any commercial property, including multi-family residential structures or portions thereof, the Property Owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and stores recyclables, compostables, universal waste, hazardous waste, and electronic waste for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.)

TABLE 6: WASTE MANAGEMENT MITIGATION MEASURES

Row	Source	Measure	Included	Response
312	CAPCOA List, p. B-20	Enhanced Recycling/Waste Reduction, Reuse, Composting. Provide infrastructure/education that promotes the avoidance of products with excessive packaging, recycle, buying of refills, separating of food and yard waste for composting, and using rechargeable batteries.	Yes	The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on recycling and composting will be provided to Property Owners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Ibid*.)

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
313	AG List, p. 8	Devise a comprehensive water conservation strategy appropriate for the project and location.	Yes	Per the Centennial Green Development Program, the Project will implement the Residential Mandatory Measures and Nonresidential Mandatory Measures for water efficiency and conservation set forth in Division 4.3 and 5.3 of the CALGreen Code or the County CALGreen Code, whichever are more stringent, and including applicable emergency regulations and subsequent amendments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 22) The water service provider will also implement tiered, conservation-based water service rates based on applicable indoor and outdoor water use performance standards. (*Ibid*.) The Project will install, maintain and monitor all non-construction potable and non-potable water use using appropriate metering equipment, such as smart meter or dual meter, throughout the site, and will install, maintain, and operate onsite wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from onsite wastewater. (*Ibid*.) The Project also requires the preparation and submittal to the Los Angeles County Department of Regional Planning of a water use report to verify that applicable indoor and outdoor water use performance standards are being achieved: (1) at the end of the 5th year following first occupancy or occupancy of the 4,000th dwelling unit; and (2) at the end of the 10th year following first occupancy or occupancy of the 10,000th dwelling unit, whichever occurs latest, and implement response measures as required to the satisfaction of the County, to ensure that water use performance standards are being achieved and that available supplies will be sufficient to meet future demand. Response measures may include, without limitation, tiered water service rate enhancements, surcharges, additional enforcement, water system repairs or upgrades and securing supplemental water from sources such as inter-basin groundwater transfers or new imported water supplies. Provide real-time water consumption data to residents and businesses from service provider to monitor usage. (*Ibid*.) The owners of all single-family and multi-family residential units shall also be required, upon resale, to present to the buyer a written water audit checklist at the time the seller provides the buyer with the Real

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				Estate Transfer Disclosure Statement required by California Civil Code, Section 1102 et seq. The water audit checklist shall certify by a qualified 3rd party at the expense of seller that all low water use appliances, plumbing fixtures, and landscape irrigation systems are the same as those originally installed or, if changed, otherwise comply with the water efficiency standards set forth in Centennial's Green Development Program. The CC&Rs of the master homeowners association or other applicable association shall require compliance with the provisions of this measure and shall provide notice to individual owners of the resale water audit checklist requirement. The master homeowners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure. (*Ibid*.) The project will implement a water wise program, managed by the service provider, that includes all feasible measures to reduce indoor water use and associated energy use, including but not limited to implementing the Indoor Plumping Fixtures and Appliances measures identified in the Centennial Green Development Program (discussed in the paragraph below this one) in addition to the following indoor water use performance standards: • Residential indoor water use--45 gallons per capita per day; • Commercial indoor water use--200 gallons per day per thousand square feet; • Business Park indoor water use--65 gallons per day per thousand square feet, of which approximately 30 percent will be supplied by using recycled water for indoor wastewater and cooling purposes by buildout and full occupancy; • Institutional indoor water use--65 gallons per day per thousand square feet • Hotel indoor water use--125 gallons per day per room. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 23)

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				Per the Centennial Green Development Program, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code. Additionally, water efficient fixtures that meet or exceed state or County CALGreen Code performance shall be installed, including but not limited to the following: For non-residential buildings: • Showerheads 2.0 gpm @ 80 psi; • Bathroom faucets 0.5 gpm @ 60 psi; • Kitchen faucets 2.6 gpm @ 60 psi; • Toilets 1.28 gallons/flush; • Urinals 0.5 gallons/flush For single family and multifamily residential buildings: • Kitchen Faucets. The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 psi. Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi. • Appliances. Dishwashers and clothes washers in residential buildings shall comply with the following: Install at least one qualified ENERGY STAR appliance with maximum water use as follows: 1. Standard Dishwashers – 4.25 gallons per cycle. 2. Compact Dishwashers – 3.5 gallons per cycle. 3. Clothes Washers – water factor of 6 gallons per cubic feet of drum capacity. (*Ibid*.) The Project also requires the installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				California Appliance Efficiency Regulations, Energy Star, or other applicable standards, and monitoring and implementing California Energy Commission guidelines and regulations for water efficient appliances, for both residential and non-residential uses. (*Ibid*.)
314	AG List, p. 8	Design buildings to be water-efficient. Install water-efficient fixtures and appliances.	Yes	The Project requires the installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards, and monitoring and implementing California Energy Commission guidelines and regulations for water efficient appliances, for both residential and non-residential uses. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 23) Other water efficiency measures incorporated into the Project are discussed in row 313.
315	SMAQMD List, p. 11	Apply Water Conservation Strategy. Reduce indoor and outdoor water use.	Yes	The Project incorporate numerous requirements for water conservation that would substantially reduce indoor and outdoor water use, as discussed in row 313.
316	SMAQMD List, p. 11	Indoor Water Use. Install low-flow bathroom faucet, kitchen faucet, toilet, shower. Reduce indoor water use with low-flow fixture.	Yes	The Project requires the installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards, and monitoring and implementing California Energy Commission guidelines and regulations for water efficient appliances, for both residential and non-residential uses. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 23) Per the Centennial Green Development Program, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code. Additionally, water efficient fixtures that meet or exceed state or County CALGreen Code performance shall be installed, including but not limited to the following:

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				For non-residential buildings: • Showerheads 2.0 gpm @ 80 psi; • Bathroom faucets 0.5 gpm @ 60 psi; • Kitchen faucets 2.6 gpm @ 60 psi; • Toilets 1.28 gallons/flush; • Urinals 0.5 gallons/flush For single family and multifamily residential buildings: • Kitchen Faucets. The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 psi. Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi. • Appliances. Dishwashers and clothes washers in residential buildings shall comply with the following: Install at least one qualified ENERGY STAR appliance with maximum water use as follows: 1. Standard Dishwashers – 4.25 gallons per cycle. 2. Compact Dishwashers – 3.5 gallons per cycle. 3. Clothes Washers – water factor of 6 gallons per cubic feet of drum capacity. (*Ibid*.)
317	BAAQMD List, p. 4-19	Install low-water use appliances and fixtures	Yes	The Project requires low-water appliances and fixtures, as set forth in row 316.
318	CAPCOA List, p. B-30	Water Use Appliances**.** Require the installation of low-water use appliances.	Yes	The Project requires low-water appliances and fixtures, as set forth in row 316.

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
319	SMAQMD List, p. 12	Reduce turf in landscapes and lawns. Use less turf than normal projects	Yes	This is required by the County's drought-tolerant landscaping requirements, which specify that a maximum of 25 percent of landscaped areas may be turf grass. (DRP 2017, p. 5.21-36) Accordingly, per the Centennial Green Development Program, the Project will require that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf grass and that landscaped commercial areas may include turf only if irrigated with recycled water. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 27)
320	AG List, p. 8	Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.	Yes	Per the Centennial Green Development Program, the Project will design irrigation systems to conform to the hydrozones of the landscape design plan and optimize water efficiency by matching plant type, utilizing drip or subsurface irrigation wherever possible, and applying water at agronomic rates. Additionally, require: • "Smart" controllers, such as weather-based irrigation controllers or other self-adjusting irrigation controllers, for all irrigation systems that will accommodate all aspects of the landscape and irrigation design plans. (DRP 2017, Appendix 2.0-A to Appendix 4.0-A, p. 24) • Irrigation equipment with a minimum 0.80 outdoor irrigation efficiency shall be used for all public park and private park irrigation. (*Ibid*.) • Irrigation equipment with a minimum 0.81 outdoor irrigation efficiency for all recreation and entertainment land use, arterial roadway and slope irrigation. (*Ibid*.) • Low water use plants shall be used within all irrigated slope areas with an average plant factor, as defined in the Model Water Efficient Landscape Ordinance (DWR 2015), of 2.0. (*Ibid*.) • Water Smart/Evapotranspiration (ET) controllers or equivalent shall be used for outdoor irrigation. Require use of CARB-approved or electric landscape maintenance equipment for public common areas. (*Ibid*.)

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
321	SMAQMD List, p. 12	Use water-efficient irrigation systems. Install a smart irrigation control system.	Yes	The Project incorporates water-efficient and smart irrigation systems, as discussed in row 320.
322	BAAQMD List, p. 4-19	Restrict the use of water for cleaning outdoor surfaces/Prohibit systems that apply water to non-vegetated surfaces	Yes – Functional Equivalent Required	The use of outdoor water is restricted. Per the Centennial Green Development Program, Outdoor water use will be limited to 45 percent of the reference evapotranspiration rate of 64.15 inches. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 23) Further, all Specific Plan wastewater shall be treated onsite, and provided to and be required to be used for 100 percent of outdoor irrigation uses by commercial, business park, institutional, school, hotel, park, slope, recreational/entertainment and arterial roadway outdoor irrigation demand. (*Id.,* p. 24)
323	AG List, p. 7	Incorporate water-reducing features into building and landscape design.	Yes	Per the Centennial Green Development Program, the Project will construct 60 percent of the public and OA trails (Project Greenway Trails will be 80 percent) with permeable materials that allow the movement of water around the paving materials to allow precipitation to percolate through the paving system to the soil below. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) As discussed in the Specific Plan, to be water-sensitive, the Project landscape concepts utilize a plant palette that is tailored to the unique, desert environmental conditions, borrows extensively from the existing landscape, allowing for both native and adapted species. Any plants selected for planting must be able to survive hot, dry summers and windy conditions without high irrigation demands. (*Id.,* Appendix 4.0-A, p. 3-42) The Project also incorporates low-water fixtures and appliances into building design, as discussed in rows 313 through 316.
324	BAAQMD List, p. 4-19	Implement water-sensitive urban design practices in new construction	Yes	Per the Centennial Green Development Program, the Project will construct 60 percent of the public and OA trails (Project Greenway Trails will be 80 percent) with permeable materials that allow the movement of water around the paving materials to allow precipitation to percolate through the paving system to the soil below. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) As discussed in the Specific Plan, to be water-sensitive, the Project landscape concepts utilize a plant palette that is tailored to the unique, desert environmental conditions,

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				borrows extensively from the existing landscape, allowing for both native and adapted species. Any plants selected for planting must be able to survive hot, dry summers and windy conditions without high irrigation demands. (*Id.,* Appendix 4.0-A, p. 3-42) The Project also incorporates low-water fixtures and appliances into building design, as discussed in rows 313 through 316.
325	BAAQMD List, p. 4-19	Install rainwater collection systems in residential and Commercial Buildings	No – Not Feasible and Not Required to Reduce Impact.	The Project will already make use of reclaimed water as part of the Centennial Wastewater Management Plan discussed below in rows 326 through 328. Further, installing rainwater collection systems would interfere with desirable, natural drainage that would recharge groundwater. The Project will control erosion and manage stormwater within landscape, water supply, and drainage features through the implementation of an integrated water resources management program that includes management of raw water, potable water, wastewater, recycled water, groundwater recharge, and stormwater management. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12) See also row 329.
326	AG List, p. 8	Make effective use of graywater. (Graywater is untreated household waste water from bathtubs, showers, bathroom wash basins, and water from clothes washing machines. Graywater to be used for landscape irrigation.)	Yes	As noted in the Centennial Green Building Development Program, the Project will Implement the Centennial Wastewater Management Plan (Centennial Specific Plan Section 3.5), and construct two wastewater reclamation facilities (WRF) to provide on-site treatment of all wastewater generated in the Specific Plan, to be located on each side of the California Aqueduct. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 12) The West WRF shall have an average daily capacity of 0.3 million gallons per day and the East WRF shall have an average daily capacity of 3.2 million gallons per day. (*Ibid*.) The Project will then use recycled water from on-site wastewater treatment plant(s) as a permanent source of water for landscaped common areas and other authorized uses, if available. (*Ibid*.) The Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential, multifamily, and very low and low single-family buildings shall be constructed with recycled water infrastructure to serve common areas for these facilities, except where prohibited by law. To the extent recycled water is produced within the

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				Project and available, recycled water shall be used for landscape irrigation within those common areas. Covenants, conditions and restrictions (CC&Rs) shall require the owners of such common areas to maintain, repair and replace irrigation systems and plantings in accordance with County approved plans. (*Ibid*.) The water will be required to be used for the following uses: • Indoor wastewater and cooling use for business park commercial users, except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias) • 100 percent of outdoor irrigation uses by commercial, business park, institutional, school, hotel, park, slope, recreational/ entertainment and arterial roadway outdoor irrigation demand • 50 percent of total very low density residential lot outdoor irrigation demand • 45 percent of total outdoor irrigation demand in low density lots of at least 7,000 square feet in area
327	SMAQMD List, p. 11	Use Reclaimed Water – Project uses non-potable water. Use Grey Water – Project reuses onsite water.	Yes	The Project will provide facilities for water reclamation and make extensive use of it on the Project site, as discussed in row 326.
328	BAAQMD List, p. 4-18	Provide necessary infrastructure and treatment to allow use of 50 percent greywater/recycled water in residential and commercial uses for outdoor irrigation.	Yes	The Project provides necessary infrastructure to reclaim water, as discussed in row 326. The water will be required to be used for the following uses: • Indoor wastewater and cooling use for business park commercial users, except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias) • 100 percent of outdoor irrigation uses by commercial, business park, institutional, school, hotel, park, slope, recreational/ entertainment and arterial roadway outdoor irrigation demand

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				• 50 percent of total very low density residential lot outdoor irrigation demand • 45 percent of total outdoor irrigation demand in low density lots of at least 7,000 square feet in area. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 24)
329	AG List, p. 8	Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on- site can drastically reduce the need for energy-intensive imported water at the site.)	Yes	The Project will comply with the County of Los Angeles Low Impact Development Standards Manual. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14) The overall physical design for Centennial respects the natural setting by preserving major drainage features and open space through careful grading that respects the topography, which in turn allows for compact development that maximizes open space. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 7) Stormwater management methods will include a complementary combination of on-site treatment, traditional underground storm drainage facilities, multi-purpose storm-water basins, and drainage courses. (*Id.,* Appendix 4.0-A, p. 2-58) Multi-purpose greenway basins will filter urban runoff and excess storm flow recharge associated with development's inevitable increase in impermeable surfaces. (*Ibid*.) Additional techniques will include, but are not limited to, filter strips, bioretention areas, and swales in parkways, all of which can incrementally reduce runoff and improve water quality. (*Ibid*.) See Centennial Specific Plan Section 3.6, Drainage Plan, for further information. The Project will also control erosion and manage stormwater within landscape, water supply, and drainage features through the implementation of an integrated water resources management program that includes management of raw water, potable water, wastewater, recycled water, groundwater recharge, and stormwater management. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 12)
330	AG List, p. 9	Provide education about water conservation and available programs and incentives.	Yes	Per the Centennial Green Development Program, the Project's community website will have information about water conservation and efficiency for project residents, customers, tenants and large energy users. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21)

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
331	AG List, p. 9	Offset water demand from new projects so that there is no net increase in water use.	Yes – Functional Equivalent Required	The Project would offset some Project water demand by the use of groundwater that is currently used for Tejon Ranch's ongoing agricultural operations, because Project development would replace existing agricultural uses on the site. (DRP 2017, Appendix 5.18-A, Centennial Specific Plan Water Supply Assessment). While not all water demand will be offset such that there is no net increase in water use, the Project has demonstrated the availability of sufficient water supplies to meet Project demand, and the Project's water demand will be both reliably and sustainably met. The Project's water supplies are discussed in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. Project recycled water use is discussed on p. 5.18-67 of the Draft EIR and in Section 5.19, Wastewater Collection and will be generated by the treatment of indoor wastewater in onsite facilities to California Title 22 standards. As shown in Draft EIR Table 5.18-10, at buildout these facilities will produce approximately 4,577 acre feet per year of recycled water and will meet 40 percent of total Project water demand. The Project's use of State Water Project (SWP) supplies is discussed on pages 5.18-62 to 5.18-64, and the delivery reliability of these supplies is discussed on pages 5.18-20 to 5.18-28 and 5.18-54 to 5.18-64 of the Draft EIR. Other water supplies that will be used by the Project include recycled water, groundwater and return flows from urban use in the Antelope Valley Basin in accordance with the Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015, certain supplies from the Antelope Valley-East Kern Water Agency to be provided as repayment for water provided to the Agency in prior years. As shown in Table 5.18-10, taking account of the anticipated average annual delivery reliability of SWP supplies to the Antelope Valley (*Id.,* pp. 5.18-20 to 5.18-28 and 5.18-54 to 5.18-64), on average SWP water will be used to meet 37 percent of total Project buildout demand and 63 percent of Project water demand will be met by using other water supplies. The Project's use of 1,634 acre-feet per year of groundwater, production of imported water return flows from urban

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				water use in the Antelope Valley Basin, and water banking operations in the Antelope Valley will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution, which was approved by the Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time (*Id.,* Appendix 5.18-D).

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
332	AG List, p. 11	Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio.	Yes	The Project preserves large swaths of natural landscape and biological resource areas. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use. (DRP 2017, p. 4-6) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (*Id.,* pp. 5.21-36, 5.21-37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) Per the Centennial Green Development Program, the Project will reduce heat loads from glazing by strategically locating shade trees. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)
333	AG List, p. 17	Require best management practices in agriculture and animal operations to reduce emissions, conserve energy and water, and utilize alternative energy sources, including biogas, wind and solar.	Yes	The Project would not include large-scale, high-emission agricultural operations, and the planned small, local operations would have very low emissions and would provide carbon sequestration benefits. Rather, Per PDF 5-1, the Project would accommodate 50 acres of small-scale agriculture and related uses, including, but not limited to community gardens, farmers markets/produce stands, growing and sales of nursery stocks, and commercial greenhouses. (DRP 2017, p. 5.5-12)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
334	AG List, p. 17	Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits.	Yes	Per the Centennial Green Development Program, the Project will "Preserve existing oak woodlands, savannahs, and other sensitive habitat areas as indicated in the Specific Plan and EIR by including these habitat areas in the Open Space designation. Specifically, preserve oak woodlands, savannahs, and other sensitive habitat areas near Oso Canyon and at the foot of the San Gabriel Mountains southerly of SR-138." (DRP 2017, Appendix 2-A to Appendix 4.0-A, at p. 12) The Project would not include large-scale, high-emission agricultural operations, and the planned small, local operations would have very low emissions and would provide carbon sequestration benefits. Per PDF 5-1, the Project would accommodate 50 acres of small-scale agriculture and related uses, including, but not limited to community gardens, farmers markets/produce stands, growing and sales of nursery stocks, and commercial greenhouses. (*Id.,* p. 5.5-12)
335	AG List, p. 17	Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance.	Yes	The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (DRP 2017, pp. 5.21-36, 5.21-37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) Per the Centennial Green Development Program, the Project will reduce heat loads from glazing by strategically locating shade trees. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
336	SLOAPCD List, p. 3-17	Provide shade tree planting in parking lots to reduce evaporative emissions from parked vehicles. Design should provide 50 percent tree coverage within 10 years of construction using low ROG emitting, low maintenance native drought resistance trees.	Yes	The Centennial Specific Plan contains parking lot landscaping guidelines that require minimum 4-foot by –foot area per tree, measured from the inside of the planter area, and minimum one 15-gallon tree is required for 10 parking spaces. (DRP 2017, Appendix 4.0-A, p. 2-66) The Specific Plan also contains parking lot landscape coverage minimums for individual Land Use Designations, which are in addition to general minimum landscape coverage requirements in the commercial/employment designations and Business Park designation (*Id.,* pp. 2-28, 2-32). The Specific Plan also specifies that for Commercial Centers, parking lots should be landscaped to provide shade. (*Id.,* p. 3-32) The Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (*Id.,* Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees in parking lots larger than 15 spaces, including a requirement to demonstrate at least 50 percent coverage within 15 years of construction. (See Los Angeles County Department of Regional Planning Tree Planting Guide, available at: http://planning.lacounty.gov/assets/upl/project/tpo_guide.pdf.)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
337	CAPCOA List, p. B-10	Parking Area Tree Cover**:** Provide parking lot areas with 50 percent tree cover within 10 years of construction, in particular low emitting, low maintenance, native drought resistant trees. Reduces urban heat island effect and requirement for air conditioning, effective when combined with other measures (e.g., electrical maintenance equipment and reflective paving material).	Yes	The Centennial Specific Plan contains parking lot landscaping guidelines that require minimum 4-foot by –foot area per tree, measured from the inside of the planter area, and minimum one 15-gallon tree is required for 10 parking spaces. (DRP 2017, Appendix 4.0-A, p. 2-66) The Specific Plan also contains parking lot landscape coverage minimums for individual Land Use Designations, which are in addition to general minimum landscape coverage requirements in the commercial/employment designations and Business Park designation (*Id.,* pp. 2-28, 2-32). The Specific Plan also specifies that for Commercial Centers, parking lots should be landscaped to provide shade. (*Id.,* p. 3-32) The Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (*Id.,* Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees in parking lots larger than 15 spaces, including a requirement to demonstrate at least 50 percent coverage within 15 years of construction. (See Los Angeles County Department of Regional Planning Tree Planting Guide, available at: http://planning.lacounty.gov/assets/upl/project/tpo_guide.pdf.)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
338	BAAQMD List, p. 4-14	Plant shade trees within 40 feet of the south side or within 60 feet of the west sides of properties.	Yes – Functional Equivalent Required	Per the Centennial Specific Plan, the Project will use trees, landscaping and sunscreens to west and south exterior building walls to reduce energy use where feasible and consistent with building and site purpose, and consistent with other applicable requirements such as encouraging higher density and restricted plant palette. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)
339	2008 OPR List p. 18	<u>Landscaping/Urban Forestry</u> 1) Plant trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling. 2) Preserve or replace onsite trees (that are removed due to development) as a means of providing carbon storage.	Yes	1. Per the Centennial Specific Plan, the Project will use trees, landscaping and sunscreens to west and south exterior building walls to reduce energy use where feasible and consistent with building and site purpose, and consistent with other applicable requirements such as encouraging higher density and restricted plant palette. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) 2. The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (*Id.,* pp. 5.21-36, 5.21-37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
340	Ag List, p. 7	Create water-efficient landscapes.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10)
341	SLOAPCD List, p. 3-18	Plant drought tolerant, native shade trees along southern exposures of buildings to reduce energy used to cool buildings in summer.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
				requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) Per the Centennial Specific Plan, the Project will use trees, landscaping and sunscreens to west and south exterior building walls to reduce energy use where feasible and consistent with building and site purpose, and consistent with other applicable requirements such as encouraging higher density and restricted plant palette. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18)
342	SMAQMD List, p. 12	Water efficient landscape. Plant native or drought-resistant trees and vegetation.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
				incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) The Project also makes extensive use of reclaimed water for irrigation, as discussed in rows 326 through 328.
343	SLOAPCD List, p. 3-19	Eliminate high water consumption landscape (e.g., plants and lawns) in residential design. Use native plants that do not require watering and are low ROG emitting.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
344	CAPCOA List, pp. B-20, B-21	Landscaping. Project shall use drought resistant native trees, trees with low emissions and high carbon sequestration potential. Evergreen trees on the north and west sides afford the best protection from the setting summer sun and cold winter winds. Additional considerations include the use of deciduous trees on the south side of the house that will admit summer sun; evergreen plantings on the north side will slow cold winter winds; constructing a natural planted channel to funnel summer cooling breezes into the house. Neighborhood CCR's not requiring that front and side yards of single family homes be planted with turf grass. Vegetable gardens, bunch grass, and low-water landscaping shall also be permitted, or even encouraged.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) Per the Centennial Green Development Program, the Project must provide that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf grass and that landscaped commercial areas may include turf only if irrigated with recycled water. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 27) Per PDF 5-1, the Project would also accommodate 50 acres of small-scale agriculture and related uses, including, but not limited to community gardens, farmers markets/produce stands, growing and sales of nursery stocks, and commercial greenhouses. (*Id.,* p. 5.5-12)

TABLE 9: MEASURES NOT RELEVANT TO THE PROPOSED PROJECT OR TO ANY PERMITTED PROJECT USE

Row	Source	Measure	Included	Response
345	BAAQMD List p. 4-15	Retrofit existing buildings to meet CA GBC standards	N/A	The proposed Project involves new construction, rather than modifications to existing buildings. This measure is therefore inapplicable.
346	2008 OPR List, p. 19	Retrofit municipal water and wastewater systems with energy efficient motors, pumps and other equipment, and recover wastewater treatment methane for energy production.	N/A	The proposed Project involves new construction, rather than modifications to existing buildings. This measure is therefore inapplicable.
347	2008 OPR List, p. 19	Execute an Energy Savings Performance Contract with a private entity to retrofit public buildings. This type of contract allows the private entity to fund all energy improvements in exchange for a share of the energy savings over a period of time.	N/A	The proposed Project involves new construction, rather than modifications to existing buildings. This measure is therefore inapplicable.
348	CAPCOA List, p. B-30	Retro-Commissioning**.** The process ensures that all building systems perform interactively according to the contract documents, the design intent and the owner's operational needs to optimize energy performance.	N/A	The proposed Project involves new construction, rather than modifications to existing buildings. This measure is therefore inapplicable.
349	2008 OPR List, p. 19	Convert landfill gas into energy sources for use in fueling vehicles, operating equipment, and heating buildings.	N/A	There will not be a landfill on the project site, nor does the proponent have any control over or access to landfill gas. (DRP 2017, p. 5.21-75)
350	2008 OPR List, p. 19	Offer rebates and low-interest loans to residents that make energy-saving improvements on their homes.	N/A	This mitigation measure is intended to be applicable to appliance and energy system makers, and lenders, and the Project proponent is neither.

TABLE 9: MEASURES NOT RELEVANT TO THE PROPOSED PROJECT OR TO ANY PERMITTED PROJECT USE

Row	Source	Measure	Included	Response
351	2008 OPR List, p. 19	Offer government incentives to private businesses for developing buildings with energy and water efficient features and recycled materials. The incentives can include expedited plan checks and reduced permit fees.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
352	2008 OPR List, p. 20	Offer government employees financial incentives to carpool, use public transportation, or use other modes of travel for daily commutes.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
353	2008 OPR List, p. 19	Purchase Energy Star equipment and appliances for public agency use.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
354	CAPCOA List, p. B-31	School Curriculum**.** Include how to reduce GHG emissions (e.g., energy saving, food miles) in the school curriculum.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
355	2008 OPR List, p. 19	Purchase government vehicles and buses that use alternatives fuels or technology, such as electric hybrids, biodiesel, and ethanol. Where feasible, require fleet vehicles to be low emission vehicles. Promote the use of these vehicles in the general community.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
356	AG List, p. 17	The list suggests that "If, after analyzing and requiring all reasonable and feasible on-site mitigation measures for avoiding or reducing greenhouse gas-related impacts, the lead agency determines that additional mitigation is required, the agency may consider additional off-site mitigation. The project proponent could, for example, fund	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA.

TABLE 9: MEASURES NOT RELEVANT TO THE PROPOSED PROJECT OR TO ANY PERMITTED PROJECT USE

Row	Source	Measure	Included	Response
		off-site mitigation projects that will reduce carbon emissions, conduct an audit of its other existing operations and agree to retrofit, or purchase verifiable carbon "credits" from another entity that will undertake mitigation."		
357	SLOAPCD List, pp. 3-20 to 3-21	The list suggests that "Operational phase emissions from large development projects that cannot be adequately mitigated with on-site mitigation measures alone will require off-site mitigation in order to reduce air quality impacts to a level of insignificance if emissions cannot be adequately mitigated with on-site mitigation measures alone." The list provides suggested off-site mitigation strategies on p. 3-21.	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.
358	CAPCOA List, p. B-33	Off-Site Mitigation Fee Program**.** Provide/Pay into an off-site mitigation fee program, which focuses primarily on reducing emissions from existing development and buildings through retro-fit (e.g., increased insulation).	N/A	Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.
359	CAPCOA List, p. B-33	Offset Purchase**.** Provide/purchase offsets for additional emissions by acquiring carbon credits or engaging in other market "cap and trade" systems.	N/A	Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
Construction				
360	2017 OPR List, p. 343	Enforce idling time limits for construction vehicles	Yes	Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes. (DRP 2017, pp. 5.11-79, 5.21-89) As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16)
361	CARB List, p. 7	Enforce idling time restrictions for construction vehicles.	Yes	Project MMs 11-2 and 21-4 incorporate this requirement, as discussed further in row 360.
362	2017 OPR List, p. 343	Require construction vehicles to meet latest engine standards.	Yes	Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
363	CARB List, p. 7	Require construction vehicles to operate with the highest tier engines commercially available.	Yes	This requirement is incorporated into MM 11-2, as discussed further in row 362.
364	2017 OPR List, p. 343	Divert and recycle demolition waste, and use locally-sourced building and recycled content materials to the extent possible.	Yes	With regard to construction waste, the Master Developer shall provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the 2016 California Green Building Standards (CALGreen) Code. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code.
365	CARB List, p. 7	Divert and recycle construction and demolition waste, and use locally-sourced building materials with a high recycled material content to the greatest extent feasible.	Yes	With regard to the diversion of waste, this requirement has been incorporated in to the Project, as discussed in row 364. With regard to building material selection, see new MM 21-21 set forth in row 59.
366	2017 OPR List, p. 343	Minimize tree removal, and mitigate indirect GHG impacts from vegetation removal.	Yes	The Project preserves large swaths of natural landscape and biological resource areas. Approximately 5,787 acres (approximately 45.9 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use. (DRP 2017, p. 4-6) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (*Id.,* pp. 5.21-36, 5.21-37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) Per the Centennial Green Development Program, the Project will reduce

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				heat loads from glazing by strategically locating shade trees. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)
367	CARB List, p. 7	Minimize tree removal, and mitigate indirect GHG emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance.	Yes	This requirement is met, see row 366.
368	2017 OPR List, p. 343	Utilize existing on-site power poles rather than temporary gasoline/diesel power generators.	Yes – Functional Equivalent Required.	Per Draft EIR Table 5.21-3, initial Project construction activities are anticipated to require the use of temporary generators. (DRP 2017, p. 5.21-51) While there are SCE electric lines running north-south to the Oso Pumping Plant and National Cement Plant and east-west along SR-138 as well as the Bailey Substation located on an SCE-owned parcel in the southwestern portion of the Project site, these existing electric lines do not currently provide power to the Project site and would require extensions and upgrades. Project construction activities will use available electric power, including expanded electric power from newly-constructed Project-related powerlines and substations.
369	CARB List, p. 7	Utilize existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators	Yes – Functional Equivalent Required.	This requirement is met; see row 368 for further discussion.
370	2017 OPR List, p. 343	Increase use of electric and renewable fuel construction equipment.	Yes – Functional Equivalent Required	Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve
371	CARB List, p. 7	Increase use of electric and renewable fuel powered construction equipment and	Yes – Functional Equivalent Required	

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
		require renewable diesel fuel where commercially available		emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) MM 11-2 also requires the use of 2010 or newer diesel haul trucks. (*Id.,* p. 5.11-79)
372	2017 OPR List, p. 343	Require diesel equipment fleets to exceed any current emission standard.	Yes – Functional Equivalent Required	Project diesel equipment fleets will both be required to meet EPA Tier 4 Final emission standards to the extent that the equipment is available, and will additionally be required to be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, as further discussed in row 371.
373	CARB List, p. 7	Require diesel equipment fleets to be lower emitting than any current emissions standard	Yes – Functional Equivalent Required	Project diesel equipment fleets will both be required to meet EPA Tier 4 Final emission standards to the extent that the equipment is available, and will additionally be required to be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, as further discussed in row 371.
374	2017 OPR List, p. 343	Require best available control technology for all construction equipment.	Yes	Project diesel equipment fleets will both be required to meet EPA Tier 4 Final emission standards to the extent that the equipment is available, and will additionally be required to be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, as further discussed in row 371.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
Operation				
375	2017 OPR List, p. 343	Achieve a zero net emissions goal for all new development.	Not feasible within the Project boundaries based on Project activities that fall within jurisdiction and control of Applicant and Lead Agency.	While the Project has been designed to and will have much lower per capita and per residential unit GHG emissions in relation to existing average per capita and per residential unit GHG emissions, the majority of Project GHG emissions occur from vehicular emissions that fall solely within the jurisdiction and control of federal and state agencies (e.g., in regulating the types and fuel efficiencies of vehicles), and in generating electricity within the grid serving the Project region including the Project site. Vehicular GHG emission reductions, for example, are achieved under the state's stringent GHG laws[2208] from a combination of existing legal mandates, including but not limited to the Cap and Trade program covering all fossil fuel related emissions from "wells to wheels," mandatory increases in non-fossil fuel vehicles, and compliance with regional land use and transportation strategies to reduce GHG from land use and transportation patterns.[2209] Similarly, electricity generation from renewable resources such as solar and wind power, is mandated under state laws,[2210] and is also subject to evolving and improving technologies (e.g., storage) and governance frameworks (e.g., multi-state grid integration). Achieving a "net zero" greenhouse gas reduction outcome within the Project boundaries for transportation, electric generation, and other offsite sources that are outside the jurisdiction and control of Los Angeles County is infeasible. Other development applicants have proposed "net zero" greenhouse gas projects which require payments of fees or costs for offsite GHG reductions; however, imposing such external costs on a Project increases Project costs and reduce the affordability of Project housing.[2211,2212,2213] Extraordinarily high existing housing costs have already caused California to have the highest poverty rate in the nation

[2208] S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).
[2209] OPR. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Jan. 20, 2016), https://perma.cc/8EWJ-MV3Y.
[2210] CCR, Title 24, Part 11
[2211] California Energy Commission, Zero Net Energy Strategy Presentation (8/22/17).
[2212] Governor's Office of Planning and Research, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Jan. 20, 2016).
[2213] CARB. 2017 Climate Change Scoping Plan Update, at 113 (Jan. 20, 2017), p. 39, 151-152

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				according to the US Census,[2214] which in turn has already led to a substantial net out-migration of California's working families to much higher per-capita GHG states such as Texas, Nevada and Arizona.[2215] Increasing Project housing costs and reducing Project affordability will further exacerbate the California housing crisis and encourage more outmigration to higher per capita GHG states. Although greenhouse gas is a global pollutant for which reductions can be achieved in other countries and continents, mandating and monitoring such offsite reductions is outside the jurisdiction and control of the lead agency for CEQA purposes. Also, please see response to Comment F.8-87; all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change. It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[2216, 2217] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization

[2214] Dan Walters, Why does California have the nation's highest poverty level?, CALMATTERS (Aug. 13, 2017), https://perma.cc/GMM9-QWUA.

[2215] Drew Lynch, Californians Consider moving to rising housing costs, poll finds, CAL WATCHDOG (Sept. 21, 2017).

[2216] California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

[2217] Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

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				strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[2218,2219] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[2220] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy. Moreover, MMs 21-2 and 21-3 obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (DRP 2017, pp. 5.21-88, -89)
376	2017 OPR List, p. 343	Develop an offsite retrofit program to support the conversion of existing housing stock to be more efficient at resource consumption.	Not feasible within the Project boundaries based on Project activities that fall within jurisdiction and control of Applicant and Lead Agency.	Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project

[2218] *Ibid*.

[2219] Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

[2220] California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

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				are not required by CEQA. See response to Comment F.8-96 for further discussion.
377	2017 OPR List, p. 344; CARB List, p. 7	Comply with lead agency's standards for mitigation transportation impacts under SB 743.	Yes	SB 743 did not mandate which metric or methodology OPR should propose to use instead of LOS in or outside TPAs. The OPR discussion drafts proposed to replace CEQA's current LOS significance thresholds with two new thresholds based on VMT and traffic inducement (i.e., the construction of any new capacity on existing highways or major roadways). The OPR proposal remains extremely controversial, especially outside major cities already served by transit, and with the goods movement industry and related manufacturing and agricultural producers in California who rely on adequate roadway capacity. The OPR proposal has not proceeded to the next administrative step required by SB 743, which is the commencement of formal rulemaking with a proposed new amendment to the CEQA Guidelines. At present, no state agency mandate exists to ignore CEQA's current LOS threshold of significance or to impose a new or alternative threshold of significance, including the VMT thresholds that have been discussed by the OPR. Notably, the NW 138 FEIR, which was issued by Caltrans in June 2017, evaluates impacts on the basis of the LOS thresholds in the existing CEQA Guidelines. It should also be noted that local agencies may adopt their own thresholds of significance, provided these lead agency thresholds are supported by substantial evidence in the record. Los Angeles County has not adopted changes to the existing LOS-based CEQA significance thresholds. Consequently, the Draft EIR and the STS properly utilize the LOS thresholds in the CEQA Guidelines.
378	2017 OPR List, p. 344	Require on-site EV charging capabilities for parking spaces serving the project.	Yes	The Project provides extensive electric vehicle charging infrastructure throughout the Project site. Per MM 21-15 (as updated in response to Comment F.8-95), the Project will provide one 208/240 VAC receptacle for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. (DRP 2017, p. 5.21-91)

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Row	Source	Measure	Included	Response
				Per MM 21-16 (as updated in response to Comment F.8-95), "alternative energy fueling stations" shall be installed as follows, and each provide for the charging of two electric vehicles: • Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least 17 residential units shall provide a minimum of one alternative energy vehicle fueling station for the first 17 residential units and an additional alternative energy vehicle fueling station for each additional 17 residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station. • Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station. (*Id.,* p. 5.21-91) See also MM 11-4, as updated by response to Comment F.8-95, regarding the installation of Electric Vehicle Supply Equipment as defined by CALGreen Code Section 202, in nonresidential buildings. See also the Centennial Green Development Program specifications regarding electric vehicle infrastructure. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 14) See below under *Transportation Demand Management* with regard to car-sharing.
379	CARB List, p. 7	Require on-site EV charging capabilities for parking spaces serving the project to meet jurisdiction-wide EV proliferation goals.	Yes	The Project provides extensive electric vehicle charging infrastructure throughout the Project site, as described further in row 378.
380	2017 OPR List, p. 344	Provide fewer on-site parking spaces than required by code if appropriate	Yes	Per the Green Development Program, the Project will provide a framework for a community-wide parking plan that is based on parking demand and need. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 14) Parking requirements for the Project shall be in accordance with Par

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				11, Vehicle Parking Spaces, Sections 22.52.1000-1210 of Title 22, Zoning Ordinance, except as specified in the Centennial Specific Plan. (*Id.,* Appendix 4.0-A, p. 2-65) As specified in the Specific Plan, shared parking to reduce the total amount of required parking may be allowed for Joint-Use Mixed-Use projects, or where a shared parking proposal is appropriate. (*Ibid*.) The Centennial Specific Plan also sets out clustered/shared parking facility metrics to meet parking needs while enhancing the walkability and character of Village Core and Town Centers by avoiding multiple, single use parking lots or multiple, small shared parking lots. (*Id.,* Appendix 4.0-A, p. 2-66) The metrics include the following: 1. In the Village Cores, up to two shared parking facilities (i.e. a lot or structure designed according to assigned uses at the time of construction of the facility, based on parking "maximums" established in the Specific Plan) shall be used to meet the onsite parking needs of all non-residential uses located in each of the Village Cores. (*Ibid*.) 2. In the Town Center, up to three shared facilities shall be used to meet the onsite parking needs of all non-residential uses located in the Town Center. (*Ibid*.) 3. In the BP/IC designated areas of the CCD, the number of shared parking facilities needed to meet the onsite parking requirements of all uses located in each of these areas shall be determined by a parking demand study at the time of tentative tract map submittal. (*Ibid*.) 4. Any additional parking for Town Center/CCD uses shall be met by on-street parking. If on-street parking cannot satisfy all parking demands, a discretionary permit may be filed for extra parking. (*Ibid*.) 5. Shared and on-street parking should be utilized for residential uses located in the Village Cores and Town Center, and Shared and on-street parking used to meet onsite parking needs shall be allowed

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				"by-right" (i.e. without a discretionary permit) for any use located in the centers/CCD. (*Ibid*.) Each shared parking facility located within a Village Core, Town Center, and CCD shall be fully contained within one development block. Parking structures shall be located behind or beneath buildings and may be wrapped with development on the street frontage or alternatively, shall have commercial or civic uses on the ground floor where portions of the structure front along streets. (*Ibid*.)
381	CARB List, p. 8	Allow for new construction to install fewer on-site parking spaces than required by local municipal building code, if appropriate.	Yes	The Centennial Specific Plan allows for this, as discussed further in row 380.
382	2017 OPR List, p. 344; CARB List, p. 8	Dedicate on-site parking for shared vehicles.	Yes	Per MM 21-17, preferential parking for low-emitting, fuel-efficient, and carpool/vanpool vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code. (DRP 2017, pp. 5.21-91, -92) Per MM 11-4 (as updated in response to Comment F.8-95), it shall be as follows: two for 10 to ~~15~~ 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces. (DRP 2017, p. 5.11-79) Relevant TMA activities include implementing car-sharing programs, and such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 13) Measure language is as follows: **Implement Car-Sharing Program (e.g. Zipcar, Car2Go)** – either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based programs encourage carpooling and therefore reduce traffic volumes. (*Id.,* p. 13)

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Row	Source	Measure	Included	Response
383	2017 OPR List, p. 344; CARB List, p. 8	Provide adequate, safe, convenient, and secure on-site bicycle parking and storage in multi-family residential projects and in non-residential projects.	Yes	Sufficient and appropriate amounts of safe and convenient bicycle parking and end-of-trip facilities are included in the Project, for both residential and nonresidential use, as specified in MMs 11-4, 11-5, 11-6, 21-17, 21-18, and 21-19, and as further discussed in rows 94 through 109, above.
384	2017 OPR List, p. 344; CARB List, p. 8	Provide on- and off-site safety improvements for bike/ped/transit connections and/or implement relevant improvements identified in the applicable bicycle and/or pedestrian master plan.	Yes	A pedestrian- and bicycle-friendly network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. The Project also provides extensive bicycle-related infrastructure, as addressed more fully in rows 89-112. See also the discussion regarding complete streets and connectivity in rows 68 through 71 and 76 through 80.
385	2017 OPR List, p. 344; CARB List, p. 8	Require on-site renewable energy generation.	Yes	The Project commits to a minimum of 50 percent renewable energy generation, as provided in MM 21-1, with the following more specific relevant commitments included in the Centennial Green Development Program with regard to solar panels: • A minimum of 30 percent of all single-family detached and attached residential units at buildout shall have solar panel systems installed on roof areas or on top of other structures on the site (for example, patio covers or pergolas). Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 30 percent of all multi-family residential units at buildout shall have solar panel systems on roof areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 60 percent of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • All residential buildings will be compatible with solar panel systems giving home buyers the option to include a photovoltaic array system as a home design system.

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Row	Source	Measure	Included	Response
				The Project's wastewater reclamation facilities will also include equipment for capture and reuse of biogas for energy production. (DRP 2017, p. 5.21-75)
386	2017 OPR List, p. 344	Prohibit wood-burning fireplaces in new development.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
387	CARB List, p. 8	Prohibit wood-burning fireplaces in new development, and require replacement of wood-burning fireplaces for renovations over a certain size development.	Yes	The Project complies with this requirement, as discussed in row 386. The Project does not involve renovations to existing buildings, so no replacement will be necessary.
388	2017 OPR List, p. 344	Require cool roofs.	Yes	The Project is already legally required to comply with this measure. The Project must comply with requirements of the Los Angeles Green Building Standards Code (Title 31). Title 31 includes measures requiring cool roofs. California's Building Energy Efficiency Standards (Title 24) also require cool roofs and has requirements for efficient insulation. Accordingly, the Project's Specific Plan specifies that all Project buildings will come standard with cool roofs. (DRP 2017, Appendix 4.0-A, p. 3-62) Per the Centennial Green Development Program, roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19)

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Row	Source	Measure	Included	Response
389	CARB List, p. 8	Require cool roofs and "cool parking" that promotes cool surface treatment for new parking facilities as well as existing surface lots undergoing resurfacing.	Yes	The Project will provide cool roofs, as discussed in row 388. With regard to cool parking, the Project will include installation of cool pavements if approved by Caltrans and the County for roadway uses, provided that road installation and maintenance durability and costs are comparable to existing approved roadway materials (since early replacements or more intensive repair result in higher GHG emissions). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19) It would also use light-colored, non-reflective finishes to help reduce glare for outside sidewalks, driveways, patios and parking areas. (*Ibid*.)
390	2017 OPR List, p. 344	Require net energy metering (NEM) ready roofs.	Yes – Functional Equivalent Required	MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. Further, the Specific Plan's Green Development Program requires that all residential buildings be compatible with solar panel systems, and that all commercial and residential structures include passive solar design techniques. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) It also requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. (*Ibid*.)
391	2017 OPR List, p. 344; CARB List, p. 8	Require organic collection in new development.	Yes	The Project implements the residential and nonresidential mandatory measures for material conservation and efficiency that are set forth in Division 4 (residential) and division 5.4 (nonresidential) of the CALGreen Code, including but not limited to: • The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on

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				recycling and composting will be provided to Property Owners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) • Prior to the issuance of each building permit from commercial properties, including multi-family residences, schools, and places of worship, the Property Owner shall submit to the County a site plan of the property that depicts how solid wastes would be collected and stored for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.) • Prior to sale, lease, or rental of any commercial property, including multi-family residential structures or portions thereof, the Property Owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and stores recyclables, compostables, universal waste, hazardous waste, and electronic waste for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.) The Project Applicant/Master Developer shall set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station that includes a household, hazardous waste permanent collection and reuse center and allows for mulching/composting operations. (*Ibid*.) The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Ibid*.)
392	2017 OPR List, p. 344; CARB List, p. 8	Require low-water landscaping in new development. Require water efficient landscape maintenance to conserve water and reduce landscape waste.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish

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				minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10)
393	2017 OPR List, p. 344	Achieve Zero Net Energy performance.	Not feasible within the Project boundaries based on Project activities that fall within jurisdiction and control of Applicant and Lead Agency.	While the Project has been designed to and will have much lower per capita and per residential unit GHG emissions in relation to existing average per capita and per residential unit GHG emissions, the majority of Project GHG emissions occur from vehicular emissions that fall solely within the jurisdiction and control of federal and state agencies (e.g., in regulating the types and fuel efficiencies of vehicles), and in generating electricity within the grid serving the Project region including the Project site. Vehicular GHG emission reductions, for example, are achieved under the state's stringent GHG laws[2221] from a combination of existing legal mandates, including but not limited to the Cap and Trade program covering all fossil fuel related emissions from "wells to wheels," mandatory increases in non-fossil fuel vehicles, and compliance with regional land use and transportation strategies to reduce GHG from land use and transportation patterns.[2222] Similarly, electricity generation from renewable resources such as solar and wind power, is mandated under state laws,[2223] and is also subject to evolving and improving technologies (e.g., storage) and governance frameworks (e.g., multi-state grid integration). Achieving a "net zero" greenhouse gas reduction outcome within the Project boundaries for transportation, electric generation, and other offsite sources that are

[2221] S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).
[2222] OPR. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Jan. 20, 2016), https://perma.cc/8EWJ-MV3Y.
[2223] CCR, Title 24, Part 11

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				outside the jurisdiction and control of Los Angeles County is infeasible. Other development applicants have proposed "net zero" greenhouse gas projects which require payments of fees or costs for offsite GHG reductions; however, imposing such external costs on a Project increases Project costs and reduce the affordability of Project housing.[2224,2225,2226] Extraordinarily high existing housing costs have already caused California to have the highest poverty rate in the nation according to the US Census,[2227] which in turn has already led to a substantial net out-migration of California's working families to much higher per-capita GHG states such as Texas, Nevada and Arizona.[2228] Increasing Project housing costs and reducing Project affordability will further exacerbate the California housing crisis and encourage more outmigration to higher per capita GHG states. Although greenhouse gas is a global pollutant for which reductions can be achieved in other countries and continents, mandating and monitoring such offsite reductions is outside the jurisdiction and control of the lead agency for CEQA purposes. Also, please see response to Comment F.8-87; all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change. It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency

2224 California Energy Commission, Zero Net Energy Strategy Presentation (8/22/17).
2225 Governor's Office of Planning and Research, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Jan. 20, 2016).
2226 CARB. 2017 Climate Change Scoping Plan Update, at 113 (Jan. 20, 2017), p. 39, 151-152
2227 Dan Walters, Why does California have the nation's highest poverty level?, CALMATTERS (Aug. 13, 2017), https://perma.cc/GMM9-QWUA.
2228 Drew Lynch, Californians Consider moving to rising housing costs, poll finds, CAL WATCHDOG (Sept. 21, 2017).

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				Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[2229, 2230] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[2231,2232] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[2233] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy. Moreover, MMs 21-2 and 21-3 obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (DRP 2017, pp. 5.21-88, -89)

2229 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

2230 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

2231 *Ibid*.

2232 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

2233 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

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394	CARB List, p. 8	Achieve Zero Net Energy performance targets prior to dates required by CALGreen.	No. Not feasible.	Meeting this requirement prior to dates required by CALGreen would exceed CEQA requirements. Courts have consistently held that single projects cannot be required to bear a greater than proportional share of mitigating a cumulative significant impact (*Dolan v. City of Tigard* (1994) 512 U.S. 374; *Nollan v. Cal. Coastal Comm.* (1987) 483 U.S. 825, 835 n.4; *Ehrlich v. City of Culver City* (1996) 12 Cal. 4th 854). This limitation is also expressly stated in CEQA Guidelines §§15041(a), 15126.4(a)(4). Because GHG emissions from transportation, water and waste management and use, heating and cooling of buildings, and a myriad of other activities are common to all new and modified development projects, and are common attributes of simply residing, working or producing goods or services in California, the feasibility of the mitigation measures required for this project must be commensurate with a fair share allocation and not with a hypothetical "zero net" or "net reduction" threshold or standard. Within this cumulative impact mitigation measure framework, all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change. Please also see rows 375 and 376.
395	2017 OPR List, p. 344; CARB List, p. 8	Require new construction to achieve third-party green building certification, such as the GreenPoint Rated program and the LEED rating system.	Yes – Functional Equivalent Required	California is a global leader on climate policy and programs and has adopted scores of statutes and regulations to reduce GHG across multiple sectors, which are the equivalent of or would exceed LEED standards. The "green" ranking systems, including LEED, are public and private ranking entities under no obligation to incorporate or address inconsistent applicable California standards, and generally target just a fraction of the multiple sources of GHG emissions associated with land use projects. Further, because the ranking systems, including LEED, are not part of the integrated programs, regulations, and statutes designed to achieve California's GHG reduction target, they do not have any inherent or presumptive superiority to California's legal mandates. These systems also require specialized training and expertise to monitor and certify, can change without notice to affected parties, may not remain timely based on changing technologies and laws, and provide a less stable enforcement framework than compliance with California's legally-required GHG reduction requirements and the

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				carefully crafted Centennial Green Development Program. However, the Centennial Green Development Program does require the delivery of a third-party verification by a qualified inspector to the Department of Public Works that demonstrates that the Centennial Green Development Program has been implemented. The qualified inspector could be a LEED accredited professional. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 8) It is also noted that many of the LEED design principles are consistent with Project design and principles. For example, the Project meets LEED design criteria including walkable streets, a connected and open community, mixed-use neighborhoods, a mix of housing types, transportation demand management, access to public space and recreation facilities, and visitability and universal design. (See U.S. Green Building Council, LEED credit library, available online at: www.usgbc.org/credits).
396	2017 OPR List, page 344; CARB List, p. 8	Require the design of bikes lanes to connect the regional bicycle network.	Yes	Project buildout would result in the provision of a network of bike paths, lanes, and routes connecting all Project uses, and two underpasses and one overpass bridge crossing will be constructed across the SR-138 to facilitate bicycle access to employment centers. (DRP 2017, pp. 4-35 to 4-36, Exhibit 4-8). As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (*Id.,* Appendix 4.0-A, p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are described below and shown on Specific Plan Figure 3-3, *Bicycle Network*. (*Ibid*.) **Bike Path (Class I Multi-use trail).** Class I multi-use trail bikeways provide a completely separated travel way for the exclusive use of bicyclists and pedestrians, with crossflow minimized. These bikeways are generally located in community trails and greenways. (*Ibid*.) **Bike Lane (Class II bikeway).** Class II bikeways include a striped lane for one-way bike travel on a street or highway. When roadways contain additional rights-of-way, a painted buffer may be included to buffer

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				bicyclists from automobiles and transit. This buffered design is commonly referred to as an Enhanced Class II Bikeway. (*Ibid*.) **Bike Route (Class III bikeway).** Class II bikeways provide for shared use with motor vehicle traffic, and routes are marked with appropriate signage. Painted shared lane markings on pavement, commonly referred to as sharrows, may also be incorporated into Class III bikeways, further identifying shared use between motorists and bicyclists. (*Ibid*.) **Protected Bike Lane (Class IV bikeway).** A protected bikeway, commonly referred to as a cycle track, combines the user experience of a separated path with the on-street infrastructure of a conventional bike lane. Cycle tracks vary in configuration. Cyclists could be separated from motor vehicle traffic through such means as raised medians, on-street parking, bollards, or elevated pathways. They may be one-way (one direction on each side of the street) or two-way (both directions side-by-side on one side of the street). The buffers shown for Class IV bikeways in Specific Plan Figures 3-6, 3-7, and 3-11 may be raised to provide additional safety for cyclist and vehicular traffic. (*Ibid*.) **Trails.** Community, Greenway, and Regional trails within Centennial also provide for shared use pathways by bicycle, pedestrian, and in some cases equestrian activities. (*Ibid*.) All major Project roadways would include bicycle infrastructure, as can be seen on Specific Plan Figures 3-2 and 3-3. See also Figures 3-6: Six-Lane Major Highway, 3-7: Four-Lane Secondary Highway, 3-8: Collector 1 – with Median, 3-9 Collector 2- without Median, and 3-10: Collector 3 – with Parking, 3-11 Industrial Collector for illustrations of bike lanes incorporated into rights-of-way. (*Id.,* Appendix 4.0-A, pp. 3-10 to 3-16).
397	2017 OPR List, p. 344; CARB List, p. 8	Expand urban forestry and green infrastructure in new land development.	Yes	The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (DRP 2017, pp. 5.21-36, 5.21-

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) Per the Centennial Green Development Program, the Project will reduce heat loads from glazing by strategically locating shade trees. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)
398	2017 OPR List, p. 344; CARB List, p. 8	Require preferential parking spaces for park and ride to incentivize carpooling, vanpooling, commuter bus, electric vehicles, and rail service.	Yes	Project transit centers will provide options for park and ride facilities, shuttle stops, bike rental, and other options for public transit services. (DRP 2017, Appendix 4.0-A, p. 1-7) The installation of Park-And-Ride Lots near transit stops and carpool lanes that will attract commuters is also included in the roster of potential transportation and vehicle demand measures to be implemented by the TMA to meet transportation demand performance standards articulated in MMs 10-25 and 10-26, as indicated in Table 2-C-2 of the Project's Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 14) MM 21-17 requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles. (*Id.,* pp. 5.21-91, -92)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
399	2017 OPR List, p. 344	Require a transportation management plan for specific plans.	Yes	MMs 10-25 and 10-26 require the implementation of on-site programs to reduce vehicle trips, including the formation of a Transportation Management Association (TMA) that would coordinate and manage a Ride Share Program, Transit Program, and Commuter Bus Program. (DRP 2017, p. 5.10-104) MM 10-25 requires implementation of the Mobility Plan, which includes two transit hubs to serve as alternative means of transportation on the Project site, and requires the creation and ongoing operation of the TMA. (*Id.,* p. 5.10-153) These mandatory measures require the reduction of single-occupancy automobile use for off-site commutes by 20 percent and require the reduction of single occupancy automobile uses within the Project site by 30 percent. (*Ibid.*) MM 10-26 lays out key Transportation Demand Management (TDM) elements that are key to the Mobility Plan and specifies that the TMA will fund and manage ongoing operation of transportation programs, including but not limited to transit and on-demand services. (*Id.,* p. 5.10-154)
400	CARB List, p. 8	Require a transportation management plan for specific plans which establishes a numeric target for non-SOV travel and overall VMT	Yes	MMs 10-25 and 10-26 require the implementation of on-site programs to reduce vehicle trips, including the formation of a Transportation Management Association (TMA) that would coordinate and manage a Ride Share Program, Transit Program, and Commuter Bus Program. (DRP 2017, p. 5.10-104) MM 10-25 requires implementation of the Mobility Plan, which includes two transit hubs to serve as alternative means of transportation on the Project site, and requires the creation and ongoing operation of the TMA. (*Id.,* p. 5.10-153) These mandatory measures require the reduction of single-occupancy automobile use for off-site commutes by 20 percent and require the reduction of single occupancy automobile uses within the Project site by 30 percent. (*Ibid.*) MM 10-26 lays out key Transportation Demand Management (TDM) elements that are key to the Mobility Plan and specifies that the TMA will fund and manage ongoing operation of transportation programs, including but not limited to transit and on-demand services. (*Id.,* p. 5.10-154)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
401	2017 OPR List, p. 344	Develop a rideshare program to facilitate participation of commuters to the major employment centers.	Yes – Functional Equivalent Required	As part of the Project's overall transportation demand management (TDM) strategy to reduce the dependence on the private automobile, which would result in a consequential reduction in overall volume of Project-generated trips off site, the Project Applicant will participate in or form a Transportation Management Association (TMA) to serve the residents and employees of businesses within the Project area or will be organized in conjunction with an existing organization in the Antelope Valley or Santa Clarita area. (DRP 2017, p. 5.10-141) If the former, the Centennial TMA will specifically develop strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. (*Ibid*.) Such coordination will also help match ride sharers and provide information on transit options; The TMA's purpose will be to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. (*Ibid*.) Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is as follows: • Provide Ride-Sharing Programs (e.g. Uber Pool, Lyft Line) – that gives people a way to commute to work besides their personal vehicle by the sharing of a vehicle and costs with other people headed in the same direction. Traffic volume is reduced by encouraging carpooling and rideshare passengers tend to have relatively long commutes which reduce more vehicle miles because the trips that are reduced are twice as long on average. (*Id.,* p. 12) • Implement Car-Sharing Program (e.g. Zipcar, Car2Go) – either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based
402	CARB List, p. 8	Develop a rideshare program targeting commuters to major employment centers	Yes – Functional Equivalent Required	

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				programs encourage carpooling and therefore reduce traffic volumes. (*Id.,* p. 13) • Implement School Pool Program – similar to a ride-sharing program for school children and differs from bussing services to public schools since the program helps match parents to take students to private schools, or to schools where students cannot walk or bike but do not meet the requirements for bussing. Traffic volume is reduced by encouraging parents to share their vehicle. (*Ibid*.) • Ridesourcing [or Transportation Network Companies (TNC)] (e.g. Uber, Lyft) arranges rides for passengers with drivers that use their privately-owned vehicle for a fee and can provide rides to and from stations and help with first/last mile situations. Ridesourcing helps reduce vehicle trips by providing a different way to get to the destination besides a personal vehicle. (*Id.,* p. 16)
403	2017 OPR List, p. 344; CARB List, p. 8	Require design of bus stops/shelter/express lane in new development to promote the usage of mass-transit.	Yes	Project proposes to provide two Transit Hubs to improve the efficiency of matching localized trips with regional (off-site) trips and connect to multi-modal transportation options such as local and regional bus services, on-demand car services, carpools and vanpools, and that provides secure and convenience bike storage for cyclists. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) Transit Hubs shall provide a minimum of one alternative energy vehicle charging stations with multiple outlets, free wifi, and real time tracking of transit. (*Ibid*.) It would be the responsibility of the TMA to provide transit route maps and schedules. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Transit Hubs shall have adequate pedestrian, bicycle, and parking facilities for off-site transit connection service. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17) The centers would provide convenient access to public bus transportation, carpooling, park and ride, special charter operations, and/or similar types of activities related to local or off-site transit usage. (*Id.,* p. 4-37). An information center would be an important part of the services offered, and the primary objective of such centers is to provide focal and gathering points for a variety of private and public transportation activities, all of which reduce dependency on the private

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				automobile. (*Ibid*.) Commuter service may be provided by Santa Clarita Transit, Antelope Valley Transit, or a combination of both, and it is envisioned that commuter service from Centennial would be integrated with existing services provided by these operators and would connect Centennial to existing Metrolink service, future high-speed rail service, and employment centers throughout the region. (*Id.,* p. 4-38) These centers would, at least initially, be used to promote carpooling and vanpooling until such time as ridership justifies commuter service. (*Ibid*.) The following metrics also ensure that the Project can accommodate a community transit system: A transit route easement no less than 25 feet wide shall be reserved in the CCD (connecting the Town Center, BP and I/C areas) and also run northerly connecting to the Village Five Core; If a transit system is implemented, transit stop easements shall be reserved in all Village Cores, the Town Center, and CCD, as well as other areas where necessary, efficient, and beneficial to provide transit access. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 9)
404	2017 OPR List, p. 344; CARB List, p. 8	Require that gas outlets be provided in residential backyards for use with outdoor cooking appliances such as gas barbeques if natural gas service is available.	Yes	Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (DRP 2017, p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)
405	2017 OPR List, p. 344; CARB List, p. 8	Require that electrical outlets with installed on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment.	Yes	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79)
406	2017 OPR List, p. 345; CARB List, p. 8	Require the design of an electric box is residential unit garage to promote electric vehicle usage.	Yes	Per MM 21-15 (as updated in response to Comment F.8-95), the Project will provide one 208/240 VAC receptacle for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. (DRP 2017, p. 5.21-91)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
407	2017 OPR List, p. 345; CARB List, p. 8	Require electric vehicle charging station (conductive/inductive) and signage for nonresidential developments.	Yes	The Project provides extensive electric vehicle charging facilities, as required in MMs 21-16, 21-19, 11-4, and 11-6, discussed further in row 129. As indicated in Table 2-C-1 of the Mobility Plan, facilities could accommodate inductive and conductive charging. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 7).
408	2017 OPR List, p. 345; CARB List, p. 8	Provide electric outlets to promote electric landscape maintenance equipment be utilized to the extent feasible on parks and public/quasi-public lands.	Yes	All landscape maintenance equipment at Centennial will be electric. (DRP 2017, p. 5.21-79)
409	2017 OPR List, p. 345	Require each residential unit to be pre-plumber and structurally engineered for the future installation of a solar energy system.	Yes	MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. Further, the Specific Plan's Green Development Program requires that all residential buildings be compatible with solar panel systems, and that all commercial and residential structures include passive solar design techniques. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) It also requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. (*Ibid*.)
410	CARB List, p. 9	Require each residential unit to be "solar ready" including installing the appropriate hardware and proper structural engineering	Yes	MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. Further, the Specific Plan's Green Development Program requires that all residential buildings be compatible with solar panel systems, and that all commercial and residential structures include

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Row	Source	Measure	Included	Response
				passive solar design techniques. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) It also requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. (*Ibid*.)
411	2017 OPR List, p. 345; CARB List p. 9	Require the installation of energy conservation appliances such as tankless water heaters and whole house fans.	Yes	Uses associated with the Project are subject to appliance efficiency requirements for water heaters. (California Appliance Efficiency Regulations (Title 20 Standards), Sections 1605.1(f), 1605.3(f).) Consistent with the Los Angeles County Community Climate Action Plan, a minimum of 10 percent of all single-family detached residential units at Project buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) Further, Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. (*Ibid*.) Further, per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (*Id.,* p. 5.21-89) The Centennial Green Development Program requires the use of removable covers for pools and spas, which are the functional equivalent on automatic covers with regard to efficiency. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) Automatic covers may result in accidental drownings or other injuries. Efficient pumps and motors for pools and spas are already required under applicable Building Energy Efficiency Standards. The Project incorporates passive and energy-efficient cooling and heating systems, as described in rows 221 through 232.

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Row	Source	Measure	Included	Response
412	2017 OPR List, p. 345; CARB List, p. 9	Require each residential and commercial building be equipped with energy efficient AC units and heating system with programmable thermostat timers.	Yes	Uses associated with the Project are subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) MM 21-8 requires that Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission requirements or ENERGY STAR requirements, or equivalent, shall be exclusively offered by residential builders, and this includes room air conditioners. (DRP 2017, p. 5.21-90) See also the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18) Buildings will also be required to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for response signals from the electric utility. (*Id.,* p. 20) All Project buildings will include appropriately sized and high-efficiency heating and cooling systems. (*Id.,* Appendix 4.0-A, p. 3-62)
413	2017 OPR List, p. 345; CARB List, p. 9	Require each residential and commercial building utilize low flow water fixtures such as low flow toilets and faucets.	Yes	Per the Centennial Green Development Program (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 23), the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code. Additionally, water efficient fixtures that meet or exceed state or County CALGreen Code performance shall be installed, including but not limited to the following: For non-residential buildings: • Showerheads 2.0 gpm @ 80 psi; • Bathroom faucets 0.5 gpm @ 60 psi; • Kitchen faucets 2.6 gpm @ 60 psi; • Toilets 1.28 gallons/flush; • Urinals 0.5 gallons/flush (*Ibid*.)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				For single family and multifamily residential buildings: • Kitchen Faucets. The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 psi. Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi. (*Ibid*.) • Appliances. Dishwashers and clothes washers in residential buildings shall comply with the following: Install at least one qualified ENERGY STAR appliance with maximum water use as follows: 1. Standard Dishwashers – 4.25 gallons per cycle. 2. Compact Dishwashers – 3.5 gallons per cycle. 3. Clothes Washers – water factor of 6 gallons per cubic feet of drum capacity. (*Ibid*.)
414	2017 OPR List, p. 345; CARB List, p. 9	Require the use of energy efficient lighting for all street, parking, and area lighting.	Yes	Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting. The Centennial Green Development Program also requires builders to use energy efficient lighting with automated controls in compliance with all applicable requirements of Title 24, Part 6, Section 150.0(k). (DRP 2017, Appendix 2-A to appendix 4.0-A, p. 19) Outdoor lighting associated with the Project must also meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.

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Row	Source	Measure	Included	Response
				The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as follows: • Exterior lighting shall not cause unacceptable light trespass and shall be fully shielded. (*Ibid*.) • Outdoor lighting shall be turned off using automatic control devices or systems between the hours of 10:00 PM and sunrise of the following day in commercial, business park, and mixed-use areas, unless required by the County Building Code. If the property operates beyond 10:00 PM, then outdoor lighting shall be turned off 1 hour after the operation ends for the day. (*Ibid*.) • Outdoor lighting for safety and security reasons is allowed after 10:00 PM only if fully shielded motion sensors are used to turn lighting after 10:00 PM and the sensors turn the lighting of automatically no more than 10 minutes after the area is vacated or at least 50 percent of the total lumen levels are reduced or 50 percent of the total outdoor light fixtures are turned off between 10:00 PM and sunrise. (*Ibid*.) • Outdoor lighting in residential and open space areas that are over 15 feet in height shall have an output no greater than 400 lumens. (*Ibid*.) • The maximum height of outdoor lighting fixtures shall be 20 feet in Residential and Open Space areas, 30 feet in Commercial, Mixed Use, and Public areas, and 35 feet in Business Park areas. (*Ibid*.) • The following outdoor lighting is prohibited unless mandated for health and safety reasons by a public agency: drop-down lenses, mercury vapor lights, ultraviolet lights, search lights, laser lights and any outdoor lighting that flashes, blinks, alternates or moves. (*Ibid*.) • Outdoor light fixtures in outdoor recreational areas shall be mounted, aimed, and fully shielded to that light beams fall onto

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				activity areas and no unacceptable light trespass occurs on surrounding areas or properties. Outdoor lighting shall only provide the minimum necessary to illuminate recreational activities areas and shall be no more than 75 feet high. Preferably, these fixtures shall also use high pressure sodium or metal halide lamps. (*Ibid*.) • Outdoor advertising signs, business signs and roof and freestanding signs that are lighted shall be fully shielded. Externally mounted light fixtures shall be mounted on the top of the sign and shall be oriented downward. Externally mounted bulbs or lighting tubes for signs shall not be visible from adjoining properties or public rights-of-way, unless such bulbs or tubes are filled with neon, argon, krypton or other self-illuminating substance. (*Ibid*.) • Street lights (consistent with rural design) shall be limited to urban cross sections with sidewalks, curbs and gutters or at intersections and driveways on County roads, where necessary to alleviate traffic hazards, improve traffic flow and/or promote safety and security of pedestrians. (*Ibid*.) • Limit the hours of community-managed lighting on public streets to midnight unless later lighting will advance public safety and walkability goals. (*Ibid*.)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
415	2017 OPR List, p. 345; CARB List, p. 9	Require the landscaping design for parking lots with shade trees to reduce urban heat island.	Yes	The Centennial Specific Plan contains parking lot landscaping guidelines that require minimum 4-foot by –foot area per tree, measured from the inside of the planter area, and minimum one 15-gallon tree is required for 10 parking spaces. (DRP 2017, Appendix 4.0-A, p. 2-66) The Specific Plan also contains parking lot landscape coverage minimums for individual Land Use Designations, which are in addition to general minimum landscape coverage requirements in the commercial/employment designations and Business Park designation (*Id.,* pp. 2-28, 2-32). The Specific Plan also specifies that for Commercial Centers, parking lots should be landscaped to provide shade. (*Id.,* p. 3-32) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees in parking lots larger than 15 spaces, including a requirement to demonstrate at least 50 percent coverage within 15 years of construction. (See Los Angeles County Department of Regional Planning Tree Planting Guide, available at: http://planning.lacounty.gov/assets/upl/project/tpo_guide.pdf.)
416	2017 OPR List, p. 345; CARB List, p. 9	Incorporate water retention in design of parking lots and landscape.	Yes	The Project will comply with the County of Los Angeles Low Impact Development Standards Manual. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14) The overall physical design for Centennial respects the natural setting by preserving major drainage features and open space through careful grading that respects the topography, which in turn allows for compact development that maximizes open space. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 7) Stormwater management methods will include a complementary combination of on-site treatment, traditional underground storm drainage facilities, multi-purpose storm-water basins, and drainage courses. (*Id.,* Appendix 4.0-A, p. 2-58) Multi-purpose greenway basins will filter urban runoff and excess storm flow recharge associated with development's inevitable increase in impermeable surfaces. (*Ibid*.) Additional techniques will include, but are not limited to, filter strips, bioretention areas, and swales in parkways, all of which can incrementally reduce runoff and improve water quality. (*Ibid*.) See Centennial Specific Plan Section 3.6, Drainage Plan, for further information. The Project's Green Development Program requires that 60 percent of public and OA trails

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Row	Source	Measure	Included	Response
				(Project Green Trails will be 80 percent) with permeable materials, which may include decomposed granite, soilcrete, gravel pavers, grass pavers, variations on different types of grids and blocks, loose aggregate, poly-pavement, permeable asphalt and concrete, and as identified in the Trails Plain in Specific Plan Section 3.11.7. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 10) For Project streets, street design proposals for County review will include technically feasible (given expected future uses) and legally feasible (given applicable ordinances and other requirements) street designs that include permeable pavement, groundcovers, or other measures to reduce use of concrete and asphalt. (*Ibid*.)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
417	CARB List, p. 9	Require the development project to propose an off-site mitigation project which should generate carbon credits equivalent to the anticipated GHG emission reductions. This would be implemented via an approved protocol for carbon credits from CAPCOA, the CARB, or other similar entities determined acceptable by the local air district.	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.
418	CARB List, p. 9	Require the project to purchase carbon credits from the CAPCOA GHG Reduction Exchange Program, American Carbon Registry, Climate Action Reserve, or other similar carbon credit registry determined to be acceptable by the local air district.	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
419	CARB List, p. 9	Encourage the applicant to consider generating or purchasing local and California-only carbon credits as the preferred mechanism to implement its off-site mitigation measure for GHG emissions and that will facilitate the State's efforts in achieving the GHG emission reduction goal.	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.

Response to Comment F.8-205:

As discussed in response to Comment F.8-203, and in the Draft EIR at page 1-1, Public Resources Code §21100(b)(3) requires the EIR set forth feasible mitigation measures to minimize significant environmental effects of the Project. The Commenter correctly notes that the Lead Agency's determination that a particular mitigation measure is infeasible must be supported by substantial evidence, as required by CEQA Guidelines § 15091(b). The Commenter is also correct that the EIR must propose and describe feasible mitigation measures to minimize significant environmental effects even if those significant effects cannot be reduced to a less than significant level and are therefore unavoidable. However, CEQA does not require the EIR to analyze every conceivable mitigation measure.[2234] Rather, the EIR need only analyze mitigation measures that are feasible, practical and effective.[2235] Please see response to Comment F.8-204, which addresses mitigation measures proposed by the Commenter for inclusion in the EIR.

Response to Comment F.8-206:

A site-specific probabilistic seismic hazard analysis was performed for the Project site consistent with State and County building code requirements.[2236] This site-specific analysis is more accurate and relevant to assessing seismic parameters for potential development than the United States Geological Survey (USGS) map. The USGS map cited in the comment is meant to be used as a broad (i.e., Statewide), general (i.e., unquantified) indication of potential shaking potential over different portions of the state. The risk of both primary (i.e., surface rupture and ground shaking) and secondary (e.g., liquefaction, landslides) seismic risks are fully disclosed and analyzed in Section 5.1 of the Draft EIR. Further, preparation of the Draft EIR involved a series of reviews by the County's Geotechnical and Materials Engineering Division of both the preliminary geotechnical reports prepared for the Project and the Draft EIR Section 5.1. It is also noted that the 2003 map cited in the comment has been superseded by a 2016 version.[2237] As stated on this map, "The resulting earthquake shaking potential is used in developing building code design values, estimating future earthquake losses, and prioritizing earthquake retrofit." Calculations of earthquake shaking hazard for California are part of a cooperative project between USGS and California Geological Survey (CGS), and are part of the National Seismic Hazard Maps. On the National Seismic Hazard Maps website, the difference between geologic hazard and geologic risk is discussed. As stated on this website, "Bottom line: High earthquake hazard does not mean high risk. Also, while you can't change the underlying earthquake hazard, you can reduce earthquake risk by managing the built environment".[2238] This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "Compliance with geotechnical recommendations, which reflect building code requirements, would result in the construction of earthquake-resistant structures. However, in the event of a major seismic

2234 *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal.App.4th 911, 935; *San Franciscans for Reasonable Growth v. City & County of San Francisco* (1989) 209 Cal.App.3d 1502, 1519

2235 *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 365

2236 DRP 2017, pp. 5.1-11 and -12

2237 Available at: ftp://ftp.conservation.ca.gov/pub/dmg/pubs/ms/048/MS_048_revised_2016.pdf.

2238 U.S. Geological Survey (USGS). 2017 (Last accessed August 31). Earthquake Hazards Program: Introduction to the National Seismic Hazard Maps. Reston, VA: USGS. https://earthquake.usgs.gov/hazards/learn/.

event, no structure is completely safe from damage. Incorporation of these measures reduces the potential risk from seismic and geotechnical conditions to the maximum extent practicable under current engineering practice." Additionally, the National Seismic Hazard Maps website states "there are versions of the maps designed specifically for the public, to help people learn more about the hazard from earthquake ground shaking in their area".[2239] An example of such a map is then presented, and is the Frequency of Damaging Earthquake Shaking Around the U.S..[2240] As shown on this map, the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State. This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "It should be emphasized that, while the Project site has identified geotechnical constraints, the overall seismic risk at the Project site is the same as Southern California in its entirety." In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area.

Regarding the proposed fault setback, the Geologic Safety Zone setback required for the two unnamed faults within the Project site is 100 feet, potentially reduced to 50 feet, to be consistent with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act (AP Act). As discussed on page 5.1-3, "City and County jurisdictions must require a geologic investigation to demonstrate that a proposed development project, which includes structures for human occupancy, is adequately set back (usually at least 50 feet) from an active fault prior to permitting." As discussed on pages 5.1-16 through 5.1-17, consistent with State regulations, there would no building on or within the required setback (usually at least 50 feet) of the Alquist-Priolo Earthquake Fault Zone for the San Andreas Fault. Additionally, the "purpose of the AP Act is to reduce the threat to life and property, specifically from surface fault rupture, by preventing the construction of building used for human occupancy of the surface trace of active faults".[2241] Therefore, the setbacks of 50 to 100 feet are appropriate for purposes of avoiding impacts associated with surface rupture of an active fault.

The setback zone for the San Andreas Fault is incorporated into the Geologic Safety Zone, which also establishes building setbacks for the two unnamed on-site faults. However, the risks from surface rupture of a fault is a different issue than the risks from strong seismic ground shaking during an earthquake; accordingly, the State CEQA Guidelines includes two separate thresholds for these issues.

Response to Comment F.8-207:

It is not the case that the Draft EIR only evaluates seismic hazard at the center of the Project site. Rather, the Draft EIR uses a combination of appropriate methodologies to evaluate seismic hazard on the entire Project site. The Draft EIR explains that Geocon used a combination of deterministic and probabilistic methodologies to prepare its 2015

[2239] *Ibid.*
[2240] Available at: https://earthquake.usgs.gov/hazards/learn/images/2014hazmap-induced-lg.gif.
[2241] DRP 2017, p. 5.1-3

Preliminary Geologic Summary Report.[2242] For the Deterministic Seismic Hazard Analysis (DSHA), Geocon used EZ-FRISK software, which indicates that, using coordinates generally correlating to the central portion of the Project site, there are 29 known active faults located within a search radius of 50 miles.[2243] Draft EIR Table 5.1-1 therefore lists the estimated maximum earthquake magnitude (M) and peak ground acceleration (g, or percent of the force gravity) for the most dominant faults, in relationship to the central portion of the Project site, listed by increasing distance, for the three different acceleration-attenuation relationships (i.e., mathematical equations related to group motion) applied in the DSHA.[2244] As noted in response to Comment F.8-206, the National Seismic Hazard Maps website provides a map titled Frequency of Damaging Earthquake Shaking Around the U.S..[2245] As shown on this map, the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State. This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "It should be emphasized that, while the Project site has identified geotechnical constraints, the overall seismic risk at the Project site is the same as Southern California in its entirety." In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to more or less risk of a seismic event and the magnitude of the event in a certain area. As such, the evaluation of seismic hazard (which is not equivalent to risk, as discussed in response to Comment F.8-206) based on the approximate center of the site is an appropriate evaluation methodology.

Further, while listing of peak accelerations is useful for comparison of potential effects of fault activity in a region, other considerations are important such as frequency and duration of motion and soil conditions underlying the site. Therefore, Project site soil was studied (see next paragraph), and in conjunction with the DSHA, Geocon also conducted a Probabilistic Seismic Hazard Analysis (PSHA).

The PSHA is based on the premise that the potential for an earthquake in an area is a function of the combined annual probabilities for earthquakes on all faults capable of generating energy of a certain level in that area, and assumes that earthquakes occur randomly in time and the annual probability for earthquake occurrences is the same from year to year; A higher frequency of small to moderate earthquake occurrences is also considered.[2246] The EZ-FRISK program used accounts for earthquake magnitude as a function of fault rupture length, and site acceleration estimates are made using the earthquake magnitude and distance from the site of the rupture zone. The program also accounts for uncertainty in each of the following: (1) earthquake magnitude, (2) rupture length for a given magnitude, (3) location of the rupture zone, (4) maximum possible magnitude of a given earthquake, and (5) acceleration at the site from a given earthquake along each fault. By calculating the expected accelerations from considered earthquake sources, the program calculates the total average annual expected number of occurrences of site acceleration greater than a specified

[2242] *Id.,* Appendix 5.1-A
[2243] *Id.,* p. 5.1-10
[2244] Ibid.
[2245] Available at https://earthquake.usgs.gov/hazards/learn/images/2014hazmap-induced-lg.gif.
[2246] DRP 2017, p. 5.1-11

value.[2247] The Draft EIR therefore includes Table 5.1-2, which presents the site-specific probabilistic seismic hazard parameters including the three different acceleration-attenuation relationships (i.e., mathematical equations related to ground motion) applied in the PHSA, and the probability of exceedance.[2248] In addition to the three relationships identified in the EZ-FRISK program, the CGS has a program that calculates the ground motion for a 10 percent of probability of exceedance in 50 years, based on an average of several attenuation relationships, and Draft EIR Table 5.1-3 presents the calculated results from the Probabilistic Seismic Hazards Mapping Ground Motion page from the CGS website.[2249]

Soil and geologic conditions were previously identified by observation of exploratory excavations, geologic mapping, interpretation of stereo aerial photographs, and review of published geologic literature.[2250] Surficial deposits encountered included previously placed fill, topsoil, alluvium, colluvium, and shallow landslide debris.[2251] The Draft EIR and its Appendix 5.1-A describe each type of soil and geologic unit in detail, appropriately evaluate potential adverse impacts due to the soil or geologic unit, and suggest mitigation that would reduce impacts to a less than significant level.[2252]

The Draft EIR also very specifically discloses the location of the San Andreas Fault and analyzes its potential impacts on any part of the Project site. It acknowledges that "the only fault in the vicinity of the Project site within a designated Alquist-Priolo Earthquake Fault Zone is the San Andreas Fault..." and notes that the "Fault Zone and fault line cross the southwestern edge and southernmost point of the Project site, as shown on Exhibit 5.1-2, Geologic Hazards."[2253] Due to the proximity of both the San Andreas Fault and Garlock Fault to the Project site, a fault research company called Earth Consultants International (ECI) conducted a detailed fault investigation on the Project site and evaluated potential hazards as a result of fault locations in relation to the Project site and planned development areas.[2254] Per the Geocon report, earthquakes that might occur on the San Andrea Fault Rift Zone are potential generators of significant ground accelerations at the site (0.73 g for a 10 percent probability in 50-year occurrence) should an earthquake on the fault occur.[2255] However, foundation systems can be designed to withstand these relatively high ground accelerations, and secondary impacts such as liquefaction can be mitigated by remedial grading, structural design and foundations or ground improvement techniques; active fault zones including this one can also be mitigated by implementing setback zones from Alquist-Priolo Earthquake Fault Zones.[2256] Accordingly, as shown on Draft EIR Exhibit 5.1-2, the Project has been designed to avoid development in areas near the San Andreas Earthquake Fault Zone, which are instead proposed as open space and drainage areas.[2257]

[2247] *Id.,* Appendix 5.1-A, p. 10
[2248] *Id.,* p. 5.1-12; *Id.,* Appendix 5.1-A, p. 11
[2249] *Ibid*.
[2250] *Id.,* Appendix 5.1-A, p. 3
[2251] *Ibid*.
[2252] *Id.,* pp. 5.1-6 to -9; Appendix 5.1-A, pp. 3-7, 13-14
[2253] *Id.,* pp. 5.1-9, -10
[2254] *Id.*, Appendix E of Appendix 5.1-A; *Id.,* Appendix 5.1-A, p. 8
[2255] *Id.,* Appendix 5.1-A, p. 13
[2256] *Ibid*.
[2257] *Id.,* p. 5.1-16

The Draft EIR and the Geocon report conclude that there are no soil or geologic conditions present on or near the Project site that would preclude the safe development of all proposed land uses on the Project site, given incorporation of all existing and future, tract map-level, geotechnical recommendations into grading and construction plans and specifications; this includes compliance with County subdivision specifications, County zoning and building code requirements, and the Project's Grading Plan, and the Specific Plan's Hillside Design Guidelines.[2258] All geotechnical recommendations found in the previously prepared and 2015 Geocon reports are standard engineering techniques, and the 2015 report has determined that Project development is feasible provided the seismic and other geotechnical constraints identified within the Project site's grading boundaries are addressed, via future, tract map-level geotechnical studies to be performed as part of Project implementation consistent with County and State building code requirements.[2259] The Project shall incorporate all applicable geotechnical recommendations identified in the geotechnical documents previously prepared for the Project, including those reviewed and compiled in the 2015 Geocon report,[2260] and those to be identified in the geotechnical reports for the Final Engineering and Grading Plans (which must incorporate the findings of all soils engineering and geologic studies) for individual tract maps and the associated final grading plans to be processed as the Project is implemented.[2261] Implementation of these requirements would ensure that impacts related to the proximity to active faults, including proximity to the San Andreas Earthquake Fault Zone, would be less than significant. With regard to the sufficiency of mitigation, see also responses to Comments F.8-208 and F.8-210.

Response to Comment F.8-208:

Potential geologic and seismic impacts of the Project are appropriately disclosed and assessed in Draft EIR Section 5.1 and in Geocon's 2015, site-specific *Preliminary Geologic Summary Report*, which is included in the Draft EIR as Appendix 5.1-A. With regard to geologic conditions on the Project site, the surficial and geologic units on site are described and analyzed, including previously placed fill, topsoil, alluvium, colluvium, shallow landslide debris, Older Alluvium, the Hungry Valley Formation, the Oso Canyon Formation, the Quail Lake Formation, and the Neenach Volcanic Formation.[2262] The approximate locations of the surficial and geologic units are also disclosed.[2263] These conditions were determined based on site reconnaissance, geologic field mapping by an engineering geologist, and subsurface excavations with small and large diameter boring and exploratory backhoe trenches; the trenches were used to identify geologic contacts, and observe and sample near-surface soil conditions.[2264] Small diameter borings were drilled in alluvium and deep colluvium to evaluate thickness, groundwater conditions and the in situ condition of geologic deposits, while large diameter borings were performed in proposed cut slopes to characterize structural or lithologic features that could potentially impact slope-stability.[2265] In August

[2258] *Id.,* page 5.1-15
[2259] *Ibid*.
[2260] *Id.,* Appendix 5.1-A
[2261] *Id.,* p. 5.1-16
[2262] *Id.,* pp. 5.1-6 to 5.1-9; *Id.,* Appendix 5.1-A, pp. 3-7
[2263] *Id.,* Appendix 5.1-A, Figures 3 to 11
[2264] *Id.,* Appendix 5.1-A, p. 1
[2265] Ibid.

2001 through June 2002, Geocon also subcontracted with Earth Consultants International (ECI) to perform a site-specific fault study that included a series of fault trenches. ECI prepared a comprehensive report addressing the presence of faults, impacts associated with faulting, age dating of on-site sediments, and delineating recommended fault setbacks where appropriate.[2266] This study has been included in the Draft EIR as Appendix E to Draft EIR Appendix 5.1-A, and the results of the study have been incorporated into Draft EIR Section 5.1. The location of faults and setback zones associated with active faulting identified within the grading limits for the Project are presented in Figures 2 through 11 in Draft EIR Appendix 5.1-A, and collected in Draft EIR Exhibit 5.1-2.

Based on the above-described analysis, the Draft EIR and Geocon report conclude the following with regard to each type of surficial and geologic unit present on the Project site:

A. Previously placed fill: Isolated areas of previously placed fill exist throughout portions of the site, are generally uncompacted, and are of a limited extent and thickness.[2267] Deposits are not suitable in their present condition for support of additional fill and/or structural loading, and will therefore require removal and recompaction in areas of planned development.[2268]

B. Topsoil (unmapped): A relatively thin blanket of topsoil covers natural hillsides on the site.[2269] The soils are compressible and not suitable for loading, and will therefore require removal and recompaction within areas of planned grading.[2270]

C. Alluvium: The alluvium on site is in canyons and low-lying areas, varies in thickness from approximately 4 to 65 feet, and generally becomes denser with depth.[2271] The top 5 to 15 feet are generally loose and not suitable for loading, while below 15 feet, the alluvium has low compressibility potential and relatively minor volume change characteristics upon saturation, making it appropriate for loading.[2272] The upper 15 feet will therefore generally need to be removed and recompacted prior to placing fill; this is based on preliminary site study, and further subsurface information and laboratory testing will be needed to provide more refined remedial grading recommendations for each relevant portion of the Project site.[2273]

D. Colluvium: This type of soil is present under gently to moderately inclined slopes and semicircular bowl-shaped areas near the heads of arroyos and canyon drainages on the Project site; it varies in thickness from approximately 3 feet to 50+ feet, with an anticipated average thickness of 15 to 20 feet.[2274] Colluvium is poorly consolidated, porous, has low moisture content, and is subject to collapse upon wetting and settlement from loading, and therefore partial to complete removal and recompaction

2266 Ibid.
2267 *Id.,* p. 5.1-7; *Id.,* Appendix 5.1-A, p. 3
2268 Ibid.
2269 *Id.,* p. 5.1-7; *Id.,* Appendix 5.1-A, p. 4
2270 Ibid.
2271 Ibid.
2272 Ibid.
2273 Ibid.
2274 *Ibid*.

will be required in areas of planned development.[2275] Additional subsurface information and laboratory testing will be needed to provide more refined remedial grading recommendations for each relevant portion of the Project site.[2276]

E. Landslide debris: A large, ancient landslide was encountered in the northwestern portion of the Oso Canyon area, covering approximately 1 mile in length, between 1,000 to 3,000 wide, and up to 200 feet thick.[2277] The landslide was mapped and partially delineated with exploratory trenches as well as a single, large-diameter boring.[2278] Previous mapping of the landslide suggests that its head was in granitic bedrock approximately 500 feet west of the Project site's western property line, and exploratory excavations and mapping indicate that the landslide failed within the adversely dipping claystones and shale of the Quail Lake Formation.[2279] The proposed Project entirely avoids this area, it is located within SEA No. 17, and it would be designated open space.[2280] Because there would be no development on or adjacent to this landslide, there would be no impact related to its presence.[2281] Another small, shallow landslide was mapped along a north-facing arroyo slope and several other small, shallow slumps and erosional sloughings were observed during on-site investigations along the more steeply eroded arroyos.[2282] The small landslide was mapped and partially delineated with exploratory trenches, and the others were not mapped because they do not exceed widths of 50 feet.[2283] Observations and exploratory excavations indicate these initially failed in permeable cohesionless gravelly sands of Older Alluvium.[2284] These landslides and small surficial slumps are not considered a potentially adverse impact, because they can be mitigated with standard remedial grading techniques, including removal and recompaction.[2285]

F. Older Alluvium: Older Aluvium terrace deposits cap the upper portions of mesas and ridges across the majority of the Project site and are one of the major deposits anticipated to be encountered during grading, at depths of approximately 8 to 74 feet.[2286] Except for surficial, weathered portions or thin interbedded clayey layers, the Older Alluvium displays high shear strength characteristics and low expansion potential, and given the in situ density of it, it is considered suitable for support of additional fill and/or structural loading.[2287] However, some localized layers consist of unconfined clean, gravelly sand that are subject to erosion and surficial landslides under heavy or perched groundwater conditions.[2288] Cohesionless zones encountered at finish grade may require undercutting and, if encountered in cut

2275 *Ibid*.
2276 *Id.,* Appendix 5.1-A, p. 4
2277 *Id.,* p. 5.1-7, Appendix 5.1-A, p. 5
2278 *Ibid*.
2279 *Id.,* p. 5.1-7
2280 *Ibid*.
2281 *Ibid*.
2282 *Id.,* p. 5.1-19
2283 *Id.,* p. 5.1-19; *Id.,* Appendix 5.1-A, p. 5
2284 *Ibid*.
2285 *Ibid*.
2286 *Id.,* page 5.1-8; Appendix 5.1-A, p. 5
2287 *Ibid*.
2288 *Ibid*.

slopes, may require slope stabilization to reduce the potential for slope erosion and shallow sloughage.[2289] When excavated and compacted, Older Alluvium should provide good capping material for lots and for outer slope zones of fill slopes.[2290]

G. Hungry Valley Formation: A relatively small exposure of the Hungry Valley Formation was encountered within the southwestern portion of the Project site. It has some bentonite clay seams, which can contribute to slope instability.[2291] However, the extent of it on the site is very small, and it is outside the development area of the Project, so there will be no impact.[2292]

H. Oso Canyon Formation: This formation was encountered at shallow depths in arroyos and lower slopes along the ridges and mesas in the southern and western portions of the site; it is expected to generate cut materials by proposed grading.[2293] Soil from this formation generally has very low expansion potential, high shear strength, and satisfactory foundation engineering characteristics in either a natural or properly compacted condition, and the formation on-site is considered suitable to support structural fill and/or loading in its present condition.[2294] Geotechnical investigations encountered strongly cemented zones up to 3 feet thick in this unit, and where encountered, excavations will likely require a very heavy effort with conventional heavy-duty grading equipment and/or localized breaking or possible blasting; Once ripped or broken up, large rock fragments will be generated that will require special placement procedures and compaction when placed in fills.[2295]

I. Quail Lake Formation: This formation is present in the western-most quadrant of the Project site, and several dipping bedding plane shears or remolded clay seams were encountered within large-diameter exploratory borings; these bedding plane shears are significant because they represent planes of weakness and when exposed in cut slopes can lead to slope instability.[2296] Some portions of the formation also have intersecting sets of clay-lined joints that could impact surficial slope stability.[2297] Expansion testing on the formation indicates a variable range of expansion indices from low to high, and highly expansive clay exposed at finish grade will require remedial grading to provide a select low expansive soil cap.[2298]

J. Neenach Volcanic Formation: A small exposure of this unit was mapped in the southeastern portion of the site.[2299] Additional subsurface work should be performed to evaluate the degree of weathering and rippability characteristics of this unit.[2300]

2289 *Id.,* Appendix 5.1-A, p. 5
2290 *Id.,* p. 6
2291 *Id.,* p. 5.1-8; *Id.,* Appendix 5.1-A, p. 6
2292 *Ibid*.
2293 *Ibid*.
2294 *Ibid*.
2295 *Ibid*.
2296 *Id.,* p. 5.1-9; *Id.,* Appendix 5.1-A, p. 6
2297 *Id.,* p. 5.1-9; *Id.,* Appendix 5.1-A, p. 7
2298 *Ibid*.
2299 *Id.,* p. 5.1-9
2300 *Id.,* Appendix 5.1-A, p. 7

Following this thorough analysis of site conditions and recommendations to ensure less than significant impacts, Geocon's report concludes that "Based on our study, we conclude that no soil or geologic conditions were encountered that would preclude development of the proposed grading and improvements provided the adverse geotechnical conditions identified herein are mitigated. Additional site-specific geotechnical studies should be performed during planning and/or preparation of tentative maps and grading plans".[2301] The information in the Geocon report appropriately documents the feasibility of site development and the geotechnical hazards that are present, as needed to evaluate the thresholds for geology and soils presented in Appendix G of the State CEQA Guidelines.

Coupled with the incorporation of the Geocon recommendations, discussion of the Project's required compliance with State and County requirements that would ensure the reduction of impacts to a less than significant level is an appropriate approach under CEQA. State and County requirements have been crafted over many years of experience in addressing geologic hazards and risk, and have been exhaustively updated based on past experience with seismic activity throughout California and in Los Angeles County. The Project will be subject to and comply with these exhaustive requirements. First, the Project is subject to the requirements of the Alquist-Priolo Act of 1972, which is "intended to provide policies and criteria to assist cities, counties, and state agencies in the exercise of their responsibility to prohibit the location of developments and structures for human occupancy across the trace of active faults" for any project located within a delineated earthquake fault zone.[2302] The Project must also be consistent with the Seismic Hazards Mapping Act[2303] of 1990, which directs the State Department of Conservation to identify and map areas subject to hazards in order to "assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes."[2304] The proposed Project complies with the Alquist-Priolo Act of 1972 and the Seismic Hazards Mapping Act by preventing the construction of any structures used for human occupancy within designated Alquist-Priolo Earthquake Fault Zones and around the unnamed faults that were identified on the site as part of the Project's site-specific geotechnical investigations.[2305] Per PDF 5.1, the Project's Geologic Safety Zone would institute a minimum 100-foot setback (i.e., 100 feet in each direction) from the fault lines that traverse any development area; the width of the setback may potentially be reduced to 50 feet (in each direction), with the approval of the county, provided there is no evidence of fault activity from further trenching to be performed as part of an additional fault investigation during the site development process.[2306] The required setback and potential reduction to a distance of 50 feet is consistent with the requirements of the Alquist-Priolo Act, for which the setback is generally 50 feet.

The California Department of Education has also promulgated standards for school siting and construction in the California Code of Regulations[2307] with which the Project must

[2301] *Id.,* Appendix 5.1-A, p. 13
[2302] California Public Resources Code (PRC) § 2621.5(a),(b)
[2303] *Id.,* Chapter 7.8, §§ 2690-2699.6
[2304] PRC § 2692(a)
[2305] DRP 2017, pp. 5.1-13 and -14
[2306] *Id.,* p. 5.1-14
[2307] CCR, Title 5, Article 1

comply.[2308] These standards are implemented by individual school districts, and describe detailed procedures and requirements for school siting and land acquisition; development and approval of plans and specifications; and goals for the operation and maintenance of schools.[2309] Section 14004(f) of Title 5 requires that planned educational facilities are "designed to meet Federal, State and local statutory requirements for structure, fire, and public safety", and Section 14011(g) requires compliance with Section 17212 and 17212.5 of the California Education Code, which describe standards for the "geological and soils engineering studies" that are required before acquiring any school site and constructing any school building within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan.[2310] The studies must be conducted by competent personnel and "shall be of a nature as will preclude siting of a school in any location where the geological and site characteristics are such that the construction effort required to make the school building safe for occupancy is economically unfeasible."[2311] The Department of General Services may also require similar studies for the construction or alteration of any school building on a site located outside of the boundaries of any special studies zone.[2312] Further, no school building shall be constructed, reconstructed, or relocated on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building.[2313] Mandatory Project compliance with these requirements will ensure that no schools would be inappropriately located, and impacts would be less than significant.[2314]

The County of Los Angeles Building Code (County Building Code) is promulgated under Title 26 of the Los Angeles County Code, and it incorporates and adopts by reference both the 2016 California Building Code and the 2015 International Building Code. The County Building Code contains extensive and specific requirements for construction in areas that present seismic risks, which would apply to the Project. With regard to hazard study and evaluation of a project's suitability for a site, County Building Code Chapter 1, Section 110.2, "Geotechnical Hazards", restricts building and grading activities in areas where geotechnical hazards of landslide, settlement, and slippage may be activated or increased as a result of project activities. The Project Applicant will be required to submit an Engineering Geology and/or Soils Engineering report to indicate how the hazard will be eliminated or mitigated prior to the use or occupancy of the relevant portions of the Project site.[2315] Per Chapter 1, Section 111, the reports must be prepared by a California-certified engineering geologist or California-licensed civil engineer, respectively, and must contain a finding regarding the safety of the site and the proposed work against a landslide, settlement, or slippage and a finding regarding the effect that the proposed work would have on the geotechnical stability of the area outside the proposed work.[2316] With regard to structural safety, County Building Code Chapter 16, Structural Design, describes requirements for construction of structures

[2308] DRP 2017, p. 5.1-4
[2309] *Ibid*.
[2310] *Ibid*; California Education Code § 17212
[2311] *Ibid*.
[2312] California Education Code § 17212.5
[2313] *Ibid*.
[2314] DRP 2017, pp. 5.1-16 and -17
[2315] *Id.,* p. 5.1-4
[2316] *Id.,* pp. 5.1-4 and -5

based on earthquake loads, including modifications to requirements defined in ASCE 71/2016 CBC Section 1613 related to Seismic Design Categories (formerly Seismic Zones) to reflect County conditions. The Seismic Design Categories consider building location, building use, and underlying soil conditions while Seismic Zones considered only building location. These County-specific building requirements are in addition to all other requirements of the 2016 California Building Code.[2317] County Building Code Chapter 17, Structural Tests and Special Inspections, requires an applicant to "submit a statement of special inspections prepared by the registered design professional in responsible charge in accordance with Section 106.4.2, as a condition for permit issuance" when specified seismic conditions are met. Section 1709 includes requirements for use of the registered design professional responsible for the structural design, or another registered design professional, to perform structural observations for those buildings included in particular Seismic Design Categories.[2318] Further, slope stabilization for the Project will comply with Title 26 of the Los Angeles County Building Code, Appendix Chapter 33, Excavation and Grading, and Appendix J, Section J110, Slope Planting and Erosion Control.

The Los Angeles County General Plan and the AVAP also include goals and policies that address geotechnical issues in the unincorporated County areas. Applicable AVAP policies PS 2.1 and 2.2 limit the amount of potential development in Seismic Zones and along the San Andreas Fault and other fault traces, and on steep slopes and landslide and liquefaction areas.[2319] Policy PS 2.3 prohibits the construction of new structures on or across a fault trace, and the intent of Policy PS 2.3 is to ensure that new development does not cause or contribute to slope instability.[2320] The Project is consistent with these AVAP policies because it incorporates a Geologic Safety Zone into the Project and will follow Project-specific plans, County building code requirements, and other recommendations.[2321] The majority of the Project site has slopes less than 25 percent (outside HMAs) and the areas with the greatest slopes would be preserved as open space, including the areas with potential landslide and liquefaction hazards in the northwestern corner of the site, as depicted in Draft EIR Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.[2322] Project development would require grading of some sloped areas, as well as cutting and filling of some slope areas. Slopes would not be graded at angles steeper than a 2:1 ratio (horizontal to vertical), in accordance with the Project's Conceptual Grading Plan, County building code requirements, and other grading-related recommendations of the geotechnical reports to prepared for each tract map, and contained in the preliminary geotechnical report included in the Draft EIR as Appendix 5.1-A.

The First District Court of Appeal addressed appropriate reliance on compliance with regulatory requirements and the incorporation of suggested measures included in preliminary geotechnical investigations in *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884. In *Oakland Heritage Alliance*, a local organization ("the Alliance")

2317 *Id.,* p. 5.1-5
2318 *Ibid*.
2319 *Id.,* p. 5.1-6
2320 *Ibid*.
2321 *Id.,* p. 5.8-60
2322 *Id.,* p. 5.8-61

challenged an EIR prepared for the development of approximately 64 acres in Oakland, where the EIR identified potential seismic hazards because the site was in close proximity to the Hayward Fault Zone, San Andreas Fault Zone, and other faults capable of producing significant ground shaking at the project site.[2323] The trial court granted the Alliance's petition for writ of mandate, finding among other things that the original EIR's discussion of the project's seismic risks was inadequate, whereupon the City revised the EIR and certified it as revised.[2324] The City moved the trial court for an order discharging the writ and terminating the suspension of the project approvals, which the court granted, concluding that "the EIR as revised did not improperly defer mitigation of seismic effects, finding 'the statutory scheme described in the Revised EIR – designed to address the evaluation and mitigation earthquake-related impacts – does provide a sufficient standard of performance under CEQA. Further, the Revised EIR commits the city to mediation of seismic impacts by compliance with this statutory scheme (and other specified requirements stated in the mitigation measures), and thus the Revised EIR does not improperly defer mitigation in violation of CEQA." The court also found that substantial evidence supported the City's finding that the mitigation would reduce seismic impacts to a less than significant level."[2325]

The Alliance challenged the trial court's decision on appeal, but the First District upheld the order discharging the writ, explaining that a less than significant impact does not necessarily mean no impact at all, and that the Revised EIR appropriately concluded, after an extensive discussion of local and state requirements and a preliminary geotechnical report, that state and local code requirements would ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse resulting in a potential for injury or death.[2326] The court also held that the EIR appropriately noted that site-specific investigations would be required before final project design, and remedial methods adjusted as necessary, and that the standard engineering approaches, accepted by the geotechnical engineering community and implemented in communities all over California, that were preliminarily suggested in the EIR, provided substantial evidence that impacts would be reduced to a less than significant level.[2327] Further, the court held that there was no improperly deferred mitigation where the EIR and geotechnical investigation provided evidence that mitigation is feasible and discussed a range of mitigation strategies, all of which were standard, professionally accepted engineering practices, and where the EIR discussed required compliance with all geotechnical recommendations in future site-specific investigation reports and with described, mandatory state and local requirements.[2328] As the court concluded, "the Revised EIR proposes compliance with a regulatory scheme designed to ensure seismic safety. Although final design of the structures, including seismic safety design, is deferred until a later date, the Revised EIR gives adequate assurance that seismic

[2323] Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th at 888
[2324] *Id.,* at 887
[2325] *Id.,* at 895
[2326] *Id.,* at 899-900, 905
[2327] *Id.,* at 903-904
[2328] *Id.,* at 910-911

impacts will be mitigated through engineering methods known to be feasible and effective."[2329]

Analysis and discussion in the Draft EIR is consistent with the above-described approach upheld as appropriate under CEQA in *Oakland Heritage Alliance*. The Draft EIR appropriately concludes that compliance with statutes, regulations, and local ordinances, whose requirements are described above in this response, combined with implementation of recommended measures in the Geocon report and the future performance of further site-specific investigations to identify more specific site conditions and mitigation requirements, would ensure that impacts are less than significant under all geology and soil thresholds presented in Appendix G of the State CEQA Guidelines. This is standard practice and does not represent deferment of action with regard to geotechnical hazards on the site. Further, because adherence to statutes, regulations, and ordinances is already mandatory, incorporating them as mitigation measures is unnecessary and not required under CEQA. The approach taken in the Draft EIR analysis does not constitute a failure to evaluate potential impacts by merely promising compliance without meaningful analysis. Rather, this conclusion is appropriately based on expert documentation and interpretation of the facts regarding geologic conditions documented on the site and discussed above, expert understanding of the extent to which compliance with State and County requirements will mitigate impacts on the Project site, and expert assurance that seismic impacts will be mitigated through engineering methods known to be feasible and effective. The Draft EIR complies with CEQA requirements for geotechnical analysis, and no further analysis is required at this time.

Response to Comment F.8-209:

The Project has been designed such that it can accommodate sensitive land uses within its planned development area, including with regard to seismic hazards. First, Project development is concentrated away from environmentally sensitive areas. Project development entirely avoids major identified hazard areas including the ancient landslide in the northwest portion of the Project site and the Geologic Safety Zone established under PDF 1-1.[2330] Project areas with the greatest slopes are preserved as Open Space, including areas with potential landslide and liquefaction hazards as depicted in Draft EIR Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.[2331] The Project has also been designed such that at least 50 percent of the development footprint is located on the flattest portions of the site (i.e., those areas having slopes of less than 25 percent) when that area does not contain rare, sensitive, or State or federally listed threatened or endangered species.[2332]

The Draft EIR also appropriately considers and discusses siting requirements for schools and other sensitive uses that would ensure impacts are less than significant. As discussed in the Draft EIR, the California Department of Education has promulgated standards for school siting and construction in the California Code of Regulations[2333] with which the Project must

[2329] *Id.,* at 912
[2330] DRP 2017, Exhibit 5.1-2 and p. 5.1-13
[2331] *Id.,* p. 5.8-61
[2332] *Id.,* Appendix 1-B of Appendix 4.0-A, p. 1
[2333] *CCR,* Title 5, Article 1

comply.[2334] These standards are implemented by individual school districts, and describe detailed procedures and requirements for school siting and land acquisition; development and approval of plans and specifications; and goals for the operation and maintenance of schools.[2335] Section 14004(f) of Title 5 requires that planned educational facilities are "designed to meet Federal, State and local statutory requirements for structure, fire, and public safety", and Section 14011(g) requires compliance with Section 17212 and 17212.5 of the California Education Code, which describe standards for the "geological and soils engineering studies" that are required before acquiring any school site and constructing any school building within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan.[2336] The studies must be conducted by competent personnel and "shall be of a nature as will preclude siting of a school in any location where the geological and site characteristics are such that the construction effort required to make the school building safe for occupancy is economically unfeasible."[2337] The Department of General Services may also require similar studies for the construction or alteration of any school building on a site located outside of the boundaries of any special studies zone.[2338] Further, no school building shall be constructed, reconstructed, or relocated on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building.[2339] Hospitals are also required to reflect seismic safety concerns in their location decisions and building designs, pursuant to building code requirements.[2340] Mandatory Project compliance with these requirements will ensure that no schools or hospitals would be inappropriately located, and impacts would be less than significant.[2341] As discussed in response to Comment F.8-208, the analysis in Draft EIR Section 5.1 describes the additional geotechnical studies, and associated engineering measures to alleviate identified geotechnical conditions, that would be required pursuant to State and County codes. This is standard practice and does not represent deferment of action with regard to geotechnical hazards on the site. For further discussion, please also see response to Comment F.8-208.

Response to Comment F.8-210:

The potential for seismically-induced (i.e., earthquake-triggered) landslides is fully addressed in the *Preliminary Geologic Summary Report,*[2342] which was prepared by a California-Certified Engineering Geologist and a Registered Geotechnical Engineer, and was the basis for the analysis in Draft EIR Section 5.1. The report summarizes soil and geologic conditions within the Project site, presents compiled subsurface data from previous site-specific geotechnical studies, discusses site-specific geologic hazards, and provides recommendations for reducing impacts and for the preparation of future site-specific studies

2334 DRP 2017, p. 5.1-4
2335 *Ibid*.
2336 *Ibid*; California Education Code § 17212
2337 *Ibid*.
2338 California Education Code § 17212.5
2339 *Ibid*.
2340 DRP 2017, p. 5.1-16
2341 *Id.,* pp. 5.1-16, -17
2342 *Id.,* Appendix 5.1-A

during the preparation of tentative maps and grading plans.[2343] The report and Draft EIR conclusions regarding risk of landslides are based on expert interpretation of the facts regarding geologic conditions documented on the site.

As discussed in response to Comment F.8-208, the geologic units underlying the site, including their characteristics and constraints, including related to slope stability, are described in the Draft EIR. The Quail Lake Formation is identified in the geotechnical studies as having "dipping bedding plane shears". Bedding planes are the planes of division that separate successive layers of a stratified (i.e., layered) rock; dipping planes are tilted, or angled, relative to a horizontal ground surface; and shears are a type of rock deformation resulting from stresses that cause the portion of a rock body on one side of a plane to slide past the portion of the opposite side. As disclosed in the Draft EIR, these bedding plane shears are significant because they represent planes of weakness and when exposed in cut slopes can lead to slope instability.[2344] Also, the Draft EIR discloses that the large landslide in the northwest portion of the Project site failed within the adversely dipping claystones and shale of the Quail Lake Formation.[2345] To be "adversely" dipping refers to the angle of a geologic unit being in the opposite direction, such as to a slope (either engineered or natural) or movement of a landslide. The dips of existing geologic units, and whether there are shears and/or clay layers/joints in the units, are the types of observations made by geologists precisely because they can affect slope stability in the absence of appropriate engineering measures. These are not unusual characteristics of geologic units, nor do they represent characteristics that prevent land use development. This is supported by the conclusion of Geocon's report that "Based on our study, we conclude that no soil or geologic conditions were encountered that would preclude development of the proposed grading and improvements provided the adverse geotechnical conditions identified herein are mitigated. Additional site-specific geotechnical studies should be performed during planning and/or preparation of tentative maps and grading plans".[2346]

With regard to the large, ancient landslide identified in the northwest portion of the Project site, the Commenter is correct that the greatest slopes would be preserved as open space, including the areas with potential landslide and liquefaction hazards in the northwestern corner of the site, as depicted in Draft EIR Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.[2347] The statement that evidence of the ancient landslide indicates susceptibility to similar events in the Project area is an unsubstantiated opinion that is not based on facts or reasonable assumptions. As stated in Section 21082.2(a) of the *Public Resources Code*, the determination of a significant environmental impact shall be based on "substantial evidence in light of the whole record". Section 21082.2(c) states that "Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous…is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The Draft EIR, including the geotechnical report and its appendices, therefore rely on substantial evidence

[2343] *Id.,* p. 1-14
[2344] *Id.,* p. 5.1-9; *Id.,* Appendix 5.1-A, p. 6
[2345] *Id.,* p. 5.1-7
[2346] *Id.,* Appendix 5.1-A, p. 13
[2347] *Id.,* p. 5.8-61

demonstrating that the ancient landslide bears no relation to the potential for "similar large landsliding events" in the remainder of the Project area.

Response to Comment F.8-211:

With regard to on-site risks from the steeper topography in the western portion of the Project site and the steep arroyos, such risk was thoroughly evaluated and addressed in the Draft EIR. First, geological conditions in the applicable areas were studied. Large diameter borings were performed in proposed cut slopes to characterize structural or lithologic features that could potentially impact slope-stability.[2348] The Project has been designed to be consistent with AVAP Policy PS 2.2, which is to "Limit the amount of development on steeps slopes (Hillside Management Areas) and within landslide and liquefaction areas…" As discussed in the Draft EIR, the majority of the Project site has slopes less than 25 percent and is therefore outside of a Hillside Management Area. The Specific Plan includes Figure 3-19, Preliminary Slope Analysis, which indicates that the majority of the Project's development area has slopes less than 15 percent or 25 percent.[2349] This is because the Project has been designed such that the areas with the greatest slopes would be preserved as open space, including the areas with potential landslide and liquefaction hazards in the northwestern corner of the site, as depicted in Draft EIR Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.[2350]

Based on the preliminary slope analysis, approximately 26 percent of slopes greater than 25 percent will be affected by grading and many of those slope areas are small and isolated.[2351] To ensure that these steeply sloped areas within the Project's development area would have stable slopes and building pads at buildout, future subdivision maps will define the precise scope of grading for each development phase in the Project site, and such maps will be consistent with the intent, goals, and guidelines provided in the Centennial Specific Plan's Hillside Design Guidelines, included in the Draft EIR as Appendix 1-B to the Specific Plan, which is Draft EIR Appendix 4.0-A. Areas that will graded for development have been identified on the Conceptual Grading Plan shown at Specific Plan Figure 3-20 – it depicts the general grading approach for the topography of the Project site and has been designed to eliminate the potential safety threat posed by development in areas with steep slopes.[2352] A more precise analysis of slopes for each relevant area will be prepared with each tract map submittal. Slope stabilization shall also conform to Title 26 of the Los Angeles County Building Code, Appendix Chapter 33, Excavation and Grading and Appendix J, Section 110, Slope Planting and Erosion Control.[2353] Project construction will also comply with a wide range of local and state requirements, suggestions in the Project preliminary geotechnical report, and suggestions in future, more specific geotechnical report to ensure that impacts are less than significant, as more thoroughly discussed in response to Comment F.8-208.

[2348] *Id.,* Appendix 5.1-A, p. 1
[2349] *Id.,* Appendix 4.0-A, p. 3-17
[2350] *Id.,* p. 5.8-61
[2351] *Id.,* Appendix 4.0-A, p. 3-26
[2352] *Ibid*.
[2353] *Ibid*.

With regard to the documentation regarding the landslides triggered by the 1994 Northridge earthquake, those events bear no relation to risk on the Project site because the Northridge area (i.e., the earthquake epicenter) is situated approximately 50 miles to the south of the Project site and has a different geotechnical context. Specifically, the risk of landslides is based on both (1) topography and native geologic conditions and (2) engineered treatments of developed areas. Existing topography and geologic conditions on the Project, as they relate to landslide risk is fully addressed in the geotechnical studies of the site and disclosed in the Draft EIR, as discussed in the paragraphs above.

The referenced U.S. Geological Survey (USGS) study by Harp and Jibson states in its abstract that the 11,000 earthquakes cited in this comment occurred over an area of "about 10,000 km^2", or approximately 3,861 mi^2. For context, the County of Los Angeles is 4,751 mi^2, meaning the area of the USGS study encompassed an area equivalent to over 80 percent of the County. In the event of a strong (magnitude [M]6-6.9) or major (M 7-7.9) earthquake on any of the regional active faults in southern California, such as the M6.7 Northridge earthquake in 1994, widespread damage and even fatalities over a very large area would be anticipated. This is in part due to the varying levels of earthquake-resistant engineering and construction techniques present in the structures of any existing, large, metropolitan area in southern California, as well as the highly varied topography and underlying geologic conditions. The Draft EIR does not purport there would be no damage to the proposed Centennial Project in the event of an earthquake. The Draft EIR asserts it is feasible to design and construct the proposed uses on the Project site, consistent with State and local code requirements, such that although there may be damage to structures there would be a less than significant impact related to the potential for injury and death due to this damage, including reducing the risk of collapse. This conclusion is based on substantial evidence in the record, and expert opinion based on this evidence.

The USGS study abstract also states that "most of the landslides were concentrated in a 1,000-km^2 area that includes the Santa Susana Mountains and the mountains north of the Santa Clara River valley." Further, the study states "Most of the triggered landslides were shallow (1-5 m)…". In other words, most of the landslides were within an area occupying 10 percent of the area reviewed, this area included mountainous regions, and that most landslides were shallow. These statements correlate with the risk of landslides being highly correlated with topography; in a mountainous area there are steep slopes and these slopes are in a natural condition, as such there is a high risk of seismically-induced landslides compared to an area with rolling or relatively level topography and/or areas with engineered slopes. The Project's development footprint does not include steep slopes such as would be found in mountainous areas; further, the development footprint would include engineered slopes of less than a 2:1 ratio, which must be proven to be adequately stable in the supporting geotechnical studies required by State and local codes. For all of these reasons, referencing the number of landslides in an area almost the size of Los Angeles County, with highly varied topography and both developed and undeveloped areas, with the seismic risk on the Project site is a false equivalency and is not substantiated with facts.

With regard to the potential risk on the Project site because of its location within 25 miles of 8 dominant faults, as discussed in response to Comment F.8-207, because of the extremely

high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to more or less risk of a seismic event and the magnitude of the event in a certain area.

The Draft EIR has adequately evaluated the risk posed by potential earthquake-triggered landslides. This comment does not represent expert opinion or other facts that supplant the findings of site-specific geotechnical studies. The potential for seismically-induced (i.e., earthquake-triggered) landslides is fully addressed in Draft EIR Appendix 5.1-A, which was prepared by a California-Certified Engineering Geologist and a Registered Geotechnical Engineer, and was the basis for the analysis in Draft EIR Section 5.1. Please also refer to response to Comment F.8-210.

Response to Comment F.8-212:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment expresses an opinion about and does not address or question the content of the Draft EIR, and no further response is required. The following information summarizes the analysis of water supplies in the Draft EIR.

The Project's water supplies are discussed in Section 5.18, Water Resources. As discussed on Draft EIR pages 5.18-2 and 5.18-51 to 5.18-67, and as summarized in Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years, the Project will utilize several water supplies and on- and off-site water banking facilities to meet potable demand. Available supplies include groundwater and imported water return flows in accordance with the approved Antelope Valley Basin Adjudication Judgment and Physical Solution; State Water Project (SWP) supplies secured for Project use and imported to the site under an agreement with the Antelope Valley – East Kern Water Agency (AVEK); and AVEK service area deliveries. Indoor wastewater will be conveyed to one of two Project on-site treatment facilities; will be treated to State unrestricted reuse standards; and will be distributed to meet approximately 40 percent of buildout water demand. The Project's water supplies will sustainably meet buildout potable and recycled water demands and will maintain an average annual reserve supply of more than 79,000 acre-feet, or more than 11 years of full-buildout potable water demand, after buildout has been achieved. The analysis of the Project's water supplies is consistent with and based on the most current projections prepared by state and regional public agencies with specific expertise and responsibility for analyzing water supplies, including imported and ground water, under applicable laws, regulations and policies. The Project's use of recycled water is consistent with state and regional policies, rules and regulations that encourage the use of recycled water to reduce demand for potable water supplies.

As discussed on pages 5.18-27 to 5.18-28, and as shown in Draft EIR Appendix 5.18-C, the analysis of the project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns and operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver

to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative Early Long Term (ELT) delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise.

The analysis of project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current Urban Water Management Plan[2354] prepared and adopted in accordance with California Water Code Section 10610 et seq. (the "Urban Water Management Planning Act"). The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors in California, is the largest SWP water importer in the Antelope Valley basin and will import all of the SWP system supplies that the Project will use. As discussed on Draft EIR page 5.18-24, the UWMP includes the projected delivery of 4,000 acre-feet per year (afy) of SWP water to the Tejon Ranch Company, all of which will be used for the Project. In addition, as discussed on Draft EIR pages 5.18-62 and 5.18-63, AVEK will also import SWP water transferred from the Tulare Lake Basin Water Storage District (1,451 afy) and the Dudley Ridge Water District (1,993 afy) to the Tejon Ranch Company. The transfer agreements are included in Appendices L and K of Draft EIR Appendix 5.18-A, and the agreement with AVEK to import the transferred water supplies is included in Draft EIR Appendix 5.18-E. The projected water deliveries to the Tejon Ranch Company in the UWMP and the SWP transfer water imported by agreement with AVEK are analyzed by using the same methodology in the AVEK UWMP for SWP delivery reliability. The UWMP utilizes the current DCR, which the UWMP states is a "biennial report to assist SWP contractors and local planners in assessing the near and long-term availability of supplies from the SWP [and] provides SWP supply estimates for SWP contractors to use in their planning efforts".[2355] The AVEK UWMP considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2356] In addition, the UWMP used a single dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The UWMP analyzed multiple drought year water supplies based on the ELT projections for 1990 to 1992 of 12, 16, and 24 percent of AVEK's Table A amounts, which the UWMP states is the "worst case" 3-year period in the ELT scenario, and which results in an average annual delivery of 17 percent of AVEK's contracted SWP amounts during the drought period. The lowest Table A deliveries of water from the SWP during the most recent drought period, (2013 to 2015) were 35 percent, 5 percent, and 20 percent respectively,

2354 DRP 2017, Appendix 5.18-F
2355 *Id.,* Appendix 5.18-F, p. 6-1
2356 *Ibid*.

which results in an average of 20 percent. The ELT scenario considered in the UWMP uses an average delivery level that is lower than the lowest average 3-year delivery level that occurred during the most recent California drought even with the historically low delivery of 5 percent of SWP contract amounts in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario.

In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2357] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single dry year SWP amount of 5 percent, which was implemented for the Project analysis.[2358]

All Project use of groundwater, imported water return flow production, and water banking will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2359] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin. Section 1.5 of the Adjudication Judgment and Physical Solution states that after the Phase 3 trial of the proceedings, the Court determined that the safe yield of the Antelope Valley Basin is 110,000 acre-feet per year. Section 3.5.43 of the Adjudication Judgment and Physical Solution defines safe yield to mean the amount of annual extractions of water from the Basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Section 3.4 of the Adjudication Judgment and Physical Solution states that the physical solution governs groundwater, imported water and Antelope Valley Basin storage space to ensure that the Antelope Valley Basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield and provides that, after a 7-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634-acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the post-rampdown amount of the overlying production right of 1,634-acre feet per year allocated to Tejon Ranch Company in the Adjudication Judgment and Physical Solution. The volume of imported water return flows that will be used by the Project is derived directly from the Adjudication Judgment and Physical Solution, which provides that imported water used to meet urban demand in the Antelope Valley Basin may be recovered by the importing party in an amount equal to 39

[2357] *Id.,* Appendix 5.18-G
[2358] *Id.,* Appendix 5.18-G, p. 18
[2359] *Id.,* Appendix 5.18-D

percent of the average imported water use over the prior 5 years. As discussed on Draft EIR page 5.18-64, the analysis of return flow supplies in the Draft EIR is conservative because the Adjudication Judgment and Physical Solution allows for the additional production of return flows generated by urban imported water use in the Antelope Valley watershed as well as in the Basin with Watermaster approval. The Project water supplies discussed in the Draft EIR do not include potential return flows supplies for watershed urban use because these have not yet been approved by the Watermaster. The Adjudication Judgment and Physical Solution includes the continued operation of the existing water bank operated by the Tejon Ranch Company and Tejon RanchCorp, and the proposed onsite water bank will be operated in accordance with the Adjudication Judgment and Physical Solution with the approval of the Watermaster.[2360]

The fact that the Adjudication Judgment and Physical Solution, including the annual groundwater allocation to the Tejon Ranch Company, takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts, and ensures that groundwater use will be sustainable over time.

The Project water supply analysis is also consistent with the analysis methodologies used in the current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site. Although the Project is not within the service area of and will not receive any water from the County Waterworks District 40, the District has the responsibility and expertise for projecting the reliability of Antelope Valley water supplies, and the District's analysis of these supplies uses substantially the same methodology as the Project analysis. The District's UWMP includes: (a) SWP imports based on the AVEK UWMP reliability factors discussed above; (b) groundwater use and imported water return flows allocated to the District under the Adjudication Judgment and Physical Solution; and (c) extensive use of water banking, including dry year recoveries from District water banked in wetter years ranging from 25,300 to 70,525 acre afy in drier years. Based on these supplies, the Los Angeles County Waterworks District 40 UWMP concludes that District has adequate water supplies to meet projected demands in all types of water years, including normal or average, single-dry, and multiple-dry year droughts.[2361]

2360 *Id.,* pp. 5.18-52 and -53

2361 County of Los Angeles Department of Public Works (DPW). 2017 (February 2). Final 2015 Urban Water Management Plan for District 40 (p. ES-3). Alhambra, CA: DPW. https://dpw.lacounty.gov/wwd/web/Documents/2015%20Integrated%20Urban%20Water%20Management%20Plan%20for%20the%20Antelope%20Valley.pdf.

Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[2362] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

As discussed on Draft EIR page 5.18-67, at buildout, approximately 4,577 afy of recycled water will be used to meet 40 percent of total Project water demand. This level of recycled water use is significantly above the average and per capita recycled water use in the Antelope Valley and furthers the objectives of the State of California in substituting recycled water for potable water throughout the state. As discussed on Draft EIR page 5.18-12, the California recycled water use policy adopted in 2009 by the State Water Resources Control Board (SWRCB) (Resolution No. 2009-0011) states that, "In the face of an unprecedented water crisis due to the collapse of the Bay-Delta ecosystem, climate change, continuing population growth combined with a severe drought on the Colorado River and failing levees in the Delta, the SWRCB has adopted a Recycled Water Policy in an effort to move aggressively towards a sustainable water future" by declaring "our independence from relying on the vagaries of annual precipitation and move towards sustainable management of surface waters and groundwater, together with enhanced water conservation, water reuse and the use of stormwater." The Project's proposed recycled water use is consistent with the state Recycled Water Policy and results in the significant use of recycled water generated from onsite

[2362] DRP 2017, Appendix 5.18-C

wastewater reclamation facilities (WRFs) and treated to California Code of Regulations Title 22 unrestricted reuse standards. Potential impacts from the operation of the WRFs are discussed in Draft EIR Sections 5.18 and 5.19 and on Draft EIR pages 5.4-73 and 5.4-74. The WRFs must comply with Title 22 of the *California Code of Regulations,* the California Porter-Cologne Act, and the Lahontan Basin Plan's surface and groundwater quality objectives. Waste Discharge Requirements (WDRs) issued by the Lahontan Regional Water Quality Control Board will require the Project to include design features, such as berms, levees, spill containment features, and other topographical elevation features, to protect the WRFs during large flood events and to protect adjacent properties under any emergency conditions. As shown on Exhibit 4-14 in the Draft EIR, there are no sewer pipelines or force mainlines that would cross over the State Water Project (SWP) Aqueduct; therefore, there is no risk of sewer line rupture over the SWP Aqueduct. As requested by the Lahontan Regional Water Quality Control Board, response to Comment D.3-14 addresses the Antelope Valley Salt and Nutrient Plan adopted in conformance with the state Recycled Water Policy. In response to Comment D.3-14, the following text has been added after the fourth paragraph on page 5.4-70 of the Draft EIR:

> A Salt and Nutrient Management Plan (SNMP) was developed for the Antelope Valley Groundwater Basin in May 2014. The baseline water quality analyses for the Antelope Valley Groundwater Basin included in the SNMP indicates that overall groundwater quality with respect to the SNMP constituents of concern is below the SNMP water quality management goals. These goals are consistent with the Regional Board's Basin Plan to protect the beneficial uses of the water. The analysis of future water quality (through 2035) indicates slowly increasing trends in the overall basin groundwater salt and nutrient quality that will remain below the SNMP water quality management goals. Therefore, no new implementation measures as part of the SNMP process are recommended at this time. Nevertheless, existing measures or practices are already in place to manage water quality, and frequent monitoring is recommended to assess trends in water quality.
>
> The SNMP developed for the Antelope Valley Groundwater Basin in May 2014 proposes a monitoring plan to track the water quality in the basin. Results will be used to determine whether the concentrations of salt and nutrients over time are consistent with the SNMP predictions and the applicable SNMP water quality management goals. The monitoring program includes 32 municipal water supply wells that are currently monitored by the California Department of Public Health. The results from these existing monitoring programs will be downloaded from the State Board's Geotracker Groundwater Ambient Monitoring and Assessment (GAMA) database and included in the monitoring report prepared by the SNMP stakeholders or the appointed Antelope Valley Groundwater Basin Watermaster, if applicable. Imported, recycled, and treated potable water supply to the region will also be monitored and results included in the report. The Project must comply with all applicable requirements of the SNMP, including the identification or installation of appropriate groundwater monitoring wells in consultation with the SNMP

stakeholders or the appointed Antelope Valley Groundwater Basin Watermaster, if applicable, to supplement the Antelope Valley SNMP monitoring program as necessary to implement the SNMP monitoring program in the Project area.

Salt and nutrient management implementation measures that are incorporated into the Project include:

- Municipal wastewater management. The proposed wastewater reclamation facilities (WRFs) s will incorporate tertiary treatment processes that include nitrification-denitrification treatment processes to control nitrate concentration in the effluent and recycled water. The WRFs will use ultraviolet light (UV) disinfection to reduce chloride concentrations as opposed to chlorination disinfection processes, consistent with the Lahontan RWQCB and Title 22 requirements (see MM 19-2).

- Industrial waste management. The WRFs will implement industrial waste management measures (i.e., pretreatment program, educational outreach, and coordination with customers).

- Recycled water irrigation management. The implementation of recycled water is regulated by the Title 22 California Code of Regulations. Numerous BMPs and operating procedures will be followed when using recycled water for irrigation as required by Regional Board permits. These BMPs and operating procedures include water quality monitoring at the treatment plant; applying irrigation water at a rate that does not exceed the demand of the plants, with respect to water and nutrients; a site supervisor will be responsible for regulatory and permit compliance at all times; irrigation will not be allowed to occur at any time when unauthorized runoff may occur, such as during times of rainfall or very low evapotranspiration, and any excessive overspray must be controlled.

- Low impact development techniques. As stormwater has low to no concentrations of salt and nutrients, the Project incorporates low impact development stormwater management techniques that promote groundwater recharge (see MM 4-1).

- Landscaping BMPs to limit nutrients in runoff. The Project will implement integrated pest management (IPM) and landscaping BMPs consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program. The IPM and landscaping BMPs will be confirmed in a Landscaping Plan submitted to the County during

the review and approval process for each tract map application (see MM 4-2).

Results of the monitoring will be used to determine whether additional implementation measures are necessary to maintain the SNMP water quality management goals. Monitoring report results that indicate ambient groundwater quality exceeding 50 percent of the baseline assimilative capacity or significant increases may require additional modeling and/or evaluation to determine what mitigation action, if any, is necessary and appropriate. Such measures, which would be implemented by appropriate regional authorities in conjunction with the SNMP, may include:

- Reducing the amount of salts added to groundwater via source water – modified wastewater treatment processes such as increased retention time or blending prior to use for irrigation.

- Reducing the amount of salts and nutrients added to water via anthropogenic sources – BMPs, public outreach, and land management guidelines.

- An ordinance or ban on water softeners that uses salts may result in reduced chloride and slightly reduced TDS concentrations in the wastewater and ultimately reduced concentrations in the recycled water produced.

Consequently, the Draft EIR utilizes the most current and best available information about all of the Project's water supplies and considers all applicable impacts from the proposed use of SWP imports, groundwater, return flows, banked water, and recycled water. The analysis is based on the most current DWR DCR, the current AVEK UWMP, the Antelope Valley Adjudication Judgment and Physical Solution entered by the Court in December 2015, and the state of California and Lahontan Regional Water Quality Control Board recycled water use policies and requirements. The analysis has been peer reviewed by one of the leading California engineering firm and all applicable recommendations in the peer review have been implemented.[2363] Cumulative impacts have been evaluated based on applicable plans and policies for the Antelope Valley as well as the AVEK UWMP and the Antelope Valley Basin Adjudication Judgment and Physical Solution.

The Draft EIR includes mandatory and enforceable water conservation, monitoring and adaptive management measures. MM 18-1 requires the following water efficiency and conservation measures, all of which will be incorporated into the Mitigation Monitoring and Reporting Plan (MMRP) for the Project adopted and enforced by the County as required by CEQA:

1. The Project Applicant/Developer must comply with the water efficiency and conservation measures set forth in Divisions 4.3 and 5.3 of the California Green

[2363] DRP 2017, Appendix 5.19-A

Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent.

2. The Project Applicant/Developer must install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site.

3. The Project Applicant/Developer must install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater and use recycled water to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation demand in 50 percent of the total very low and low density residential lot landscaped area.

4. The Project Applicant/Developer must require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards.

5. The Project Applicant/Developer must require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses, the use of Water Smart/Evapotranspiration-based controllers, and the use of low water use plants and shrubs in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance.

6. The Project Applicant/Developer must require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District) to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: (a) Residential indoor water use – 55 gallons per capita per day; (b) Commercial indoor water use – 200 gallons per day per thousand square feet; (c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias); (d) Institutional indoor water use – 50 gallons per day per thousand square feet; (e) Hotel indoor water use – 125 gallons per day per room; (f) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site ; and (g) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site.

As discussed in Draft EIR Section 5.18, the analysis of Project water supplies, even assuming demand above the levels in MM 18-1, such as indoor residential water use of 65 gallons per capita per day instead of 55 gallons per capita per day (the current state consumption target), shows that the Project's water supplies will sustainably meet post-buildout demand

and maintain an average banked supply of 79,000 acre-feet over time. To provide an additional level of assurance that Project supplies will meet demand, MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. This additional analysis must occur at Project development milestones that are approximately 25 and 50 percent of buildout levels. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified for the project. MM 18-2 will be incorporated into the MMRP for the Project adopted and enforced by the County as required by CEQA.

As a result, the Project's analysis of water supplies takes account of all applicable impacts, and significant, enforceable water conservation, monitoring and adaptive management mitigation measures have been implemented, including comprehensive water use and availability reports at conservative Project buildout milestones, to ensure that projected water supplies and demand levels are being achieved before any additional construction can occur.

Response to Comment F.8-213:

This comment inaccurately describes the analysis methodology used to analyze Project water supplies, incorrectly identifies the drought period used in the analysis, does not reference the current Antelope Valley-East Kern Water Agency (AVEK) Urban Water Management Plan (UWMP) used in the Draft EIR water supply analysis, and fails to acknowledge the extensive and sophisticated analysis of potential climate change impacts that have been incorporated into the projections used in the AVEK UWMP and in the Project water supply analysis.

As discussed on Draft EIR pages 5.18-2 to 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2364] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2365] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the

[2364] DRP 2017, Appendix 5.18-A
[2365] *Ibid.*

previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

The analysis of Project imported water supplies is consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2366] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors in California, the largest SWP importer in the Antelope Valley basin, and will import all of the SWP system supplies that the project will use. As discussed on Draft EIR page 5.18-24, the UWMP includes the projected delivery of 4,000 acre-feet per year (afy) of SWP water to the Tejon Ranch Company, all of which will be used for the project. In addition, as discussed on Draft EIR pages 5.18-62 and 5.18-63, AVEK will also import SWP water transferred from the Tulare Lake Basin Water Storage District (1,451 afy) and the Dudley Ridge Water District (1,993 afy) to the Tejon Ranch Company. The transfer agreements are included in Appendices L and K of Draft EIR Appendix 5.18-A, and the agreement with AVEK to import the transferred water supplies in included in Draft EIR Appendix 5.18-E. The projected water deliveries to the Tejon Ranch Company in the UWMP and the SWP transfer water imported by agreement with AVEK are analyzed by using the same methodology in the UWMP analysis of SWP delivery reliability. The UWMP utilizes the current DCR, which the UWMP states is a "biennial report to assist SWP contractors and local planners in assessing the near and long-term availability of supplies from the SWP [and] provides SWP supply estimates for SWP contractors to use in their planning efforts".[2367] The UWMP considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario in the DCR is "the most conservative and appropriate study to use for long term

[2366] *Id.,* Appendix 5.18-F
[2367] *Id.,* Appendix 5.18-F, p. 6-1

planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2368] In addition, the UWMP uses a single dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The UWMP analyzes multiple drought year water supplies based on the ELT projections for 1990 to 1992 of 12, 16, and 24 percent of AVEK's Table A amounts, which the UWMP states is the "worst case" 3-year period in the ELT scenario, and which results in an average annual delivery of 17 percent of AVEK's contracted SWP amounts during the drought period. The lowest Table A deliveries of water from the SWP during the most recent drought period, (2013 to 2015) were 35 percent, 5 percent, and 20 percent respectively, which results in an average of 20 percent. The ELT scenario considered in the UWMP uses an average delivery level that is lower than the lowest average 3-year delivery level that occurred during the most recent California drought even with the historically low delivery of 5 percent of SWP contract amounts in 2014.

Consequently, the Project drought year analysis does not rely on the period 1931 to 1933 and is more conservative than the lowest average delivery rates over any three-year period during the most recent drought. To the extent the cited references to sections of the UWMP Planning Act, which pertain to the preparation of UWMPs, are relevant for CEQA purposes, the current AVEK UWMP, as reviewed by the DWR in 2017, is consistent with all of the requirements of the Water Code, including the analysis of drought periods.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2369] Although the comment does not cite to any specific issues with the analysis of climate change incorporated into the ELT scenario and used in the Project analysis, for informational purposes the following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2370] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry,

2368 *Ibid*.
2369 *Ibid*.
2370 BDCP 2014

the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2371]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such

[2371] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the ELT scenario in the DCR, and as more conservatively adjusted to account for a single-dry year of 5 percent of SWP deliveries and to use the 1990 to 1992 drought period in the current AVEK UWMP and in the Project water analysis, incorporates an analysis of potential climate change impacts developed to address the substantial analytical issues and uncertainties inherent in the analysis of climate change impacts in California at regional and watershed levels. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on

existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2372] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2373]

In summary, the Project's analysis includes a 3-year drought period from 1990 to 1992 for AVEK deliveries in the ELT scenario. The average annual delivery during this period—17 percent—is lower than any 3-year period during the last drought. The Project analysis also incorporates a comprehensive analysis of potential climate change impacts on water supplies that was developed by agencies with special expertise in water planning and subject to extensive public and state and federal agency review.

Response to Comment F.8-214:

This comment cites the water shortage contingency portion of the 2008 Antelope Valley-East Kern (AVEK) Water Agency Urban Water Management Plan (UWMP). The text of the 2008 UWMP states, "The water shortage response plan was designed based on the assumption that during a long-term drought DWR will have a reduction in water deliveries."[2374] The portion of the quote in the comment after the word "deliveries" does not appear to occur in the cited document.

As discussed on Draft EIR page 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2375] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2376] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature

2372 DRP 2017, Appendix 5.18-F, p. 6-1
2373 DPW 2017, p. 5-1
2374 DRP 2017, Appendix E of Draft EIR Appendix 5.18-A
2375 *Id.,* Appendix 5.18-A
2376 *Ibid*.

implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed in Section 5.18 of the Draft EIR, in the current DCR,[2377] and in the current AVEK UWMP,[2378] the DWR, the owner and operator of the State Water Project (SWP), reduces SWP deliveries in dry years when surface water is not available. The DWR has a legal obligation to estimate the delivery reliability of SWP water during normal or average, single-dry and multiple-dry years on a biannual basis to address potential delivery curtailments for statewide water planning purposes. AVEK is one of 29 SWP system contractors, and the cited text included in the 2008 UWMP accurately discusses water shortage contingency based on the fact that DWR will reduce deliveries during a long-term drought. The effects of reduced SWP deliveries due to droughts and other factors is discussed at length in Section 5.18 and quantitatively analyzed in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years. The analysis shows that, despite the use of an SWP delivery projection that is more conservative than the current DCR base scenario, the Project has sufficient water supplies to meet full buildout demand on a sustainable basis while retaining an average of 79,000 acre-feet—about 11 years of potable water demand—in the Project's water banks over time. The analysis uses the same methodology and approach in the current AVEK UWMP[2379] which was approved by the agency in 2016 and reviewed and found to meet Water Code requirements by the DWR in 2017.

To the extent the discussion of water shortage contingencies in the current AVEK UWMP are relevant for CEQA purposes, Section 8 of the current UWMP, Water Shortage Contingency Planning, describes how the agency would reduce deliveries to customers by up to 50 percent in the event of water supply shortages in accordance with UWMP preparation requirements under the California Water Code. As discussed in Draft EIR Section 5.18, and quantitatively analyzed in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years, the Project analysis includes the potential reduction of up to 95 percent of imports provided by AVEK (a single year delivery of imported water of just 5 percent), and several other years in which deliveries would be lower than 50 percent of potential full amounts. The analysis shows that other sources of Project water supply are more than sufficient to meet demand during these drier periods when SWP supplies imported by AVEK would be subject to curtailment of up to 95 percent of potential full amounts. The comment does not identify any substantive issue or concern with the analysis of Project water supplies.

[2377] *Id.,* Appendix 5.18-C
[2378] *Id.,* Appendix 5.18-F
[2379] *Ibid*.

Response to Comment F.8-215:

This comment inaccurately describes the Project's existing volume of banked water and includes unsubstantiated, speculative assertions about the reliability of banked supplies in the Antelope Valley that are not reflected in the current water management plans adopted by water agencies in the region.

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2380] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2381] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed on Draft EIR pages 3-7, 5.18-52, and 5.18-61, the Tejon Ranch Company (TRC) and its affiliates currently own and operate a water bank on 160 acres located northeast of the Project site in Kern County (TRC Water Bank). The water bank was constructed in 2006 and currently stores water for TRC and AVEK. As of December 2015, approximately 17,287 acre-feet had been stored in the TRC Water Bank for Project use. As discussed on Draft EIR page 5.18-61, the stored water was conveyed from the California Aqueduct to the TRC Water

[2380] *Id.,* Appendix 5.18-A
[2381] *Ibid*.

Bank, released into the bank's percolation ponds, and infiltrated into the ground. TRC is storing the banked water for the benefit of the Project in accordance with an agreement between TRC and the Project Applicant.[2382]

The TRC Water Bank is included as a preexisting banking facility that will continue operations in the Antelope Valley in accordance with the Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015.[2383] All Project groundwater use will comply with the Adjudication Judgment and Physical Solution. The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. Consistent with the Adjudication Judgment and Physical Solution, 10 percent of the stored amount of water must be retained in the aquifer to supplement groundwater supplies and to account for infiltration and extraction losses. The analysis of Project water supplies, including in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single dry and multiple dry years, properly include the existing water bank balance of 17,287 acre-feet and subsequently increase the amounts in the Project's water banks to account for wetter years, when available water would be stored in the banks, and decrease the storage amounts in drier years, when water would be extracted from the banks when imported water was less available. As required by the Adjudication Judgment and Physical Solution, the Project analysis incorporates the requirement that 10 percent of the stored amount of water must be retained in the aquifer to supplement groundwater supplies and to account for infiltration and extraction losses. Consequently, the Project analysis is based on actual amounts of water that are stored in an existing, operational water bank included in the Adjudication Judgment and Physical Solution and projects future water banking activity in a manner that complies with the requirements of the Adjudication Judgment and Physical Solution.

No evidence of any kind is provided to support the implication that earthquakes, pollution or other unforeseen factors not otherwise accounted for in the water banking requirements established under the Adjudication Judgment and Physical Solution require the assumption that no banked water of any amount may be considered to be available for Project use, even though 17,287 acre-feet is actually stored in the existing TRC Water Bank. The Adjudication Judgment and Physical Solution requires no such methodology or speculative analysis, nor do other, major water agencies use such an approach in their analyses of water banking in the Antelope Valley and other locations. Groundwater banking is discussed in both the current AVEK UWMP and the current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site. AVEK and the Los Angeles County Waterworks District 40 are two of largest water districts in the Antelope Valley and are subject to the Adjudication Judgment and Physical Solution. Consistent with the Project analysis, the AVEK UWMP identifies the amount of water AVEK has currently put into storage in existing water banks (34,100 acre-feet), and projects that all of this water will be available in future years less the 10 percent leave-behind amount required by the Adjudication Judgment and Physical Solution.[2384] Section 5.1.1 of the Los Angeles County Waterworks District 40 UWMP provides a detailed discussion of several existing and

[2382] *Id.,* Appendix I of Appendix 5.18-A
[2383] *Id.,* Appendix 5.18-D
[2384] *Id.,* Appendix 5.18-F, p. 8-4

proposed water banking facilities in and outside of the Antelope Valley. These include the AVEK Westside Water Bank with a recovery capacity of 36,000 afy, the Antelope Valley Water Bank (AVWB), an 18-square-mile water banking facility that will be capable of 100,000 afy of recharge and 100,000 afy at buildout, the AVEK Water Supply Stabilization Project 2 (WSSP2) groundwater basin banking project that will be capable of delivering up to 30,000 afy, and the existing Semitropic Water Storage District (Semitropic) located in the San Joaquin Valley in north-central Kern County, with a storage capacity of 1 million acre-feet, a recharge capacity of 90,500 afy, and a firm extraction capacity of 90,000 afy. The Los Angeles County Waterworks District 40 UWMP states that water banking is a crucial strategy that involves storing water when it is available in wet years or low-demand periods and subsequently recovering it in periods of drought or high demand. Water banking losses are assumed to be 10 percent in the District's UWMP consistent with the Adjudication Judgment and Physical Solution. The UWMP states that the District has adequate water supplies to meet projected demands normal, single-dry year, and multiple-dry years through the use of banked water which is projected to range in amounts from 25,300 to 70,525 afy.[2385] Neither the current AVEK nor the Los Angeles County Waterworks District 40 UWMPs assume that existing banked water supplies must be ignored in future projections of water supplies, or that these banked amounts are subject to speculative losses above the requirements of the Adjudication Judgment and Physical Solution. The comment does not identify any substantive issues or concerns with the analysis of Project water supplies, including water banking supplies.

Response to Comment F.8-216:

This comment cites a statement on page 5-1 of Draft EIR Appendix 5.18-A and not, as stated, to Draft EIR Section 5.18. The comment inaccurately describes how banked water is used to meet Project demand over time as summarized in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years and incorrectly references the drought period used in the Project analysis.

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2386] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2387] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional

2385 DPW 2017, p. ES-3
2386 DRP 2017, Appendix 5.18-A
2387 *Ibid*.

water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

The analysis of Project imported water supplies is consistent with and based on the analysis prepared by AVEK in the agency's current UWMP[2388] prepared and adopted in accordance with California Water Code Sections 10610 et seq. (the "Urban Water Management Planning Act"). The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the project will use. The UWMP utilizes the current DCR, which the UWMP states is a "biennial report to assist SWP contractors and local planners in assessing the near and long-term availability of supplies from the SWP [and] provides SWP supply estimates for SWP contractors to use in their planning efforts".[2389] The UWMP considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario in the DCR is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2390] In addition, the UWMP uses a single dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The UWMP analyzes multiple drought year water supplies based on the ELT projections for 1990 to 1992 of 12, 16, and 24 percent of AVEK's Table A amounts, which the UWMP states is the "worst case" 3-year period in the ELT scenario, and which results in an average annual delivery of 17 percent of AVEK's contracted SWP amounts during the drought period. The lowest Table A deliveries of water from the SWP during the most recent drought period, (2013 to 2015) were 35 percent, 5 percent, and 20 percent respectively, which results in an average of 20 percent. The ELT scenario considered in the UWMP uses an average delivery

2388 *Id.,* Appendix 5.18-F
2389 *Id.,* Appendix 5.18-F, p. 6-1
2390 Ibid.

level that is lower than the lowest average 3-year delivery level that occurred during the most recent California drought even with the historically low delivery of 5 percent of SWP contract amounts in 2014. Consequently, the Project drought year analysis does rely on the period 1931 to 1933 and is more conservative than the lowest average delivery rates over any three-year period during the most recent drought.

As discussed on Draft EIR page 5.18-54 and shown in Tables 5.18-10 to 5.18-12, the Project's water supplies include the following: (1) water currently banked at the existing TRC Water Bank to the north of the Project site; (2) purchased and in-lieu program rights to water deliveries from AVEK and the return of certain water supplies loaned to AVEK in 2008 and 2009 for later return and delivery (collectively, AVEK call water); (3) groundwater subject to the allocations in the Adjudication Judgment and Physical Solution;[2391] (4) Table A Amounts transferred from the Tulare Lake Basin Water Storage District and the Dudley Ridge Water District that will be imported for Project use under an existing agreement with AVEK;[2392] (5) service area deliveries of SWP water by AVEK that are incorporated in the Agency's current UWMP; (6) recycled water treated to Title 22 unrestricted reuse levels generated by the Project's on-site wastewater treatment facilities; and (7) in-basin return flows from Project imported water use in accordance with the Adjudication Judgment and Physical Solution.[2393] The existing TRC Water Bank and the proposed on-site water bank will be used to bank, store, and retrieve water for use in dry periods to enhance the Project's overall water supply reliability.

The methodology used to analyze Project demand and supply in Draft EIR Tables 5.18-10, 5.18-11, and 5.18-12 reflects the terms and conditions of the Adjudication Judgment and Physical Solution pertaining to groundwater, return flow and banked water use,[2394] the AVEK import agreement for the Tulare Lake Basin Water Storage District and the Dudley Ridge Water District,[2395] and the projections of imported water volumes under hydrological conditions that consider climate change and average, single dry and multiple dry year conditions consistent with the AVEK UWMP.[2396] All available resources are shown as supplies in Draft EIR Tables 5.18-10, 5.18-11, and 5.18-12 after applicable adjustments. For example, as shown in Draft EIR Tables 5.18-10, 5.18-11, and 5.18-12, all AVEK imports of Tulare Lake and Dudley ridge water under the AVEK import agreement are reduced by 5 percent for delivery to AVEK as required by the agreement.[2397] Certain water supplies, such as unused groundwater allocated to TRC, and return flows from imported water, are subject to a 10-year carryover provision in the Adjudication Judgment and Physical Solution.[2398] All recycled water use is presumed to be utilized by outdoor vegetation or subject to evapotranspiration and is not treated as a potential source of additional recharge or supply once utilized. As discussed on Draft EIR page 5.18-64, returns flows from urban imported water use in the Antelope Valley Basin may be recovered by the importing party in an

2391 *Id.,* Appendix 5.4-D
2392 *Id.,* Appendix 5.4-E
2393 *Id.,* Appendix 5.4-D
2394 Ibid.
2395 *Id.,* Appendix 5.18-E
2396 *Id.,* Appendix 5.4-F
2397 *Id.,* Appendix 5.4-E, p. 3
2398 *Id.,* Appendix 5.18-D, p. 42

amount equal to 39 percent of the average imported water use over the prior 5 years. As shown in Table 5.18-10, the amount of in-basin return flows attributable to the Project's imported water use will increase as the Project is developed and will mature 5 years after buildout. At full buildout in Year 20, in-basin return flows will be approximately 862 afy and will increase to a maximum of 1,034 afy by Year 25. In each year, the difference between the available water supply and demand is calculated. If supply exceeds demand, the excess supply is delivered to and stored in the Project water banks. If demand exceeds supply, the excess demand is met by using banked water subject to the 10 percent leave-behind requirement in the Adjudication Judgment and Physical Solution. As shown in Tables 5.18-10, 5.18-11, and 5.18-12, the Project's water supplies meet projected demand at buildout and, on a sustainable basis thereafter, allow for the maintenance of an average annual reserve banked supply of more than 79,000 acre-feet. The amount of the average annual reserve that will be maintained in the water banks equates to more than 11 years of the Project's full buildout potable demand and provides the Project with a significant emergency supply.

This analytical approach is consistent with the AVEK UWMP analysis of imported water reliability, the terms of the Tulare and Dudley Ridge import agreement with AVEK, the use of groundwater, return flows, and banked water under the Adjudication Judgment and Physical Solution, and the state of California and Lahontan Regional Water Quality Control Board policies and requirements for recycled water use. The Project's water supply and banking analysis is also consistent with the methodology used in the current Los Angeles County Waterworks District 40 UWMP to analyze similar water supplies for portions of the Antelope Valley east of the Project area.[2399] None of these analyses, including the Project, assume water is a static entity, and the comment does not identify any substantive issue or concern with the analysis of Project water supplies, including water banking supplies.

Response to Comment F.8-217:

This comment cites a statement contained on page 5-5 of Draft EIR Appendix 5.18-A. The italicized portion of the comment and the phrase that contains the word "proper" in quotes do not appear in the Draft EIR or in a Draft EIR appendix. The comment inaccurately quantifies the amount of banked water that is available for use to meet Project demand over time in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years and does not acknowledge that the Project water supply analysis incorporates a comprehensive analysis of climate change prepared by agencies with expertise in water planning. Finally, the comment provides no supporting evidence for the suggestion that water banks are poorly managed, an assertion that is also not consistent with the analysis of water banking in current Urban Water Management Plans adopted by major water districts in the Antelope Valley and the regulatory oversight of water banking applicable to the Project and other water banks under the Antelope Valley Basin Adjudication Judgment and Physical Solution.

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water

[2399] DPW 2017

Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2400] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2401] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed on Draft EIR page 5.18-54 and shown in Tables 5.18-10 to 5.18-12, the Project's water supplies include the following: (1) water currently banked at the existing TRC Water Bank to the north of the Project site; (2) purchased and in-lieu program rights to water deliveries from AVEK and the return of certain water supplies loaned to AVEK in 2008 and 2009 for later return and delivery (collectively, AVEK call water); (3) groundwater subject to the allocations in the Adjudication Judgment and Physical Solution;[2402] (4) Table A Amounts transferred from the Tulare Lake Basin Water Storage District and the Dudley Ridge Water District that will be imported for Project use under an existing agreement with AVEK;[2403] (5) service area deliveries of SWP water by AVEK that are incorporated in the Agency's current UWMP; (6) recycled water treated to Title 22 unrestricted reuse levels generated by the Project's on-site wastewater treatment facilities; and (7) in-basin return flows from Project imported water use in accordance with the Adjudication Judgment and

[2400] DRP 2017, Appendix 5.18-A
[2401] *Ibid*.
[2402] *Id.,* Appendix 5.4-D
[2403] *Id.,* Appendix 5.4-E

Physical Solution.[2404] The existing TRC Water Bank and the proposed on-site water bank will be used to bank, store, and retrieve water for use in dry periods to enhance the Project's overall water supply reliability. As shown in Draft EIR Tables 5.18-10, 5.18-11, and 5.18-12, the Project's water supplies meet projected demand at buildout and, on a sustainable basis thereafter, allow for the maintenance of an average annual reserve banked supply of more than 79,000 acre-feet. The amount of the average annual reserve that will be maintained in the water banks equates to more than 11 years of the Project's full buildout potable demand.

As shown in Draft EIR Table 5.18-10, in normal years, virtually no water would be used from the water banks to meet demand. As shown in Draft EIR Table 5.18-11, in a single-dry year where just 5 percent of imported supplies would be available, the Project would require the use of banked water to meet demand in amounts ranging from a projected 2,999 acre-feet in Year 5 to 3,946 acre-feet at buildout in Year 20. As shown in Draft EIR Table 5.18-12, excluding early years of the Project when supplies would exceed demand, during drought periods the amount of banked water required to meet demand would range from about 539 acre-feet in Year 8 to 3,163 acre-feet in Year 18. As shown in Draft EIR Tables 5.18-11 and 5.18-12, after accounting for annual transfers from the water banks and the 10 percent leave-behind required by the Adjudication Judgment and Physical Solution, a substantial reserve supply would still be maintained in the water banks during and immediately after a single dry year and a multiple year drought. This reserve would subsequently be augmented by banked supplies during wetter years. This analytical approach and use of water banking is consistent with the AVEK UWMP and the methodology used in the current Los Angeles County Waterworks District 40 UWMP to analyze substantially similar water supplies for portions of the Antelope Valley east of the Project area.[2405]

Groundwater banking is also discussed in both the current AVEK UWMP and the current UWMP adopted by Los Angeles County Waterworks District 40. AVEK and the Los Angeles County Waterworks District 40 are two of largest water districts in the Antelope Valley and are subject to the Adjudication Judgment and Physical Solution. Both the AVEK UWMP and Los Angeles County Waterworks District 40 UWMP analyses include water banking, including in-basin banks subject to the Adjudication Judgment and Physical Solution. The water banking facilities discussed in the UWMPs include the AVEK Westside Water Bank,[2406] the Antelope Valley Water Bank (AVWB), an 18-square-mile water banking facility that will be capable of 100,000 afy of recharge and 100,000 afy at buildout, the AVEK Water Supply Stabilization Project 2 (WSSP2) groundwater basin banking project that will be capable of delivering up to 30,000 afy, and out of basin banks such as the existing Semitropic Water Storage District (Semitropic) located in the San Joaquin Valley in north-central Kern County, with a storage capacity of 1 million acre-feet, a recharge capacity of 90,500 afy, and a firm extraction capacity of 90,000 afy. The Los Angeles County Waterworks District 40 UWMP states that water banking is a crucial strategy that involves storing water when it is available in wet years or low-demand periods and subsequently recovering it in periods of drought or high demand. Indeed, the Los Angeles County Waterworks District 40 UWMP states that the District has adequate water supplies to meet projected demands normal, single-dry year, and

[2404] *Id.,* Appendix 5.4-D
[2405] DPW 2017
[2406] DRP 2017, Appendix 5.18-F, p. 8-4

multiple-dry years through the use of banked water which is projected to range in amounts from 25,300 to 70,525 afy.[2407] Neither of the UWMPs includes any suggestion, reference or discussion of "infamously poor" water bank management as stated in the comment, and the comment itself provides no support for this assertion.

The comment also suggests that the Project analysis of banking supplies is "untenable" because it does not account for climate change. This assertion is inaccurate because the ELT scenario used in the AVEK UWMP and in the Project analysis includes a substantial analysis of climate change. The inclusion of climate change factors in the ELT scenario is specifically cited as the rationale for using the ELT scenario on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2408] The following discussion summarizes the ELT analysis of climate change for informational purposes.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2409] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2410]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical

[2407] DPW 2017, p. ES-3
[2408] DRP 2017, Appendix 5.18-5, p. 6-1
[2409] BDCP 2014
[2410] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the ELT scenario in the DCR, and as more conservatively adjusted to account for a single-dry year of 5 percent of SWP deliveries and to use the 1990 to 1992 drought period in the current AVEK UWMP and in the Project water analysis, incorporates an analysis of potential climate change impacts developed to address the substantial analytical issues and uncertainties inherent in the analysis of climate change impacts in California at regional and watershed levels. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2411] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2412]

In summary, the comment provides unsubstantiated assertions about water banking management that are not supported in the current UWMPs adopted by AVEK and Los Angeles County Waterworks District 40, inconsistent with the water banking provisions of the Adjudication Judgment and Physical Solution, and do not identify any substantive issues or concerns with the analysis of Project water supplies.

Response to Comment F.8-218:

This comment inaccurately describes the Project's existing volume of banked water and includes unsubstantiated, speculative assertions about analysis of banked supplies in the Antelope Valley that are not reflected in the current water management plans adopted by water agencies in the region.

[2411] DRP 2017, Appendix 5.18-F, p. 6-1
[2412] DPW 2017, p. 5-1

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2413] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2414] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed on Draft EIR pages 3-7, 5.18-52, and 5.18-61, the Tejon Ranch Company (TRC) and its affiliates currently own and operate a water bank on 160 acres located northeast of the Project site in Kern County (TRC Water Bank). The water bank was constructed in 2006 and currently stores water for TRC and the AVEK. As of December 2015, approximately 17,287 acre-feet had been stored in the TRC Water Bank for Project use. As discussed on Draft EIR page 5.18-61, the stored water was conveyed from the California Aqueduct to the TRC Water Bank, released into the bank's percolation ponds, and infiltrated into the ground. TRC is storing the banked water for the benefit of the Project in accordance with an agreement between TRC and the Project Applicant.[2415]

[2413] DRP 2017, Appendix 5.18-A

[2414] *Ibid*.

[2415] *Id.,* Appendix I of Draft EIR Appendix 5.18-A

The TRC Water Bank is included as a preexisting banking facility that will continue operations in the Antelope Valley in accordance with the Antelope Valley Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015.[2416] All Project groundwater use will comply with the Adjudication Judgment and Physical Solution. The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. Consistent with the Adjudication Judgment and Physical Solution, 10 percent of the stored amount of water must be retained in the aquifer to supplement groundwater supplies and to account for infiltration and extraction losses. The analysis of Project water supplies, including in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single dry and multiple dry years, properly include the existing water bank balance of 17,287 acre-feet and subsequently increase the amounts in the Project's water banks to account for wetter years, when available water would be stored in the banks, and decrease the storage amounts in drier years, when water would be extracted from the banks when imported water was less available. As required by the Adjudication Judgment and Physical Solution, the Project analysis incorporates the requirement that 10 percent of the stored amount of water must be retained in the aquifer to supplement groundwater supplies and to account for infiltration and extraction losses. Consequently, the Project analysis is based on actual amounts of water that are stored in an existing, operational water bank included in the Adjudication Judgment and Physical Solution and projects future water banking activity in a manner that complies with the requirements of the Adjudication Judgment and Physical Solution.

No evidence of any kind is provided to support the comment's assertion that the analysis of water banking supplies requires the assumption that no banked water of any amount may be considered to be available for Project use, even though 17,287 acre-feet is actually stored in the existing TRC Water Bank. The Adjudication Judgment and Physical Solution requires no such methodology or speculative analysis, nor do other, major water agencies use such an approach in their analyses of water banking in the Antelope Valley and other locations. Groundwater banking is discussed in both the current AVEK UWMP and the current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site. AVEK and the Los Angeles County Waterworks District 40 are two of largest water districts in the Antelope Valley and are subject to the Adjudication Judgment and Physical Solution. Consistent with the Project analysis, the AVEK UWMP identifies the amount of water AVEK has currently put into storage in existing water banks (34,100 acre-feet), and projects that all of this water will be available in future years less the 10 per cent leave-behind amount required by the Adjudication Judgment and Physical Solution.[2417] Section 5.1.1 of the Los Angeles County Waterworks District 40 UWMP provides a detailed discussion of several existing and proposed water banking facilities in and outside of the Antelope Valley. These include the AVEK Westside Water Bank with a recovery capacity of 36,000 afy, the Antelope Valley Water Bank (AVWB), an 18-square-mile water banking facility that will be capable of 100,000 afy of recharge and 100,000 afy at buildout, the AVEK Water Supply Stabilization Project 2 (WSSP2) groundwater basin banking project that will be capable of delivering up to 30,000 afy, and the existing Semitropic Water Storage

[2416] *Id.,* Appendix 5.18-D
[2417] *Id.,* Appendix 5.18-F, p. 8-4

District (Semitropic) located in the San Joaquin Valley in north-central Kern County, with a storage capacity of 1 million acre-feet, a recharge capacity of 90,500 afy, and a firm extraction capacity of 90,000 afy. The Los Angeles County Waterworks District 40 UWMP states that water banking is a crucial strategy that involves storing water when it is available in wet years or low-demand periods and subsequently recovering it in periods of drought or high demand. Water banking losses are assumed to be 10 percent in the District's UWMP consistent with the Adjudication Judgment and Physical Solution. The UWMP states that the District has adequate water supplies to meet projected demands normal, single-dry year, and multiple-dry years through the use of banked water which is projected to range in amounts from 25,300 to 70,525 afy.[2418] Neither the current AVEK nor the Los Angeles County Waterworks District 40 UWMPs assume that existing banked water supplies must be ignored or reduced to "zero" in future projections of water supplies. The comment does identify any substantive issues or concerns with the analysis of Project water supplies, including water banking supplies.

Response to Comment F.8-219:

This comment cites a statement contained on page 4-1 of Draft EIR Appendix 5.18-A. As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2419] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2420] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to

[2418] DPW 2017, p. ES-3
[2419] DRP 2017, Appendix 5.18-A
[2420] *Ibid*.

implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

The fact that the Superior Court entered a final Adjudication Judgment and Physical Solution for the Antelope Valley Basin Adjudication in December 2015 is discussed on Draft EIR pages 4-49, 5.2-15, 5.4-22, 5.18-14, 5.18-15, and 5.18-17 to 5.18-19. All Project groundwater use will comply with the Adjudication Judgment and Physical Solution.[2421] The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution also takes account of and avoids potential long-term, cumulative impacts to the Antelope Valley Basin. Section 1.5 of the Adjudication Judgment and Physical Solution states that after the Phase 3 trial of the proceedings, the Court determined that the safe yield of the Antelope Valley Basin is 110,000 acre-feet per year. Section 3.5.43 of the Adjudication Judgment and Physical Solution defines safe yield to mean the amount of annual extractions of water from the Basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Section 3.4 of the Adjudication Judgment and Physical Solution states that the physical solution governs groundwater, imported water and Antelope Valley Basin storage space to ensure that the Antelope Valley Basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield and provides that, after a 7-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634-acre feet per year, all of which will be provided to and utilized by the Project.

In addition, as discussed on Draft EIR pages 5.18-19 and 5.18-20, the Adjudication Judgment and Physical Solution provides that:

- Parties that import water through AVEK and that are identified on Exhibit 8 of the Adjudication Judgment and Physical Solution may produce return flows from imported water used for municipal and industrial purposes within the Antelope Valley Basin equal to 39 percent of the average amount of imported water used in the preceding five years. Parties that use imported water on lands outside the basin but within the basin watershed are entitled to produce return flows to the extent they can establish, to the satisfaction of the watermaster, that such return flows augment the basin groundwater supply. The Tejon Ranch Company and Tejon RanchCorp are included in Exhibit 8 of the Judgment and Physical Solution.
- All parties have the right to store water in the basin pursuant to a storage agreement with the watermaster. The Adjudication Judgment and Physical

[2421] *Id.,* Appendix 5.18-D

Solution does not limit or modify the operation of preexisting banking projects or the performance of preexisting exchange agreements, including existing water banks operated by the Tejon Ranch Company and Tejon RanchCorp.

- Unproduced portions of a groundwater allocation may be carried over for 10 years and stored after the carry-over period subject to the terms and conditions of a storage agreement approved by the watermaster.
- Pursuant to terms and conditions established by the watermaster and subject to hydrologic review by an engineer retained by the watermaster, a party may transfer all or any portion of its applicable groundwater production rights to another party so long as the transfer does not cause a material injury, as defined in the Judgment and Physical Solution.
- The Tejon Ranch Company and Tejon RanchCorp are included in the list of parties that conduct business and that may produce and transport groundwater for use on lands outside the basin and within the watershed of the basin, as shown in Exhibit 9 of the Judgment and Physical Solution.

Consequently, the Adjudication Judgment and Physical Solution was entered by the Court in December 2015, and addresses groundwater, return flow, water banking and other water rights in the Antelope Valley. The Draft EIR analysis of Project water supplies is fully consistent with and accurately accounts for the Adjudication Judgment and Physical Solution. The comment does not identify any substantive issue or concern with the analysis of Project water supplies, including water supplies subject to the Adjudication Judgment and Physical Solution.

Response to Comment F.8-220:

This comment cites a statement contained on page 26 of the 2008 Antelope Valley-East Kern Water Agency (AVEK) Urban Water Management Plan (UWMP).[2422] The comment also cites to a provision of the Water Code that applies to the development of UWMP by California water suppliers and not to a specific CEQA requirement.

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2423] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2424] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in

[2422] *Id.,* Appendix E of Appendix 5.18-A
[2423] *Id.,* Appendix 5.18-A
[2424] *Ibid*.

unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

Water Code Section 10632(a) pertains to the inclusion in applicable UWMPs of an "urban water shortage contingency analysis" that includes elements "that are within the authority of the urban water supplier." The current AVEK UWMP was adopted in 2016 and reviewed and determined to be consistent with all Water Code requirements by the DWR in 2017. As stated in the AVEK UWMP,[2425] AVEK prepared the current UWMP in accordance with the DWR "2015 Urban Water Management Plans Guidebook for Urban Water Suppliers" (Guidebook) for a wholesale supplier. The DWR Guidebook[2426] states that Section 10632(a)(4) of the Water Code as cited in the comment applies to retail urban water providers and not to wholesale water suppliers.[2427] In addition, the Guidebook states that retail UWMPs "make their own determination as to which prohibitions, and which stage for each prohibition, are most appropriate for their service area" in compliance with Water Code Section 10632.[2428] Consequently, under current law and regulatory practice, and as reflected in the current AVEK UWMP, the provision cited in the comment is not applicable to a wholesale provider such as AVEK. To the extent the discussion of water shortage contingencies in the current AVEK UWMP required by current law and regulatory practice is relevant for CEQA purposes, Section 8 of the current UWMP, Water Shortage Contingency Planning, describes how the agency would reduce deliveries to customers by up to 50 percent in the event of water supply shortages in accordance with Water Code UWMP

[2425] *Id.,* Appendix 5.18-F, p. 1-1

[2426] California Department of Water Resources (DWR). 2016 (March). *2015 Urban Water Management Plans Guidebook for Urban Water Suppliers*. Sacramento, CA: DWR. http://www.water.ca.gov/urbanwatermanagement/docs/2015/UWMP_Guidebook_Mar_2016_FINAL.pdf.

[2427] *Id.,* pp. 8-4 and -5

[2428] *Id.,* p. 8-5

preparation requirements. As discussed in Draft EIR Section 5.18, and quantitatively analyzed in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years, the Project analysis includes the potential reduction of up to 95 percent of imports provided by AVEK (a single year delivery of imported water of just 5 percent), and several other years in which deliveries would be lower than 50 percent of potential full amounts. The analysis shows that other sources of Project water supply are more than sufficient to meet demand during these drier periods when supplies imported by AVEK would be subject to reductions of up to 95 percent of potential full amounts.

Contrary to the comment, the Draft EIR includes mandatory and enforceable water conservation, monitoring and adaptive management measures. MM 18-1 requires the following water efficiency and conservation measures, all of which will be incorporated into the Mitigation Monitoring and Reporting Plan (MMRP) for the Project adopted and enforced by the County as required by CEQA:

1. The Project Applicant/Developer must comply with the water efficiency and conservation measures set forth in Divisions 4.3 and 5.3 of the California Green Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent.
2. The Project Applicant/Developer must install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site.
3. The Project Applicant/Developer must install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater and use recycled water to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation demand in 50 percent of the total very low and low density residential lot landscaped area.
4. The Project Applicant/Developer must require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards.
5. The Project Applicant/Developer must require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses, the use of Water Smart/Evapotranspiration-based controllers, and the use of low water use plants and shrubs in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance.
6. The Project Applicant/Developer must require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water

> District) to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: (a) Residential indoor water use – 55 gallons per capita per day; (b) Commercial indoor water use – 200 gallons per day per thousand square feet; (c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias); (d) Institutional indoor water use – 50 gallons per day per thousand square feet; (e) Hotel indoor water use – 125 gallons per day per room; (f) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site ; and (g) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site.

As discussed in Draft EIR Section 5.18, the analysis of project water supplies, even assuming demand above the levels in MM 18-1, such as indoor residential water use of 65 gallons per capita per day instead of 55 gallons per capita per day (the current state consumption target), shows that the Project's water supplies will sustainably meet post-buildout demand and maintain an average banked supply of 79,000 acre-feet over time. To provide an additional level of assurance that Project supplies will meet demand, MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. This additional analysis must occur at Project development milestones that are approximately 25 and 50 percent of buildout levels. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified for the Project. MM 18-2 will be incorporated into the MMRP for the Project adopted and enforced by the County as required by CEQA.

The Draft EIR analysis shows that Project water supplies are sufficient to meet construction period, buildout, and post-buildout demands on a sustainable basis while retaining an average of over 79,000 acre-feet of reserve supplies in the Project water banks—or approximately 11 years of full buildout potable supply—over time. The Project is required to implement significant and substantial water conservation measures in accordance with MM 18-1 that will be included in the MMRP and enforceable by the County. MM 18-2 provides an additional level of assurance that projected supplies and demands will be achieved at two milestones in the Project development process (approximately 25 and 50 percent of full buildout) and prohibits further development until any identified excess

demand or insufficient supply issues are resolved to the satisfaction of the County. The comment does not identify any substantive issues or concerns with the analysis of Project water supplies, including the mandatory and enforceable water conservation, monitoring and adaptive management mitigation measures applicable to the Project.

As discussed on Draft EIR page 5.18-3, the Project's water facilities will be owned and operated by a Public Water Purveyor or organized as a Community Services District, a statutory water district or PUD with the appropriate capacity to own, operate, and maintain the Project's water system. The Project Water Purveyor will be funded through a rate-payer system and fees. Until the Project Water Purveyor is established, the Project Applicant/Developer will be responsible for all Project- related water services. All of the Project's water supplies and the design, permitting, financing and construction of all treatment, collection and distribution infrastructure will be provided by the Project Applicant/Developer. The Project Water Purveyor will be subject to the UWMP preparation requirements of Water Code Sections 10610 et seq. and will also be required to meet the retail UWMP provisions of the Water Code as set forth in the Guidelines. These requirements will include the applicable provisions of Water Code Section 10632 pertaining to the analysis of urban water shortage contingencies.

Response to Comment F.8-221:

This comment inaccurately states that the Project will use "Nickel water" to meet any of the Project's projected demand and appears to reference tables in Draft EIR Appendix 5.18-A in support of this incorrect statement. As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2429] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2430] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the

[2429] DRP 2017, Appendix 5.18-A
[2430] *Ibid*.

California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed on Draft EIR pages 3-7, 5.18-61, and 5.18-62, during 2008 and 2009, the Tejon Ranch Company (TRC) agreed to loan certain water supplies to AVEK for return in later years pursuant to exchange agreements with AVEK. The supplies loaned to AVEK include 8,393 acre-feet of water purchased by TRC from the Nickel Family, LLC in 2008 and 6,893 acre feet of water purchased by TRC from Nickel Family, LLC in 2009. These transactions have occurred, and the applicable supplies were provided to AVEK nearly a decade ago. No other water related to supplies currently or formerly owned by the Nickel Family, LLC will be used for Project purposes in any way.

AVEK is obligated to return 1.5 times the amount of the 2008 and 2009 water supplies provided by TRC under the agency's agreements with TRC. The remaining balance of water that AVEK is required to return to TRC under these agreements is 13,595 acre-feet. TRC has also participated in an in-lieu program administered by AVEK under which AVEK provides surface supplies in future wetter years in exchange for TRC using groundwater and foregoing SWP deliveries in prior dry years. The amount of water that AVEK is required to supply to TRC under the in-lieu program is 13,032 acre-feet. In 2007 and 2008, TRC purchased 2,362 acre-feet of water from AVEK for future delivery. For ease of reference, the AVEK water return obligations under the 2008 and 2009 agreements, the in-lieu program, and the 2007 and 2008 purchases by TRC are collectively referred to as "AVEK Call Water" in the Draft EIR. The total amount of AVEK Call Water available for Project use is 28,989 acre feet. As shown in Draft EIR Table 5.18-10, the AVEK Call Water is used as part of the Project's reserve supply, and delivery is assumed to occur on a pro-rata basis over 20 average water years. The actual delivery timing can be flexibly arranged with AVEK to reflect the agency's available supplies from year to year. The Project's water supply and demand projections assume that no AVEK Call Water would be supplied in either a single-dry year or during multiple-dry year droughts.[2431]

Consequently, no Nickel water will be used by the Project and no analysis of potential impacts related to the potential use of Nickel water is required.

Response to Comment F.8-222:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional

[2431] *Id.,* Tables 5.18-11 and 5.18-12

Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on pages Draft EIR 5.18-27 and 5.18-28 the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2432] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the Project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2433] In addition, the UWMP used a single-dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2434] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report

[2432] *Id.,* Appendix 5.18-F
[2433] *Id.,* Appendix 5.18-F, p. 6-1
[2434] *Id.,* Appendix 5.18-G

also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2435]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2436] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2437] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2 (Climate Change Approach and Implications for Aquatic Species) of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2438] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the

[2435] *Id.,* Appendix 5.18-G, p. 18
[2436] *Id.,* Appendix 5.18-D
[2437] *Id.,* Appendix 5.18-F, p. 6-1
[2438] BDCP 2014

participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2439]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such

[2439] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate

change".[2440] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2441]

Response to Comment F.8-223:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on Draft EIR pages 5.18-27 and 5.18-28 the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2442] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2443] In addition, the UWMP used a single-dry year SWP

[2440] DRP 2017, Appendix 5.18-F, p. 6-1
[2441] DPW 2017, p. 5-1
[2442] DRP 2017, Appendix 5.18-F
[2443] *Id.,* Appendix 5.18-F, p. 6-1

allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2444] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2445]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2446] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2447] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2 (Climate Change Approach and Implications for Aquatic Species) of the public review documents prepared and published for the proposed Bay Delta

[2444] *Id.,* Appendix 5.18-G
[2445] *Id.,* Appendix 5.18-G, p. 18
[2446] *Id.,* Appendix 5.18-D
[2447] *Id.,* Appendix 5.18-F, p. 6-1

Conservation Plan (BDCP).[2448] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2449] The references include three publications by the author cited in the comment.

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially at regional levels of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

[2448] BDCP 2014

[2449] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a

model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2450] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2451]

Response to Comment F.8-224:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on Draft EIR pages 5.18-27 and 5.18-28, the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2452] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code

[2450] DRP 2017, Appendix 5.18-F, p. 6-1
[2451] DPW 2017, p. 5-1
[2452] DRP 2017, Appendix 5.18-F

requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the Project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2453] In addition, the UWMP used a single-dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2454] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2455]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2456] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

[2453] *Id.,* Appendix 5.18-F, p. 6-1
[2454] *Id.,* Appendix 5.18-G
[2455] *Id.,* Appendix 5.18-G, p. 18
[2456] *Id.,* Appendix 5.18-D

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2457] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2458] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2459]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the

[2457] *Id.,* Appendix 5.18-F, p. 6-1

[2458] BDCP 2014

[2459] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period. As summarized on pages 5.A.2.0-1 and 5.A.2.0-2 of BDCP Appendix 5.4.A the analysis results include consideration of climate change effects on peak

flow, flooding periods, water quality, including salinity, water temperature, and other potential impacts on SWP and federal water system volumes and impacts to aquatic species.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2460] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2461]

Response to Comment F.8-225:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on Draft EIR pages 5.18-27 and 5.18-28 the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan

[2460] DRP 2017, Appendix 5.18-F, p. 6-1
[2461] DPW 2017, p. 5-1

planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2462] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the Project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2463] In addition, the UWMP used a single-dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2464] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2465]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2466] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which

[2462] DRP 2017, Appendix 5.18-F
[2463] *Id.,* Appendix 5.18-F, p. 6-1
[2464] *Id.,* Appendix 5.18-G
[2465] *Id.,* Appendix 5.18-G, p. 18
[2466] *Id.,* Appendix 5.18-D

requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2467] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2 (Climate Change Approach and Implications for Aquatic Species) of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2468] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2469]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a

[2467] *Id.,* Appendix 5.18-F, p. 6-1

[2468] BDCP 2014

[2469] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California

hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2470] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2471]

Response to Comment F.8-226:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes

[2470] DRP 2017, Appendix 5.18-F, p. 6-1
[2471] DPW 2017, p. 5-1

in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on pages Draft EIR 5.18-27 and 5.18-28 the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2472] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the Project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2473] In addition, the UWMP used a single-dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2474] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2475]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical

[2472] DRP 2017, Appendix 5.18-F
[2473] *Id.,* Appendix 5.18-F, p. 6-1
[2474] *Id.,* Appendix 5.18-G
[2475] *Id.,* Appendix 5.18-G, p. 18

Solution.[2476] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2477] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2 (Climate Change Approach and Implications for Aquatic Species) of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2478] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District,

[2476] *Id.,* Appendix 5.18-D
[2477] *Id.,* Appendix 5.18-F, p. 6-1
[2478] BDCP 2014

the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2479]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

[2479] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2480] The current UWMP adopted by Los Angeles County Waterworks District 40 for

[2480] DRP 2017, Appendix 5.18-F, p. 6-1

portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2481]

Response to Comment F.8-227:

The Commenters' citation to *Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal. App. 4th 1552, 1562-1563, is noted. As *Pfeiffer* notes, a lead agency's land use consistency determination is entitled to "great deference" and must be upheld unless "*no reasonable person* could have reached the same conclusion" (emphasis added) as the agency.[2482] "Because policies in a general plan reflect a range of competing interests, the governmental agency must be allowed to weigh and balance the plan's policies when applying them, and it has broad discretion to construe its policies in light of the plan's purposes."[2483] As long as "officials considered the applicable policies and the extent to which the proposed project conforms with those policies," the agency's determination must be affirmed.[2484] This highly deferential standard applies not just to a local government's determinations under the State's Planning & Zoning Law, but also to a lead agency's determination of plan consistency in a CEQA document, whether that determination is made in an Negative Declaration,[2485] or, as here, in an EIR.[2486]

The EIR thoroughly examines the Project's overall consistency with all applicable plans, including the County's General Plan and the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Plan.[2487] The increase in housing and employment that would occur with Project implementation is consistent with the projections for the Project site included in the RTP/SCS, and the Project would also contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County. As the Draft EIR also shows, the Project would further the goals and policies of the General Plan, especially the goals and policies of the AVAP. Specifically, the EIR contains a detailed analysis of every goal and policy in the AVAP, showing that the Project complies with every applicable AVAP goal and policy.[2488] This detailed analysis fully complies with – and even exceeds – the County's obligations under CEQA. (See *N. Coast Rivers All*, 216 Cal.App.4th at 633 ["CEQA includes no . . . requirement" to "provide a detailed discussion of the Project's consistency with the plan"]; see also *Highway 68 Coal. v. Cty. of Monterey* (2017) 14 Cal. App. 5th 883, 896 ["CEQA does not require an analysis of general plan consistency"].)

The Lead Agency disagrees with the Commenters' assertions that the Project is inconsistent with applicable land use plans, for several reasons.

2481 DPW 2017, p. 5-1

2482 200 Cal.App.4th at 1563 [quoting *Save Our Peninsula Committee v. Monterey Cty. Bd. of Sup'rs* ("*Save Our Peninsula*") (2001) 87 Cal.App.4th 99, 142); *A Local & Regional Monitor v. City of Los Angeles* (1993) 16 Cal.App.4th 630, 648

2483 *Pfeiffer*, 200 Cal.App.4th at 1563 [citing *Save Our Peninsula*, 87 Cal.App.4th at 142]

2484 *Ibid.*

2485 *Joshua Tree Downtown Business All. v. Cty. of San Bernardino* (2016) 1 Cal.App.5th 677, 695-97

2486 *Pfeiffer*, 200 Cal.App.4th at 1561-63; *N. Coast Rivers All. v. Marin Mun. Water Dist. Bd. of Directors* (2013) 216 Cal.App.4th 614, 632-33

2487 DRP 2017, pp. 5.8-19 to -74; 5.9-23 to -33

2488 *Id.,* pp. 5.8-21 to -71

First, as set forth above, the Commenters' own cited authority affirms that an agency's consistency determination is valid unless a challenger can meet the "heavy burden" to show that "no reasonable person" could consider the project consistent with the plan, when that plan is viewed as a whole.[2489] "[G]eneral plan consistency may be found where a project is compatible with, and does not frustrate, the general plan's goals and policies."[2490] "[A]s long as the . . . [agency] reasonably could have made a determination of consistency, the . . . [agency's] decision must be upheld."[2491] The Commenters' opinions about the applicable plans are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration, but none of these opinions establish that it would be entirely unreasonable for the Regional Planning Commission and Board of Supervisors to consider the Project compatible with the applicable plans.

Second, the Commenters do not argue that the Project is inconsistent with the General Plan, the AVAP, or any other applicable plan, as that plan is viewed in its entirety. Instead, the Commenters' claims are based on their argument that the Project conflicts with a handful of individual plan goals and policies, viewed in isolation. (See Comments F.8-228 through F.8-241.) As described in the Draft EIR and in responses to Comments F.8-228 through the F.8-241, the Project does not, in fact, conflict with any of the specific goals or policies cited by the Commenters. However, even if the Project *did* arguably create some tension with the handful of plan goals and policies cited by the Commenters, this fact would not establish that the Project is inconsistent with the plans when viewed as a whole.

"It is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan."[2492] No project "could completely satisfy every policy" in a general plan, and the law "does not impose such a requirement." (*Sequoyah Hills Homeowners Assn v. City of Oakland* (1993) 23 Cal.App.4th 704, 719; see also *Pfeiffer*, 200 Cal.App.4th at 1563 (quoting *Friends of Lagoon Valley*, 154 Cal.App.4th at 817) ("State law does not require perfect conformity between a proposed project and the applicable general plan.") "General plans ordinarily do not state specific mandates or prohibitions. Rather, they state 'policies,' and set forth 'goals.'"[2493] "An action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment."[2494] It is only required "that a project be 'in agreement or harmony with the terms of the applicable plan, not in rigid conformity with every detail thereof.'" (*Naraghi Lakes*, 1 Cal.App.5th at 18 [quoting *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 678].)

Moreover, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies. It is enough that the proposed project will be compatible with the objectives, policies, general land uses and programs specified in the

[2489] *Pfeiffer*, 200 Cal.App.4th at 1563
[2490] *Naraghi Lakes Neighborhood Pres. Ass'n v. City of Modesto* (2016) 1 Cal. App. 5th 9, 23 [quotation omitted].
[2491] *Id.* [quoting *California Native Plant Society v. City of Rancho Cordova* ("*CNPS*") (2009) 172 Cal.App.4th 603, 637]
[2492] *Pfeiffer*, 200 Cal.App.4th at 1563 [quoting *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1511]
[2493] *Naraghi Lakes*, 1 Cal.App.5th at 17
[2494] *Pfeiffer*, 200 Cal.App.4th at 1563 [quoting *Friends of Lagoon Valley*, 154 Cal.App.4th at 817]

applicable plan."[2495] Accordingly, agencies have a well-established authority to '"weigh and balance the various policies when considering project compliance."[2496] Even a project that conflicts with one or several specific policies can validly be considered consistent with the plan as whole, as long the agency reasonably concludes that the project is "generally compatible with the . . . policies" in the plan, or concludes that "'on balance,' the project would further the . . . policies and not obstruct their attainment."[2497] (See also *Friends of Lagoon Valley*, 154 Cal.App.4th at 822 [although city acknowledged that "some aspects of ... [the project] ... deviated from particular planning provisions" in the city's General Plan, the city's overall consistency determination was affirmed; the court rejected claims of General Plan inconsistency, noting that the challenger "construes the policies expressed in the plans too rigidly and ignores the flexibility City officials have in implementing them"].) And, as stated above, to demonstrate inconsistency, it must be the case that no reasonable person could consider the project to be consistent with the plan as whole, even after considering all of the evidence supporting the agency's consistency determination.[2498]

Here, the Project furthers numerous General Plan goals and policies, including but not limited to the following:

- The Project furthers the five "**Guiding Principles**" of the General Plan: to employ smart growth; ensure community services and infrastructure are sufficient to accommodate growth; provide the foundation for a strong and diverse economy; promote excellence in environmental resource management; and provide healthy, livable and equitable communities. The Project will provide housing opportunities at a variety of income levels pursuant to the Centennial Affordable Housing Implementation Plan (PDF 9-1), will create an estimated 23,675 permanent jobs, will protect large expanses of open space, along with scattered parks and recreational facilities, will locate commercial areas, schools, and parks at the village cores in order to promote a balanced distribution of land uses, will feature a network of bikeways, trails and sidewalks to promote healthy living, and will accommodate health clubs, health food stores, health service clinics, health retreats, community gardens, as well as 50 acres of small-scale agriculture and agriculture-related uses such as community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, and commercial greenhouses.[2499] (See response to Comment F.8-20.)
- The Project meets the goals and policies of the General Plan **Land Use Element,** including but not limited to the following:
    - **Goal LU 5** ("Vibrant, livable and healthy communities with a mix of land uses, services and amenities") and related **Policies LU 5.1, 5.2, 5.3, 5., 5.5, 5.6, 5.7 and 5.8**. As described above and in the Draft EIR, Section 5.8, L*and Use, Entitlements & Planning*, pages 5.8-7 through 5.8-9 and pages 5.8-20 through

[2495] *Sierra Club*, 121 Cal. App. 4th at 1511
[2496] *San Francisco Tomorrow v. City & Cnty. of San Francisco* (2014) 228 Cal. App. 4th 1239, 1252
[2497] *Ibid.*
[2498] *Pfeiffer*, 200 Call.App.4th at 1566; *CNPS*, 172 Cal.App.4th at 637-39
[2499] DRP 2017, pp. 5.8-7 to -9, -20, -21; pp. 5.9-1, -28; LACDRP 2015, pp. 18-19

5.8-21, the Project will provide a broad mix of land uses, with a well-distributed mix of commercial, recreational and educational uses.

- **Goal LU 9** ("Land use patterns and community infrastructure that promote health and wellness"), and related **Policies 9.1, 9.2 & 9.3**, and **Goal LU 10** ("Well-designed and healthy places that support a diversity of built environments"). The Project will provide a network of bikeways, trails and sidewalks throughout the Project site, along with scattered parks and recreational facilities, and will provide opportunities for such uses as health clubs, health food stores, health service clinics, health retreats, community gardens, community gardens, and farmers markets.
- **Goal LU 11** ("Development that utilize sustainable design techniques") and related **Policies 11.4, 11.7 and 11.8**. The Project includes numerous sustainable design performance metrics, described in the Mission and Vision, and in Appendix 2-A, *Green Development Program,* of the Specific Plan.

- The Project furthers the goals and priorities of the County's **Housing Element**,[2500] thereby assisting the County in meeting its legal obligations under the State Housing Element Law, Gov. Code § 65580 *et seq*, and in addressing the Statewide affordable housing crisis. Specifically, the Project would further the following Housing Element goals and policies:
  - **Goal 1** (**"**A wide range of housing types in sufficient supply to meet the needs of current and future residents, particularly for persons with special needs, including but not limited to low income households, seniors, persons with disabilities, large households, single-parent households, the homeless and at risk of homelessness, and farmworkers") and **Policy 1.1** ("Make available through land use planning and zoning an adequate inventory of vacant and underutilized sites to accommodate the County's Regional Housing Needs Assessment (RHNA) allocation"). The Project would contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production in unincorporated areas of Los Angeles County to meet regional housing needs.[2501]
  - **Goal 2** ("Sustainable communities with access to employment opportunities, community facilities and services, and amenities"), and **Policy 2.1** ("Support the development of housing for low and moderate-income households and those with special needs near employment and transit"). The Project includes a Mobility Plan that requires formation and ongoing operation of a Transportation Management Association, includes facilities for alternatives to automobile (e.g., public transit, bicycle and pedestrian systems), and locates

[2500] LACDRP 2014
[2501] DRP 2017, pp. 5.9-2, -3, -28, -29

the town center in a manner to accommodate mixed-use developments and high density residential uses nearby to commercial uses.[2502]

- **Goal 3** ("A housing supply that ranges broadly in housing costs to enable all households, regardless of income, to secure adequate housing"), **Policy 1.3** ("Coordinate with the private sector in the development of housing for low and moderate-income households and those with special needs. Where appropriate, promote such development through incentives"), **Policy 1.4** ("Assist housing developers to identify and consolidate suitable sites for developing housing for low and moderate-income households and those with special needs") and **Policy 3.1** ("Promote mixed income neighborhoods and a diversity of housing types throughout the unincorporated areas to increase housing choices for all economic segments of the population"). In accordance with the Centennial Affordable Housing Implementation Plan (PDF 9-1), the Project would also include a minimum of 10 percent or 1,933 units that would be affordable to either very low, low, or moderate-income households, and a mix of single family attached, multi-family attached, and mixed-use units would be provided throughout the Project site.[2503]

- The Project furthers the goals and policies in the General Plan's **Economic Development Element**, including but not limited to the following goals and policies:
  - **Goal ED 1** ("An economic base and fiscal structures that attract and retain valuable industries and businesses") and related **Policies ED 1.1, 1.2, 1.4, 1.5, 1.6, and 1.8.** The Project will create an estimated 23,675 permanent jobs, and a full range of light industrial, business, and other commercial uses are planned that are intended to yield a broad range of employment opportunities, from retail services to large corporate employers.[2504]
  - **Goal ED 2** ("Land use practices and regulations that foster economic development and growth") and related policies **ED 2.4, 2.5, 2.6, and 2.7**. As described immediately above and in the Draft EIR, the Project will create jobs and employment opportunities that will foster economic growth in the Economic Opportunity Areas that are identified in the AVAP as the appropriate locations for growth.

Focusing specifically on the AVAP, the component of the General Plan most directly relevant to the Project site, the Commenters do not dispute that, as shown in the Draft EIR, Section 5.8, *Land Use, Entitlements and Planning*, pages 5.8-20 through 5.8-71, the Project would further all of the following AVAP goals and policies, among many others:

- **Goal LU 1** ("A land use pattern that maintains and enhances the rural character of the unincorporated Antelope Valley"), and related **Policies LU 1.1, 1.2 and 1.3.** The Project conforms to the Land Use Policy Map of the AVAP, focuses development and

[2502] *Id.,* pp. 5.7-20, 5.8-30 to -41
[2503] *Id.,* p. 5.9-28
[2504] *Id.,* pp. 5.8-74, 5.9-29

associated growth within areas identified for growth, and preserves rural preserve areas.

- **Policy LU 1.4** ("Ensure that there are appropriate lands for commercial and industrial services throughout the unincorporated Antelope Valley sufficient to serve the daily needs of rural residents and to provide local employment opportunities"). The Project's commercial, business park and institutional/civic uses will serve rural residents and are anticipated to create 23,675 permanent jobs.
- **Policy LU 1.5** ("Provide varied lands for residential uses sufficient to meet the needs of all segments of the population, and allow for agriculture, equestrian uses and animal-keeping uses in these areas where appropriate"). The Project will create significant housing opportunities for different segments of the population, and will set aside 50 acres for small-scale agriculture.
- **Goal LU 4** ("A land use pattern that promotes the efficient use of existing and/or planned infrastructure and public facilities"). The Project will promote efficient use of infrastructure and public facilities, by implementing specific planning and design metrics in the Specific Plan.[2505]
- **Goal LU 6** ("A land use pattern that makes the Antelope Valley a sustainable and resilient place to live"). One of the Project's key objectives is to implement the AVAP land use designation for the site, and ensure consistency with the SCAG Sustainable Community Strategy.[2506]
- **Goal M 3** ("An efficient network of major, secondary, and limited secondary highways to serve the Antelope Valley") and related **Policies M 3.1, M 3.2, M 3.3, M 3.4, and M 3.5.** The Project's internal roadways will establish the highway system that will serve the Project and surrounding areas, and the Project will also create a network of "right-sized" secondary roadways, contribute to the Project's fair share for improvements, and comply with the Traffic Mitigation Agreement with the County and Caltrans.[2507]
- **Goal COS 10** ("Diverse energy systems that utilize existing renewable or waste resources to meet future energy demands"), **Goal COS 11** ("Energy systems for use in public facilities that reduce consumption of nonrenewable resources while maintaining public safety"), **Goal COS 12** ("Individual energy systems for onsite use that reduce consumption of non-renewable resources and dependence on utility-scale energy production facilities") and related **Policies COS 10.1, 10.2, 10.6**, **11.2, 11.3, and 12.1**, and **Policy ED 1.10.** A minimum of 50 percent of the Project's anticipated electrical energy demand at buildout shall be met by onsite renewable energy, the Project will equip 100 percent of all single-family detached homes to be "solar-ready" or equivalent, based on the latest technology, the Project's wastewater reclamation facilities will capture and reuse biogas for energy, and the Specific Plan's Utility land use designation allows for a Materials Recovery Facility/Solid Waste Transfer Facility and green waste mulching.

[2505] *Id.,* Appendix 4.0-A, Table MV-1, pp. M-8 to M-10
[2506] *Id.,* p. 5.21-85
[2507] *Id.,* pp. 5.10-1 to -2

- **Goal COS 17** ("Buildings are sustainable, conserving energy, water, and other resources, and limiting greenhouse gas emissions") and related **Policies COS 17.1, 17.2, 17.4, 17.5, 17.6, 17.7, 17.8, and 17.9.** The Project includes a Green Development Program that requires all development to incorporate environmentally sustainable development practices in the design and construction of the Project.
- **Policy ED 1.20** ("Support the development of a range of travel options that better connect the Antelope Valley to existing regional trade and employment centers in other regions, including the High Desert Corridor and the Northwest 138 Corridor Improvement Project, as directed in the policies of the Mobility Element"). + other mobility
- **Goal ED 1** ("A healthy and balanced economic base in the Antelope Valley that attracts a wide range of industries and businesses and provides high-paying jobs for local residents"), **Policy ED 1.1** ("Promote the continued development of regional commercial and industrial employment centers in economic opportunity areas in the Antelope Valley.") and **Policy ED 1.3** ("Support the growth of "high-tech" industries to employ the Antelope Valley population's highly educated workforce.") The Project would provide areas for nonresidential development that would accommodate commercial and business park uses that would accommodate employment centers and improve the economic base of the Antelope Valley.
- **Policy ED 1.15** ("Where appropriate, promote residential development as part of a wider mixed-use strategy in communities that desire such uses in their areas and where plans for major infrastructure and facilities are currently underway. These areas have been identified as economic opportunity areas as shown in the Land Use Policy Map (Map 2.1) of this Area Plan"). The Project is consistent with the Land Use Policy Map of the AVAP, would include mixed use neighborhoods to promote walkability as described in the Specific Plan, and would focus land use development and associated growth within the West EOA and Future Rural Town Area where future development is planned and anticipated.
- **Policy ED 1.19** ("Promote the creation of a four-year public university in the Antelope Valley to provide opportunities for continuing education and workforce development"). The Project would accommodate a college campus as a permitted use in areas designated as Business Park, School, and Institutional/Civic and allowed subject to a CUP in areas designated as Mixed Use, Commercial, and Recreation/Entertainment. Also, the increase in population brought by the Project would make a university in the Antelope Valley more viable.

This is only a small subset of the numerous General Plan and AVAP goals and policies that the Project would further.[2508]

To the extent that the Project creates any arguable inconsistency with any of the specific AVAP or General Plan goals and policies cited by the Commenters in their comment letter, those goals and policies must be weighed and balanced against the numerous goals and

[2508] *Id.,* pp. 5.8-20 to -71

policies that the Project would further. On balance, the Project is in harmony with the General Plan, the AVAP, and all applicable plans, when those plans are viewed as a whole. The Project is generally compatible with the plans' goals and policies and will not obstruct their attainment.

"Because EIRs are required only to evaluate 'any inconsistencies' with plans, no analysis should be required if the project is consistent with the relevant plans."[2509] Here, the EIR's analysis demonstrates that the Project is not inconsistent with the General Plan, the AVAP, or any other applicable plan, especially when those plans are viewed as a whole. Therefore, the EIR's Land Use, Entitlements and Planning section properly concludes that the Project does not have the potential to cause a significant impact on the environment.

Third, it is also important to note that land use inconsistency is not, standing alone, a significant CEQA impact. CEQA's scope is limited to "physical impacts on the environment," and does not include "social or economic impacts."[2510] "[A]n inconsistency between a project and other land use controls does not in itself mandate a finding of significance… [i]t is merely a factor to be considered in determining whether a particular project may cause a significant environmental effect."[2511] Therefore, it is "incorrect" to assert that "[land use] inconsistency itself is an environmental impact"; rather, "inconsistency between a proposed project and an applicable plan is a legal determination, not a physical impact on the environment." (Kostka & Zischke, Practice Under the California Environmental Quality Act (2d ed. Cal CEB) § 12.34; see also *Highway 68 Coal.*, 14 Cal. App. 5th at 893 ("the issue of whether a proposed project is consistent with a county's general plan is not a CEQA issue").)

Even if the Project were inconsistent with an applicable plan (which it is not), this would only present a CEQA issue to the extent the inconsistency would cause "physical impacts on the environment."[2512] The Commenters provide their opinions disputing the County's legal determination of plan consistency, but the Commenters do not identify how the alleged inconsistencies would cause any significant physical impacts on the environment that are distinct from the impacts analyzed in the other sections of the EIR. The EIR fully discloses, analyzes and mitigates the Project's potentially significant physical impacts on the environment in compliance with CEQA.

Response to Comment F.8-228:

Page 5.9-24 of the Draft EIR acknowledges that the projected population of the Project is more than the projected 2040 population for the two TAZs covering the Project site. SCAG projects a 2040 resident population of 51,872 residents, while it is estimated that 57,150 persons would be residents of the Project. However, Table 5.9-14 on page 5.9-17 shows that SCAG's 2040 household projections for the two TAZs is 22,496 households, which is more than the 19,333 dwelling units proposed by the Project. Thus, although the Project may exceed SCAG's population projections, it would not exceed – and in fact, would be

[2509] *Id., N. Coast Rivers Alliance*, 216 Cal.App.4th at 632 [quoting C*ity of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 918-919]
[2510] CEQA Guidelines §§ 21080(e)(2), 21082.2(c)
[2511] *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1207
[2512] CEQA Guidelines § 21080(e)(2)

considerably less than – SCAG's household projections. The potential exceedance in SCAG's population projection can be attributed to the difference in assumed household sizes, with SCAG assuming a smaller household size than the Draft EIR.[2513] The growth forecasts in the 2016-2040 RTP/SCS assume an average household size in the region of 3.0 persons per household by 2040, which is more in line with the Project's 57,120 residents in 19,333 units/households (2.95 persons per household).

Also, the 2016 RTP/SCS states that TAZ level data or any data at a geography smaller than the jurisdictional level is included in the draft growth forecasts for regional modeling purpose only, and is advisory and non-binding, since these sub-jurisdictional forecasts are not adopted as part of the 2016-2040 RTP/SCS. Thus, the difference in the Draft EIR's and SCAG's assumptions of the average household size in the Project area is not an inconsistency with SCAG projections or an inconsistency with the 2016-2040 RTP/SCS.

Since there is currently very limited existing development on the site and in the surrounding area that are within the two TAZs, SCAG's estimates of over 50,000 residents and over 22,000 households by 2040 clearly indicate that future growth is expected in the area and anticipated in the SCAG (see Exhibits 3, 6, and 9 in the Demographics and Growth Forecast for the 2016-2040 RTP/SCS). In addition, the higher estimate of the resident population of the Project provides a more conservative estimate for impact analysis in the Draft EIR.

With regards to Project consistency with the SCS component of the 2016-2040 RTP/SCS, Government Code Section 65080(b)(2)(B) states that SCAG must prepare an SCS using the more recent planning assumptions, considering local general plans and other factors. The Project is consistent with the AVAP that was adopted by the County in 2015. The SCS must identify the general location of land uses, residential densities, and building intensities within the region; areas to house all the population of the region; areas to house projected regional housing needs; and a transportation network to service transportation needs of the region. The SCS must also consider information on resource areas and farmlands and state housing goals; and forecast development pattern for the region. The Project is consistent with the planned development pattern for the Antelope Valley area and would provide housing for future residents of the region, which would be within the 2040 projections of SCAG. The Project would also help meet regional housing needs. SCAG also states that the sub-jurisdictional data and/or maps used to determine consistency with the SCS shall only be used at the discretion and with the approval of the local jurisdiction. While the County has presented sub-jurisdictional data at the TAZ level in the Draft EIR for informational purposes, the County in its discretion does not consider the difference in population projections to be a significant impact in light of the Project's consistency with the SCAG's household projections.

The development of the Project site is anticipated by, and consistent with, SCAG's 2012-2035 RTP/SCS, as well as SCAG's 2016-2040 RTP/SCS.[2514] (See responses to Comments F.8-229 and F.8-233.) When developing the 2012 RTP/SCS, some commenters raised questions about whether the development of the Project site should be incorporated as part of the

[2513] DRP 2017, p. 5.9-11

[2514] *Id.,* pp. 5.8-2, -5 to -7, -73, -74; pp. 5.9-1 to -3, -7, -8, -23 to -28

RTP/SCS. SCAG explicitly determined that development of the Project site should, and would, remain part of the plan, and clarified the EIR's methodology to better describe the fact that the plan incorporated development of the Project site into the RTP/SCS's regional growth forecasts.[2515]

Finally, as described in response to Comment F.8-227, CEQA's scope is limited to "physical impacts on the environment," and does not include "social or economic impacts."[2516] "[A]n inconsistency between a project and other land use controls does not in itself mandate a finding of significance… [i]t is merely a factor to be considered in determining whether a particular project may cause a significant environmental effect."[2517] Therefore, it is "incorrect" to assert that "[plan] inconsistency itself is an environmental impact"; rather, "inconsistency between a proposed project and an applicable plan is a legal determination, not a physical impact on the environment."[2518] Even to the extent there is any inconsistency between the Project and the RTP-SCS, this would only create a CEQA impact to the extent it would cause a physical impact on the environment. The Commenters do not describe any way in which the alleged inconsistency they identify would lead to impacts on the physical environment that are distinct from the physical impacts analyzed in the other chapters of the EIR. The EIR fully analyzes and mitigates all of the Project's reasonably foreseeable physical impacts on the environment in compliance with CEQA.

Response to Comment F.8-229:

As the Draft EIR states, the EIR "does not tier from, nor is it legally reliant upon" the AVAP EIR.[2519] The fact that the EIR cites to the AVAP and the AVAP EIR in various places does not change this fact. The Commenters cite no authority for the proposition that any time an EIR cites to a previous EIR, the later EIR is automatically "tiered" from, or legally reliant upon, the cited EIR. CEQA imposes no such requirement. To the contrary, CEQA and the State CEQA Guidelines explicitly authorize, and encourage, the practice of citing to, and incorporating by reference, relevant information from other EIRs and from other relevant documents.[2520] The AVAP and the AVAP EIR are part of the planning context for the Project, and therefore it is entirely appropriate that the Project EIR cite to the AVAP and to the AVAP EIR.[2521]

Under CEQA, "tiering" is governed by sections 21093 and 21094 of the State Public Resources Code, and two specific State CEQA Guidelines, 15152 and 15385, both entitled "Tiering." "Tiering is 'the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs.'" (*In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1170 [quoting State CEQA Guidelines, § 15385.]) "Tiering is properly used to defer analysis of environmental impacts and mitigation measures to later phases when the impacts or mitigation measures

2515 SCAG. 2012 (April). 2012-2035 Regional Transportation Plan, Comments and Responses, at pp. 72-73 and 246-47; SCAG (March). Final Programmatic Environmental Impact Report for the 2012-2035 RTS/SCS, at pp. 2-5 and 4-5.
2516 CEQA Guidelines §§ 21080(e)(2), 21082.2(c)
2517 *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1207
2518 Kostka & Zischke, Practice Under the California Environmental Quality Act (2d ed. Cal CEB) § 12.34
2519 DRP 2017, p. 5.8-3
2520 CEQA Guidelines § 21061; CEQA Guidelines §§ 15148 & 15150
2521 DRP 2017, p. 2-3; 3-11 to -22; 4-8 to -10

are not determined by the first-tier approval decision but are specific to the later phases."[2522] CEQA entrusts to the lead agency the responsibility to determine whether it is feasible and appropriate in a given circumstance for an EIR to "tier" from a previous EIR.[2523] The EIR for this Project does not "tier" from any previous EIR.

The relationship between the Project EIR and the previously certified General Plan and AVAP EIRs is governed by a different section of the Public Resources Code, section 21083.3, and a different State CEQA Guideline, § 15183, entitled "Projects Consistent with a Community Plan, General Plan, or Zoning." CEQA section 21083.3 and State CEQA Guideline section 15183 apply when, as here, a project is consistent with a General Plan for which an EIR was certified. As the Supreme Court has explained, "[w]hen approving a project that is consistent with a community plan, general plan, or zoning ordinance for which an environmental impact report already has been certified, a public agency need examine only those environmental effects that are peculiar to the project and were not analyzed or were insufficiently analyzed in the prior environmental impact report."[2524]

Here, the Project EIR falls within the parameters of CEQA § 21083.3 and State CEQA Guideline § 151583 because the Project is consistent with several different adopted plans, and an EIR was certified for each of those plans. First, although the EIR does not tier from the EIRs for the Southern California Association of Governments' 2012-2035 and 2016-2040 Regional Transportation Plans/Sustainable Community Strategies, the increase in housing and employment that would occur with Project implementation is consistent with both RTP/SCS's projections for the Project site.[2525] Second, the Project is also consistent with the AVAP as adopted by the Board in June 2015. Third, when the Board of Supervisors adopted its comprehensive 2035 General Plan Update in October 2015, it incorporated all adopted area plans – including the June 2015 AVAP, which identified the Project site for development as an Economic Opportunity Area – into the County's General Plan. EIRs were certified for all of these plans. Accordingly, CEQA only legally requires the Project EIR to analyze those "environmental effects that are peculiar to the project and were not analyzed or were insufficiently analyzed" in the previously certified EIRs.[2526] The Project EIR more than fulfills this legal requirement. The Project more than sufficiently analyzes all impacts peculiar to the Project which were not analyzed in the prior EIRs – and even goes well beyond this minimum legal requirement to ensure that all reasonably foreseeable environmental impacts of the Project are fully addressed.

As the Draft EIR explicitly discloses and acknowledges, Commenter CBD filed a lawsuit challenging the County's EIR for the AVAP, and it is theoretically possible that one outcome of that suit could be that the County's June 2015 adoption of the AVAP could be set aside.[2527]

2522 *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 431

2523 CEQA Guidelines § 21093(b)

2524 *Muzzy Ranch Co. v. Solano Cty. Airport Land Use Comm'n* (2007) 41 Cal. 4th 372, 388–89; *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal. App. 4th 911, 935; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359, 1374

2525 DRP 2017, pp. 5.8-73 and -74, 5.9-27 to -32

2526 *Muzzy Ranch Co.*, 41 Cal.4th at 389

2527 DRP 2017, pp. 5.8-71 to 5.8-73

However, it is very unlikely that this suit will result in any outcome that would affect the analysis in this Project's EIR, for several reasons.

First, in May 2017, the Los Angeles Superior Court rejected CBD's challenge in its entirety, affirming the validity of the AVAP EIR.[2528] CBD's challenge to the AVAP EIR was very narrow – CBD did not dispute that the AVAP EIR complied with CEQA in all respects when analyzing and mitigating the impacts of the version of the AVAP that was presented to the Board of Supervisors in November 2014. Instead, CBD's challenge rested entirely on its contention that the AVAP EIR and the Board of Supervisors' findings insufficiently analyzed certain relatively minor *modifications* to the AVAP that the Board of Supervisors made between November 2014 and June 2015.[2529] As the Superior Court noted, CBD's "arguments implicitly concede the adequacy of the FEIR without the subsequent amendments."[2530]

As the County noted in briefing:

> As is typical of a massive planning process, the draft AVAP underwent a number of modifications prior to final adoption in response to numerous, diverse stakeholders. Ultimately, the adopted AVAP reconciled inconsistencies between land in the draft AVAP both located within an EOA, i.e., targeted for growth, and subject to new, more-restrictive growth policies. Petitioner Center for Biological Diversity ("CBD") recognized these inconsistencies during the administrative process and asked the County to resolve them by further restricting growth in the proposed EOAs. (AR 2774-75.) Instead, the County weighed the multiple policy priorities before it and determined it best to promote and direct future growth into the EOAs. (See *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199 ("*County of Inyo*") ["CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal."])
>
> CBD is disappointed that the ultimately-adopted AVAP includes a slightly smaller increase of SEA acreage than originally identified, and that the EOAs will not be subject to some of the AVAP's more restrictive growth policies. CBD's disappointment, however, does not translate into a violation of the California Environmental Quality Act ("CEQA").[2531]

2528 See generally AVAP Ruling.

2529 See CBD AVAP Open. Br.; CBD AVAP Reply Br.

2530 AVAP Ruling, at p. 13. See also Reporter's Transcript of Proceedings, *Ctr. for Biologicial Diversity v. Cty. of Los Angeles*, No. BS 156932 (L.A. Cty. Sup. Ct. May 16, 2017) ("AVAP Transcript"), at pp. 4 -5 (Court: "To me it seems, and you can correct me if you disagree, it seems to me the petitioner is conceding the validity of the FEIR for the project"; CBD's counsel: "I think that's correct, your Honor. The focus here is on the change of project"); see also *id.* at p. 58 (CBD's counsel: "We haven't attacked the adequacy of the EIR, per se . . .."). To the extent CBD's petition alleged any other inadequacies in the AVAP EIR, CBD has now waived those arguments by declining to present them to the trial court in merits briefing. (See *City of Arcadia v. State Water Res. Control Bd.* (2006) 135 Cal. App. 4th 1392, 1424.)

2531 County AVAP Br., at p. 1 (citing Joint Appendix, *Ctr. For Biological Diversity v. Cnty. of Los Angeles*, No. BS156932 (L.A. Cnty. Sup. Ct. Feb. 15, 2017) ("AVAP Joint Appendix"), at pp. AR 2774-75).

As the County further explained, the changes made to the project between November 2014 and June 2015 did not rise to the level requiring recirculation or supplemental CEQA review, and the changes also did not render either the EIR's Project Description or the Board of Supervisors' findings inadequate.[2532] As the County noted, although "CBD laments that the Board did not apply the SEA designation to an unspecified 14,000 acres of the originally-proposed 356,773 acres . . . [t]o put this in context, a reduction of 14,000 acres by the Board still results in 342,773 acres of SEA, an approximately 208.000-acre (or 154%) expansion over existing SEA acres in the Project Area."[2533] The Los Angeles Superior Court agreed with the County in all respects, rejecting all of CBD's challenges and upholding the validity of the AVAP EIR, noting as follows, *inter alia*:

> At the hearing, the County's counsel argued that the eliminated policies are implemented for the EOAs through the land use designation. The court reviewed the Land Use Policy maps showing the SEAs and EOA land use designations. AR 30358-59. These maps show that the land use designation for the East EOA is mostly RL 10 (one residence every 10 acres) and RL20 (one residence every 20 acres) in the area covered by the former SEA within the East EOA. AR 459, 30359. Thus, the SEA may have been removed from the East EOA, but the rural density requirement of one home every 20 acres otherwise protects the scenic views. The same is true of the other two EOAs, and the West EOA also has a designation for a considerable amount of open space. AR 30358-59. Hence, the land use designations for the EOAs provide considerable protection for scenic views in the EOAs despite the loss of SEA.
>
> The 14,000 acre decrease from the Project's 208,000 acre increase is a number that by itself means little. The FEIR does not rely on the designation of any particular acreage as SEA in its environmental analysis, or otherwise state or imply that the proposed 365,773 acres of SEA is necessary to achieve the analyzed minimization of impacts. Indeed, as the County notes, the FEIR is a programmatic document which may be based more on conceptual analysis than hard numbers. Opp. at 9, n. 5. The FEIR and AVAP both state that the SEAs are intended to change gradually over time, and to continually evolve as part of the balance between environmental protection and property rights. AR 474, 30305. This is additional support for a conclusion that the somewhat smaller amount of SEA acreage in the approved Project is not a significant change from the Project studied in the FEIR.
>
> CBD has not shown that the amendments to the Project were significant new information that changed the Project in a way that deprived the public of a meaningful opportunity to comment on a substantial new or increased environmental effect. Guidelines § 15088.5(a). As a result, substantial evidence supports the County's decision that the amendments did not change

[2532] County AVAP Br., at pp. 8-14.
[2533] *Id.* at p. 9 (citing AVAP Joint Appendix, at p. AR 651).

the FEIR's conclusions and the County is not required to revise and recirculate the FEIR.

[. . .]

More importantly, the amendments did not change the Project analyzed by the FEIR. As discussed *ante*, the amendments were not intended to create a different Project, but rather to make the existing Project internally consistent. The overarching purpose of the AVAP is to preserve the natural environment and rural character of the Antelope Valley while responding to the need for additional housing and employment. The AVAP seeks to focus new development into three EOAs while preserving areas outside the EOAs and existing town areas with new Open Space and Land Use policies, new low-density land use designations, and a significant expansion of SEAs. The draft AVAP inconsistently required land within an EOA and necessarily targeted for growth to be subject to the new, more-restrictive growth policies for SEA, Rural Preserve Areas, and other policies. The amendments implemented the Project's purpose of causing development to occur within the EOAs by removing those restrictions within EOAs. The amendments were consistent with the AVAP's purpose and did not change the Project.

The FEIR adequately describes the Project as approved, permitted informed decision-making about the Project's benefits and environmental impacts.

[. . .]

The Board of Supervisor's decision in the Statement of Overriding Considerations – that the amended AVAP's benefits outweigh its environmental impacts that cannot feasibly be mitigated -- may not be lightly overturned. *See* City of Marina v. Board of Trustees of Cal. State University, (2006) 39 Cal.4th 341, 368. The Board of Supervisors' decision is supported by substantial evidence.

[. . .]

The County's decision to approve the Project as amended did not violate CEQA. "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal." County of Inyo v. City of Los Angeles, *supra,* 71 Cal.App.3d at 199. The amendments are the type of change to be expected in the CEQA process. *Cf* County of Inyo, *supra,* 71 Cal.App.3d at 199 (selection of narrow project which morphed into much broader project frustrated CEQA's public information aim).

[. . .]

The petition for writ of mandate is denied.[2534]

Second, even if the Superior Court's decision were reversed in some respects, it is unlikely that this would require the County to set aside its adoption of the AVAP or its certification of the AVAP EIR. CEQA relief is permitted only in a case of prejudicial error, and "there is no presumption that error is prejudicial."[2535] In *Neighbors for Smart Rail v. Exposition Metro Line Const. Auth.* (2013) 57 Cal.4th at 463-65 (plurality op.) and 478 (Baxter, J., concurring and dissenting), the California Supreme Court found that an EIR used an impermissible baseline to analyze CEQA's most litigated topics (traffic, parking, and related vehicular emissions), but the EIR was not set aside because six of seven justices agreed that there was no prejudicial error. Moreover, even when a CEQA error *is* prejudicial, a court may "exercise its inherent equitable authority to maintain the status quo and allow the regulations to remain operative" pending compliance with CEQA, especially when "the environment [would] be given greater protection." (*POET, LLC v. Cal. Air Res. Bd.* 218 Cal.App.4th 681, 761-62 (2013) ("*POET I*"); see also *POET, LLC v. State Air Res. Bd.* (2017)12 Cal. App. 5th 52, 101 ("*POET II*"); see also Pub. Res. Code. § 21168.9(a)(2) [CEQA's remedies section only specifically authorizes a court to suspend project activities that both "prejudice the consideration or implementation of particular mitigation measures or alternatives" *and* "could result in an adverse change or alteration to the physical environment."].) In *POET I* and *POET II*, despite twice finding that the Air Resources Board failed to comply with CEQA when adopting a Low Carbon Fuel Standards regulation, the Court of Appeal twice found that the regulation should remain in place while the CEQA error was corrected because the environment would receive greater environmental protection if the regulation remained in effect than it would if the regulation were set aside. Here, as the Los Angeles Superior Court noted, "[t]he overarching purpose of the AVAP is to *preserve the natural environment and rural character of the Antelope Valley* while responding to the need for additional housing and employment."[2536] If the AVAP were set aside, the environment would be given substantially *less* protection, because the AVAP authorizes a much less concentrated development pattern of 106,180 dwelling units at full buildout, as compared to the now–superseded former Antelope Valley Areawide General Plan ("AVAGP"), which permitted 278,158 dwelling units at full buildout in the same area.[2537] For this reason, as the AVAP EIR notes (without dispute by CBD), the "No Project/Adopted Area Plan" alternative to the AVAP is environmentally inferior to the AVAP.[2538] Moreover, because CBD is only challenging certain amendments the Board of Supervisors made to the draft AVAP, and because CBD's "arguments implicitly concede the adequacy of the FEIR without the subsequent amendments,"[2539] CBD's challenge does not provide any basis upon which the AVAP as a whole could be set aside. In fact, Commenter CBD's own counsel made an extremely rare concession for a petitioner, acknowledging

[2534] AVAP Ruling, at pp. 17-21 [footnotes omitted] (citing AVAP Joint Appendix, at pp. AR 459, AR 30358-59); see also AVAP Joint Appendix, at p. AR 448
[2535] PRC § 21005(b)
[2536] AVAP Ruling, at p. 19 (emphasis added)
[2537] LACDRP 2014, p. 7-5
[2538] *Id*., p. 7-13
[2539] *Id.* p. 13

during trial that, for exactly these reasons, even if the petitioners prevail, "it may be a situation where remand without vacatur is appropriate."[2540]

Third, even in the unlikely event that CBD ultimately prevails in its lawsuit challenging the AVAP EIR, and even if the court set aside the Board's June 2015 approval of the AVAP, the Project would still be consistent with the County's General Plan. In October 2015, the Board of Supervisors approved a comprehensive 2035 General Plan Update, which explicitly incorporated the adopted AVAP as a component of the County's General Plan.[2541] No party challenged the County's October 2015 decision to adopt the 2035 General Plan Update, and so the relevant General Plan land use designations from the AVAP would remain in effect regardless of the outcome of CBD's challenge to the County's June 2015 AVAP approval. The statute of limitations to challenge the Board's October 2015 decision to approve the 2035 General Plan Update expired more than a year and half ago.[2542]

Fourth, even putting aside all of the above, even if the AVAP were set aside and the County were ordered to reinstate the previously operative AVAGP, the Project is also consistent with the AVAGP. The EIR discloses the speculative possibly that the AVAGP could be reinstated, and the EIR's analysis concludes that the Project would only require certain straightforward amendments to the AVAGP Land Use Policy Map, Hazards and Resources Map, Highway Plan Map and Trails Map to reflect the existence of the Centennial Specific Plan.[2543] None of these map amendments have any potential to cause a significant physical impact on the environment.[2544] With the exception of these straightforward revisions to the AVAGP, the Project is consistent with all applicable AVAGP policies and does not conflict with any policy in the AVAGP.[2545] Specifically, the Project would further:

1. **AVAGP Policy 6** ("Encourage growth in and adjacent to existing urban, suburban, and rural communities"). "The Project site is in the northernmost section of Los Angeles County. The Project site is near the communities of Gorman, Frazier Park and Neenach, south of Bakersfield and west of Lancaster. Although not located in or adjacent to an existing urban, suburban, or rural community, the Project is strategically located adjacent to 2 regional transportation facilities: the I-5 and the SR-138. The Project would ultimately improve the jobs-housing balance in the area and provide a variety of public, institutional, and recreational amenities, along with supporting infrastructure, allowing for opportunities for growth within the proposed Project, and creating a self-sustaining community. Additionally, because the Project site is located approximately 35 miles north of the nearest urban community (City of

[2540] AVAP Transcript, at p. 57.

[2541] See Resolution of the Board of Supervisors of the County of Los Angeles Relating to the Adoption of Project Number 02-305 General Plan Update (Oct. 6, 2015), at p. 4 ("All community-based plans are components of the General Plan," including the "Antelope Valley Area Plan"), at p. 6 ("In June 2015, the Board approved an update to the Antelope Valley Area Plan ("AV Plan Update"), a component of the General Plan Update").

[2542] Gov. Code § 65009(c)(1)

[2543] DRP 2017, pp. 5.8-71 to -73

[2544] *Lighthouse Field Beach Rescue*, 131 Cal.App.4th at 1207; Kostka & Zischke, § 12.34

[2545] *Id.,* pp. 5.8-71 to -73; see also generally Draft EIR, Appendix 5.8-A

Santa Clarita), development of the Project would not discourage additional growth in these areas, nor would it conflict with the intent of this policy."[2546]

2. **AVAGP Policy 26** ("Encourage an appropriate mix of land use types to prevent disharmony and degradation. Residential, commercial, employment, recreational and cultural uses should be integrated using appropriate buffering techniques to create a cohesive community."). "The Project provides for a community enhanced by careful placement of land use categories that promote the integration of a broad range of housing types; community support and employment uses; civic and educational amenities; and trails and greenways in a responsible, environmentally sensitive manner that is consistent with smart growth criteria. One of the primary purposes of the Project is to ensure orderly development, including addressing issues pertaining to land use compatibility. Site planning and building design, along with screening treatments (such as enhanced landscapes) would play an integral role in forming compatibility between uses, particularly in areas of clustered or mixed-use development. The Project locates the highest density residences nearest the village cores and town center and includes a Mixed-Use Overlay that allows for residences within commercial centers. This configuration would place larger populations in key centers, encouraging pedestrian activity and reduced vehicle trips. A system of Class I-IV bike lanes, community trails and greenway trails connects residential areas to village cores and the town center, parks, schools, and industrial areas, encouraging the use of alternative forms of transportation. The open spaces located on the periphery of the Project would remain natural and would act as buffers to sensitive areas beyond the Project boundary."[2547]

3. **AVAGP Policy 52** ("Encourage the development of socially and economically diverse communities.") "The provision of a wide range of housing types promotes social and economic diversity within Centennial."[2548]

4. **AVAGP Policy 71** ("Encourage and support local efforts to attract new industry to the Antelope Valley. While the aerospace and other government related industries should continue to remain as major employment generators, emphasis should also be given to attracting other types of employers.") "Over 597 acres are designated Business Park on the Project site to provide for employment uses such as light industrial, warehousing, manufacturing, high-tech, health care, professional office, and research and development activities. Schools, health care, commercial, and technology infrastructure would add to the employment base and supply the quality services that residents and businesses would use."[2549]

5. **AVAGP Policy 72** ("Actively support and promote equal employment for all residents of the Antelope Valley"). "Centennial proposes to create approximately 23,675 permanent jobs. Employment-inducing uses include, but are not limited to, light

[2546] (Draft EIR, Appendix 5.8-A, *Antelope Valley Areawide General Plan Consistency Analysis*, at p. 2.)
[2547] *Id.,* p. 6
[2548] *Id.,* p. 12
[2549] *Id.,* p. 14

industrial, warehouse, manufacturing, high-tech, health care, research and development, schools, hospitals, medical and professional offices, government facilities, commercial services, and retail uses. These types of uses would create job opportunities for Centennial and Antelope Valley residents from a wide range of economic and educational backgrounds."[2550]

6. **AVAGP Policy 73** ("Actively encourage and promote programs to provide adequate housing for all segments of the population"). "Most villages on the Project site offer a broad range of choices in living styles and housing types for citizens from a wide range of economic levels and age groups. Approximately 10 percent of the proposed residential units are designated as affordable housing. Also refer to Section 5.9 (Population, Housing, and Employment) of this EIR for additional discussion of the Affordable Housing Implementation Plan."[2551]

7. **AVAGP Policy 218** ("Encourage development of self-sufficient communities providing housing, employment and other opportunities"). "Centennial is planned to be a self-sustaining community with a variety of land uses, housing densities, and development intensities. The Project provides for a broad range of housing types through a wide range of residential densities. Additionally, almost 597 acres of business park land uses would provide employment opportunities for light industrial, warehouse, manufacturing, high-tech, health care, and research and development activities, as well as sites reserved for corporate headquarters. All communities have diverse types of interconnected recreational spaces and pedestrian-friendly core areas with a broad range of commercial and social opportunities. The Project locates villages surrounded by open spaces. Village cores combine commercial, public, recreational, and cultural uses within convenient walking distance to most households. The location of a variety of housing types serving a range of income levels adds to the complexity of uses, contributing to the vitality and cohesiveness of villages, promoting a livable environment and strong social infrastructure with accessible design amenities."[2552]

This is just a small subset of the numerous AVAGP policies that the Project would further.[2553] Accordingly, the EIR's analysis demonstrates that "[t]he Project would have less than significant land use impacts with the AVAGP plan amendments, zone change and other associated entitlements."[2554] As discussed in response to Comment F.8-227, the County's determination that the Project is generally consistent with the AVAGP as a whole must be affirmed unless "no reasonable person" could agree with the determination, bearing in mind the County's authority to weigh potentially inconsistent policies against the numerous AVAGP policies that the Project would further. And even if the Project were inconsistent in some respects with the AVAGP (which it is not), this would only present a CEQA issue to the extent the inconsistency would cause "physical impacts on the environment."[2555] Even if the

[2550] *Ibid.*
[2551] *Ibid.*
[2552] *Id.,* p. 35
[2553] *Id.,* pp. 5.8-71 to -73; see also generally Draft EIR, Appendix 5.8-A
[2554] *Id.,* p. 5.8-73
[2555] CEQA § 21080(e)(2)

AVAGP were to be reinstated, Project would not cause any significant impacts on the environment from land use conflicts.

Response to Comment F.8-230:

Please see response to Comment F.8-227. Irrespective of whether the Project conflicts with any particular General Plan provision, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies."[2556] "General plans ordinarily do not state specific mandates or prohibitions."[2557] This comment does not identify any General Plan goal or policy with which the Project would supposedly conflict. When summarizing some of the General Plan's overarching concepts, the Draft EIR states that "[t]he Land Use Element of the County General Plan also promotes land use compatibility through complementary land uses that promote a balanced distribution of jobs, housing and services within the overall Project site."[2558] The Draft EIR demonstrates that "[t]he Project implements this important General Plan concept by locating commercial areas, schools, and parks at the village cores to serve the demand for goods and services and meet the educational and recreational needs of the residents of the individual villages and balance the distribution of jobs, housing, and services within each village."[2559] The Commenters' unsubstantiated disagreement with this conclusion does not demonstrate the Project's inconsistency with *any* General Plan goal or policy, to say nothing of demonstrating the Project's inconsistency with any goal or policy containing "the type of specificity and clarity" necessary to render a Project inconsistent with the General Plan as a whole.[2560] The County has "broad discretion to construe its [General Plan] policies in light of the plan's purposes,"[2561] and the County's determination that the Project is generally consistent with the General Plan as a whole is at least reasonable, and therefore "must be upheld."[2562]

The Project is, in fact, fully consistent with the Land Use Element's provisions promoting balanced development. Please see responses to Comments F.8-7 through F.8-9, F.8-20 through F.8-33, and F.8-231. As these responses and the Draft EIR explains, the Project is designed to maximize vehicle capture rate and improve the County's jobs-housing balance, and the Project has been situated and designed to promote regional "smart growth" planning principles established in SCAG's RTP-SCS and the County's AVAP. There is nothing in the County's Land Use Element that establishes any specific average trip length for approved projects; it is important to note that Los Angeles County covers an area roughly the size of Rhode Island, with distances between cities such as Lancaster and Long Beach that are far greater than the trip length described by the Commenters. Please see responses to Comments F.8-11 through F.8-14. As these responses and the Draft EIR explain, the Project will site necessary infrastructure and employment opportunities concurrently with, and in close proximity to, residential development, utilizing a phased development approach. As

2556 *Sierra Club*, 121 Cal. App. 4th at 1511
2557 *Naraghi Lakes*, 1 Cal.App.5th at 17
2558 DRP 2017, p. 5.8-20
2559 *Ibid.*
2560 *S.F. Tomorrow*, 228 Cal. App. 4th at 520
2561 *Pfeiffer*, 200 Cal.App.4th at 156
2562 *CNPS*, 172 Cal.App.4th at 637

these responses explain, building in appropriate flexibility to respond to market conditions is both a sound planning principle and an approach explicitly endorsed under CEQA.

Response to Comment F.8-231:

The Project would not site people dozens of miles from employment, and neither would it extend residential development with limited or no infrastructure. To the contrary, the Project is specifically designed to develop housing opportunities concurrently with, and in close proximity to, employment opportunities and infrastructure, consistent with the County General Plan and with good planning principles. Please see responses to Comments F.8-7 through F.8-9, F.8-20 through F.8-33, F.8-227, F.8-230, and F.8-232.

Jobs-housing ratio is discussed on pages 5.9-30 through 5.9-31 in Section 5.9, Population, Housing and Employment, of the Draft EIR. As discussed in Section 5.9, while the Project anticipates as many as 19,333 dwelling units to be built on the site, with a buildout population of approximately 57,150 residents, it also estimates that 23,675 permanent jobs would be created by non-residential developments on the site. These developments include planned commercial areas, business parks, schools, parks, library, fire stations, LASD substation/station, wastewater reclamation facilities, water system facilities and other public facilities that would be built as part of the Project. Residents of the Project would have the option to obtain goods and services within the site and could locate their business or place of employment at the designated commercial and business park areas. Employees at the site would also have the option to find housing within the Project. The Project has been specifically designed so that people can work and live within the Project site and not have to travel as often or longer to obtain goods, services and employment.

As stated on page 5.9-31, the Project would have an on-site jobs-housing ratio of 1.22 at buildout and would positively contribute to the attainment of the target jobs/housing ratio of 1.3 jobs per dwelling unit for the unincorporated area of the Antelope Valley, which the AVAP states is "a far improvement from the ratio of approximately one job for every five households established by the previous 1986 Antelope Valley Areawide General Plan."

The Project includes the construction of on-site public facilities (e.g., fire stations, sheriff's stations, schools, and parks), utility service systems and infrastructure (e.g. water system, sewer system, storm drainage, electrical and natural gas line extensions and upgrades), an internal roadway system and off-site roadway improvements (through implementation and funding of needed offsite improvements in accordance with the proposed Traffic Mitigation Agreement, Traffic Mitigation Fee Program or an assessment district, and payment of fair share fees), and a Mobility Plan that includes two transit hubs and creation of a Transportation Management Association (TMA) to specifically develop strategic linkages with other TMAs in order to maximize transit efficiencies and services. Thus, the residential uses of the Project would be accompanied by public facilities and services, infrastructure, utility and public transit improvements to ensure that the Project will not result in "sprawl" development. As discussed in response to Comment F.8-20, the Project has been situated and designed to promote regional "smart growth" planning principles established by SCAG's RTP/SCS and the Antelope Valley Area Plan, and SCAQMD has specifically determined that

the Project's *Centennial Specific Plan* "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (*see* Comment D.4-2).

Response to Comment F.8-231A:

This footnote 41 refers to the Los Angeles County General Plan, which is used as the source of Comment F.8-231. The comment references the definition of Jobs-Housing Balance and the general discussion of the Impacts of Suburban Sprawl in the County General Plan. Response to Comment F.8-231 addresses the information in this referenced document. It should be noted that the selection from the General Plan quoted in this comment are not from any General Plan goal or policy; this is explanatory text explaining the concept of "jobs-housing balance."

Response to Comment F.8-232:

Please see responses to Comments F.8-7 through F.8-9, F.8-20 through F.8-33, F.8-227, F.8-230, and F.8-231. Irrespective of whether the Project creates any tensions with General Plan Goal LU 3, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies."[2563] As explained in response to Comment F.8-227, the County's determination that the Project is, on balance, consistent with the County General Plan, is at least reasonable, and therefore must be affirmed, in light of the County's "broad discretion to construe its policies in light of the plan's purposes."[2564]

Regardless, as explained in the responses to the comments cited immediately *supra*, especially response to Comment F.8-20, the Project is, in fact, fully consistent with General Plan Goal LU 3. The Project site is already served by backbone regional infrastructure, which has long been planned and approved, and none of the Project's backbone infrastructure will be sized to accommodate growth beyond that which is proposed by the Project. Given its clustered development pattern and self-contained infrastructure improvements, the Project does not exhibit the characteristics of sprawl development. Accordingly, the Project is consistent with Goal LU 3 of the County General Plan.

Finally, it should also be noted that the question of whether development of the Project site is consistent with the County's General Plan has been resolved with finality on at least two previous occasions. As described in responses to Comments F.8-229 and F.8-233, in October 2015, the County Board of Supervisors incorporated the adopted AVAP – including the designation of the Project site as an EOA not subject to SEA regulations - as a component of the County's General Plan. No party challenged this action in any respect, and the statute of limitations to do so expired more than a year and half ago.[2565] In addition, although CBD did challenge the County's June 2015 certification of the AVAP EIR, neither CBD nor any other party brought any suit arguing that the County's June 2015 AVAP adoption conflicted with

[2563] *Sierra Club*, 121 Cal. App. 4th at 1511
[2564] *Pfeiffer*, 200 Cal.App.4th at 1563
[2565] Gov. Code § 65009(c)(1)

the County's General Plan, and the statute of limitations to bring any such challenge has also expired.

Response to Comment F.8-233:

Please see response to Comment F.8-227. AVAP Land Use Goal LU 2 is "[a] land use pattern that protects environmental resources." Like most general plan goals and policies, this goal "do[es] not state specific mandates or prohibitions."[2566] The County's determination that the Project's land use pattern will protect environmental resources is at least "reasonable," and therefore must be upheld, bearing in mind that the County is entitled to "great deference" in construing its own general plan and that the County is entitled to weigh and balance potentially conflicting goals and policies.

Moreover, there is more than ample substantial evidence that the project's features and mitigation measures, as well as the SEAs and other related laws, regulations and commitments applicable to the AVAP and to the Centennial project, will "protect environmental resources." As the County has explained:

> The keystone of the AVAP is its "Rural Preservation Strategy." The Strategy strives to achieve a balance between maintaining rural character and developing additional infrastructure. Specifically, the AVAP seeks to guide new economic growth and development into three "Economic Opportunity Areas" ("EOAs") while preserving areas outside the EOAs and existing town areas with new Open Space and Land Use policies, new low-density land use designations, and *over 200,000 new acres* of designated Significant Ecological Areas ("SEAs"), where the County will require additional scrutiny of biological resources prior to approval of future development.
>
> [. . .]
>
> SEAs are officially designated areas in the County identified for their biological value. Though CBD attempts to characterize the County's approval of the AVAP as a reduction in SEA acreage, the adopted AVAP actually *expands* the SEA designation within the Antelope Valley *by more than 200,000 acres*. (AR 651-652; AR 30368.)
>
> Projects proposed within SEAs must obtain a Conditional Use Permit ("CUP") and are subject to review by the SEA Technical Advisory Committee ("SEATAC"). (AR 669; County Code, Sec. 22.56.215, County's Request for Judicial Notice ["RJN"], Exh. A.) SEATAC is an advisory committee to the County Department of Regional Planning consisting of experts who specialize in various areas of biology and advise the County on a project's compatibility with the SEA. (AR 669.) The County's SEA Program is designed "to preserve the genetic and physical diversity of the County by designing biological resource areas capable of sustaining themselves into the future." (AR 455, 592, 650-

[2566] *Naraghi Lakes*, 1 Cal.App.5th at 17

> 651.) Thus, the vastly expanded SEAs adopted as part of the AVAP will greatly benefit biological resources in the Antelope Valley and beyond. (AR 668.)[2567]

As the County has also explained:

> The AVAP's Rural Preservation Strategy will focus new economic growth and development into three "Economic Opportunity Areas." The Strategy identifies four types of environment that serve different purposes: (1) Rural Town Centers, envisioned as including new locally oriented public facilities and commercial uses; (2) Rural Town Areas, envisioned as including new residential development consistent with existing community character and allowing for light agricultural, equestrian, and animal-keeping uses; (3) Rural Preserve Areas, which are largely undeveloped and not served by existing or planned infrastructure, and where' development would be limited to single family homes at very low densities and light and heavy agricultural uses; and (4) Economic Opportunity Areas (EOAs), which have "tremendous potential for economic growth and development" due in large part to two major infrastructure projects in the Antelope Valley proposed by Los Angeles County Metropolitan Transportation Authority and the California Department of Transportation: the High Desert Corridor project and the Northwest 138 Corridor Improvement project. (AR 30229-31, 30239-42.)
>
> The AVAP identifies three EOAs: East, Central, and West EOAs. (AR 30242; 30361.) All three EOAs are located along the proposed route of the two infrastructure projects mentioned above. (AR 30358-59.) Under the AVAP, "any development induced by these two infrastructure projects should be guided to the [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses ... to balance the growth and development which the two projects will undoubtedly bring with the general intent of [the] Area Plan to preserve the ecological and rural character of the Antelope Valley." (AR 30231.) Thus, the EOAs "provide an opportunity for the Area Plan to maximize the investment that state and regional agencies are bringing into the area, while still achieving the fundamental goal of rural preservation in the Antelope Valley."[2568]

With respect to the West EOA specifically:

> [The AVAP imposes n]ew requirements for certain parcels within the West EOA to complete "a Specific Plan or similar planning activity" within five years or else "the Department of Regional Planning may initiate a Community Plan for the West EOA. (AR 30307-30308.)

[2567] County AVAP Br. at pp. 1-3 (citing AVAP Joint Appendix at pp. AR 455, 492, 650-52, 669, & 30368); see also AVAP Joint Appendix at pp. AR 396, 1113 & 22675.

[2568] County AVAP Br. at pp. 3-4 (citing AVAP Joint Appendix at pp. AR 30229-31, 30239-42, 30358-59).

> [. . .]
>
> A significant portion of developable area within the West EOA is further protected by a "Natural Resource Protection and 'Smart Design' Program" adopted as part of the 2008 Tejon Ranch Conservation & Land Use Agreement between the landowners and environmental groups. (AR 9835, 9963, 10069-10073.) This Program requires the proposed "Centennial" project to set aside 3,450 acres as Open Space, as well as various other measures designed to protect the area's ecosystem, scenic resources, water supply, water quality, and other natural resources. (AR 10069-73.)
>
> [. . .]
>
> Critically, and overlooked by CBD, when the County modified the originally-proposed SEAs, it kept in place, *and ultimately adopted,* proposed land use designations that convert most of the areas previously designated for one dwelling unit per acre (N1 and N2) to one dwelling unit per 20 acres (RL20), thus drastically reducing permitted density. (AR 2785; AR 30241, 30243; AR 30358-59.) These areas are also "severely constrained by fault zones, seismic areas and Hillside Management Areas which further limit potential development." (AR 2785.) The AVAP also designates significant portions of the West EOA as OS-C (Open Space Conservation) and strategically applies the Rural Town Area label to direct growth and help preserve more environmentally sensitive areas. (AR 2786; AR 30358, 30361.)[2569]

Because the AVAP "substantially reduces development intensity within the proposed Significant Ecological Areas (SEAs) by converting most of the areas designated for residential development from N1 – Non Urban 1 (0.5 dwelling units/acre) and N2 –Non Urban 2 (1 dwelling unit/acre) to RL20 – Rural Land 20 (1 dwelling unit/20 acres) . . . [t]he existing zoning code regulations that are currently in place, including the SEA Ordinance, will be able to regulate developments in these areas so that biological resources are adequately protected."[2570] Accordingly, the County Board of Supervisors found and concluded that the AVAP's SEA designations "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development," and that "[t]he SEA Program seeks to preserve the genetic and physical diversity of biological resources by designing self-sustaining biological resource areas," that the AVAP "will expand the number of SEAs in the Project area, and the SEA land area will increase from the current 134,745 acres to 356,773 acres."[2571] The Los Angeles Superior Court upheld these and other findings by the Board of Supervisors as supported by substantial evidence.[2572]

[2569] County AVAP Br. at pp. 5 and 10 (citing AVAP Joint Appendix at pp. AR 2785-86, 9835, 9963, 10069-73, 30241, 30243, 30307-08, 30358-59, 30361

[2570] DRP 2014a, p. 2-13

[2571] AVAP Joint Appendix, at pp. AR 227 and AR 263

[2572] AVAP Ruling, at pp. 19-20

Moreover, the Project site has long been identified for development in several different approved plans. The Southern California Coalition of Governments approved its 2012-2035 RTP/SCS in 2012, and then subsequently approved its 2016-2040 RTP/SCS in 2016, both of which target the Project site for future growth.[2573] In addition, in June 2015, the Board of Supervisors explicitly incorporated the approved AVAP, including the designation of the Project site for development, into the County's General Plan.[2574] CBD failed to challenge any of these determinations.

Moreover, the development of the Project site is also analyzed in several certified EIRs, none of which were challenged by any party, including CBD. In addition to the EIRs for the 2012-2035 and 2016-2040 RTP/SCSs, the Project site is also analyzed in Caltrans' certified EIR for the Northwest 138 Corridor Improvement Project.[2575] CBD did not challenge any of these EIR certifications, and accordingly those EIRs are now "conclusively presumed to comply" with CEQA.[2576]

CBD did challenge the County's June 2015 certification of the AVAP EIR, but CBD only argued – unsuccessfully - that the EIR was inadequate to cover certain amendments the Board of Supervisors adopted to the version of the AVAP that was presented to the Board in November 2014. As the Los Angeles Superior Court explained:

> CBD's briefs overlook the purpose of the amendments, which was to rectify an inconsistency. As the County argues (Opp. at 1), the draft AVAP was inconsistent in addressing land within an EOA, and by definition targeted for growth, and yet was subject to new, more restrictive growth policies for SEA, rural areas preservation, and other policies. The FEIR does not state that the presence of SEAs within the EOAs is a necessary mitigation factor. Instead, the FEIR states that the Project would focus new development within the EOAs in order to avoid development within SEAs. AR 668-69. *Thus, it is clear that the Project always was intended to cause development within the EOAs* and that the restrictions for SEAs, Land Use, Conservation and Open Space policies limiting development, and Rural Preserve Areas within EOAs would impede this intent.[2577]

CBD only challenged these later amendments to the AVAP, and CBD's challenge "concede[s] the adequacy of the [AVAP] FEIR" with respect to the pre-amendment version of the AVAP

2573 DRP 2017, pp. 5.8-73 to -74, 5.9-27 to -32

2574 See Resolution of the Board of Supervisors of the County of Los Angeles Relating to the Adoption of Project Number 02-305 General Plan Update (Oct. 6, 2015), at p. 4 ("All community-based plans are components of the General Plan," including the "Antelope Valley Area Plan"), at p. 6 ("In June 2015, the Board approved an update to the Antelope Valley Area Plan ("AV Plan Update"), a component of the General Plan Update").

2575 Caltrans 2017, Northwest State Route 138 Corridor Improvement Project Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation, at, e.g., pp. 31, 47, 55, 83, 180, 336-37, 371, 400, 420.

2576 CEQA § 21167.2

2577 AVAP Ruling, at p. 16 (emphasis added) (citing County AVAP Br. at p. 1 and AVAP Joint Appendix at pp. AR 668-69); see also AVAP Transcript, at pp. 19-20 (Court: ". . . it seemed to me the purpose of the amendment was to negate an inconsistency between the project[] and the EIR's analysis in the sense that . . . we wanted the development to occur in this EOA area and, yet, we have these restrictions including SEA that inhibit the development, therefore we want to get rid of that inconsistency. Isn't that the purpose of the amendment?"; CBD's counsel: "*We don't disagree with that.*" [emphasis added].

presented to the Board in November 2014."[2578] But as the Superior Court held, it is "clear" that *even the version of the AVAP presented in November 2014* was intended to cause development in the West EOA, and the effects of that development were fully and sufficiently analyzed in the AVAP FEIR. CBD has clearly conceded that the AVAP EIR sufficiently analyzes the November 2014 draft version of the AVAP, and therefore CBD cannot, in any subsequent proceeding, argue that the development of the Project site has been insufficiently analyzed under CEQA. (See CEQA § 21167.2 [EIRs are "conclusively presumed to comply" with CEQA insofar as they are not challenged by any party within the applicable statute of limitations].)

In addition to being barred under CEQA, basic principles of *res judicata* and collateral estoppel also prohibit commenters from challenging the designation of the Project site for development. "Res judicata bars not only the reopening of the original controversy, but also subsequent litigation of all issues which were or *could have been* raised in the original suit." *Thompson v. Ioane* (2017) 11 Cal. App. 5th 1180, 1191 (citation omitted). The related doctrine of "issue preclusion," or [collateral estoppel] separately "precludes relitigation of issues argued and decided in prior proceedings."[2579] CBD cannot, in any future proceeding, re-litigate the issues argued and decided in the AVAP litigation, which deprives it of any ability to challenge the designation of the West EOA for development. Moreover, having failed to even attempt to avail itself of several opportunities to challenge the designation of these lands for development, CBD's claim is no longer legally viable.

With respect to the Ranch-Wide Agreement (TRCRWA), please see responses to Comments F.8-50, F.8-51, F.8-177, and F.8-181. Enforceability of the TRCRWA spans Kern and Los Angeles County boundaries and is enforceable by five different non-governmental organizations: Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club. Many aspects of the TRCRWA are also enforceable by the State Wildlife Conservation Board, which purchases conservation easements pursuant to the TRCRWA.

Response to Comment F.8-234:

Please see response to Comment F.8-227. Irrespective of whether the Project creates any tension with Goal LU 3, Policy LU 3.1 or Policy 3.5, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2580] and are authorized to '"weigh and balance the various policies when considering project compliance."[2581]

Regardless, the Project does not conflict with Goal LU 3, Policy 3.1 or Policy 3.5, or any other AVAP policies related to natural hazards. The Project's Geologic Safety Zone requires a 100-foot setback from active faults, and the Project's Floodplain Safety Zone precludes most structures in the 100-year floodplain. Most steep-sloped land south of SR-138 and at the western portion of the site is designated for open space, and Project Design Features and

[2578] AVAP Ruling, at p. 13
[2579] *Zevnik v. Superior Court* (2008) 159 Cal. App. 4th 76, 82
[2580] *Sierra Club*, 121 Cal. App. 4th at 1511
[2581] *San Francisco Tomorrow*, 228 Cal. App. 4th at 1252

Mitigation Measures have been implemented to reduce risks from Valley Fever and wildfire. Please see Draft EIR, Section 5.8, *Land Use, Entitlements and Planning*, at pages 5.8-26, and responses to Comments F.8-206 through F.8-211. Goal LU 3 is "[a] land use pattern that minimizes hazards." Like most general plan goals and policies, this goal "do[es] not state specific mandates or prohibitions."[2582] Accordingly, the County has properly concluded that that the Project "minimizes hazards," in light of the County's "broad discretion to construe its policies in light of the plan's purposes."[2583] Moreover, Policies 3.1 and 3.5's more specific restrictions apply "except within economic opportunity areas." The Project is located in the West Economic Opportunity Area.

Response to Comment F.8-235:

This comment's assertion that the Project is inconsistent with AVAP Goal LU 5, and Policies LU 5.1 through LU 5.4, of the AVAP is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see response to Comment F.8-227 for a discussion of the great deference afforded a lead agency's general plan consistency determination. Even if the Project did create any tension with Goal LU 5, or Policies LU 5.1 through LU 5.4, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2584] and are authorized to '"weigh and balance the various policies when considering project compliance."[2585] Regardless, the Project does not conflict with Goal LU 5 or Policies LU 5.1 through LU 5.4, or any other policies related to land use patterns that decrease GHG emissions, as discussed below.

Goal LU 5 establishes an AVAP goal of "[a] land use pattern that decreases greenhouse gas emissions." As discussed in the Draft EIR, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainability accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2). Thus, the Project is consistent with AVAP Goal LU 5. See responses to Comments F.8-20 and F.8-204 for further discussion.

Policy LU 5.1 establishes an AVAP policy to "[e]nsure that development is consistent with the Sustainable Communities strategy adopted in 2012, and element of the Regional

[2582] *Naraghi Lakes*, 1 Cal.App.5th at 17
[2583] *Pfeiffer*, 200 Cal.App.4th at 389
[2584] *Sierra Club*, 121 Cal. App. 4th at 1511
[2585] *San Francisco Tomorrow*, 228 Cal. App. 4th at 1252

Transportation Plan developed by the Southern California Association of Governments."[2586] The approved SCAG RTP/SCS designates the Project site for future urbanized development, and the Draft EIR describes the Project's consistency with the RTP/SCS in Section 5.8, Land Use,[2587] Section 5.9, Population, Housing and Employment,[2588] Section 5.11, Air Resources,[2589] and Section 5.21, Climate Change.[2590] As discussed in the Draft EIR, no conflict with SCAG's regional growth projections would occur since SCAG's growth projections anticipates increases in population, households, and employment in the North Los Angeles Subregion and future household and employment projections for the area that includes the Project site are consistent with the housing and employment estimates for the Project.[2591] Thus the Project is consistent with AVAP Policy LU 5.1. See also response to Comment F.8-20 for a more detailed discussion of the Project's consistency with the SCAG 2012 and 2016 RTP/SCS balanced land use plan.

Policy LU 5.2 establishes an AVAP policy to "[e]ncourage the continued development or rural town centers that provide for the daily needs surrounding residents, reducing the number of vehicle trips and providing local employment opportunities." As discussed in the Draft EIR, the Project has been situated and designed to promote regional "smart growth" planning principles established by the AVAP. Consistent with those principles, Medium- to Very High Density development is generally included in the central area of each of the Project's proposed Villages, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center.[2592] The Town Center of the Project is located in Village 3, and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center.[2593] An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[2594] In addition, non-motorized transportation planning elements are integrated into the Centennial Mobility Plan to encourage non-automotive transit modes and provide safe routes to school. The plan's backbone is the community trail system (described in Specific Plan Section 3.11.7, Trails Plan) that provides shared-use pathways for bicycles, pedestrian and, in some cases, equestrian activities. Bikeways are classified into four categories that are described in Specific Plan Section 3.2.4 and shown on Specific Plan Figure 3-3, *Bicycle Network*. These passageways are designed to avoid roadway crossings to the extent feasible and to give easy access to retail, jobs and other amenities. Thus, the Project is consistent with AVAP Policy LU 5.2. See also response to Comment F.8-204.

Policy LU 5.3 establishes an AVAP policy to "[p]reserve open space areas to provide large contiguous carbon sequestering basins." The Project preserves large swaths of natural landscape and biological resource areas. Approximately 5,624 acres (approximately

[2586] DRP 2015, p. LU-5
[2587] DRP 2017, p. 5.8-73
[2588] *Id.,* pp. 5.9-23 through 32
[2589] *Id.,* pp. 5.11-74 through 75
[2590] *Id.,* p. 5.21-85 through 86
[2591] *Id.,* p. 5.8-73
[2592] *Id.,* p. 4-16
[2593] *Ibid.*
[2594] *Id.,* pp. 4-16, 17

45.6 percent) of the 12,323-acre Project site are proposed for open space for natural resource protection and greenways, and parks for active and passive recreational use.[2595] Per PDF 5-1, the Project would also accommodate 50 acres of small-scale agriculture and related uses, including, but not limited to community gardens, farmers markets/produce stands, growing and sales of nursery stocks, and commercial greenhouses.[2596] The Project would not include large-scale, high-emission agricultural operations, and the planned small, local operations would have very low emissions and would provide carbon sequestration benefits. In addition, the Project implements the AVAP's Rural Preservation Strategy by focusing future development within the AVAP-designated West EOA, thus preserving the rural character of the AVAP planning area outside of EOAs, as discussed in more detail in response to Comment F.8-20. Thus, the Project is consistent with AVAP Policy LU 5.4.

Policy LU 5.2 establishes an AVAP policy to "[e]nsure that there is an appropriate balance of residential uses and employment opportunities within close proximity of each other." As discussed in the Draft EIR, the location of the Project and the proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trips and reduce vehicle miles traveled. The approximate 10.1 million square feet (sf) of commercial office, shopping center, and industrial land uses proposed by the Project will provide approximately 20,809 jobs, many of which are anticipated to be filled by future Project residents.[2597] The Project includes residential development to create a mixed-use community within the West EOA, consistent with the Land Use Policy Map in the AVAP. The Project would contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production to meet regional housing needs.[2598] The AVAP intends to provide an overall jobs/housing ratio of 1.3 jobs per dwelling unit in the unincorporated area of the Antelope Valley. The Economic Development Element of the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs; The Project would implement this strategy, and would provide an estimated jobs/ housing ratio of 1.22, through the development of commercial and business park uses on the site, for use by high-tech manufacturing, transportation, and logistics companies.[2599] Thus the Project is consistent with AVAP Policy LU 5.4.

As discussed in response to Comment F.8-227, even if the Project were inconsistent with AVAP Goal LU 5 or Policies LU 5.1 through LU 5.4 (which is not the case), this would only present a CEQA issue to the extent the inconsistency would cause "physical impacts on the environment."[2600] The Commenter provides their opinions disputing the County's legal determination of plan consistency, but the Commenter does not identify how the alleged inconsistencies would cause any significant physical impacts on the environment that are

[2595] *Id.,* p. 4-6
[2596] *Id.,* p. 5.5-12
[2597] *Id.,* p. 5.11-36
[2598] *Id.,* pp. 5.9-2, 3
[2599] *Id.,* p. 5.9-3
[2600] CEQA § 21080(e)(2)

distinct from the impacts analyzed, as required pursuant to CEQA, in the other sections of the Draft EIR. The Draft EIR fully discloses, analyzes and mitigated the Project's potentially significant physical impacts on the environment in compliance with CEQA.

Response to Comment F.8-236:

Please see response to Comment F.8-227. Irrespective of whether the Project conflicts with this particular policy, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2601] and are authorized to "weigh and balance the various policies when considering project compliance."[2602]

Regardless, the Project does not contradict Policy LU 5.3. The County, which has "broad discretion to construe its policies in light of the plan's purposes",[2603] appropriately views the Project's contribution to open space preservation within the overall context of the AVAP, which "seeks to guide new economic growth and development into three "Economic Opportunity Areas" ("EOAs") while preserving areas outside the EOAs and existing town areas with new Open Space and Land Use policies, new low-density land use designations, and o*ver 20,000 new acres* of designated Significant Ecological Areas ("SEAs"), where the County will require additional scrutiny of biological resources prior to approval of future development."[2604] The Project site alone will "set aside 3,450 acres as Open Space," and the "AVAP also designates significant portions of the West EOA as OS-C (Open Space Conservation) and strategically applies the Rural Town Area label to direct growth and help preserve more environmentally sensitive areas."[2605] The County also views the Project's contribution to open space within the larger context of the multiple overlapping layers of open space preservation surrounding the Project site and surrounding the AVAP. As the County Board of Supervisors has noted and found, the AVAP immediately borders "the Angeles National Forest . . . to the south," and "includes part of the Los Padres National Forest, as well as federal, State, and County parks and recreation areas," all of which are governed by their own federal, State and County-level protections.[2606] The Ranch-Wide Agreement even further supplements these already considerable open space protections, and as described in responses to Comments F.8-50, F.8-51, F.8-177, F.8-181, and F.8-233, the Draft EIR appropriately considers the Ranch-Wide Agreement.

Policy LU 5.3 endorses a general policy to "[p]reserve open space areas to provide large contiguous carbon sequestering basins." This policy, like most general plan goals and policies, "do[es] not state specific mandates or prohibitions."[2607] In light of the significant open space preservation on the Project site, in the AVAP, and in the surrounding area, the County's determination that the Project is consistent with the County's open space

2601 *Sierra Club*, 121 Cal. App. 4th at 1511
2602 *San Francisco Tomorrow,* 228 Cal. App. 4th at 1252
2603 *Pfeiffer*, 200 Cal.App.4th at 389
2604 County AVAP Br. at p. 1.
2605 *Id.,* pp. 5, 10
2606 AVAP Joint Appendix at p. AR 000227.
2607 *Naraghi Lakes*, 1 Cal.App.5th at 17

preservation policy is at least reasonable, and therefore must be affirmed, in light of the County's "broad discretion to construe its policies in light of the plan's purposes."[2608]

Response to Comment F.8-237:

Please see response to Comment F.8-227. Irrespective of whether the Project creates any tension with the plan goals and policies cited by the Commenters, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2609] and are authorized to '"weigh and balance the various policies when considering project compliance."[2610]

Regardless, the Project is, in fact, consistent with the plan goals and policies cited by the Commenters because the Project has many features designed to promote alternatives to automobile travel. Please see responses to Comments F.8-19 through F.8-33. Moreover, as the County previously determined in the AVAP EIR (without dispute by the Commenters), the adopted AVAP, including the development of the Project within the West EOA, "reduces projected residential units and associated population by 62 percent and increases employment by 62 percent" relative to projected growth under the previously adopted AVAGP. Because the AVAP "directs future development to three EOAs" such as the West EOA that includes the Project site, and because the AVAP "implements a Rural Preservation Strategy for the balance of the Project Area," development contemplated in the AVAP, including the Project, will result in less traffic, over a smaller area, than would occur in the absence of the AVAP and the Centennial Specific Plan.[2611]

In light of the AVAP's concentrated development pattern, and the Project's many features designed to promote mobility, the County has reasonably determined that the Project is consistent with the AVAP's mobility goals and policies. This determination is at least reasonable, and therefore must be affirmed, in light of the County's "broad discretion to construe its policies in light of the plan's purposes."[2612]

Response to Comment F.8-238:

This comment inaccurately summarizes the Project's water supply and the consistency of the Project with County water-related planning goals. Contrary to the comment, and as discussed in more detail in response to Comment F.8-212, the Project has a sustainable water supply. The Project's water supplies are discussed in Section 5.18, Water Resources. As discussed on Draft EIR pages 5.18-2 and 5.18-51 to 5.18-67, and as summarized in Tables 5.18-10 to 5.18-12 for normal or average, single dry, and multiple dry years, the Project will utilize several water supplies and on- and off-site water banking facilities to meet potable demand. Available supplies include groundwater and imported water return flows in accordance with the approved Antelope Valley Adjudication Judgment and Physical Solution; State Water Project (SWP) supplies secured for Project use and imported to the site

[2608] *Pfeiffer*, 200 Cal.App.4th at 1563
[2609] *Sierra Club*, 121 Cal. App. 4th at 1511
[2610] *San Francisco Tomorrow*, 228 Cal. App. 4th at 1252
[2611] DRP 2014a, p. 7-12
[2612] *Pfeiffer*, 200 Cal.App.4th at 1563

under an agreement with the Antelope Valley – East Kern Water Agency (AVEK); and AVEK service area deliveries. Indoor wastewater will be conveyed to one of two Project on-site treatment facilities; will be treated to State unrestricted reuse standards; and will be distributed to meet approximately 40 percent of buildout water demand. The Project's water supplies will sustainably meet buildout potable and recycled water demands and will maintain an average annual reserve supply of more than 79,000 acre-feet, or more than 11 years of full-buildout potable water demand, after buildout has been achieved.

The analysis of the Project's water supplies is consistent with and based on the most current projections prepared by state and regional public agencies with specific expertise and responsibility for analyzing water supplies, including imported and ground water, under applicable laws, regulations and policies. The Project's use of recycled water is consistent with state and regional policies, rules and regulations that encourage the use of recycled water to reduce demand for potable water supplies.

As discussed on pages 5.18-27 to 5.18-28, and as shown in Draft EIR Appendix 5.18-C, the analysis of the project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all SWP contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current Urban Water Management Plan[2613] prepared and adopted in accordance with California Water Code Section 10610 et seq. (the "Urban Water Management Planning Act"). The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors in California, is the largest SWP water importer in the Antelope Valley basin and will import all of the SWP system supplies that the Project will use.

In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2614] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP,

[2613] DRP 2017, Appendix 5.18-F
[2614] *Id.,* Appendix 5.18-G

the Project analysis include a single dry year SWP amount of 5 percent, which was implemented for the Project analysis.[2615]

All Project use of groundwater, imported water return flow production, and water banking will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2616] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin.

The Project water supply analysis is also consistent the analysis methodologies used in the current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site. Although the Project is not within the service area of and will not receive any water from the County Waterworks District 40, the District has the responsibility and expertise for projecting the reliability of Antelope Valley water supplies, and the District's analysis of these supplies uses substantially the same methodology as the Project analysis. The District's UWMP includes: (a) SWP imports based on the AVEK UWMP reliability factors discussed above; (b) groundwater use and imported water return flows allocated to the District under the Adjudication Judgment and Physical Solution; and (c) extensive use of water banking, including dry year recoveries from District water banked in wetter years ranging from 25,300 to 70,525 acre afy in drier years. Based on these supplies, the Los Angeles County Waterworks District 40 UWMP concludes that District has adequate water supplies to meet projected demands in all types of water years, including normal or average, single dry, and multiple dry year droughts.[2617]

Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[2618] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan environmental impact reports prepared by Los Angeles County concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The environmental impact reports further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The environmental impact reports found that while potential buildout of the Antelope Valley Area Plan and General Plan

[2615] *Id.,* Appendix 5.18-G, p. 18
[2616] *Id.,* Appendix 5.18-D
[2617] DPW 2017, p. ES-3
[2618] DRP 2017, Appendix 5.18-C

in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the environmental impact reports found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan environmental impact reports because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan environmental impact reports would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan environmental impact reports, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

Notably, no party, including the Commenter, challenged the AVAP EIR's water supply analysis within the applicable statute of limitations, and therefore this analysis is now "conclusively presumed to comply" with CEQA.[2619] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's water supply analysis (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[2620] The comment provides no evidence suggesting that that the water supply analysis in the AVAP EIR is inaccurate in any manner.

As discussed on Draft EIR page 5.18-67, at buildout, approximately 4,577 afy of recycled water will be used to meet 40 percent of total Project water demand. This level of recycled water use is significantly above the average and per capita recycled water use in the Antelope Valley and furthers the objectives of the State of California in substituting recycled water for potable water throughout the state. As discussed on Draft EIR page 5.18-12, a recycled water use policy was adopted in 2009 by the State Water Resources Control Board (SWRCB) (Resolution No. 2009-0011) and a salt and nutrient management plan (SNMP) was adopted in 2014 in accordance with the policy by the Lahontan Regional Water Quality Control Board. The Project's proposed recycled water use is consistent with the state Recycled Water Policy and the SNMP and results in the significant use of recycled water generated from onsite wastewater reclamation facilities (WRFs) and treated to California Code of Regulations Title 22 unrestricted reuse standards. Consequently, the Draft EIR utilizes the most current and

[2619] CEQA § 21167.2

[2620] Ruling on Submitted Matter, Ctr. For Biol. Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

best available information about all of the Project's water supplies and considers all applicable impacts from the proposed use of SWP imports, groundwater, return flows, banked water, and recycled water. The analysis is based on the most current DWR DCR, the current AVEK UWMP, the Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Court in December 2015, and the state of California and Lahontan Regional Water Quality Control Board recycled water use policies and requirements. The analysis has been peer reviewed by one of the leading California engineering firm and all applicable recommendations in the peer review have been implemented. Cumulative impacts have been evaluated based on applicable plans and policies for the Antelope Valley as well as the AVEK UWMP and the Antelope Valley Basin Adjudication Judgment and Physical Solution.

The Draft EIR includes mandatory and enforceable water conservation, monitoring and adaptive management measures. MM 18-1 requires the following water efficiency and conservation measures, all of which will be incorporated into the Mitigation Monitoring and Reporting Plan (MMRP) for the Project adopted and enforced by the County as required by CEQA:

1. The Project Applicant/Developer must comply with the water efficiency and conservation measures set forth in Divisions 4.3 and 5.3 of the California Green Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent.
2. The Project Applicant/Developer must install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site.
3. The Project Applicant/Developer must install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater and use recycled water to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation demand in 50 percent of the total very low and low density residential lot landscaped area.
4. The Project Applicant/Developer must require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards.
5. The Project Applicant/Developer must require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses, the use of Water Smart/Evapotranspiration-based controllers, and the use of low water use plants and shrubs in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance.

6. The Project Applicant/Developer must require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District) to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: (a) Residential indoor water use – 55 gallons per capita per day; (b) Commercial indoor water use – 200 gallons per day per thousand square feet; (c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias); (d) Institutional indoor water use – 50 gallons per day per thousand square feet; (e) Hotel indoor water use – 125 gallons per day per room; (f) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site ; and (g) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site.

The Project's consistency with the AVAP goals and policies, including the goals and policies referenced in the comment, is discussed in Section 5.8 of the Draft EIR and summarized in Draft EIR Table 5.8-1. AVAP conservation and open space (COS) Goal 1 states that "Growth and development are guided by water supply constraints" and Policy COS 1.1 states that "Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval." As discussed above and in Draft EIR Table 5.8-1, the Project is consistent with COS Goal 1 and COS Policy 1.1 because the Project has a sustainable water supply that will meet buildout demand, and maintain an average reserve supply of over 79,000 afy on a sustainable basis after buildout. Consequently, the implementation of the Project is guided by water supply constraints (the Project has a sufficient and sustainable water supply) and, contrary to the comment, the Project has demonstrated a sufficient and sustainable water supply.

AVAP COS Policy 2.1 states "Require new landscaping to comply with applicable water efficiency requirements in the County Code." As discussed on page 5.4-16 of the Draft EIR, in 2008, the County adopted the Green Building Program, which included the Drought-Tolerant Landscaping, Green Building, and Low Impact Development Ordinances (the Ordinances). In November 2013, in response to the mandates set forth in the 2010 CALGreen Code, the Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31). The County Green Building Standards Code requires that post-construction landscape designs comply with all of the following:

1. Turf areas shall not exceed 25 percent of the total landscaped area.
2. Non-invasive, drought-tolerant plant and tree species appropriate for the climate zone region shall be utilized in at least 75 percent of the total landscaped area.
3. Hydrozoning irrigation techniques shall be incorporated into the landscape design.

In addition, a water budget must be developed for landscape irrigation use that conforms to the state Model Water Efficient Landscaping Ordinance (MWELO). As discussed above, MM 18-1 and the MMRP for the Project requires that the water efficiency requirements of the County Code or the County Green Building Standards Code, whichever are more stringent, be implemented by the project and must be confirmed prior to the prior to issuance of applicable construction permits for each Project tentative map. Consequently, the Project is consistent with AVAP Policy COS 2.1 and fully complies with the County Code.

Response to Comment F.8-239:

Please see responses to Comments F.8-170, F.8-229, and F.8-233. There is no merit to the Commenters' argument that the Project site must be designated as a SEA, and the question of whether the Project site should be designated for developed has been definitively resolved on numerous previous occasions.

By contending that the Project is "inconsistent with the previous version of the AVAP," the Commenters are presumably referring to the draft version of the AVAP presented to the Board of Supervisors in November 2014, which was *never adopted*. The County is not required to demonstrate that a project conforms to a general plan feature that was ultimately rejected by the Board of Supervisors and not included in any applicable plan. Moreover, as described in response to Comments F.8-229 and F.8-233, and as explained by the Los Angeles County Superior Court, even the November 2014 draft AVAP "was intended to cause development within the EOAs," and Commenter CBD has explicitly conceded that the AVAP EIR was adequate in its analysis of the November 2014 draft AVAP.[2621]

Response to Comment F.8-240:

Please see response to Comment F.8-227. "Because EIRs are required only to evaluate 'any inconsistencies' with plans, no analysis should be required if the project is consistent with the relevant plans."[2622] Here, there is no requirement to analyze or mitigate any environmental impacts from land use conflicts, because the County has properly determined that the Project is in harmony with the General Plan's goals and policies, when viewed as a whole, and in light of the County's broad discretion to weigh and balance potentially conflicting goals and policies.[2623]

In compliance with applicable County Specific Plan requirements and state law, the Project Specific Plan includes the location of the project's internal circulation network of roadways. As described in the Draft EIR, the only required amendments to the AVAP are straightforward amendments to add the internal Project site roadways to the AVAP Highway Map and the General Plan Highway Plan Policy Map.[2624] These straightforward amendments do not have any potential to cause any significant impact on the physical environment. (See

[2621] AVAP Ruling, at pp. 13 and 16; see also AVAP Transcript at p. 58 ("We haven't attacked the adequacy of the EIR, per se . . .").

[2622] *N. Coast Rivers Alliance*, 216 Cal.App.4th at 632 [quoting C*ity of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 918-919]

[2623] *Ibid.*

[2624] DRP 2017, pp. 5.8-1, -2, -23

Lighthouse Field Beach, 131 Cal.App.4th at 1207 ["[A]n inconsistency between a project and other land use controls does not in itself mandate a finding of significance… [i]t is merely a factor to be considered in determining whether a particular project may cause a significant environmental effect].) Therefore, the EIR properly concludes that there will be no impacts to the physical environmental from land use conflicts.

Response to Comment F.8-241:

Please see response to Comment F.8-227. Irrespective of whether the Project creates any tension with the specific goals and policies cited by the Commenters, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2625] and are authorized to '"weigh and balance the various policies when considering project compliance."[2626]

Regardless, the Project does not conflict with any applicable goals and policies in the AVAP's Public Safety, Services and Facilities Element. Please see responses to Comments F.8-62 through F.8-64 and F.8-206 through F.8-211. As those responses explain, the Project would neither inadequately protect residents from fire or seismic hazards, violate policies limiting development in active seismic areas (inferred to regard the Alquist-Priolo Earthquake Hazards Act), nor fail to contain proper measures to prevent landslides. The Draft EIR also demonstrates that the Project complied with all applicable goals and policies in the AVAP Public Safety, Services, and Facilities Element.[2627] This comment does not refute of any of these specific findings, but merely connects the Commenters' unsubstantiated assertions regarding inadequate fire and seismic safety to a violation of this element of AVAP. As shown, the Project is consistent with all applicable goals and policies.

Response to Comment F.8-242:

Please see response to Comment F.8-227. "Because EIRs are required only to evaluate 'any inconsistencies' with plans, no analysis should be required if the project is consistent with the relevant plans."[2628] Here, there is no requirement to analyze or mitigate any environmental impacts from land use conflicts, because the County has properly determined that the Project is in harmony with the General Plan's goals and policies, when viewed as a whole, and in light of the County's broad discretion to weigh and balance potentially conflicting goals and policies.[2629]

In compliance with applicable County Specific Plan requirements and state law, the Project Specific Plan includes the location of the project's internal circulation network of roadways. As described in the Draft EIR, the only required amendments to the AVAP are straightforward amendments to add the internal Project site roadways to the AVAP Highway

2625 *Sierra Club*, 121 Cal. App. 4th at 1511
2626 *San Francisco Tomorrow*, 228 Cal. App. 4th at 1252
2627 DRP 2017, pp. 5.8-60 to -67
2628 *N. Coast Rivers Alliance*, 216 Cal.App.4th at 632 [quoting C*ity of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 918-919]
2629 *Ibid.*

Map and the General Plan Highway Plan Policy Map.[2630] These straightforward amendments do not have any potential to cause any significant impact on the physical environment. (See *Lighthouse Field Beach*, 131 Cal.App.4th at 1207 ["[A]n inconsistency between a project and other land use controls does not in itself mandate a finding of significance… [i]t is merely a factor to be considered in determining whether a particular project may cause a significant environmental effect].) Therefore, the EIR properly concludes that there will be no impacts to the physical environmental from land use conflicts.

Response to Comment F.8-243:

This comment regarding the administrative record is noted, will be included as part of the record, and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the Proposed Project. The County will continue to implement its document retention and management policies, and if the Draft EIR is certified, the project is approved, and a lawsuit is filed, the petitioner in the lawsuit is required to either elect to prepare the administrative record or to request that the County prepare the record. If petitioner elects to prepare the record, the County is required to review the record for completeness. As noted above, Commenter CBD currently has a lawsuit pending against the County in relation to the EIR for the AVAP, for which the administrative record was prepared as required by law as part of the litigation process. The comment does not address or specifically question the content of the Draft EIR, and no further response is required.

Response to Comment F.8-244:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment expresses an opinion about and does not address or specifically question the content of the Draft EIR, and no further response is required.

Response to Comment F.8-245:

See response to Comment F.8-25A.

Response to Comment F.8-246:

The referenced document was cited in Comment F.8-200 in support of the Commenter's claim that Los Angeles County, Kern County, and San Bernardino County rank among the nation's worst in overall ozone and PM 2.5 pollution. This referenced document is addressed in response to Comment F.8-200. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

[2630] DRP 2017, pp. 5.8-1, -2, -23

Response to Comment F.8-247:

The referenced one-page document is titled *Antelope Valley Regional Conservation Investment Strategy (AV RCIS),* with a footer that reads "Antelope Valley RCIS, Public Meeting, March 7, 2017." The document consists of (i) a Stakeholders for the AV RCIS," which list includes the name of commenter CBD. The Commenter's submittal of this document, and the document itself, are noted, included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This document was also cited in Comment F.8-172 and hyperlinked at Comment F.8-172B, and is therefore substantively addressed in responses to Comments F.8-172 and F.8-172B.

Response to Comment F.8-248:

This is an incomplete citation. It appears to be a citation to the same document listed in Comment F.8-289, which is responded to in response to Comment F.8-289. In the event this is not the same document cited in Comment F.8-289, the Lead Agency notes that not enough information has been provided to allow identification of the document after diligent search, and it therefore cannot be addressed in this Final EIR.

Response to Comment F.8-249:

The referenced document was cited in Comment F.8-190 to support the claim that Southern California has an abundance of diesel shipping traffic. This reference document is addressed in response to Comment F.8-190. This document is noted and will be included in the administrative record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-250:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Marking of deer fences to reduce frequency of collisions by woodland grouse*, are acknowledged.

Response to Comment F.8-251:

The Draft EIR incorporates the analysis of potential climate change impacts to hydrology used in the Early Long Term (ELT) scenario developed by the California Department of Water Resources in Appendix C of the State Water Project Delivery Capability Report (DCR).[2631] The climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2632] Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and

[2631] DRP 2017, Appendix 5.18-D
[2632] BDCP 2014

analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Section and World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2633] BDCP Appendix 5.A.2 provides more current and California-specific information regarding hydrology and climate change than the cited source, which in any event primarily addresses energy use for water supplies in the southwestern United States.

Response to Comment F.8-252:

The referenced document was cited in Comment F.8-188 in support of the Commenter's claim that "poor air quality that contributed to climate change will in turn worsen the impacts of climate and attendant air pollution problems." This referenced document is addressed in response to Comment F.8-188. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-253:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-254:

Note that the reference is tied to Comment F.8-152; please see response to Comment F.8-152. The comment and the referenced document, *Status of the Ringtail in California,* are acknowledged.

Response to Comment F.8-255:

The referenced document was cited in Comment F.8-190 to support the claim that Southern California has an abundance of diesel shipping traffic. This reference document is addressed in response to Comment F.8-190. This document is noted and will be included in the administrative record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

[2633] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

Response to Comment F.8-256:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Influence of roads on the endangered Stephens' kangaroo rat (*Dipodomys stephensi*): are dirt and gravel roads different,* are acknowledged.

Response to Comment F.8-257:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Effects of Invasive Alien Plants on Fire Regimes,* are acknowledged.

Response to Comment F.8-258:

Note that the reference is the same as Comment F.8-147B, which is a footnote related to Comment F.8-147; please see responses to Comments F.8-147 and F.8-147B. The comment and the referenced document, *Nonbreeding bald eagle communal and solitary roosting behavior and roost habitat on the northern Chesapeake Bay,* are acknowledged.

Response to Comment F.8-259:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the Draft EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-260:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the Draft EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-261:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the Draft EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-262:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record

and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-263:

Note that the reference is the same as Comment F.8-152A, which is a footnote related to Comment F.8-152; please see responses to Comments F.8-152 and F.8-152A. The comment and the referenced document, *California Wildlife Habitat Relationships System: Ringtail Bassariscus astutus,* are acknowledged.

Response to Comment F.8-264:

Note that the reference is the same as Comment F.8-137A, which is a footnote related to Comment F.8-137; please see responses to Comments F.8-137 and F.8-137A. The comment and the referenced document, *Fully Protected Animals,* are acknowledged.

Response to Comment F.8-265:

Note that the reference is the same as Comment F.8-87A, which is a footnote related to Comment F.8-87; please see responses to Comments F.8-87 and F.8-87A. The comment and the referenced document, *Newhall Ranch Resource and Development Management and Development Plan, Final Additional Environmental Analysis, Appendix 2.1,* are acknowledged.

Response to Comment F.8-266:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-267:

The referenced document was cited in Comment F.8-80 in support of the Commenter's claim that, without implementation of energy efficiency, the State's peak electricity demand is projected to grow by 1.14 percent between 2010 and 2020. This referenced document is addressed in response to Comment F.8-80. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-268:

This reference was cited to support a specific statement in Comment F.8-206, and is therefore acknowledged here, but addressed in response to Comment F.8-206. As noted in response to Comment F.8-206, the USGS map cited in Comment F.8-206 is meant to be used

as a broad (i.e., Statewide), general (i.e., unquantified) indication of potential shaking potential over different portions of the state. The 2003 map cited in the comment has been superseded by a 2016 version.[2634] As stated on this map, "The resulting earthquake shaking potential is used in developing building code design values, estimating future earthquake losses, and prioritizing earthquake retrofit." Calculations of earthquake shaking hazard for California are part of a cooperative project between USGS and California Geological Survey (CGS) and are part of the National Seismic Hazard Maps. On the National Seismic Hazard Maps website, the difference between geologic hazard and geologic risk is discussed. As stated on this website, "Bottom line: High earthquake hazard does not mean high risk. Also, while you can't change the underlying earthquake hazard, you can reduce earthquake risk by managing the built environment".[2635] This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "Compliance with geotechnical recommendations, which reflect building code requirements, would result in the construction of earthquake-resistant structures. However, in the event of a major seismic event, no structure is completely safe from damage. Incorporation of these measures reduces the potential risk from seismic and geotechnical conditions to the maximum extent practicable under current engineering practice." Additionally, the National Seismic Hazard Maps website states "there are versions of the maps designed specifically for the public, to help people learn more about the hazard from earthquake ground shaking in their area".[2636] An example of such a map is then presented, and is the Frequency of Damaging Earthquake Shaking Around the U.S..[2637] As shown on this map, the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State. This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "It should be emphasized that, while the Project site has identified geotechnical constraints, the overall seismic risk at the Project site is the same as Southern California in its entirety."

Response to Comment F.8-269:

See response to Comment F.8-27A.

Response to Comment F.8-270:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that the CPUC has committed to the goal of zero net energy for all new residential construction. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-271:

Note that the reference is the same as Comment F.8-112A, which is a footnote related to Comment F.8-112; please see responses to Comments F.8-112 and F.8-112A. The comment and the referenced document, *Use of Ecoregions, Hydrologic Unit Codes, and Marine*

[2634] Available at: ftp://ftp.conservation.ca.gov/pub/dmg/pubs/ms/048/MS_048_revised_2016.pdf.
[2635] USGS 2017
[2636] *Ibid*.
[2637] Available at: https://earthquake.usgs.gov/hazards/learn/images/2014hazmap-induced-lg.gif.

Protection Study Regions as the Planning Units for the State Wildlife Action Plan Update, are acknowledged.

Response to Comment F.8-272:

The referenced document was cited in Comment F.8-79 to support the claim that the development of utility-scale renewable energy facilities has the potential to adversely affect biological resources. This reference document is addressed in response to Comment F.8-79. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-273:

Note that the reference is the same as Comment F.8-145B, which is a footnote related to Comment F.8-145; please see responses to Comments F.8-145 and F.8-145B. The comment and the referenced document, *Viewsheds: a complementary management approach to buffer zones,* are acknowledged.

Response to Comment F.8-274:

Although this document is included on the list of references that follows the Commenter's full comment letter, it is not cited in the body of the comment letter itself, and the Commenter did not provide any explanation as to the intended use of the referenced document. The referenced document is titled *Scenarios of Climate Change in California: An Overview* and is dated February 2006. CEQA does not require a response to general reference documents submitted in support of comments.[2638] The Commenter's submittal of this document, and the document itself, are noted, included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. It is noted that a 2007 version of a similar document is also included on the reference list that follows the Commenter's full comment letter, as discussed in response to Comment F.8-223. It is further noted that the Project's potential significant impacts related to climate change are analyzed in Section 5.21, Climate Change.

Response to Comment F.8-275:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Spatial patterns of agricultural expansion determine impacts on biodiversity and carbon storage,* are acknowledged.

Response to Comment F.8-276:

Note that the reference is the same as Comment F.8-140A, which is a footnote related to Comment F.8-140; please see responses to Comments F.8-140 and F.8-140A. The comment and the referenced document, *California Condor Activity in the Tejon Ranch Region,* are acknowledged.

[2638] *Environmental Protection Info. V. Department of Forestry and Fire Protection* (2008) 44 Cal. 4th 459, 483, 487

Response to Comment F.8-277:

The referenced document was cited in Comment F.8-84 to support the Commenter's characterization of "green buildings." This reference document is addressed in response to Comment F.8-84. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-278:

Note that the reference is the same as Comment F.8-112A, which is a footnote related to Comment F.8-112; please see responses to Comments F.8-112 and F.8-112A. The comment and the referenced document, *Proposed Reserve Design for Tejon Ranch - A Threatened California Legacy,* are acknowledged.

Response to Comment F.8-279:

Note that the reference is the same as Comment F.8-147A, which is a footnote related to Comment F.8-147; please see responses to Comments F.8-147 and F.8-147A. The comment and the referenced document, *Recommended buffer zones and seasonal restrictions for Colorado raptors,* are acknowledged. Please note that this reference was not included on the CD which accompanied the comment letter. A literature review was conducted and was unable to locate the reference as listed. However, a 2008 paper with the same title and a line of text which indicates the author listed, G.R. Craig, originally developed the guidelines in 2002 and that the 2008 revision is the current version. Therefore, the 2008 version was reviewed in preparation of responses to Comments F.8-147 and F.8-147A.

Response to Comment F.8-280:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Hopes for the Future: Restoration Ecology and Conservation Biology,* are acknowledged.

Response to Comment F.8-281:

Note that the reference is the same as Comment F.8-161A, which is a footnote related to Comment F.8-161; please see responses to Comments F.8-161 and F.8-161A. The comment and the referenced document, *Relocation, repatriation and trans location of amphibians and reptiles: are they conservation strategies that work?,* are acknowledged.

Response to Comment F.8-282:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that distributed solar is a good example of appropriately sited renewable energy. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-283:

The referenced document was cited in Comment F.8-188 in support of the Commenter's claim that that greenhouse gas emissions contribute to human-induced climate change. This referenced document is addressed in response to Comment F.8-188. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-284:

The referenced document was cited in Comment F.8-188 in support of the Commenter's claim that air pollution adversely impacts aquatic species in the form of acid rain. This referenced document is addressed in response to Comment F.8-188. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-285:

The referenced document was cited in Comment F.8-225 to support the Commenter's claim that shifting weather patterns are having an adverse effect on water quality and quantity in many countries where groundwater sources are overdrawn. The referenced document is a 2005 report published by Harvard Medical School Center for Health and the Global Environment titled Climate Change Futures. The referenced document evaluates the potential effects of climate change on human health that may occur under two different "business as usual" climate change scenarios, including potential climate change effects related to water supply and quality in various regions of the world, including Central Europe, South America, Africa. The potential effects of climate change on Project water supplies are addressed in response to Comment F.8-225. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-286:

Note that the reference is the same as Comment F.8-129A, which is a footnote related to Comment F.8-129; please see responses to Comments F.8-129 and F.8-129A. The comment and the referenced document, *Mitigation Related Transplantation, Relocation, and Reintroduction Projects Involving Endangered and Threatened and Rare Plant Species in California, Final Submitted to the California Department of Fish and Game-Endangered Plant Program,* are acknowledged.

Response to Comment F.8-287:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Roads as conduits for exotic plant invasions in a semiarid landscape,* are acknowledged.

Response to Comment F.8-288:

The referenced document was cited in Comment F.8-191 in support of the Commenter's claim that the Draft EIR should include a life cycle assessment of the entire Project. This referenced document is addressed in response to Comment F.8-191. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-289:

The Draft EIR incorporates the analysis of potential climate change impacts to hydrology used in the Early Long Term (ELT) scenario developed by the California Department of Water Resources in Appendix C of the State Water Project Delivery Capability Report (DCR).[2639] The climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2640] Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Section and World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2641] BDCP Appendix 5.A.2 provides more current and California-specific information regarding hydrology and climate change than the cited source.

Response to Comment F.8-290:

Note that the reference is the same as Comment F.8-159A, which is a footnote related to Comment F.8-159; please see responses to Comments F.8-159 and F.8-159A. The comment and the referenced document, *Spacing and ecology of north American badgers (*Taxidea taxus*) in a prairie-dog (*Cynomys leucurus*) complex,* are acknowledged.

Response to Comment F.8-291:

This reference was cited to support a specific statement in Comment F.8-211, and is therefore acknowledged here, but addressed more directly in Comment F.8-211. Documentation regarding the landslides triggered by the 1994 Northridge earthquake, situated approximately 50 miles to the south and in a different geotechnical context, bears no relation to the risk of seismically-induced landslides on the Project site. This document

[2639] DRP 2017, Appendix 5.18-D

[2640] BDCP 2014

[2641] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

does not represent expert opinion or other facts that supplant the findings of the site-specific geotechnical studies.

Response to Comment F.8-292:

The referenced document was cited in Comment F.8-80 in support of the Commenter's claim that electricity generated from fossil fuels contributed to air pollution from carbon dioxide and fine particulate matter, and water pollution from direct spills or impacts to groundwater from drilling, mining, and injection activities. This referenced document is addressed in response to Comment F.8-80. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-293:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that energy efficiency measures reduces energy consumption and thus has beneficial impacts. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-294:

Although this document is included on the list of references that follows the Commenter's full comment letter, it is not cited in the body of the comment letter itself, and the Commenter did not provide any explanation as to the intended use of the referenced document. The referenced document is a single chapter of a larger volume titled *Climate Change 2007: Working Group I: The Physical Science Basis*, and is itself subtitled *Chapter 3: Observations: Surface and Atmospheric Climate Change*. CEQA does not require a response to general reference documents submitted in support of comments.[2642] The Commenter did not provide a copy of the referenced document to the lead agency. The Commenter's submittal of this document, and the document itself, are noted, included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. It is noted that the Project's potential significant impacts related to climate change are analyzed in Section 5.21, *Climate Change*.

Response to Comment F.8-295:

Note that the reference is the same as Comment F.8-165A, which is a footnote related to Comment F.8-165; please see responses to Comments F.8-165 and F.8-165A. The comment and the referenced document, *A literature review and analysis of pronghorn populations at Tejon Ranch, California,* are acknowledged.

[2642] *Ibid.*

Response to Comment F.8-296:

The Draft EIR incorporates the analysis of potential climate change impacts to hydrology used in the Early Long Term (ELT) scenario developed by the California Department of Water Resources in Appendix C of the State Water Project Delivery Capability Report (DCR).[2643] The climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2644] Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Section and World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2645] BDCP Appendix 5.A.2 provides more current and California-specific information regarding hydrology and climate change than the cited source, which in any event primarily addresses energy use for water supplies in the southwestern United States.

Response to Comment F.8-297:

The referenced document was cited in Comment F.8-190 to support the Commenter's claim that certain air pollutants, including PM, have been linked to adverse health effects, including birth defects. The referenced document is addressed in response to Comment F.8-190. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-298:

Note that the reference is tied to Comment F.8-109; please see response to Comment F.8-109. The comment and the referenced document, *Silent Spring Revisited: Pesticide Use and Endangered Species*, are acknowledged.

Response to Comment F.8-299:

Note that the reference is the same as Comment F.8-159A, which is a footnote related to Comment F.8-159; please see responses to Comments F.8-159 and F.8-159A. The comment and the referenced document, *Taxidea taxus,* are acknowledged.

2643 DRP 2017, Appendix 5.18-D

2644 Bay Delta Conservation Plan (BDCP). 2014. 2013 Public Review Draft BDCP. http://baydeltaconservationplan.com/EnvironmentalReview/EnvironmentalReview/2013-2014PublicReview/2013PublicReviewDraftBDCP.aspx.

2645 *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

Response to Comment F.8-300:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Ecological Light Pollution,* are acknowledged.

Response to Comment F.8-301:

Note that the reference is the same as Comment F.8-180A, which is a footnote related to Comment F.8-180; please see responses to Comments F.8-180 and F.8-180A. The comment and the referenced document, *On the perils of ecological restoration: Lessons from the El Segundo blue butterfly,* are acknowledged.

Response to Comment F.8-302:

The referenced document is the Antelope Valley Area Plan, adopted in June 2015. This document is discussed throughout the Draft EIR and will be included in the administrative record. This document is also cited in Comment F.8-7 and is therefore also discussed in detail in that response.

Response to Comment F.8-303:

The referenced document is the Los Angeles County General Plan. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-304:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that legislation is needed to promote the appropriate siting and use of renewable energy, such as CALGreen and its requirement that new construction incorporate solar-ready roofs and solar –ready pre-wiring. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-305:

Note that the reference is tied to Comment F.8-79; please see response to Comment F.8-79. The comment and the referenced document, *Wildlife Conservation and Solar Energy Development in the Desert Southwest,* are acknowledged.

Response to Comment F.8-306:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that shifting from non-renewable fossil fuels to renewable energy sources will reduce GHG emissions, air, water and pollution impacts to biological resources, provided renewable energy facilities are properly sited. This referenced document is addressed in response to

Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-307:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Poisoning Our Imperiled Wildlife,* are acknowledged.

Response to Comment F.8-308:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Historical declined of coastal sage scrub in the Riverside-Perris Plain,* are acknowledged.

Response to Comment F.8-309:

Note that the reference is the same as Comment F.8-116A, which is a footnote related to Comment F.8-116; please see responses to Comments F.8-116 and F.8-116A. The comment and the referenced document, *How much compensation is enough? A framework for incorporating uncertainty and time discounting when calculating offset ratios for impacted habitat,* are acknowledged.

Response to Comment F.8-310:

The referenced document was cited in Comment F.8-189 to support the Commenter's observation that transportation presents one of the most significant sources of pollution in urban areas. The Commenter is correct, as is discussed in response to Comment F.8-189. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-311:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Alterations of Riparian Ecosystems Caused by River Regulation: Dam operations have caused global-scale ecological changes in riparian ecosystems,* are acknowledged.

Response to Comment F.8-312:

See response to Comment F.8-28A.

Response to Comment F.8-313:

See response to Comment F.8-17A.

Response to Comment F.8-314:

Note that the reference is the same as Comment F.8-116A, which is a footnote related to Comment F.8-116; please see responses to Comments F.8-116 and F.8-116A. The comment and the referenced document, *Biodiversity offsets: two New Zealand case studies and an assessment framework,* are acknowledged.

Response to Comment F.8-315:

The Draft EIR incorporates the analysis of potential climate change impacts to hydrology used in the Early Long Term (ELT) scenario developed by the California Department of Water Resources in Appendix C of the State Water Project Delivery Capability Report (DCR).[2646] The climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2647] Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Section and World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2648] BDCP Appendix 5.A.2 provides more current and California-specific information regarding hydrology and climate change than the cited source.

Response to Comment F.8-316:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the Draft EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-317:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Landowner's Guide to Wildlife Friendly Fences,* are acknowledged.

[2646] DRP 2017, Appendix 5.18-D

[2647] BDCP 2014

[2648] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

Response to Comment F.8-318:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Effects of the Herbicide Roundup on Freshwater Microbial Communities: A Mesocosm Study,* are acknowledged.

Response to Comment F.8-319:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that zero net energy buildings produce enough renewable energy to meet the building's annual energy needs. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-320:

This reference document was cited in Comment F.8-108 to support a statement that roads create habitat fragmentation. As such, the assertion is addressed in response to Comment F.8-108. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-321:

The article referenced in this footnote discusses the California Energy Commission's denial of a 100-megawatt natural gas–fired gas turbine power plant in part because rooftop solar photovoltaic (PV) could potentially achieve the same objectives for comparable cost. The author argues several points: that urban PV is a cost-effective alternative to peaking gas-fired power, could provide reliable power in many places nationwide, could fulfill 75 percent of California's renewables target, and could minimize new transmission line buildout. The net effect of these points is to place more focus on urban PV to carry a much bigger share of the nation's renewable energy load than had been previously contemplated by policymakers.

The Specific Plan's Green Development Program requires the installation of on-site solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. It should be noted that the Project does not propose to install rooftop solar on 100 percent of single-family detached homes. It is noted that Draft EIR Table 5.21-11 inaccurately states that a minimum of 100 percent of all single-family detached residential units will be constructed with solar energy collection equipment. This statement is a typographical error. As explained in response to Comment F.3A-71, MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs that can accommodate solar collection systems. In addition, MM 21-5 requires the Project to equip a minimum of 70

percent of public and community pools and spas with active solar water heating systems where heating is necessary or desired, and MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent.

Response to Comment F.8-322:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *The Lethal Impacts of Roundup on Aquatic and Terrestrial Amphibians, Ecological Applications,* are acknowledged.

Response to Comment F.8-323:

Note that the reference is the same as Comment F.8-145A, which is a footnote related to Comment F.8-145; please see responses to Comments F.8-145 and F.8-145A. The comment and the referenced document, *Recommendations for protecting raptors from human disturbance: a review,* are acknowledged.

Response to Comment F.8-324:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-325:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-326:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-327:

The article referenced in this footnote describes the full range and scale of climate change effects on global biodiversity that have been observed in natural systems. The researchers identified a set of core ecological processes that underpin ecosystem functioning and support services to people. Of the 94 processes considered, 82 percent showed evidence of impact from climate change in the peer-reviewed literature. Examples of observed impacts from meta-analyses and case studies go beyond well-established shifts in species ranges and changes to phenology and population dynamics to include disruptions that scale from the gene to the ecosystem. Understanding shifts in ecological processes can guide human adaptation strategies. In addition to reducing greenhouse gases, the article posits that climate action and policy must therefore focus equally on strategies that safeguard biodiversity and ecosystems. The referenced document is noted for the record. As discussed in responses to Comments F.8-175 through F.8-178, climate change is acknowledged as an existing condition that has influenced the current biological setting of the Project site, and this existing physical setting is the "baseline" from which Project impacts are assessed in Section 5.7, Biological Resources, in the Draft EIR. Further, as discussed in response to Comment F.8-20, the Project is sited in a location projected for future development by, and is consistent with, the regional Sustainable Communities Strategy adopted pursuant to Senate Bill 375, the state's premiere strategy for addressing greenhouse gas emissions related to the land use sector.

Response to Comment F.8-328:

This document was cited in Comment F.8-225 to support a specific statement. However, this document was not provided on the Commenter's reference CD, and it could not be located after a diligent online search using the title and author information provided by the Commenter as search terms. Therefore, it cannot be addressed in this Final EIR. However, please see response to Comment F.8-225 for a response regarding the Commenter's assertions in that comment.

Response to Comment F.8-329:

Note that the reference is tied to Comment F.8-109; please see response to Comment F.8-109. The comment and the referenced document, *Measuring the Success of Wildlife Linkage Efforts,* are acknowledged.

Response to Comment F.8-330:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-331:

The referenced document is a summary of geology in the Imperial Valley. It is acknowledged and will be provided to the Regional Planning Commission and Board of Supervisors as part of the record. The referenced hyperlink is no longer in service, but this document was provided on the Commenter's CD. It was cited to support a statement in Comment F.8-112 and the citation is provided in a footnote at Comment F.8-112B. It is, therefore, addressed in response to Comment F.8-112B.

Response to Comment F.8-332:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Birdsong and anthropogenic noise: implications and applications for conservation,* are acknowledged.

Response to Comment F.8-333:

Note that the reference is tied to Comment F.8-109; please see response to Comment F.8-109. The comment and the referenced document, *South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion,* are acknowledged.

Response to Comment F.8-334:

Note that the reference is the same as Comment F.8-147A, which is a footnote related to Comment F.8-147; please see responses to Comments F.8-147 and F.8-147A. The comment and the referenced document, *Behavioral Responses of Wintering Bald Eagles to Human Activity,* are acknowledged.

Response to Comment F.8-335:

Note that the reference is tied to Comment F.8-79; please see response to Comment F.8-79. The comment and the referenced document, *An Ill Wind,* are acknowledged.

Response to Comment F.8-336:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Road crossing in Sigmodon Hispidus and Microtus Ochrogaster,* are acknowledged.

Response to Comment F.8-337:

The referenced document was cited in Comment F.8-80 in support of the Commenter's claim that water and energy utilities should work together to design more efficient systems in order to reduce adverse impacts on water and air resources. This reference document is addressed in response to Comment F.8-80. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-338:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-339:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-340:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-341:

Note that the reference is the same as Comment F.8-150A, which is a footnote related to Comment F.8-150; please see responses to Comments F.8-150 and F.8-150A. The comment and the referenced document, *The Status of Swainson's Hawk Breeding in the Antelope Valley of California,* are acknowledged.

Response to Comment F.8-342:

This reference document, *U.S. Census QuickFacts*, (U. S. Census Bureau, 2016) was cited and provided as part of the comment letter. It provides statistics for the entire United States and shows the percent of the country's total population in the civilian labor force (persons age 16 years or more) was 63.3 percent from 2011 to 2015. This information was used to estimate the number of residents of the Project that would be part of the civilian labor force (36,176 persons) in Comment F.8-197. As indicated in the response to Comment F.8-197, which addresses the referenced document, the estimated 23,675 jobs at the Project would include both skilled and non-skilled workers that could be filled by residents of the Project. Residents are also expected to be travelling to off-site areas for employment, which is accounted for in the Traffic Study for the Project.

Response to Comment F.8-343:

Note that the reference is the same as Comment F.8-144A, which is a footnote related to Comment F.8-144; please see responses to Comments F.8-144 and F.8-144A. The comment and the referenced document, *Bald and Golden Eagles: Population demographics and estimation of sustainable take in the United States,* are acknowledged.

Response to Comment F.8-344:

Note that the reference is the same as Comment F.8-138A, which is a footnote related to Comment F.8-138; please see responses to Comments F.8-138 and F.8-138A. The comment and the referenced document, *California Condor Recovery Program 2015 Annual Condor Population Status Update,* are acknowledged.

Response to Comment F.8-345:

Note that the reference is the same as Comment F.8-145C, which is a footnote related to Comment F.8-145; please see responses to Comments F.8-145 and F.8-145C. The comment and the referenced document, *Resident Golden Eagle Ranging Behaviour Before and After Construction of a Windfarm in Argyll,* are acknowledged.

Response to Comment F.8-346:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *A preliminary assessment of avian mortality at utility-scale solar energy facilities in the United States,* are acknowledged.

Response to Comment F.8-347:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *A phantom road experiment reveals traffic noise is an invisible source of habitat degradation,* are acknowledged.

Response to Comment F.8-348:

The article referenced in this footnote is intended to be a guide for local government officials, planners, and citizens concerned about how development within existing towns and cities—especially infill housing and mixed-use development—can help revitalize communities and accommodate the future growth of the Bay Area.

The author argues that given the region's housing crisis, residential or mixed-use infill is important to create additional housing near jobs in many existing Bay Area communities. Infill development, however, faces many obstacles in the Bay area, including but not limited to land availability, outdated zoning requirements, and lengthy permitting processes. Local governments can tackle these obstacles by creating specific plans that revise zoning codes, adopt design guidelines, and streamline permitting processes, amongst other actions. Bay Area communities, such as San Jose, San Rafael, San Francisco, Emeryville, and Oakland have

already created a favorable context for infill by creating specific plans. State and regional policy, plus citizen action and nongovernmental organizations, can build political support for infill and help Bay Area cities and towns become more livable and sustainable through infill development.

As discussed in response to Comment F.8-7, the County adopted the AVAP in 2015 as a component of its General Plan in order to establish a comprehensive land use plan for accommodating projected growth in the planning area, as required by Government Code §65583. Indeed, the AVAP expressly states that it was prepared "[i]n anticipation of future growth" and is thus "focused on ways to manage this growth".[2649] As shown in Draft EIR Table 5.9-5, significant population growth is anticipated in TAZ 20280000, which covers the portion of the Project site north of SR-138. Specifically, SCAG projects that TAZ 20280000 will grow from 372 people in 2008 to 50,505 people by 2040, as shown in Draft EIR Table 5.9-5.

As discussed in response to Comment F.7-1, the planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2016-2040 Regional Transportation Plan/Sustainable Communities Plan (2016 RTP/SCS) prepared by the Southern California Association of Governments (SCAG). Specifically, the Project is consistent with, and implements, regional and County plans to strategically locate future growth in a manner that both achieves statewide GHG reduction goals and relieves the potential adverse and social effects of focusing too much future growth in both agricultural areas and in infill, transit-oriented areas. It is AVAP's stated intent to establish a land use plan that will accommodate projected growth while also preserving the rural character of Antelope Valley.

Response to Comment F.8-349:

Note that the reference is the same as Comment F.8-163A, which is a footnote related to Comment F.8-163; please see responses to Comments F.8-163 and F.8-163A. The comment and the referenced document, *Distribution and abundance of western burrowing owls (*Athene cunicularia hypugaea*) in southeastern California,* are acknowledged.

Response to Comment F.8-350:

This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-351:

This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further

[2649] DRP 2015, pp. I-6

response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-352:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not specifically address or question the content of the Draft EIR, and no further response is required.

Response to Comment F.8-353:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not specifically address or question the content of the Draft EIR, and no further response is required.

Response to Comment F.8-354:

The Los Angeles County's Traffic Impact Analysis Report Guidelines (County of Los Angeles Department of Public Works, January 1997) state that counts should not be over one year old. The County also applies discretion based on the specifics of the study. The Project Traffic Study (Draft EIR Appendix 5.10-A) work effort was initiated in February 2015 and the traffic counts used in the traffic analysis were obtained at various times, generally between March 2014 and July 2015. As shown in Draft EIR Table 5.10-3 ICU and LOS Summary – Existing (2014 and 2015) Conditions, page 5.10-21, traffic volume data for intersections in the Santa Clarita Valley area were obtained in March 2014 and the traffic volume data for intersections along the SR-138 and in Kern County were obtained in July 2015. The dates of the traffic counts used for the impact analysis are in accordance with the guidelines of each applicable jurisdiction, as also discussed in further detail in responses to Comments F.8-355 through F.8-363.

Response to Comment F.8-355:

The Los Angeles County's Traffic Impact Analysis Report Guidelines (County of Los Angeles Department of Public Works, January 1997) and the County traffic scoping instructions (County of Los Angeles Department of Public Works, Traffic and Lighting Division, March 2014) state that counts should not be over one year old. The County also applies discretion based on the specifics of the study. The Project Traffic Study[2650] work effort was initiated in February 2015. Therefore, the oldest counts should not be older than February 2014 according to policy. The oldest counts used in the traffic study are from March 2014 (for intersections in the Santa Clarita Valley area), and the remainder were collected in January 2015 and July 2015. As such, all within the one-year timeframe specified in the guidelines and therefore not a violation of Los Angeles County policy.

[2650] DRP 2017, Appendix 5.10-A

Response to Comment F.8-356:

The Project Traffic Study work effort was initiated in February 2015.[2651] Therefore, traffic counts should not be older than February 2014 based on a one-year criterion. The oldest traffic counts used for the intersection analysis are from March 2014 for intersections in the Santa Clarita Valley area and the remainder were collected in January 2015 and July 2015. As such, all are within the one-year timeframe specified in the CMP guidelines (LACMTA 2010 Congestion Management Program, Appendix D – Guidelines for CMP Transportation Impact Analysis, Section D.5.1 – Existing Traffic Conditions). Furthermore, the traffic counts taken at the two CMP study locations, 300th Street West at SR-138 and 60th Street West at SR-138, were done in July 2015, which is after the traffic study was initiated in February 2015.

Response to Comment F.8-357:

The Project Traffic Study (Draft EIR Appendix 5.10-A) work effort by Stantec was initiated in February 2015.[2652] Therefore, any traffic counts conducted on and after February 2014 are consistent with and fully comply with all applicable criteria. As shown in Draft EIR Table 5.10-3 ICU and LOS Summary – Existing (2014 and 2015) Conditions,[2653] the count data for intersections in the Santa Clarita Valley area are from March 2014 and January 2015, and the count data for intersections along the SR-138 and for intersections in Kern County are from July 2015. Therefore, all the counts are within the one-year time frame and comply with the Los Angeles County and Metro guidance.

Response to Comment F.8-358:

The Project Traffic Study work effort was initiated in February 2015.[2654] Therefore, any traffic counts conducted on and after February 2014 are consistent with and fully comply with all applicable criteria. As shown in Draft EIR Table 5.10-3 ICU and LOS Summary – Existing (2014 and 2015) Conditions,[2655] the oldest counts used in the traffic study are from March 2014 and January 2015 for intersections in the Santa Clarita Valley area, and the count data for intersections along the SR-138 and for intersections in Kern County are from July 2015. Therefore, all the counts are within the one-year timeframe recommended by the Transportation Impact Analysis for Site Development: An ITE Proposed Recommended Practice document by the Institute of Transportation Engineers (ITE).

Response to Comment F.8-359:

The Project Traffic Study work effort was initiated in February 2015.[2656] Therefore, any traffic counts conducted on and after February 2014 are consistent with and fully comply with all applicable criteria, Los Angeles County and Metro criteria. The oldest counts used in

2651 *Ibid.*
2652 *Ibid.*
2653 *Id.,* p. 5.10-21
2654 *Id.,* Appendix 5.10-A
2655 *Id.,* p. 5.10-21
2656 *Id.,* Appendix 5.10-A

the Centennial traffic study are from March 2014 for intersections in the Santa Clarita Valley area. The traffic counts from the remaining intersections were obtained in January and July 2015. Therefore, the counts used in the traffic study are within the one year timeframe specified in the Los Angeles County and Metro guidance (County of Los Angeles Department of Public Works Traffic Impact Report Guidelines, January 1997, County of Los Angeles Department of Public Works, Traffic and Lighting Division, Traffic Study Scoping, March 2014, and LACMTA 2010 Congestion Management Program, Appendix D – Guidelines for CMP Transportation Impact Analysis, Section D.5.1 – Existing Traffic Conditions).

Response to Comment F.8-360:

The traffic counts referenced in the comment were collected in July 2015 along SR-138, a rural highway with limited influence by school traffic, and a small number of other rural intersections in in Kern County. As reflected in the low intersection capacity utilization values in Draft EIR Table 5.10-3 ICU and LOS Summary – Existing (2014 and 2015) Conditions, the SR-138 and the nearby intersections are characterized by very low volumes currently.[2657] Due to the remote location of the highway, the volume of school trips in this rural area are minimal and would not affect the findings of the analysis. Specifically, a comparison was made between the traffic study counts dated July 2015 on the SR-138 and additional counts dated December 2015 on the SR-138.[2658] As shown in the table below, the comparison shows that along the SR-138 corridor, during the AM peak hour when school trips occur, traffic volumes in July (no-school days) are generally equivalent to the traffic volumes in December (school days). Therefore, due to the remote location of the SR-138 corridor, the volume of school trips is minimal and would not affect the findings of the analysis.

Intersection	AM Peak Hour Total		
	July 2015	December 2015	Difference
1. 300th St W & SR-138	198	183	-15
2. Three Points Road & SR-138	208	200	-8
4. 230th St W & SR-138	182	174	-8
5. 190th St W & SR-138	198	161	-37
6. 170th St W & SR-138	223	200	-23
7. 110th St W & SR-138	201	172	-29
8. 90th St & w SR-138	277	284	7
10. 30th St W & SR-138	261	239	-22
11. SR-14 SB Ramps & SR-138	269	248	-21
12. SR-14 NB Ramps & SR-138	184	204	20

Response to Comment F.8-361:

As noted in response to Comment F.8-360, due to the remote location of the highway, the volume of school trips in the rural area that is the subject of the comment are minimal and would not affect the findings of the analysis. Specifically, a comparison was made between

[2657] *Id.,* Table 5.10-3, p. 5.10-21; *Id.,* Exhibit 5.10-3

[2658] Caltrans, June 2017. Northwest SR-138 Corridor Improvement Project FEIR/EIS.

the traffic study counts dated July 2015 on the SR-138 and additional counts dated December 2015 on the SR-138.[2659] As shown in the table in response to Comment F.8-360, the comparison shows that along the SR-138 corridor, during the AM peak hour when school trips occur, traffic volumes in July (no-school days) are generally equivalent to the traffic volumes in December (school days). Therefore, due to the remote location of the SR-138 corridor, the volume of school trips is minimal and would not affect the findings of the analysis.

Response to Comment F.8-362:

The Project Traffic Study utilized data from multiple sources that were collected at multiple times to inform the analysis.[2660] Data published by the Caltrans Division of Traffic Operations represents the standardized set of traffic volumes for State highways. During the data collection effort undertaken for the Traffic Study that was initiated in February 2015, the 2014 Caltrans data represented the most current set of published information from the Caltrans Division of Traffic Operations.[2661] As discussed in the Traffic Study, new peak hour and daily traffic counts were collected along the SR-138 corridor and various other locations in 2015 specifically for use in the study.[2662]

Updated data typically is released by Caltrans one to two years after the end of the calendar year. As of September 2017, the most current published data from the Caltrans Division of Traffic Operations are the 2015 traffic counts.

Traffic counts from 2010 were obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database.[2663] The 2010 counts were utilized as a supplement to check the validity of the traffic counts collected in 2014 and in 2015 at the same locations on the SR-138. As discussed in the Traffic Study,[2664] the 2010 data from the LA County Public Works database was utilized only for derivation of representative K and D factors (peak hour and directional factors, respectively) for the SR-138. That data was only used to check the validity of the new traffic counts. However, the new counts were not adjusted to reflect 2010 conditions. As shown in Table 2-5 Freeway Peak Hour K & D Factors – Existing (2014 and 2015) Conditions,[2665] the K and D factors for the SR-138 reflect the K and D factors that were derived using the new 2015 peak hour counts. The 2010 traffic counts obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were not utilized as a part of the impact analysis.

Response to Comment F.8-363:

As noted in response to Comment F.8-362, traffic counts from 2010 obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were

[2659] Caltrans 2017
[2660] DRP 2017, Appendix 5.10-A
[2661] Caltrans, October 2015. 2014 Traffic Volumes on California State Highways.
[2662] DRP 2017, Appendix 5.10-A, Section 2.1.2
[2663] Los Angeles County Department of Public Works (LACDPW). 2015 (July). Machine Count Traffic Volumes database.
[2664] DRP 2017, Appendix 5.10-A, Section 2.1.2
[2665] *Id.,* Appendix 5.10-A, p. 2.19

utilized as a supplement to check the validity of the traffic counts collected in 2014 and in 2015 at the same locations on the SR-138.[2666] As discussed in the Project Traffic Study, "For SR 138, mid-block and intersection counts were collected in 2015 for use in this study".[2667] As shown in Table 2-5 Freeway Peak Hour K & D Factors – Existing (2014 and 2015) Conditions, the K and D factors for the SR-138 reflect the K and D factors that were derived using the new 2015 peak hour counts.[2668] The 2010 traffic counts obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were not utilized as a part of the impact analysis.

Response to Comment F.8-364:

As noted in response to Comment F.8-362, traffic counts from 2010 obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were utilized as a supplement to check the validity of the traffic counts collected in 2014 and in 2015 at the same locations on the SR-138.[2669] As discussed in the Project Traffic Study, "For SR 138, mid-block and intersection counts were collected in 2015 for use in this study".[2670] Furthermore, the new peak hour counts were not adjusted to reflect 2010 conditions. As shown in Table 2-5 Freeway Peak Hour K & D Factors – Existing (2014 and 2015) Conditions, the K and D factors for the SR-138 reflect the K and D factors that were derived using the new 2015 peak hour counts.[2671] The 2010 traffic counts obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were not utilized as a part of the impact analysis. The actual intersection peak hour turning movement counts utilized for the SR-138 impact analysis were collected in 2015.[2672]

Response to Comment F.8-365:

As noted in response to Comment F.8-362, traffic counts from 2010 obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were not utilized for the impact analysis.[2673] The actual intersection peak hour turning movement counts utilized for the SR-138 impact analysis were collected in 2015. As shown on Draft EIR page 5.10-21, Table 5.10-3 Existing ICU and LOS Summary – Existing (2014 and 2015) Conditions, the 2015 peak hour traffic counts collected along SR-138 indicate that SR-138 is operating well below capacity with level of service (LOS) A conditions at each intersection.

Response to Comment F.8-366:

The use of K and D factors for deriving peak hour traffic volumes is consistent with Caltrans methodology. The explanation of peak hour volume data and definitions of K and D factors available on Caltrans' Traffic Census Program webpage states that "peak hour volume data consists of hourly volume relationships and data location. The hourly volumes are expressed

2666 LACDPW 2015
2667 DRP 2017, Appendix 5.10-A, p. 2.6
2668 *Id.,* Appendix 5.10-A, p. 2.19
2669 LACDPW 2015
2670 DRP 2017, Appendix 5.10-A, p. 2.6
2671 *Id.,* Appendix 5.10-A, p. 2.19
2672 *Id.,* p. 5.10-21, Table 5.10-3 ICU and LOS Summary – Existing (2015 and 2015 Conditions)
2673 LACDPW 2015

as a percentage of Annual Average Daily Traffic (AADT). The percentages are shown for both the AM and the PM peak periods… KD multiplied with the AADT gives the one-way peak period directional flow rate or the design hourly volume (DHV). The design hourly volume is used for either Operational Analysis or Design Analysis".[2674] Therefore, since the peak hour volumes in the Project Traffic Study are used for the impact analysis, the use of K and D factors for deriving peak hour traffic volumes is consistent with Caltrans methodology.[2675]

Response to Comment F.8-367:

Due to the daily and seasonal variation in roadway traffic volumes, traffic counts by their very nature represent an estimate of conditions. A traffic count, regardless of when taken or for any finite duration, provides a representation of the expected, typical volume of traffic where the count was taken. Traffic counts are used by traffic engineers to gauge the relative volume of traffic for a given period of time at the count applicable location.

To document the volume of traffic on State highways, Caltrans utilizes a methodology where traffic counts are adjusted based on daily and seasonal factors, to provide an estimate of Average Annual Daily Traffic (AADT). Factors representing the proportion of traffic during the peak hour (K factors), and the percent of traffic in the peak direction (D factors) are derived by Caltrans for representative locations to derive the type of peak hour volumes used for roadway capacity and level of service (LOS) analysis. As such, the traffic volumes used for analysis are not intended to represent an exact volume of traffic from a specific day, but rather are representative estimates of the expected typical condition at the applicable locations. The methodology used in the Project Traffic Study[2676] for estimating existing condition traffic volumes is consistent with the Caltrans methodology of using K and D factors to derive the directional flow rate or the design hourly volume that is used for either Operational Analysis or Design Analysis.[2677]

Response to Comment F.8-368:

As noted in response to Comment F.8-367, K and D factors represent the percentage of traffic during the peak hour in the peak direction and do not represent a specific age of traffic volume data. The age of the peak hour data derived by the K and D factors is determined by the date of the AADT volumes used in an analysis. As discussed above, the Project Traffic Study utilizes the most current Caltrans AADT volumes available at the time of the analysis.[2678]

Response to Comment F.8-369:

The existing condition traffic counts used in the Project Traffic Study are a reasonable estimate of existing conditions since all the traffic counts at all the intersections were less

[2674] Caltrans. Peak Hour Volume Data. Sacramento, CA: Caltrans. http://www.dot.ca.gov/trafficops/census/docs/Peak-Hour-Definitions-K-and-D-Factors.pdf.
[2675] *Id.,* Appendix 5.10-A
[2676] *Ibid.*
[2677] Caltrans, Peak Hour Volume Data
[2678] DRP 2017, Appendix 5.10-A

than one year old at the time the traffic study was initiated in February 2015.[2679] Furthermore, as shown in the table in responses to Comments F.8-360 and F.8-361, at 8 of the 10 locations in the table, the AM peak hour counts collected in July 2015 are higher (more conservative) than comparable counts in December when school was in session. Due to the remote location of the SR-138 corridor, the volume of school trips is minimal and would not affect the findings of the analysis.

As noted in response to Comment F.8-367, K and D factors represent the percentage of traffic during the peak hour in the peak direction and do not represent a specific age of traffic volume data. The age of the peak hour data derived by the K and D factors is determined by the date of the AADT volumes used in an analysis. As discussed above, the Traffic Study utilizes the most current Caltrans AADT volumes available at the time of the analysis.

Response to Comment F.8-370:

As noted in response to Comment F.8-367, the existing condition traffic counts used in the Project Traffic Study provide a reasonably accurate estimate of existing conditions.[2680] The traffic study was initiated in February 2015 and utilized intersection counts not older than February 2014. For the state highway system, the most current Caltrans AADT volumes were used at the time the study was initiated in February 2015, and for SR-138, additional traffic counts were collected in July 2015. The traffic count data complies with all applicable Caltrans, County, and other requirements pertaining to the age of the data. As such, there is no need or basis for obtaining new traffic counts to revise the Traffic Study.

Response to Comment F.8-371:

As shown in Figure 4-1 on page 4.4 of the Project Traffic Study Average Daily Traffic Volumes – Project Only, the volume of Project traffic that is forecast to pass through the I-5/SR-99 interchange under existing conditions is approximately 8,000 ADT with approximately 6,000 ADT to/from the Bakersfield area via SR-99.[2681] The remaining 2,000 ADT would be oriented to/from the north via I-5. Under cumulative conditions, project traffic that is forecast to pass through the I-5/SR-99 interchange is approximately 4,000 ADT with approximately 3,000 ADT to/from the Bakersfield area via SR-99. The remaining 1,000 ADT would be oriented to/from the north via I-5. Because the northerly distribution of project traffic is primarily oriented to/from the Bakersfield area, the Traffic Analysis properly focuses on the SR-99 corridor.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In

2679 *Ibid.*
2680 *Ibid.*
2681 *Ibid.*

response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 corridor north of SR-99 under existing plus Project and cumulative plus Project conditions and demonstrates that the Project would not result in a significant impact on these segments of I-5.[2682]

Response to Comment F.8-372:

As shown in Figure 4-1 on page 4.4 of the Project Traffic Study Average Daily Traffic Volumes – Project Only, the volume of Project traffic that is forecast to pass through the I-5/SR-99 interchange under existing conditions is approximately 8,000 ADT with approximately 6,000 ADT to/from the Bakersfield area via SR-99.[2683] The remaining 2,000 ADT would be oriented to/from the north via I-5. Under cumulative conditions, project traffic that is forecast to pass through the I-5/SR-99 interchange is approximately 4,000 ADT with approximately 3,000 ADT to/from the Bakersfield area via SR-99. The remaining 1,000 ADT would be oriented to/from the north via I-5. Because the northerly distribution of project traffic is primarily oriented to/from the Bakersfield area, the Traffic Analysis properly focuses on the SR-99 corridor.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 corridor north of SR-99 under existing plus Project and cumulative plus Project conditions and demonstrates that the Project would not result in a significant impact on these segments of I-5.[2684]

Response to Comment F.8-373:

As shown in Figure 4-1 on page 4.4 of the Project Traffic Study Average Daily Traffic Volumes – Project Only, the volume of Project traffic that is forecast to pass through the I-5/SR-99 interchange under existing conditions is approximately 8,000 ADT with approximately 6,000

[2682] Final EIR Appendix 5.10-C, Table A-5
[2683] DRP 2017, Appendix 5.10-A
[2684] Final EIR Appendix 5.10-C, Table A-5

ADT to/from the Bakersfield area via SR-99.[2685] The remaining 2,000 ADT would be oriented to/from the north via I-5. Under cumulative conditions, project traffic that is forecast to pass through the I-5/SR-99 interchange is approximately 4,000 ADT with approximately 3,000 ADT to/from the Bakersfield area via SR-99. The remaining 1,000 ADT would be oriented to/from the north via I-5. Because the northerly distribution of project traffic is primarily oriented to/from the Bakersfield area, the Traffic Analysis properly focuses on the SR-99 corridor.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 corridor north of SR-99 under existing plus Project and cumulative plus Project conditions and demonstrates that the Project would not result in a significant impact on these segments of I-5.[2686]

Response to Comment F.8-374:

The Project Traffic Study utilizes the HCM methodology to calculate the theoretical amount of roadway capacity that is available at each freeway mainline analysis location.[2687] Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the Highway Capacity Manual (HCM) methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates. The capacity estimates are then utilized to prepare volume to capacity ratio (V/C) calculations consistent with the V/C methodology specified by the County Congestion Management Plan.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In

[2685] DRP 2017, Appendix 5.10-A
[2686] Final EIR Appendix 5.10-C, Table A-5
[2687] DRP 2017, Appendix 5.10-A

response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-375:

The methodology used in the Project Traffic Study for evaluating freeway impacts was developed through consultations with Caltrans.[2688] As a result of these consultations, a blended approach utilizing the Highway Capacity Manual (HCM) methodology for capacity derivation and V/C ratios for the impact analysis was determined to be appropriate. V/C calculations area also consistent with the V/C methodology specified by the County Congestion Management Plan.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-376:

As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion Management Plan and after consultations with Caltrans. The capacities used for the V/C calculations were determined utilizing the Highway Capacity Manual (HCM) methodology. Draft EIR Table 5.10-2 on page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions shows each component considered to derive the roadway

[2688] *Ibid.*

capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-377:

As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion Management Plan and after consultations with Caltrans. The capacities used for the V/C calculations were determined utilizing Highway Capacity Manual (HCM) methodology. Draft EIR Table 5.10-2 on page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions shows each component considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative)

traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-378:

As noted in response to Comment F.8-374, the Project Traffic Study utilizes the HCM methodology to calculate the capacity values used for the V/C calculations.[2689] As such, the same input variables used for a HCM calculation of speed and density are used for the V/C calculations. Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-379:

While the HCM 2010 utilized density to determine LOS, the County Congestion Management (CMP) Plan utilizes V/C ratios for the determination of significant project impacts. As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion

[2689] *Id.,* Appendix 5.10-A

Management Plan and after consultations with Caltrans. HCM methodology was utilized in the preparation of V/C ratios to comply with CMP requirements.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the Highway Capacity Manual (HCM) volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-380:

As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion Management Plan and after consultations with Caltrans. The capacities used for the V/C calculations were determined utilizing Highway Capacity Manual (HCM) methodology. Draft EIR Table 5.10-2 on page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions shows each component considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density

calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-381:

As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion Management Plan and after consultations with Caltrans. The capacities used for the V/C calculations were determined utilizing Highway Capacity Manual (HCM) methodology. Draft EIR Table 5.10-2 on page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions shows each component considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

Response to Comment F.8-382:

Specifically for use in the Project Traffic Study, Caltrans provided input data such as that listed in the comment for use in deriving freeway capacities for the V/C calculations.[2690] Draft EIR Table 5.10-2, page 5.10-17 Capacities for Freeways and Expressways – Existing Conditions summarizes these input variables and the resulting Highway Capoacity Manual (HCM) variables used for analysis, which consist of the following:

1. Maximum service flow rate per mixed flow (general purpose) lane under ideal conditions (MSF)
2. Lane width factor (f_w)
3. Proportion of heavy vehicles (P_t)
4. Passenger car equivalent for heavy vehicles (E_t)
5. Heavy vehicle adjustment factor (f_{HV})
6. Driver population factor (f_p)
7. Service flow rate for LOS "E" (SF)

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative)

[2690] DRP 2017, Appendix 5.10-A

traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-383:

As noted in responses to Comments F.8-378 and F.8-382, the Project Traffic Study utilizes the HCM methodology to calculate the capacity values used for the V/C calculations.[2691] As such, the same input variables used for a Highway Capacity Manual (HCM) calculation of speed and density are used for the V/C calculations. Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-384:

As noted in response to Comment F.8-382, the Project Traffic Study utilizes the standard Highway Capacity Manual (HCM) methodology to derive capacities for the impact analysis V/C calculations. As such, the same input variables used for a Highway Capacity Manual

[2691] *Ibid.*

(HCM) calculation of speed and density are used for the V/C calculations.[2692] Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-385:

Although the comment accurately describes the standard V/C methodology, it does not accurately describe the use of the Highway Capacity Manual (HCM) to derive the capacities employed for the V/C calculations in the Project Traffic Study.[2693] This approach was utilized after consultations with Caltrans and to be consistent with the Los Angeles County Congestion Management Plan (CMP), which uses the V/C methodology in order to address the preferences of both the CMP and Caltrans for the analysis.[2694] A standard or typical capacity per lane was not used for the V/C analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the

2692 *Ibid.*
2693 *Ibid.*
2694 *Id.,* Appendix 5.10-A, p. 1.9

Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-386:

The comment accurately restates the standard density calculation methodology as shown in Chapter 11 Basic Freeway Segments of the Highway Capacity Manual 2010.

Response to Comment F.8-387:

As noted in response to Comment F.8-382, the Project Traffic Study utilizes the standard Highway Capacity Manual (HCM) methodology to derive capacities for the impact analysis V/C calculations.[2695] As such, the same input variables used for a Highway Capacity Manual (HCM) calculation of speed and density are used for the V/C calculations. Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant

[2695] *Id.,* Appendix 5.10-A

impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-388:

As noted in response to Comment F.8-382, the Project Traffic Study utilizes the standard Highway Capacity Manual (HCM) methodology to derive capacities for the impact analysis V/C calculations.[2696] As such, the same input variables used for a Highway Capacity Manual (HCM) calculation of speed and density are used for the V/C calculations. Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-389:

This comment is part of a discussion of the use of the Highway Capacity Manual (HCM) methodology for the analysis of freeway ramps. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as

[2696] *Ibid.*

Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-390:

This comment is part of a discussion of the use of the Highway Capacity Manual (HCM) methodology for the analysis of freeway ramps. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-391:

This comment is part of a discussion of the use of the Highway Capacity Manual (HCM) methodology for the analysis of freeway ramps. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the

Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-392:

The Project Traffic Study includes a ramp capacity analysis to determine if sufficient capacity exists on the ramps to accommodate future projected increases in traffic volumes.[2697] The analysis does not in any manner ignore the interaction between freeway ramps and traffic on adjacent freeway segments.

This comment is part of a discussion of the use of the Highway Capacity Manual (HCM) methodology for the analysis of freeway ramps. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-393:

Comment noted. During consultations with Caltrans, it was determined that the Highway Capacity Manual (HCM) 2010 analysis methodology was the appropriate method to evaluate SR-138 based on the existing configuration as a two-lane rural highway.

Response to Comment F.8-394:

The methodology used in the Project Traffic Study for evaluating impacts to multilane expressways.[2698] including the future configuration of SR-138, was developed through consultations with Caltrans. These discussions determined that a blended approach utilizing Highway Capacity Manual (HCM) methodology for capacity derivation and V/C ratios consistent with the Los Angeles County Congestion Management Plan (CMP) for impact analysis was appropriate.[2699]

2697 DRP 2017, Appendix 5.10-A
2698 *Ibid.*
2699 *Id.,* Appendix 5,10-A, p. 1.9

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-395:

As discussed above, the Highway Capacity Manual (HCM) utilizes different methodologies based on the type of facility being analyzed. For example, the level of service (LOS) for a two-lane rural highway is determined based on the "percent of time spent following", whereas the LOS for a multi-lane highway is determined based on "density". Through consultation with Caltrans, it was determined that "percent of time spent following" would be the most appropriate approach for evaluating the existing configuration of SR-138. Therefore, the HCM 2010 methodology was utilized to evaluate existing conditions for SR-138. For future multi-lane configurations, including SR-138, after consultations with Caltrans the V/C methodology was used in the analysis to be consistent with the Los Angeles County Congestion Management Plan. Capacity estimates on the SR-138 were derived using variables consistent with the HCM methodology. Standard or typical capacities were not used for the V/C analysis. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative)

traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-396:

The assignment of traffic volumes for cumulative conditions was prepared using the North County Sub-Area Travel Demand Model, which was most recently used by Los Angeles County when developing the Antelope Valley Area Plan (AVAP). The traffic model was first developed for use by Caltrans for the Northwest SR-138 Corridor Project analysis. The model represents a combination of the SCAG RTP/SCS model and the KernCOG model. As such, the future year traffic forecasts presented in the Centennial Traffic Study and the assignment of project trips to I-5 are consistent with recent planning studies by the County and Caltrans.

Response to Comment F.8-397:

The most current traffic data from Caltrans (2015) indicates that the segment of I-5 just north of the I-5/SR-99 split currently carries 34,000 AADT,[2700] which is lower than the volume of 48,000 ADT inferred by the data shown in the Project Traffic Study, Figure 2-4 Existing (2014 & 2015) AADT and ADT Volumes.[2701] AADT and ADT volumes are presented in the traffic study for informational purposes, as the impact analysis is based on peak hour trips. As such, any revisions to the ADT volumes would not affect the Draft EIR impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS includes an analysis of the I-5 at the split with SR-99 and north of SR-99 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is not affected by the ADT value

[2700] Caltrans. 2015 (October). 2014 Traffic Volumes on California State Highways.
[2701] DRP 2017. Appendix 5.10-A

discussed above.[2702] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-398:

The most current traffic data from Caltrans (2015) indicates that the segment of I-5 just north of the I-5/SR-99 split currently carries 34,000 AADT,[2703] which is lower than the volume of 48,000 ADT inferred by the data shown in the Project Traffic Study, Figure 2-4 Existing (2014 & 2015) AADT and ADT Volumes.[2704] AADT and ADT volumes are presented in the traffic study for informational purposes, as the impact analysis is based on peak hour trips. As such, any revisions to the ADT volumes would not affect the Draft EIR impact analysis. Furthermore, due to a typographical error, the Cumulative Condition No-Project ADT volume for the segment of I-5 just south of SR-99, which is estimated to be 114,300 ADT, is incorrectly shown as 110,250 on page 4.32, Table 4-6 of the Traffic Study,[2705] as are the associated peak hour volumes for that segment. Based on the revised volumes, the segment of I-5 north of the I-5/SR-99 split is forecast to be 48,000 ADT, an increase of 14,000 ADT over the 2015 volume reported by Caltrans. Revisions to the I-5 volumes noted above do not affect the Draft EIR impact analysis as demonstrated in the STS.[2706]

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 at the split with SR-99 and north of SR-99 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is not affected by the ADT value discussed above.[2707] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

[2702] Final EIR Appendix 5.10-C, Table A-5
[2703] Caltrans 2015, 2014 Traffic Volumes on California State Highways
[2704] DRP 2017, Appendix 5.10-A
[2705] *Ibid.*
[2706] Final EIR Appendix 5.10-C, Table A-5
[2707] *Ibid.*

Response to Comment F.8-399:

The most current traffic data from Caltrans (2015) indicates that the segment of I-5 just north of the I-5/SR-99 split currently carries 34,000 AADT,[2708] which is lower than the volume of 48,000 ADT inferred by the data shown in the Project Traffic Study, Figure 2-4 Existing (2014 & 2015) AADT and ADT Volumes.[2709] AADT and ADT volumes are presented in the traffic study for informational purposes, as the impact analysis is based on peak hour trips. As such, any revisions to the ADT volumes would not affect the Draft EIR impact analysis. As discussed in response to Comment F.8-398, the correct Cumulative Condition No-Project ADT volume for the segment of I-5 just south of SR-99 is110,250 ADT. Based on the revised volumes, the segment of I-5 north of the I-5/SR-99 split is forecast to be 48,000 ADT, an increase of 14,000 ADT over the 2015 volume reported by Caltrans. As noted in response to Comment F.8-397, AADT and ADT volumes are presented in the traffic study for informational purposes, as the impact analysis is based on peak hour trips. As such, any revisions to the ADT volumes do not affect the Draft EIR impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 at the split with SR-99 and north of SR-99 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is not affected by the ADT value discussed above (see Final EIR Appendix 5.10-C, Table A-5). The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-400:

The comment references a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts provided by Caltrans. As shown in the table below, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south and north of the SR-99 split, and north of SR-138. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in

[2708] Caltrans 2015, 2014 Traffic Volumes on California State Highways
[2709] DRP 2017, Appendix 5.10-A

the NW SR-138 FEIR north of SR-138 (122,600), is consistent with the 2035 AADT reported in the Draft EIR for this same location (124,000), which is also consistent with the volume shown in the referenced table from the Draft EIR (118,000) for south of the I-5/SR-99 split. Finally, as shown in the table below, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR-99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138.

GROWTH RATE COMPARISON

I-5 TCR	2011	2035	Total Growth %	Annual Growth %
I-5 n/o SR-99	41,000	91,100	122%	5.1%
I-5 s/o SR-99	81,000	179,900	122%	5.1%
I-5 n/o SR-138	75,000	166,600	122%	5.1%
NW SR-138 Corridor Study	**2012**	**2040**	**Total Growth %**	**Annual Growth %**
I-5 n/o SR-138	70,600	122,600	73%	2.6%
I-5 s/o SR-138	67,900	125,800	85%	3.0%
Caltrans Traffic Volume Reports	**2005**	**2015**	**Total Growth %**	**Annual Growth %**
I-5 n/o SR-99	32,000	34,000	6%	0.6%
I-5 s/o SR-99	71,000	82,000	15%	1.5%
I-5 n/o SR-138	73,000	72,000	-1%	-0.1%
I-5 s/o SR-138	72,000	70,000	-3%	-0.3%

Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2710] The STS also demonstrates that, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

[2710] Final EIR Appendix 5.10-C, Table A-5

Response to Comment F.8-401:

As discusssed in response to Comment F.8-400, this comment is based on a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts documented by Caltrans. As shown in the table in response to Comment F.8-400, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south north of the SR-99 split, and north of SR-138. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in the NW SR-138NW SR-138 FEIR north of SR-138 (122,600), is consistent with the 2035 AADT reported in the Draft EIR for this same location (124,000), which is also consistent with the volume shown in the referenced table from the Draft EIR in Comment F.8-400 (118,000) for south of the I-5/SR-99 split. Finally, as shown in the table in response to Comment F.8-400, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR-99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138.

Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Draft EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2711] The STS also demonstrates that, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-402:

As discusssed in response to Comment F.8-400, this comment is based on a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts documented by Caltrans. As shown in the table in response to Comment F.8-400, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south north of the SR-99 split, and north of SR-138. As discussed in more detail in

[2711] *Ibid.*

response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in the NW SR-138 FEIR north of SR-138 (122,600), is consistent with the 2035 AADT reported in the Draft EIR for this same location (124,000), which is also consistent with the volume shown in the referenced table from the Draft EIR in Comment F.8-400 (118,000) for south of the I-5/SR-99 split. Finally, as shown in the table in response to Comment F.8-400, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR-99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138.

Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2712] The STS also demonstrates that, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR. Consequently, the analysis of the referenced facility in the comment is consistent with more recent and reliable Caltrans data, including the 2017 NW SR-138 FEIR, and provides an accurate and meaningful analysis of potential impacts to that facility using the HCM as well as the V/C methodologies.

Response to Comment F.8-403:

As discusssed in response to Comment F.8-400, this comment is based on a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts documented by Caltrans. As shown in the table in response to Comment F.8-400, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south north of the SR-99 split, and north of SR-138. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in the NW SR-138 FEIR north of SR-138 (122,600), is consistent with the 2035 AADT reported

[2712] *Ibid.*

in the Draft EIR for this same location (124,000), which is also consistent with the volume shown in the referenced table from the Draft EIR in Comment F.8-400 (118,000) for south of the I-5/SR-99 split. Finally, as shown in the table in response to Comment F.8-400, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR-99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138.

Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2713] The STS also demonstrates that, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR. Consequently, the analysis of the referenced facility in the comment is consistent with more recent and reliable Caltrans data, including the 2017 NW SR-138 FEIR, and provides an accurate and meaningful analysis of potential impacts to that facility using the HCM as well as the V/C methodologies.

Response to Comment F.8-404:

Due to a typographical error, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table below, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2714] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions

[2713] *Ibid.*
[2714] DRP 2017, Appendix 5.10-A

with and without the Project.[2715] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

	Cumulative with Project	Cumulative without Project	Project Increment
10. Between South Jct SR-138 and Smokey Bear Rd	127,000	105,000	22,000
11. Between Smokey Bear Rd and Vista Del Lago Rd	129,000	110,000	19,000
12. Between Vista Del Lago Rd and Templin Hwy	129,000	**110,000**	**19,000**
13. Between Templin Hwy and Lake Hughes Rd	130,000	**111,000**	**19,000**
14. Between Lake Hughes Rd and Parker Rd	158,000	140,000	18,000
15. Between Parker Rd and Hasley Canyon Rd	175,000	160,000	15,000
16. Between Hasley Canyon Rd and North Jct SR-126	174,000	163,000	11,000
Bold = Revised ADT Volume			

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-405:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

[2715] *Ibid.*

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2716] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2717] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-406:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2718] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions

2716 *Ibid.*
2717 *Ibid.*
2718 *Ibid.*

with and without the Project.[2719] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-407:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2720] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2721] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis

[2719] *Ibid.*
[2720] *Ibid.*
[2721] *Ibid.*

discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-408:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2722] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2723] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM

[2722] *Ibid.*
[2723] *Ibid.*

methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-409:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2724] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2725] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-410:

The comment does not cite the text of MM 10-5 or the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.[2726] MM 10-5 specifically requires that, prior to the issuance of each constuction permit, the

[2724] *Ibid.*
[2725] *Ibid.*
[2726] Final EIR Appendix 2.0-C.Rev

Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also required to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County.

Response to Comment F.8-411:

MM 10-5 and the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP)[2727] for the Project specifically require that, prior to the issuance of each constuction permit, the Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also require to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County. See also responses to Comments F.8-10 to F.8-12 concerning CEQA requirements for describing a project's phasing and buildout, none of which require the level of specificity suggested in the comment.

Response to Comment F.8-412:

MM 10-5 and the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP)[2728] for the Project specifically require that, prior to the issuance of each constuction permit, the Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow

[2727] *Ibid.*
[2728] *Ibid.*

in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also require to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County. See also responses to Comments F.8-10 to F.8-12 concerning CEQA requirements for describing a project's phasing and buildout, none of which require the level of specificity suggested in the comment.

Response to Comment F.8-413:

MM 10-5 and the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP)[2729] for the Project specifically require that, prior to the issuance of each constuction permit, the Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also required to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County. See also responses to Comments F.8-10 to F.8-12 concerning CEQA requirements for describing a project's phasing and buildout, none of which require the level of specificity suggested in the comment.

Response to Comment F.8-414:

MM 10-5 and the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP)[2730] for the Project specifically require that, prior to the issuance of each constuction permit, the Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow

[2729] *Ibid.*
[2730] *Ibid.*

in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also required to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County. See also responses to Comments F.8-10 to F.8-12 concerning CEQA requirements for describing a project's phasing and buildout, none of which require the level of specificity suggested in the comment.

Response to Comment F.8-415:

As discussed on Draft EIR page 5.10-51, the North County Sub-Area Model used by Los Angeles County for the Antelope Valley Area Plan (AVAP) was also utilized in the Draft EIR. The model show that 40 percent of the trips made on-site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. As shown in Table 3.8 of the traffic study,[2731] the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. The model estimates that an average external trip will be 45.9 miles in length. Finally, the North County Sub-Area Model estimates that 48 percent of all trips will be internal and 52 percent of all trips will be external to the Project. Consequently, the average Project trip is estimated to be 25.5 miles in length.

As discussed in more detail in response to Comment F.8-23, the North County Sub-Area Model these results are consistent with applicable traffic models for the Lancaster/Palmdale area, which is larger than the Project but also relatively isolated from other developed amenity and employment locations, project that 70 percent of all tripends are internal to the region (Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale). Similarly, traffic models indicate that 74 percent of the total tripends in the Santa Clarita Valley will be internal when the region is built out (Santa Clarita Valley Consolidated Traffic Model Version 4.1, City of Santa Clarita and the County of Los Angeles). The North County Sub-Area Model estimates of the Project's average daily internal and external trips and tripends at buildout are also consistent with 2011-2015 American Community Survey (ACS) 5-Year Estimates of the percentage of all workers aged 16 or older working in their places of residence, or internal to 11 communities that are relatively isolated from other employment locations and that have approximately the same average total workforce as the Project at full buildout. The ACS data indicates that the percentage of workers that are employed in their place of residence ranges from 60 percent in Santa Maria, California to 46 percent in Lancaster, California and 32 percent in Palmdale, California. The average percentage of work within the place of residence for the 11 communities is 48 percent, which

[2731] DRP 2017, Appendix 5.10-A

is conistent with the mode results. The ACS time of travel to work data for the 11 communities show that, in locations such as Palmdale with a relatively high percentage of external work trips, trip times are comparatively high because a greater percentage of the residents in these communities commute to employment in other, relatively distant locations. The ACS data for Palmdale, for example, show daily work trips average nearly 41 minutes. This result is consistent with the North County Sub-Area Model estimate that external Project trips, without accounting for the proportion of work trips that would be internal to the project, would average about 45.9 miles (e.g., about 45 minutes at an average of 60 miles per hour). The ACS data further indicate that, on average, a relatively isolated community in which 52 percent of work trips are external and 48 percent of work trip are internal would have an average commute time of about 25.3 minutes. This is also generally consistent with the model estimate that average trips would be about 25.5 miles for the Project.

The model results reported in the Draft EIR, however, do not take into account the Project's Transportation Management Association (TMA) and other measures required in the Mitigation Monitoring and Reporting Program (MMRP).[2732] As discussed in more detail in response to Comment F.8-15, The Project's transportation management obligations are discussed in Draft EIR Section 4.5.5, Mobility Plan and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[2733] The MMRP requires, among other mandatory actions, the implementation of the Mobility Plan, including (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities,

[2732] Final EIR Appendix 2.0-C.Rev
[2733] DRP 2017, Appendix 5.10-A

employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party" in the columns applicable to Final EIR MMs 10-25 and 10-26 in Draft EIR Appendix 2.0-A. MM10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Plan implementation measures, which include verification to the County that, prior 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on-demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time.

As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[2734] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site

[2734] Final EIR Appendix 4.0-A.Rev

plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

In summary, the Project trip lengths derived from the North County Sub-Area Model are generally consistent with the trips lengths and internal and external trip activity typical of communities that are located relatively far from pther locations. The model does not account for traffic reduction measures that must be implemented by the Project under the MMRP and confirmed by the County during the tentative map approval process. Contrary to the comment, there is nothing extraordinary about the Project's trip length, and there is no support for the assertions in the comment to the contrary. The Project will implement state of the art transit and transporation demand mangement measures to further reduce the projected levels of travel using single occupancy vehicles.

Response to Comment F.8-416:

Comment noted. The formation, operation, function and implementation of the Project Mobility Plan is discussed in response to Comment F.8-418 and in more detail in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-417:

Comment noted. The formation, operation, function and implementation of the Project Mobility Plan is discussed in response to Comment F.8-418 and in more detail in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-418:

The Project's transportation management obligations, including transit, are discussed in Specific Plan Section 4.5.5, Mobility Plan and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[2735] The Mitigation Monitoring and Reporting Program (MMRP) requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26).[2736] The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant

[2735] DRP 2017, Appendix 5.10-A
[2736] Final EIR Appendix 2.0-C.Rev

emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party in the columns applicable to Final EIR MMs 10-25 and 10-26 in Draft EIR Appendix 2.0-A. MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Plan implementation measures, which include verification to the County that, prior to the 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on-demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures

will be implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[2737] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consdequently, the amount of transit to be provided will be based on demand and in compliance with the MMRP, which in turns requires that the Project Mobility Plan be fully implemented to the satisfaction of the County during the review and approval process for each teantive tract map As demand increases, the levels of transit service will be increased to accommodate the demand. The excerpt cited in the comment refers to the minimum amount of commuter transit vehicles needed to address specific off-site impacts. The actual amount of off-site commuter transit vehicles could be significantly greater based on demand for the service and the requirements of the MMRP implementing the Project Mobility Plan. Additional information concerning Project transit requirements is provided in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-419:

The Project's transportation management obligations, including transit, are discussed in Section 4.5.5, Mobility Plan, and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[2738] The Mitigation Monitoring and Reporting Program (MMRP)[2739] requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26). The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more

[2737] Final EIR Appendix 4.0-A.Rev
[2738] DRP 2017, Appendix 5.10-A
[2739] Final EIR Appendix 2.0-C.Rev

efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party" in the columns applicable to Final EIR MM 10-25 and 10-26 in Draft EIR Appendix 2.0-A. MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Plan implementation measures, which include verification to the County that, prior to the 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on-demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting

transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[2740] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consequently, the amount of transit to be provided will be based on demand and in compliance with the MMRP, which in turn requires that the Project Mobility Plan be fully implemented to the satisfaction of the County during the review and approval process for each tentative tract map. Additional information concerning Project transit requirements is provided in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-420:

The Project's transportation management obligations, including transit, are discussed in in Section 4.5.5, *Mobility Plan* and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, *Mobility Plan*.[2741] The Mitigation Monitoring and Reporting Program (MMRP) requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26).[2742] The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other

[2740] Final EIR Appendix 4.0-A.Rev
[2741] DRP 2017, Appendix 5.10-A
[2742] Final EIR Appendix 2.0-C.Rev

destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party" in the columns applicable to Final EIR MMs 10-25 and 10-26 in Final EIR Appendix 2.0-A.Rev. MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Plan implementation measures, which include verification to the County that, prior to the 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on-demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit

and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan (Final EIR Appendix 4.0-A.Rev). Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consequently, the amount of transit to be provided will be based on demand and in compliance with the MMRP, which in turns requires that the Project Mobility Plan be fully implemented to the satisfaction of the County during the review and approval process for each tentative tract map. Additional information concerning Project transit requirements is provided in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-421:

For the reasons discussed in the responses to comments concerning traffic issues in comment letter F.8, including the response to Appendix A of letter F.8 (responses to Comments F.8-354 to F.8-422) the Draft EIR and the Supplemental Traffic Study (STS) prepared to incorporate the Caltrans preferred Alternative 2 improvements for the SR-138[2743] provide a throrough and valid analysis of potential Project traffic and transportation impacts that fully complies with all CEQA requirements.

Response to Comment F.8-422:

Comment noted.

Response to Comment F.8-423:

As noted in response to Comment F.8-365, the SR-126 traffic counts used for analysis were collected in 2015. The unemployment rates shown in Comment F.8-423 for prior years are not applicable to the methodology utilized to obtain the SR-126 traffic counts used in the analysis and do not affect the results in any manner.

[2743] DRP 2017, Appendix 5.10-C

Response to Comment F.8-424:

As noted in response to Comment F.8-375, in response to a request by Caltrans, a Supplemental Traffic Study (STS) was prepared to incorporate the Caltrans' preferred alternative for SR-138 identified in the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Draft EIR. The STS includes Highway Capacity Manual volume-density calculations utilizing the measures of effectiveness listed in Caltrans Guide for the Preparation of Traffic Impact Studies cited in Comment F.8-424.

Response to Comment F.8-425:

As noted in response to Comment F.8-400, the comment references a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts provided by Caltrans. As shown in response to Comment F.8-400, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south and north of the SR-99 split, and north of SR-138. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). As summarized in response to Comment F.8-400, the NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in the NW SR-138 FEIR north of SR-138 is consistent with the 2035 AADT reported in the Draft EIR for this same location and is also consistent with the volume shown in the Draft EIR for south of the I-5/SR 99 split. Response to Comment F.8-400 also documents that, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR 99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138. Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. Finally, as discussed in response to Comment F.8-400, in July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2744] The STS also demonstrates that the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

[2744] Final EIR Appendix 5.10-C, Table A-5

Response to Comment F.8-426:

As noted in responses to Comments F.8-404 to F.8-409, due to a typographical error, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and also the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR 126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas. ADT volumes are presented in the traffic study[2745] for informational purposes. The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2746] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis. In addition, as discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

[2745] DRP 2017, Appendix 5.10-A
[2746] *Ibid.*

Exhibits B and C to Letter F.8

Response to Exhibit B – Vollmar 2004. 2003-2004 Botanical Survey Report Centennial SP:

Note that Exhibit B is tied to Comments F.8-118, F.8-119, and F.8-120; please see responses to Comments F.8-118, F.8-119, and F.8-120. The comments and the document provided on the CD, *Vollmar 2004. 2003-2004 Botanical Survey Report Centennial SP,* are acknowledged and discussed within the responses mentioned above.

Response to Exhibit C – SEA Overlay:

Note that Exhibit C is tied to Comments F.8-114, F.8-170, and F.8-171; please see responses to Comments F.8-114, F.8-170, and F.8-171. The comments and the map provided on the CD, *SEA Overlay,* are acknowledged and discussed within the responses mentioned above.

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CENTER for BIOLOGICAL DIVERSITY Because life is good.

Protecting and restoring natural ecosystems and imperiled species through Science, education, policy, and environmental law

Via USPS

October 5, 2017

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, California 90012
JSackett@planning.lacounty.gov

Re: Additional Comments on the Centennial Project Draft Environmental Impact Report

Dear Mr. Sackett:

These additional comments are submitted on behalf of the Center for Biological Diversity ("Center"), the Center for Food Safety and the California Native Plant Society regarding the Draft Environmental Impact Report ("DEIR") for the proposed Centennial Project ("Project"). F.9-1

In our comments dated August 16, 2017, we referenced an Administrative Draft of the Antelope Valley Regional Conservation Investment Strategy (at pg. 44). That document includes important information on the biological and conservation values of the proposed Centennial development area in the context of the larger connectivity and conservation needed in the west end of the Antelope Valley. Because the County is involved with the Antelope Valley Regional Conservation Investment Strategy, we did not previously submit that document. Subsequently, we have become aware that the Antelope Valley Regional Conservation Investment Strategy is removing the Centennial area from the planning effort at the request of Tejon Ranch[1]. However, the biological resources and conservation modeling of the Centennial area remain a valid and informative source of information for the Centennial area. The County needs to consider these data and information in the ongoing environmental review. For that reason we submit the Administrative Draft of the Antelope Valley Regional Conservation Investment Strategy. It is a large 28MB file, so it is on the included CD. F.9-2

Please feel free to contact us with any questions.

Respectfully submitted,

Ileene Anderson
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John P. Rose
Staff Attorney
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1 http://smmc.ca.gov/pdf/attachment4730_Attach%201.pdf

Response to Comment Letter F.9
Center for Biological Diversity
October 5, 2017

Response to Comment F.9-1:

This is an introductory comment explaining the identity of the Commenters, who have previously submitted comment letters.

Response to Comment F.9-2:

The Commenter's submittal, via CD, of the June 2017 Administrative Draft of the Antelope Valley Regional Conservation Investment Strategy (June Admin Draft) is noted. The referenced CD was not enclosed with the October 5 letter; the letter was submitted more than two months following the close of the public comment period on the Draft EIR. The CD was received by the County in a separate transmittal approximately one week later.

The Regional Conservation Investment Strategy (RCIS) program referenced by the Commenter is a pilot program authorized by Assembly Bill 2087 (2016).

Background on RCIS Program. The Legislature expressly described the purpose of this program in Section 1850 of the California Fish and Game Code, which provides in pertinent part:

> It is . . . the policy of the state to encourage voluntary conservation mechanisms to **identify and implement advance mitigation actions** that do all of the following:
>
> (1) Can be used to compensate for project impacts, including, but not limited to, infrastructure and renewable energy projects, more efficiently.
>
> (2) Are effective ecologically.
>
> (3) Will help to conserve regionally important biological and other energy resources.
>
> It is . . . the intent of the Legislature to create nonregulatory mechanisms to guide investments in conservation, infrastructure, and compensatory mitigation for impacts to natural resources, including impacts to threatened and endangered species, other sensitive species, natural communities, ecological processes, and connectivity.
>
> In enacting this chapter, **it is not the intent of the Legislature to regulate the use of land, establish land use designations, or to affect, limit, or restrict the land use authority of any public agency**.
>
> (Fish & Game Code Section 1850(c)-(e), emphasis added.)

In Guidance issued by the California Department of Fish and Wildlife (CDFW), the program's purpose was summarized, in its entirety, as follows:

- Achieve more **strategic, effective conservation**
- Promote resiliency to climate change & other pressures
- Support infrastructure & other projects with **efficient mitigation delivery**

(RCIS Program Guidelines Public Presentation,[2747] emphasis added)

The RCIS legislation mandates the contents of a RCIS plan, which includes but is not limited to the requirement that the RCIS plan "**account for reasonably foreseeable development** of major infrastructure facilities, including, but not limited to, renewable energy and housing." The RCIS plan must also "include provisions **ensuring that the strategy will be in compliance with all applicable** state and **local requirements** and does not preempt the authority of local agencies to implement infrastructure and urban development in local general plans" (emphasis added).[2748] The RCIS plan must be developed "in consultation with local agencies that have land use authority."[2749] A draft RCIS plan must be submitted to CDFW for initial review, a revised version that adequately addresses CDFW's comments must then be prepared and made available for public review, and following public review the final version must be submitted to and may be approved by CDFW.[2750]

Antelope Valley RCIS Pilot. The process to prepare the Antelope Valley RCIS pilot (AV RCIS) began in 2016 and resulted in the publication of an "administrative draft" AV RCIS in June of 2017 (June Admin Draft).

AV RCIS Created By Private Consultants Funded by Private Foundation With No Public Agency Applicant. Although the RCIS legislation requires that an RCIS may be proposed by the department or any other public agency, and shall be developed in consultation with local agencies that have land use authority within the geographic area of the regional investment strategy,"[2751] the June Admin Draft did not have a public agency applicant or sponsor. Instead, although the June Admin Draft states that the process was begun in March of 2016 by the "Desert and Mountains Conservation Authority (DMCA) Steering Committee" and that the DMCA is the "RCIS Applicant,"[2752] the DMCA Board declined to take action to authorize the RCIS process in both 2016 and 2017, did not appoint Steering Committee members or Advisory Board members, and was itself "invited" to participate on the Steering Committee by an unidentified "working group" in June of 2016. [2753]

[2747] RCIS Program Guidelines Public Presentation (June 21, 2017), PDF, available at https://www.wildlife.ca.gov/Conservation/Planning/Regional-Conservation.
[2748] Fish & Game (F&G) Code section 1853(c)(7-8)
[2749] F&G Code section 1853(e)
[2750] F&G Code, Section 1854
[2751] F&G Code section 1552(a)
[2752] June Admin Draft 1-4
[2753] The DMCA Board meeting in March of 2016 was cancelled, in June of 2016 the Board received a "briefing" from the Deputy Director of a different agency, the Santa Monica Mountains Conservancy (SMMC) about a "working group"

Los Angeles County accepted a small ($18,500) grant from a private nonprofit foundation to help fund staff participation in the RCIS pilot for the Antelope Valley area generally, but no specific pilot plan area or parameters were proposed or agreed to by the County as of its acceptance of the grant. The June Admin Draft was accordingly produced by private consultants paid from a private foundation, apparently managed by a Sacramento law firm called the Resources Law Group, with no public agency applicant or approval. The private consultants formed a "Steering Committee" and an "Advisory Committee", without any public agency control or oversight. There is no record of any vote taken by either committee in determining what lands were to be included in the AV RCIS, what criteria and methodology was to be used to identify potential conservation and mitigation lands, or what criteria and methodology was to be used to assess the biological resource values for selected lands.

The County first learned in the summer of 2017 that the boundaries of the RCIS pilot project included the only three locations in Antelope Valley designated as Economic Opportunity Areas (EOAs) by the Los Angeles Board of Supervisors, in a unanimous vote adopting the Antelope Valley Area Plan (AVAP). The Project site is located in one of these designated growth areas, in the West EOA. The AVAP preserves the vast majority of County lands in Antelope Valley, which are slated for continued open space uses rather than development.

County representatives did not agree that the three EOAs were appropriate for inclusion in the AV RCIS pilot program, since the purpose of this program was to identify compensatory mitigation and conservation lands, and the AV RCIS must be "in compliance with all applicable . . . local requirements," which includes the AVAP Plan. After the County's request that the AV RCIS exclude the EOAs was first verbally rejected by the private consultants working under contract to the Resources Law Group, the County explained its position more formally by the County in a letter to other Steering Committee members:

> The Antelope Valley Area Plan ("AVAP"), adopted as a community-based plan for the Antelope Valley area and a component of the General Plan, relies on a Rural Preservation Strategy to meet the goals and objectives of the General Plan, by balancing priorities for environmental conservation and preservation against the need for development. As part of the AVAP Rural Preservation Strategy, three Economic Opportunity Areas ("EOAs") were adopted. . . . The AVAP Rural Preservation Strategy achieves this balance of preservation and development by concentrating development within the EOAs to preserve the open and rural areas outside the EOAs. Areas mapped as EOAs are designated by the County as priority areas for development to occur.
>
> In reviewing the administrative draft of the AVRCIS, it has become apparent that the AVRCIS has chosen to prioritize some of the EOAs for conservation. The County's adopted policy direction for the EOAs thus conflicts with the AVRCIS's designated that prioritized the same areas for conservation. This

which has "invited" DMCA to be a member of the steering committee, and the approved minutes of the June Board meeting indicate that no action was taken by the Board on participating in or approving any role for the DMCA in the Antelope Valley RCIS Pilot (*see* http://dmca.ca.gov/agenda_archive.asp for March, June and September 2016 Board meetings).

> designation in the AVRCIS also conflicts with the regional conservation investment strategy legislation, which is to provide guidance for identification of areas for compensatory mitigation and must consider local land use planning designations and foreseeable developments.
>
> To correct these inconsistencies the priority conservation designation in the EOAs under the AVRCIS must be amended to exclude the EOAs. By their function, EOAs cannot be considered areas of conservation priority.

The County responded by again restating that the EOAs be excluded from the RCIS.[2754]

Also in the summer of 2017, shortly after release of the Draft EIR for the Centennial project, Tejon Ranchcorp representatives first became aware that the AV RCIS included the Centennial development project site notwithstanding earlier assurances in writing by the AVAP lead consultant, Terry Watt, that the site had been excluded given that it was slated for development and not conservation under both the Ranch-Wide Agreement and the AVAP.[2755] Although several signatories of the Ranch-Wide Agreement, like the County, had also initially agreed to participate as members of the private and non-governmentally sanctioned committees set up by the consultants driving the AV Plan's preparation (i.e., the Steering Committee and the Advisory Committee for the AV RCIS), representatives from these organizations, including the Sierra Club (Steering Committee) and Audubon California, Natural Resources Defense Council, Endangered Habitats League (Advisory Committee), later resigned from these "committees" consistent with the scientific judgement about the biological integrity and value created through the preservation of 90 percent of the Ranch, and the limited development of only 10 percent of the Ranch, under the Ranch-Wide Agreement.[2756]

It is also noteworthy that commenter Center for Biological Diversity (CBD) serves as a member of the Advisory Committee. Center for Biological Diversity was an initial participant in the Ranch-Wide Agreement negotiations but resigned and has since pursued lawsuits against Tejon Ranch as well as Los Angeles County attempting to block implementation of the development projects on the remaining 10 percent of Tejon Ranch lands not required to be conserved in perpetuity, including four development project sites in Kern County but only one – the Centennial Project site - located within Los Angeles County. (Please also refer to response to Comment F.8-229 for further information about the Commenter's lawsuit challenge to the AVAP.) Further, in the *same timeframe* that Center for Biological Diversity was participating as a member of the AV RCIS's Advisory Committee to develop the draft AV RCIS, it took the express position in communications with Tejon Ranch on litigation pending in Kern County that it could not in *any instance* agree to the development of the proposed Centennial Project. Commenter Center for Biological Diversity (CBD) received AV RCIS Advisory Committee member status, granted by the AV RCIS's private consultants and funders. CBD's avowed opposition to any development on Tejon Ranch – they have called for

[2754] County of Los Angeles letter to AV RCIS Steering Committee, August 10, 2017

[2755] Email correspondence, T. Watt, 7/7/16, and ICF memorandum July 8, 2016

[2756] The Steering Committee and Advisory Committee membership roster as of June 2017 is included in section 6.4 and 6.5 of the administrative draft AVAP Plan (p. 6-2 to 6.3)

the entirety of the Ranch to become a new national park, and have repeatedly filed lawsuits against Ranch development projects - thereby created a clear and ongoing opportunity for CBD to bias the scope and content of the AV RCIS – including the decision by the AV RCIS funders, consultants and advocates to abruptly reverse their earlier written decisions to exclude Tejon Ranch and the Project site from the AV RCIS.

It is noteworthy that the June 2017 administrative draft AV RCIS[2757] submitted by the Commenter in a later letter (see response to Comment F.9-2) is incorrectly identified as being "prepared for" the Desert Mountains Conservation Authority (DMCA) by the Antelope Valley Steering Committee. At the time of this comment, that statement is inaccurate. The DMCA had taken no action to serve as the applicant for the AV RCIS at the time the Commenter submitted its initial comment letter and did not do so until September 13, 2017. The individual contact is Paul Edelman, who serves as the Deputy Director of the Santa Monica Mountains Conservancy (SMMC). (The SMMC's opposition to the Centennial project is noted in its separate comment letter on the Draft EIR, addressed separately herein in response to the SMMC comments.) SMMC is a member of the joint powers agency that comprises the DMCA; Mr. Edelman is also identified as the sole DMCA representative on the Steering Committee.[2758]

As initially noted above, it was almost four months after completion of the June Admin Draft, and more than a month after the "Steering Committee" received the County's letter, that the unelected governing board of the DMCA actually met to consider a resolution "authorizing both public agency sponsorship and submission" of the AV RCIS to the CDFW.[2759] This was the first and only public agency action taken on this pilot program, notwithstanding the fact that the prior 18 months private consultants, and entities such as the Commenter serving on governance "steering" and "advisory" committees appointed by the private consultants, had unilaterally (and without the "public agency" status required by the RCIS legislation) designated themselves as the decision makers in developing the AV RCIS. These private consultants made various decisions about how the AV RCIS should be developed and what it should include, and about when or whether notice, consultation and/or concurrence should be sought from any public agency, landowner, or the public generally. (For example, other than the consultation between Tejon and the lead AV RCIS consultant, who also formerly served as a Tejon Ranch consultant, there is no indication of any AV RCIS notice or comment process with state or local agency landowners, or private landowners.)

In connection with DMCA ultimately taking the role as "applicant" of the AV RCIS on September 13, 2017, it is notable that the record from the DMCA meeting contains statements that the AV RCIS was being intentionally prepared in a way that was meant to dissuade and circumvent public participation. For instance, during the September DMCA hearing, the SMMC Deputy Director and DMCA staff made the following statements:

- The AV RCIS is a "private document moving through" the approval process.

[2757] June Admin Draft
[2758] *Id.*, p. C-2
[2759] DMCA Agenda, Resolution and Staff Report, September 13, 2017

- The absence of transparency, notice and accountability is intentional: "You haven't seen the final draft and people preparing it don't want it to go public until it goes to [C]DFW" – and the Steering Committee had concluded it was better have the process remain "closed."
- The exclusion of landowner participants in the Steering Committee was likewise intentional because the "main goal is conservation priorities, not landowner priorities."

Given the Commenter's assertion that the Centennial site should never be developed and the mitigation measures are wholly inadequate, it is also noteworthy that even in the absence of giving Tejon Ranch any notice of or opportunity to comment on the DMCA's Board action on the AV RCIS, DMCA staff advised its Board that the Centennial project had the mitigation land it needed on Tejon Ranch. At the September meeting, a DMCA Board member questioned whether DMCA could be liable to Tejon Ranch given that the June Admin Draft identified the Centennial site as a conservation priority under some criteria (e.g., "Figure 3-9, Least Cost Corridor Results for Large Species Connectivity for the Antelope Valley RCIS Area."). Staff stated in response: **Tejon has a "good case [for removal from the AV RCIS] in the sense they are self-contained and have mitigation land**" – but elected not to remove Tejon Ranch and instead "play this [Tejon's removal] by ear" as the process continued. In the Staff Report for this agenda item, "The [AV RCIS] planning team has not made a decision (to staff's knowledge) as of yet about Tejon Ranch's request [for removal of Tejon Ranch from the AV RCIS]."[2760]

- With respect to a Board question regarding how the RCIS program addressed compliance with local land use requirements more generally, staff stated that it would be used in commenting on future development project proposals, that it is a "pushing" document to move development to other locations, and will be controversial because "the truth hurts."
- The Board ultimately voted to be the sponsoring agency for the AV RCIS, and to allow the Board director to submit whatever final form of AV RCIS is ultimately created by its "private" authors as directed by Steering Committee members also appointed by such private authors.

Further highlighting the lack of public participation by which the AV RCIS is being created and its character as a "private study," neither the County nor Tejon Ranch were notified of the September 13, 2017 meeting. As a result, neither the County nor Tejon were therefore able to attend or participate in the discussion of either the boundaries of the RCIS study area (which did not appropriately include designated areas included in the AVAP as economic opportunity areas, including the Project site), or in the discussion of whether to include Tejon Ranch and the Project site in the RCIS at all – notwithstanding that Tejon had previously submitted a written request to be notified of any DMCA meetings at which the RCIS was discussed. During the DMCA meeting, the staff responsible for the RCIS confirmed that the RCIS was "private" and the sponsors had affirmatively elected not to provide a draft

[2760] DMCA Staff Report, Agenda Item VII, September 13, 2017

of the administrative draft plan to other parties (e.g., other jurisdictional agencies, any landowners, etc.). The staff also concluded that the exclusion of Tejon Ranch from the RCIS would not affect the adequacy of mitigation for the Project because Tejon Ranch had its own adequate mitigation land. Finally, the staff and Board members acknowledged that the RCIS would be used to comment on and advocate for different land use and conservation actions, and that the DMCA risked legal liability for interfering with the land use decisions of local agencies and landowners.

Confirming the "private" status of the AV RCIS, a week after the DMCA Board meeting, with no further input or direction from the DMCA Board itself, another member of the Steering Committee Graham Chisholm who identifies as a member of the "Conservation Strategy Group," reported that "the steering committee was comfortable with the recommendation to remove Tejon Ranch from the draft Antelope Valley Regional Conservation Investment Strategy (AVRCIS)."[2761] Still later, the attorney for the AV RCIS, Chris Beale, emailed that "[w] on the AVRCIS is currently on hold. We expect to resume work later this year or early next year. When we do, we will take the map and information into consideration when sorting out how the administrative draft EIR will be revised to exclude Tejon Ranch lands. If we have any questions, I'll follow up with you then."[2762]

Notwithstanding the correspondence cited above, the County's request that the three designated EOA development areas in the AVAP be removed from the AV RCIS was rejected by DMCA staff and the Board, notwithstanding statutory obligation to consider approved land plans. As explained in the September DMCA Board staff report: The County's request that the EOAs be removed "has been rejected because it would completely warp the scientific modeling and outright exclude critical habitat areas." The County was not notified of, or given any opportunity to comment on, staff's recommendation or the Board's acceptance of staff's recommendation.[2763]

The County has subsequently resigned in protest from the AV RCIS Steering Committee and has further elevated its objections to CDFW leadership.[2764] CDFW responded by acknowledging the County's concerns and inviting further dialogue. The "Steering Committee" response, authored by a private consultant and without apparent authorization of the DMCA (since it was not on DMCA letterhead), disagreed that the RCIS should exclude the EOAs and reneged on a prior commitment to share a revised administrative draft with the County prior to submittal to CDFW. The Steering Committee letter also quoted the RCIS statutory language stating that the RCIS had no direct regulatory effect, while not acknowledging the Steering Committee members' statements to the DMCA board of the intended effect of the RCIS to influence land use decisions or the direct use by the Commenter of the administrative draft RCIS in its opposition comments to the Draft EIR.

Commenter CBD, as an Advisory Committee member, after learning that the Steering Committee had agreed to remove Tejon Ranch (inclusive of the Centennial project site) from

[2761] Email correspondence, G. Chisholm, September 18, 2017
[2762] Email correspondence, C. Beale, October 10, 2017
[2763] DMCA Resolution, Agenda Item VII, September 13, 2017
[2764] County letters to Steering Committee and CDFW, November 6, 2017

the AV RCIS, submitted the June Admin Draft in a comment filed more than two months after the close of the public comment period on the Centennial Draft EIR. Before addressing the three specific substantive comments identified in the letter, the background information about the AV RCIS provides the context for evaluating the scientific and legal status of this June Admin Draft:

- The June Admin Draft was not prepared by or at the direction of any expert biological resources agency (or any other public agency for that matter), but was privately funded and privately managed to intentionally include as mitigation/conservation land a proposed development site at a location designated for development under the County's applicable land use plan, in contravention of the statutory requirements of the RCIS legislation.
- Committee members on committees formed by these private parties to prepare the June Admin Draft include the Commenter and SMMC - avowed opponents of the Centennial project.
- Committee members include CBD, which based on prior written correspondence between CBD and Tejon Ranch is strongly opposed to the Project, has sued the County to challenge to the AVAP EOA development areas, and brought that policy bias to the AV RCIS including reversing earlier commitments by AV RCIS staff to exclude Tejon Ranch.
- The late submittal of the June Admin Draft is noted, with substantive responses provided in response to Comment F.9-2.
- As even the DMCA staff acknowledged, Tejon Ranch is "self-contained" and has its own "mitigation land."
- Although some DCMA and Steering Committee members (other than commenters CBD and SMMC) reportedly supporting excluding the County EOAs and/or Tejon Ranch, these concerns were apparently dismissed and the final decision was left to the funders, drafters, and Centennial Project opponent SMMC – and used by Centennial Project opponent CBD as a "late hit" objection outside the extended public comment period on the Draft EIR.
- The AV RCIS is currently on indefinite hold, but Tejon Ranch – inclusive of the Centennial project site – will be excluded from the AV RCIS.

June Admin Draft Not "Best Available Science". The Commenter's opinion that the Draft EIR needs to be revised and recirculated to "incorporate the results of the RCIS process" is noted. The June Admin draft explains that a "map-based Environmental Evaluation Modeling System (EEMS)[2765] was used to generate the biological value model results." The draft report goes on to explain that "[t]he biological value model was developed interactively with stakeholder involvement, where input from stakeholders and local experts could be dynamically changed, resulting in a transparent and nimble modeling process." The draft report then directs the reader to two Appendices, F and G, for an explanation of the

[2765] Sheehan 2016

methodology used to rank the biological value of lands within the AV RCIS area.[2766] Appendix G reads in its entirety: "Description of Modeling Methodology to be provided."[2767] The missing modeling methodology was in turn used to generate the draft report's conclusions and figures about the biological resource values of the Centennial project site and other Antelope Valley lands. A detailed response cannot be provided to missing modeling methodology, which precludes any ability for the lead agency to evaluate its legitimacy.

The Draft EIR does, however, include an assessment of the three biological resource values identified by the Commenter as relevant in the June Admin Draft. With respect to the June Admin Draft's designation of the project site as a habitat core area called "Western Antelope Valley," for example, the designation encompasses nearly all of the Centennial Project site. The Draft EIR includes all biological resources, inclusive of the three species groups (desert, agriculture/grassland, and foothill/riparian) included in the June Admin Draft, were in fact studied and documented in regard to their occurrence on the Project site. Subsequent analysis reviewed the impacts of the Centennial project accordingly. The Project site in the Draft EIR, however, was not separated as distinctly named "unit" of land as was the case with the June Admin Draft; instead, the biological resource values on the Project site were considered as part of the mosaic of habitat areas in the region, which vary in quality and connectivity throughout. It should be noted that the Project region, in regard to the biological resources evaluation in the Draft EIR, did not truncate at the Los Angeles County boundary but continued northward into Kern County and up to the Tehachapi Mountains ridgeline. The June Admin Draft, however, did truncate its "Western Antelope Valley" subarea to exclude the immediately adjacent Kern County lands, which both undermines the regional biological assessment and overstates the importance of the "island" of land created by the private consultants and project opponents responsible for preparing the June Admin Draft. As such, substantially greater habitat areas occur within the region, including those preserved in open space uses such as the conserved lands in Tejon Ranch and the conserved lands for the Angeles National Forest, than is identified in the AV RCIS Area. The Project has also been designed to avoid the highest biological value portions of the site, and approximately 1/3 of the areas on the west and northwest portions of the area mapped as the in the June Admin Draft as the "Western Antelope Valley" have been avoided and preserved within the Centennial On- and Off-site Mitigation Preserve.

Similarly, the area identified as a habitat core and referred to as "Pine Canyon" contains a portion of the Project site which was studied and analyzed in detail as well. This area contains habitat applicable to all three species groups modeled by the AV RCIS including desert, agriculture/grassland, and foothill/riparian. In addition, this area was also evaluated for off-site mitigation value and is included nearly in its entirety within the Centennial On- and Off-site Mitigation Preserve. The Centennial Mitigation Preserve captures a total of 45,000+ acres within the area (inclusive of Kern County) which represents a large percentage of the general regional core habitats west of Palmdale and Lancaster even under the apparent methodology used by the June Admin Draft preparers and project opponents.

[2766] June Admin Draft, p. 3-3
[2767] June Admin Draft, App. G

Finally, the Draft EIR extensively considered the issue of the Project site's importance to wildlife movement and connectivity, as discussed in Draft EIR Section 5.7, Biological Resources (Impact 7-2). The Draft EIR concludes that as mitigated, the Project will have a less than significant impact on wildlife movement. Specifically, the Draft EIR concludes based on extensive project-level analyses conducted over two decades, that:

> Information presented in the Wildlife Movement discussion clearly identifies the foothills and highlands of the Tehachapi Mountains as the regional linkage zone, and the core area of this linkage zone is several miles to the northwest of the Project Site. As a result, the Project's indirect impacts [to wildlife movement] are not expected to reach the primary regional linkage area, and regionally connectivity is expected to be minimally impacted. The Project would not cause any regional populations of plants or animals in adjacent regions to become isolated. The Project's indirect impacts on wildlife movement are therefor considered to be less than significant.
>
> (DRP 2017, p. 5.7-170)

The June Admin Draft, although it does not include the technical methodology used to create its resource ranking maps, shows the east-west center of the Project site as a "least cost corridor" for wildlife movement, where as noted by the Commenter "the animals have the easiest time moving through the area." (Figure 3-9) However, this location is bisected by the California aqueduct, and onsite evidence shows that there is minimal to no linkage across the aqueduct in the center of the site. This wildlife connectivity example is one of numerous examples of the kind of simple but fundamental errors that occur when predicting biological information as opposed to having access to or developing the range of site-specific studies completed for the Draft EIR. Even such foundational information as the location of the Project itself is in error in the June Admin Draft, which for example omits southern and eastern site areas from Figure 2-13. Similarly, Figures 2-3 and 2-5 incorrectly maps areas of the Project site as grasslands which are known to be woodlands, and Figure 3-13 depicts as riparian locations on the site that are not riparian.

Appendix F, "Focal Species Habitat Models," consist solely of a series of 27 figures, 26 of which depict predicted species occurrence data and confirmed species occurrence data. The methodology used to create the Figures is not explained. Half of the figures show some predicted or confirmed occurrence information on the Centennial project site. The Draft EIR considered each of the 14 species for which predicted or actual occurrence data is depicted in Appendix F, but as is the case with wildlife connectivity, the June Admin Draft both understates and overstates species data given what appears to have been limited to no access to the site-specific data included in the Draft EIR that had been published earlier in the summer. Specific responses are provided below for all species for which Appendix F shows predicted occurrences on the Project site:

Appendix F Species Figures	June Admin Draft and Actual Ground-Truthed Conditions Accurately Reported in Centennial Draft EIR
F-11: California Condor	June Admin Draft predicts extensive foraging and some roosting activity on the Project site; however, condor GPS tracking data and other data reported in the Draft EIR confirm that there is very little foraging, and no roosting (DRP 2017, pp. 5.7-94, 5.7-118 through 5.7-120, and 5.7-148).
F-12: Golden Eagle	June Admin Draft shows isolated area near SR 138 as part of the "species range;" however, this species is known to occur throughout much of the region both on- and off- the Project site (DRP 2017, pp. 5.7-90, 5.7-114, and 5.7-150).
F-14: Least Bell's Vireo	June Admin Draft predicts "high occurrence" areas on Project site; however, numerous onsite surveys show extremely little usage and no evidence validates high occurrence prediction. In addition, the Project site is not within USFWS designated Critical Habitat for this species (DRP 2017, pp. 5.7-97, 5.7-122, and 5.7-148).
F-15: Loggerhead Shrike	June Admin Draft shows predicted "high occurrence" areas on the Project site and throughout much of the project region; however, the eBird and CNDDB data provided suggest a much more sparse occurrence and no evidence validates high occurrence. As discussed in the Draft EIR, shrike were detected in various areas of the Project site, but that nesting habitat is expected to be restricted to Oso Canyon and the woodland habitats at western edge of site. (DRP 2017, pp. 5.7-95, 5.7-121, and 5.7-151)
F-16: Long-Billed Curlew	June Admin Draft shows predicted "high occurrence" areas on the Project site; however, the eBird and CNDDB data provided suggest a very limited occurrence in the region. Surveys conducted for the Centennial project detected only a few migrants on-site over multiple years. Potentially suitable breeding habitat is present on the Project site, but no nesting activities have been observed (DRP 2017, pp. 5.7-95, 5.7-121, and 5.7-151).
F-18: Northern Harrier	June Admin Draft shows predicted "high occurrence" areas on the Project site and adjacent areas; however, observation data included in Appendix F does not exhibit higher use in this area relative to the balance of the RCIS area. The Draft EIR indicates that this raptor was observed using the Project site for foraging but not breeding, although potentially suitable nesting habitat is present where sufficient amounts of vegetative cover are available to protect this ground-nesting raptor (DRP 2017, pp. 5.7-93, 5.7-117, and 5.7-150).
F-19: Prairie Falcon	June Admin Draft shows predicted "high occurrence" areas on a portion of the Project site and throughout most of the valley floor portions of the RCIS area; however, the observation data provided does not support a conclusion of higher use in Project area relative to other areas of the RCIS where the species has been detected more regularly. As described in the Draft EIR, the prairie falcon was observed using the Project site for foraging but it is not expected to breed on-site. (DRP 2017, p. 5.7-103). Also note, this falcon is not considered special status for the purposes of State CEQA guidelines but was discussed in the Draft EIR as a species considered to be at risk of decline or extirpation in Los Angeles County by the Los Angeles Chapter of the Audubon Society (DRP 2017, p. 5.7-89).
F-20: Swainson's Hawk	June Admin Draft depicts "Expert Model Distribution" range of this species which appears to depict foraging during both breeding and migrating periods without any distinction between these very different periods. No explanation of the meaning of this category is provided and the lack of distinction between migrating and breeding areas is inconsistent with other species shown such as the willow flycatcher. Surveys for the Draft EIR found migrants passing by in spring, and foraging over the east end of the Project site in vicinity of the alfalfa fields, but no breeding birds were detected. The riparian habitats on the Project site are considered too sparse to provide suitable nesting habitat for this raptor (DRP 2017, pp. 5.7-93, 5.7-115, 5.7-116, 5.7-145, 5.7-148 and 5.7-149).

Appendix F Species Figures	June Admin Draft and Actual Ground-Truthed Conditions Accurately Reported in Centennial Draft EIR
F-21: Tricolored Blackbird	June Admin Draft shows predicted "high occurrence" areas on a portion of the Project site and throughout much of the RCIS area; however, the observation data provided does not support a conclusion of higher use in the Project area relative to other areas of the RCIS where the species has been detected more regularly. As described in the Draft EIR, a nesting colony was detected on-site in 2006 and 2008 using vegetation associated with a pond on the north-central edge of the Project site, but not thereafter. In 2015, large numbers were found nesting outside the Project site in vegetation surrounding Quail Lake. The Project site provides suitable foraging habitat, but very little potentially suitable nesting habitat (DRP 2017, pp. 5.7-91, 5.7-111, 5.7-112, 5.7-113, 5.7-114, 5.7-149 and 5.7-150).
F-22: Willow Flycatcher	June Admin Draft predicts several scattered "high occurrence" locations on the Project site; however, onsite surveys have confirmed that breeding is not occurring on predicted areas of the site. Migrant willow flycatchers may occur in almost any habitat and at any location in the region during spring and fall migrations, however, numerous onsite surveys show extremely little usage and no evidence validates high occurrence prediction. In addition, the Project site is not within USFWS designated Critical Habitat for this species (DRP 2017, pp. 5.7-94, 5.7-118, and 5.7-148).
F-23: American Badger	June Admin Draft predicts "high occurrence" locations on portions of the Project site and vast portions of the valley floor within the RCIS area. Although dens have been observed on-site, they have occurred in areas outside of the mapped "high occurrence" area where, in fact, no detections have occurred. Additional, the areas designated as high occurrence provide no evidence of increased suitability relative to most other areas on the site (DRP 2017, pp. 5.7-98, 5.7-126, and 5.7-153).
F-24: Desert Kit Fox	June Admin Draft predicts "high occurrence" over most of the Project site as well as adjacent areas; however, this species is not known to exist in these areas and have never been located during two decades of on-site survey work.
F-25: Mojave Ground Squirrel	June Admin Draft correctly indicates no occurrence for this species on the Project site. The Project site is west of the known range of the Mojave ground squirrel.
F-26: Mountain Lion	June Admin Draft shows isolated area near SR 138 as part of the "species range;" however, this species is known to occur throughout much of the region both on- and off- the Project site.
F-27: Tehachapi Pocket Mouse	June Admin Draft predicts "high occurrence" at Project site; however, the entirety of the Project site was assessed by a qualified biologist and determined to be unsuitable habitat for this species.

The factual errors in the June Admin Draft are typical of what would be expected to occur in a large-scale planning exercise, given the cost and time required to complete site-specific surveys. However, it is also the case that much of this work is predictive and has not been validated by, and is in fact inaccurate, based on actual site surveys. Since Appendix F, along with the missing Appendix G, served as source data for most of the biological value ranking information in the June Admin Draft, and the species mapping source data is substantially in error as applied to the Project site, there June Admin Draft does not create substantial evidence of a new or worse significant adverse biological resource impact, and accordingly recirculation of a revised Draft EIR is unwarranted.

Commenters' Views Conflict with Independent Biological Resource Expert Findings by Five State Agencies and Sierra Club, NRDC, Endangered Habitats League and Audubon California. Finally, while the June Admin Draft is more recent, the Commenters' assertion that it presents significant new information warranting recirculation must be weighed against the many independent agencies and environmental advocacy groups that have already extensively evaluated the biological resource values of Tejon Ranch in the context of the proposed development of the Centennial site. The Tejon Ranch Land Use and Conservation Agreement (Ranch-Wide Agreement or TRCRWA) is a historic example of the "voluntary conservation mechanisms" that the Legislature intended the RCIS program to encourage. Specifically, and as agreed to in Exhibit R of the TRCRWA the Secretary for the California Resources Agency, the Director of the California Department of Fish and Game, the Director of the Wildlife Conservation Board, the Director of the California State Parks Department, the Secretary for the California Environmental Protection Agency, and the Chair of the California State Water Resources Control Board:

> [W]e understand that of the approximately 270,000 acres comprising [Tejon] Ranch, the Ranch-wide Agreement would provide for the permanent preservation of at least 178,000 acres and for the option to preserve an additional 62,000 acres through the purchase of conservation easements, or potentially fee title, for an anticipated total of approximately 240,000 acres, or almost 90 percent of the total Ranch acreage. Because of the many unique factors noted above, **including the sheer magnitude of this conservation effort and the significant resource values attributed to this property**, and in viewing the 240,000 acres in the Conserved Areas in a holistic manner, **we expect that TRC [Tejon Ranchcorp, the owner of Tejon Ranch] will be allowed to use those Conserved Areas and corresponding natural resource values associated with these Conserved Areas to meet the land conservation and corresponding natural resource mitigation requirements for and the planned development** and other activities within the Developed Areas, **including** the designated planned development projects of Tejon Mountain Village, **Centennial** and Grapevine, subject to potential limitations for Conserved Areas acquired using public funds as described below.[2768]

According to the environmental advocacy group signatories to the TRCRWA, including Audubon California, the Endangered Habitats League, the Natural Resources Defense Council, the Planning and Conservation League, and the Sierra Club (collectively referred to as the "Resource Group" in the TRCRWA):

[2768] Conservation easements were acquired with public funding on the 62,000 acres referenced in Exhibit R, as described in the Draft EIR. The Draft EIR notes that pursuant the Ranch-Wide Agreement, conservation easements were purchased in March of 2011, and that three of the five conservation easement purchase areas comprising approximately 20,000 acres are proximate to the Centennial site. (DRP 2017, p. 4-45) The Draft EIR also notes that management of these areas is "subject to the conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch." (DRP 2017, p. 5.7-62)

> This Agreement was reached **after two years of careful scientific analysis** and intense negotiations between TRC, its partners and the Resource Groups. All parties believe that the Agreement provides for a far better conservation outcome than the typical project-specific permitting and protracted litigation methods most often used in development and conservation disputes. (TRCRWA, Executive Summary, 2008, emphasis added)
>
> The Parties to this Agreement desire to protect in perpetuity substantial and significant natural resource values of the 270,000-acre Tejon Ranch. These natural resource values include an extraordinary diversity of native species and vegetation communities, numerous special status plant and animal species, intact watersheds and landscaping supporting natural ecosystem functions and regionally significant habitat connectivity.
>
> The long-term conservation of Tejon Ranch has been one of the highest priorities of the Resource Organizations. . . . By comprehensively addressing the entire Tejon Ranch, this Agreement avoids fragmentation of many of the environmentally sensitive areas on Tejon Ranch.
>
> This Agreement allows TRC to pursue development plans in defined development areas without opposition from the Resource Organizations while enabling a conservancy to preserve Tejon Ranch's natural resource values for future generations."
>
> (TRCRWA, p. 1-2, emphasis added)

Given that 90 percent of Tejon Ranch was permanently conserved, and only 10 percent can be developed (inclusive of the Centennial site), the inclusion of Tejon Ranch in the initial administrative draft of the AV RCIS (submitted under separate cover by the same commenter, see Comment F.9-1) did not further the RCIS program purpose of proactively identifying future conservation and mitigation lands for future compensatory mitigation use. Tejon Ranch, inclusive of the Centennial site, was also the subject of two years of intense scientific review by the Resource Organizations as part of the TRCRWA process, and has been the subject of more than 20 years of biological resource studies as part of the Centennial Draft EIR preparation process.

G. Individuals

CENTENNIAL

at TEJON RANCH

Subject: FW: Centennial DEIR comment

From: Jack T. [mailto:jacktca@gmail.com]
Sent: Friday, May 19, 2017 6:39 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: Centennial DEIR comment

Mr. Jodie Sackett,

I am the guy who urged you to put a "use it or lose it" clause into the Tejon Centennial equation. See my email in the 2015 comments document.

I am a middle class guy. I pay property taxes on my ranch in Neenach. I bought one of my lots from a man who was in a pickle. He owed lots of money in property tax. So he was forced to sell his property to me for cheap. Property taxes are a form of use-it-or-lose it pressure.

Let's take a look at the adjective "tentative" in the DEIR. What is the difference between a "tentative" tract and a plain old tract? Owners of empty lots in Neenach with tumbleweeds down a mile down the street in Neenach pay roughly $500-1000 per lot in property tax per year. Multiply 20,000 home lots in Centennial x $750/year and the property tax bill comes out to $15,000,000 per year. That's the difference between tentative and real tracts!

Unlike the middle class, the Tejon 1% club calls their lots "tentative" tracts and they don't have to pay premium property tax because until someone tips the scale and actually calls them real tracts then they are ranch land or farm land or just plain wilderness. No doubt taxed at a different rate.

There are no provisions in the system in place to make sure that Tejon Centennial will be built. There is no what-if to assess the damage plans for Centennial will do to local and neighbor investors if it does not go forward.

In my opinion TRC (Tejon Ranch stock ticker) is a way for the 1% club to park their money in real estate to avoid paying short term capital gains taxes on the New York Stock market. The machinations of the stock market make are not even mentioned in your DEIR.

The only assumption you make is that the project will be built and that the project serves as a real plan, not a façade. You need to take the damage made to neighbors and the unfairness caused by avoiding property taxes into account in your DEIR in the case where Centennial will not be built and the investors or company decide to sit on the plan and ride it out for whatever financial gain they may have. There are plenty of scenarios I can think of which would allow them to benefit by not building.

G.1-1

Jack Tuszynski

Response to Comment Letter G.1
Jack Tuszynski
July 19, 2017

Response to Comment G.1-1:

Thank you for your comment and your participation in this public process. In accordance with Government Code § 66424.5, the term "tentative map" refers to a map made for the purpose of showing the design and improvement of a proposed subdivision and the existing conditions in and around it and need not be based upon an accurate or detailed final survey of the property. Per Government Code § 66426, tentative maps are required for all subdivisions creating five or more parcels. This comment also questions why the "machinations of the stock market" were not analyzed in the Draft EIR. In accordance with Government Code § 21100(b), the Draft EIR is required to analyze the project's potentially significant effects on the physical environment but, per CEQA Guideline § 15064(e), "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." Since the "machinations of the stock market" are an economic and social concern, they need not be analyzed in the EIR. This comment did not raise concern regarding the Project's potential environmental effects or the adequacy of the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

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From: susan rudnicki <susanrudnicki@gmail.com>
Sent: Friday, July 07, 2017 10:12 AM
To: Jodie Sackett
Subject: Reject Tejon Ranch devastating Centennial Project

Dear Mr. Sackett,

I am a resident of Los Angeles for my entire 61 years. We have already experienced the severe changes associated with the latest long term drought, yet the County Regional Planning Department considers a sprawling, thirsty, exurban development in the face of all science and logical thinking to the contrary.

This boondoggle should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided. I have been following this discussion for years and the developers always want to paint their construction project in shades of "green" for the marketing message appeal of the moment.

We have already been seeing extensive brush fires in California and the West---the "Centennial" sprawl will be another burden on already overtaxed fire surveillance and response at taxpayer's expense for pretentious "country living" surburbanites living in a VERY fire-prone landscape. This is unacceptable risk and absolute recklessness in the era of massive Climate Change. G.2-1

I have gone birding and botanical searching in the Tejon Ranch area under the auspices of the Native Plant Society. It is a gorgeous, tiny remnant of what used to be a wild California.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

Thank you,

susan rudnicki

90266

Response to Comment Letter G.2
Susan Rudnicki
July 7, 2017

Response to Comment G.2-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2769] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2770] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2771]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2772] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2773] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2774] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2775] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2776]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2777] Rural Town Areas serve as transition area between Rural

[2769] DRP 2015, p. I-2
[2770] *Id.*, p. I-5
[2771] *Id.*, p. I-6
[2772] *Id.*, p. I-5
[2773] *Ibid*.
[2774] *Id.*, p. I-6
[2775] *Id.*, p. I-7
[2776] *Ibid*.
[2777] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2778] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2779]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2780] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2781] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2782]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2783] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2784] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2778 *Ibid*.
2779 *Ibid*.
2780 DRP 2017, p. 4-4
2781 DRP 2015, p. I-8
2782 *Ibid*.
2783 *Id.*, p. I-8
2784 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2785] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2786] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2787]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2788] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2789] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2790] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2791] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS[2792], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2785 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
2786 *Id.,* p. 4-7
2787 *Ibid*.
2788 *Id.,* p. 4-8
2789 *Ibid*.
2790 *Ibid*.
2791 *Ibid*.
2792 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2793] The RWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2794] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's concerns about hazards and fire safety, biological resources, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.7 (Biological Resources), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of this EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.4 (Biological Resources), 5.8 (Hazards and Hazardous Materials), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.4 (Biological Resources), 3.9 (Hazards and Hazardous Materials), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

[2793] DRP 2017, p. 4-45
[2794] *Ibid*.

From: Virginia DeMoss <vmdemoss@aol.com>
Sent: Friday, July 07, 2017 10:53 AM
To: Jodie Sackett
Subject: Say "NO" Tejon's Centennial Project

Dear Mr. Sackett,

Please do not let urban sprawl ruin this precious open space in Southern California!

Tejon Ranch's proposed Centennial new city is a bad idea for Los Angeles County and should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

G.3-1

Thank you,

Virginia DeMoss

90814

Response to Comment Letter G.3
Virginia DeMoss
July 7, 2017

Response to Comment G.3-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2795] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2796] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2797]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2798] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2799] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2800] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2801] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2802]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2803] Rural Town Areas serve as transition area between Rural

[2795] DRP. 2015, p. I-2
[2796] *Id.,* p. I-5
[2797] *Id.,* p. I-6
[2798] *Id.*, p. I-5
[2799] *Ibid*.
[2800] *Id.*, p. I-6
[2801] *Id.*, p. I-7
[2802] *Ibid*.
[2803] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2804] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2805]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2806] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2807] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2808]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2809] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2810] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2804 *Ibid*.
2805 *Ibid*.
2806 DRP 2017, p. 4-4
2807 DRP 2015, p. I-8
2808 *Ibid*.
2809 *Id.*, p. I-8
2810 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2811] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2812] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2813]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2814] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2815] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2816] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2817] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2818] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2811 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
2812 *Id.,* p. 4-7
2813 *Ibid*.
2814 *Id.,* p. 4-8
2815 *Ibid*.
2816 *Ibid*.
2817 *Ibid*.
2818 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2.)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2819] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2820] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's concerns about hazards and fire safety, biological resources, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.7 (Biological Resources), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of this EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.4 (Biological Resources), 5.8 (Hazards and Hazardous Materials), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.4 (Biological Resources), 3.9 (Hazards and Hazardous Materials), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

[2819] DRP 2017, p. 4-45
[2820] *Ibid*.

From: Karen Tracy <oktracy@mac.com>
Sent: Friday, July 07, 2017 11:22 AM
To: Jodie Sackett
Subject: Tejon's Centennial Project: REJECT

Dear Mr. Sackett,

This amount of massive consumption is bad for everyone and everything except profits.

This project must be rejected in order to save the land and the eco system dependent upon it. To destroy it in order to create a housing/marketing-mega-structure-sprawl is senseless and merely destructive. G.4-1

Karen Tracy

92252

Response to Comment Letter G.4
Karen Tracy
July 7, 2017

Response to Comment G.4-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2821] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2822] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2823]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2824] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2825] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2826] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2827] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2828]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2829] Rural Town Areas serve as transition area between Rural

[2821] DRP 2015, p. I-2
[2822] *Id.,* p. I-5
[2823] *Id.,* p. I-6
[2824] *Id.*, p. I-5
[2825] *Ibid*.
[2826] *Id.*, p. I-6
[2827] *Id.*, p. I-7
[2828] *Ibid*.
[2829] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2830] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2831]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2832] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2833] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2834]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2835] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2836] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2830 *Ibid*.
2831 *Ibid*.
2832 DRP 2017, p. 4-4
2833 DRP 2015, p. I-8
2834 *Ibid*.
2835 *Id.*, p. I-8
2836 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2837] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2838] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2839]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2840] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2841] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2842] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2843] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2844] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2837 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
2838 *Id.,* p. 4-7
2839 *Ibid*.
2840 *Id.,* p. 4-8
2841 *Ibid*.
2842 *Ibid*.
2843 *Ibid*.
2844 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2845] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2846] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Section 5.4 of the AVAP EIR, and Section 3.4 of the RTP/SCS EIR.

[2845] DRP 2017, p. 4-45
[2846] *Ibid*.

From: Matt Pakucko <pakuckomat@aol.com>
Sent: Friday, July 07, 2017 11:28 AM
To: Jodie Sackett
Subject: REJECT! Tejon's Centennial Project

Dear Mr. Sackett,

Kill the California Condor? Really?
More urban sprawl into the desert?
Water from where?

Tejon Ranch's proposed Centennial new city is a bad idea for Los Angeles County and should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

G.5-1

Thank you,

Matt Pakucko

91326

Responses to Comment Letter G.5
Matt Pakcucko
July 7, 2017

Response to Comment G.5-1:

Thank you for your comment and for your participation in this public process. The Project's objectives and design features promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2847] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2848] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2849]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2850] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2851] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2852] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2853] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2854]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2855] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential

[2847] DRP 2015, p. I-2
[2848] *Id.,* p. I-5
[2849] *Id.,* p. I-6
[2850] *Id.*, p. I-5
[2851] *Ibid*.
[2852] *Id.*, p. I-6
[2853] *Id.*, p. I-7
[2854] *Ibid*.
[2855] *Ibid*.

and light agricultural uses.[2856] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2857]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2858] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2859] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2860]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2861] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2862] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Project's objectives and design features implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from

2856 *Ibid*.
2857 *Ibid*.
2858 DRP 2017, p. 4-4
2859 DRP 2015, p. I-8
2860 *Ibid*.
2861 *Id.*, p. I-8
2862 *Ibid*.

rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2863] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2864] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2865]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2866] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016 RTP/SCS.[2867] The 2016 RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2868] This would be made through the operation of low or no emission transportation systems by 2040. The 2016RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2869] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016 RTP/SCS[2870], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2.)

2863 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
2864 *Id.,* p. 4-7
2865 *Ibid*.
2866 *Id.,* p. 4-8
2867 *Ibid*.
2868 *Ibid*.
2869 *Ibid*.
2870 SCAG 2016a

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2871] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2872] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's general concerns regarding native grasslands and wildflowers and wildlife corridors, please see Section 5.7, Biological Resources, of the Draft EIR, which disclosed the Project's potential impact to these resources and determined that direct and indirect impacts would be mitigated to a less than significant level, while cumulative impacts for regional wildlife corridors and impacts to native grasslands would be a cumulative significant impact.[2873] With respect to the comment's concern about the Project killing condors, the California condor is a California fully protected species and no condor will be killed; please see Section 5.7 of the Draft EIR.

With respect to this comment's general concerns about hazards and fire safety, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of the Draft EIR for a complete analysis of the Project's related potential impacts.

2871 DRP 2017, p. 4-45
2872 *Ibid.*
2873 *Id.,* pp. 5.7-158, 5.1-162

From: Sandra Namoff <snamoff@gmail.com>
Sent: Friday, July 07, 2017 11:38 AM
To: Jodie Sackett
Subject: Tejon's Centennial Project - Where would the water come from?

Dear Mr. Sackett,

Please do not approve Centennial!! New cities don't make sense in areas where drought conditions lead to major problems with water availability. Just three years ago small municipalities in arid areas of southern California were worried that their wells would be too dry to support their communities. Stop water intensive development in deserts! G.6.1

Thank you,
Sandy Namoff

Sandra Namoff

91711

Response to Comment Letter G.6
Sandra Namoff
July 7, 2017

Response to Comment G.6-1:

Thank you for your comment and for your participation in this public process. With respect to this comment's general concerns about water supply, please see Section 5.18 (Water Resources) of this EIR, which discloses all related Project impacts and identifies measures to reduce such impacts to a less than significant level. See, also, Section 5.17 (Utilities and Service Systems) of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.18 (Utilities and Service Systems) of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035). This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Drought and water sources are discussed in Section 5.18, Water Resources.

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From: Susan Baraz <sbaraz@anet.net>
Sent: Friday, July 07, 2017 12:18 PM
To: Jodie Sackett
Subject: Reject Tejon's Sanctuary

Dear Mr. Sackett,

Tejon Ranch's proposed Centennial new city is exactly what we DON'T need for LA County!! What are all those homes and industries going to do to our already, polluted, emission soaked environment-congested roadways 5 Freeway, -and lack of places where one can actually breath and has the best native grassland in the state of California -this is yet ANOTHER project that has no place in today's already impacted -planning world. This is callousness at it;s worst. Who needs it, and who would PROFIT from turning this special area into another eye sore-for people who have less and less areas to enjoy, aside from the sanctuary it provides to so many of natures creatures and plant life.
How dare you play god with such valuable natural resources for yet another ugly massive urban sprawl in the middle of nowhere?
SHAME ON YOU ALL!!!

Los Angeles County needs to protect the site's native grasslands and wildflower fields as the treasures that they are -- preserve the wildlife movement corridors that are essential for it's wonderful influence on climate-change,

You MUST reject the ridiculous Centennial project and mark the place as the for open space and conservation for all the benefits it brings to people, clean air, and all life it helps in being such a valuable and precious resource.

G.7-1

Thank you,
Susan Baraz

Susan Baraz

90403

Response to Comment Letter G.7
Susan Baraz
July 7, 2017

Response to Comment G.7-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2874] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2875] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2876]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2877] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2878] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2879] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2880] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2881]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2882] Rural Town Areas serve as transition area between Rural

2874 DRP 2015, p. I-2
2875 *Id.*, p. I-5
2876 *Id.*, p. I-6
2877 *Id.*, p. I-5
2878 *Ibid*.
2879 *Id.*, p. I-6
2880 *Id.*, p. I-7
2881 *Ibid*.
2882 *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2883] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2884]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2885] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2886] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2887]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2888] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2889] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2883 *Ibid*.
2884 *Ibid*.
2885 DRP 2017, p. 4-4
2886 DRP 2015, p. I-8
2887 *Ibid*.
2888 *Id.*, p. I-8
2889 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2890] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2891] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2892]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2893] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2894] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2895] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2896] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS[2897], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2890 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, 142; 5.11-75; 5.21-85
2891 *Id.,* p. 4-7
2892 *Ibid*.
2893 *Id.,* p. 4-8
2894 *Ibid*.
2895 *Ibid*.
2896 *Ibid*.
2897 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2898] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2899] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's general concerns regarding native grasslands and wildflower, please see Section 5.7 (Biological Resources) of the Draft EIR, which disclosed the Project's potential impact to this resource and determined that direct and indirect impacts would be mitigated to a less than significant level, while cumulative impacts would be significant after mitigation.[2900]

With respect to this comment's general concerns about traffic and air quality, please see Sections 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.13 (Visual Resources) of this EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project can be found in these documents: Sections 5.1 (Aesthetics), 5.3 (Air Quality), 5.4 (Biological Resources), and 5.16 (Transportation and Traffic) of the AVAP EIR, and Sections 3.1 (Aesthetics), 3.3 (Air Quality), 3.4 (Biological Resources), and 3.17 (Transportation and Traffic) of the 2016-2040 RTP/SCS EIR.

2898 DRP 2017, p. 4-45
2899 *Ibid*.
2900 *Id.,* pp. 5.7-158, 5.1-162

From: Rose Ann Witt <rawitt@verizon.net>
Sent: Friday, July 07, 2017 2:21 PM
To: Jodie Sackett
Subject: Tejon's Centennial Project Must be Rejected!

Dear Mr. Sackett,

Tejon Ranch's proposed Centennial new city is a bad idea for Los Angeles County and should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

As a biologist and concerned California taxpayer, I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

G.8-1

Thank you,

Rose Ann Witt

91362

Response to Comment Letter G.8
Rose Ann Witt
July 7, 2017

Response to Comment G.8-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2901] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2902] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2903]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2904] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2905] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2906] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2907] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2908]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2909] Rural Town Areas serve as transition area between Rural

[2901] DRP 2015, p. I-2
[2902] *Id.,* p. I-5
[2903] *Id.,* p. I-6
[2904] *Id.*, p. I-5
[2905] *Ibid*.
[2906] *Id.*, p. I-6
[2907] *Id.*, p. I-7
[2908] *Ibid*.
[2909] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2910] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2911]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2912] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2913] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2914]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2915] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2916] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2910 *Ibid*.
2911 *Ibid*.
2912 DRP 2017, p. 4-4
2913 DRP 2015, p. I-8
2914 *Ibid*.
2915 *Id.*, p. I-8
2916 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2917] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2918] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2919]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2920] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2921] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2922] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2923] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2924] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2917 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, 142; 5.11-75; 5.21-85
2918 *Id.,* p. 4-7
2919 *Ibid*.
2920 *Id.,* p. 4-8
2921 *Ibid*.
2922 *Ibid*.
2923 *Ibid*.
2924 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2925] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2926] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's general concerns regarding native grasslands and wildflower, please see Section 5.7 (Biological Resources) of the Draft EIR, which disclosed the Project's potential impact to these resources. As discussed, direct and indirect impacts to native grasslands would be mitigated to a less than significant level, while cumulative impacts would be significant after mitigation.[2927]

With respect to this comment's general concerns about hazards and fire safety, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of this EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project can be found in these documents: Sections 5.3 (Air Quality), 5.4 (Biological Resources), 5.8 (Hazards and Hazardous Materials), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.4 (Biological Resources), 3.9 (Hazards and Hazardous Materials), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

[2925] DRP 2017, p. 4-45
[2926] *Ibid*.
[2927] *Id.,* pp. 5.7-158, 5.1-162

From: Marianna Breton <marianna2pep@yahoo.com>
Sent: Friday, July 07, 2017 6:53 PM
To: Jodie Sackett
Subject: Reject Centennial housing project in the middle of the desert

Dear Mr. Sackett,

This Centennial development in Antelope Valley is a bad idea for Los Angeles County and should be rejected. Installing a new mega city in the middle of the last, best native grassland in the state of California is an environmental disaster which will create more gridlock on arteries leading into the city.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

L.A. County regional planning must reject this proposal as there is plenty of available housing the high desert communities.

G.9-1

Thank you,

Marianna Breton

91765

Response to Comment Letter G.9
Marianna Breton
July 7, 2017

Response to Comment G.9-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2928] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2929] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2930]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2931] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2932] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2933] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2934] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2935]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2936] Rural Town Areas serve as transition area between Rural

[2928] DRP 2015, p. I-2
[2929] *Id.*, p. I-5
[2930] *Id.*, p. I-6
[2931] *Id.*, p. I-5
[2932] *Ibid*.
[2933] *Id.*, p. I-6
[2934] *Id.*, p. I-7
[2935] *Ibid*.
[2936] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2937] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2938]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2939] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2940] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2941]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2942] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2943] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2937 *Ibid*.
2938 *Ibid*.
2939 DRP 2017, p. 4-4
2940 DRP 2015, p. I-8
2941 *Ibid*.
2942 *Id.*, p. I-8
2943 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2944] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2945] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2946]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2947] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2948] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2949] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2950] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2951] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2944 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, 142; 5.11-75; 5.21-85
2945 *Id.,* p. 4-7
2946 *Ibid*.
2947 *Id.,* p. 4-8
2948 *Ibid*.
2949 *Ibid*.
2950 *Ibid*.
2951 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2952] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2953] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's general concerns regarding native grasslands and wildflower, please see Section 5.7, Biological Resources, of the Draft EIR, which disclosed the Project's potential impact to these resources. As discussed, direct and indirect impacts to native grasslands would be mitigated to a less than significant level, while cumulative impacts would be significant after mitigation.[2954]

With respect to this comment's general concerns about transportation and traffic, please see Section 5.10, Traffic, Access, and Circulation, of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project can be found in these documents: Sections 5.4 (Biological Resources) and 5.16 (Transportation and Traffic) of the AVAP EIR, and Sections 3.4 (Biological Resources) and 3.17 (Transportation and Traffic) of the RTP/SCS EIR.

[2952] DRP 2017, p. 4-45
[2953] *Ibid*.
[2954] *Id.,* pp. 5.7-158, 5.1-162

From: Brad Berger <bberger@uci.edu>
Sent: Saturday, July 08, 2017 8:02 AM
To: Jodie Sackett
Subject: Bad Idea: Tejon's Centennial Project

Dear Mr. Sackett,

Tejon Ranch's Centennial Project would destroy yet another piece of the dwindling "old California" that gives the region character. The sparsely developed 138 corridor is a much needed buffer between the growth of the Lancaster/Palmdale area, and the south end of the decimated central valley of California. G.10

Please reject this plan.

Brad Berger

92268

Response to Comment Letter G.10
Brad Berger
July 8, 2017

Response to Comment G.10-1:

Thank you for your comment and for your participation in this public process. This comment's assertion that the Project would destroy the character of the region is contrary to the Project's objectives and design features, which protect the rural character of the region, promote "smart growth," and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2955] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2956] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2957]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2958] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2959] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2960] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2961] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2962]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-

[2955] DRP 2015, p. I-2
[2956] *Id.,* p. I-5
[2957] *Id.,* p. I-6
[2958] *Id.*, p. I-5
[2959] *Ibid*.
[2960] *Id.*, p. I-6
[2961] *Id.*, p. I-7
[2962] *Ibid*.

oriented commercial uses.[2963] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2964] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2965]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2966] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2967] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2968]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2969] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2970] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

2963 *Ibid*.
2964 *Ibid*.
2965 *Ibid*.
2966 DRP 2017, p. 4-4
2967 DRP 2015, p. I-8
2968 *Ibid*.
2969 *Id.*, p. I-8
2970 *Ibid*.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2971] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2972] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2973]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2974] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2975] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2976] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2977] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2978] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project

2971 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, 142; 5.11-75; 5.21-85
2972 *Id.,* p. 4-7
2973 *Ibid*.
2974 *Id.,* p. 4-8
2975 *Ibid*.
2976 *Ibid*.
2977 *Ibid*.
2978 SCAG 2016a

"exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2979] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2980] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's reference to the region's "character," it is assumed that the Commenter is raising a concern about the visual character of the Project site. As discussed in Section 5.13, Visual Resources, the Project proposes to preserve many existing features to minimize the visual alteration of the site, as listed in PDFs 13-1 through 13-6, as required for implementation through MMs 7-13 from Section 5.7, Biological Resources, and MMs 13-1 through 13-3. These include retention of rock outcroppings visible from off-site areas; use of landform/contour grading; use of landscaping designs that are similar to the natural topography; preservation of open space; use of native and regionally appropriate plant species in public landscape areas; provision of development setbacks from natural areas; and inclusion of aesthetically pleasing and consistent Project signing both internally and externally. However, even with these features, the overall change to the site resulting from grading and development of the Project would be a substantial visual impact that may be perceived by some as an impact for which no additional feasible mitigation exists. As such, the Draft EIR describes the significant and unavoidable impacts related to a change in visual character of the Project site, as experienced by viewers at public vantage points (primarily existing transportation thoroughfares including SR-138 and 300th Street West).

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the

[2979] DRP 2017, p. 4-45
[2980] *Ibid*.

topic of aesthetics can be found in these documents: Section 5.1 of the AVAP EIR, and Section 3.1 of the RTP/SCS EIR.

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From: Samuel Dea <sdea@planning.lacounty.gov>
Sent: Monday, July 10, 2017 7:28 AM
To: Kristin Starbird; Jodie Sackett
Subject: FW: Centenial Project DEIR, SCH # 2001031072

Please add Mr. Bourgeois to the notification list.

Sam

From: jbourg2271@aol.com [mailto:jbourg2271@aol.com]
Sent: Sunday, July 02, 2017 1:12 PM
To: Samuel Dea <sdea@planning.lacounty.gov>
Cc: JBourg2271@aol.com; jbourgeois029@gmail.com
Subject: Centenial Project DEIR, SCH # 2001031072

Mr. Dea,

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. G.11-1

jbourg2271@aol.com

jbourgeois029@gmail.com

Mailing Address:

160 W. Foothill Parkway S Ste. 105-92

Corona, Ca 92882

Please confirm receipt of this email.

Thank You,

Joe Bourgeois

Response to Comment Letter G.11
Joe Bourgeois
July 2, 2017

Response to Comment G.11-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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Pamela De Vries

Botany
Restoration Ecology

P.O. Box 5173
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93222-5173

Phone: 661-242-1574
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pdevries@frazmtn.com

July 4, 2017

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor Room 1348
320 West Temple Street
Los Angeles, California 90012
JSackett@planning.lacounty.gov

Via email and USPS

Re: Comments on the Centennial Project Draft Environmental Impact Report
State Clearinghouse No. 2004031072
County Project No. 02-232
General Plan Amendment No. 02-232
Zone Change No. 02-232
Vesting Tentative Parcel Map No. 060022
Conditional Use Permit No. 02-232
Development Agreement No. RPPL2016003940

Dear Mr. Sackett:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Tejon Ranch Centennial Project.

My comments are primarily concerned with the presentation of existing biological conditions, specifically the accuracy of the mapping of vegetation types on the project site. I also have several comments on the discussion of rare plants.

General Comments on Vegetation Mapping and Related Discussions

The vegetation map presented in the DEIR is based on mapping surveys that were conducted almost twelve years ago, in August and September of 2005 (apart from a newly incorporated portion of the project site east of 300th St. W. that was mapped in August 2015). There is no indication in this DEIR that the vegetation map developed in 2005 has been ground-truthed for accuracy anytime during the last twelve years; it is reasonable to assume that at least some changes have occurred over this long period of time and that the vegetation map as presented is not completely accurate. G.12-1

Likewise, the discussion of vegetation types is outdated. In the methodology section, Paragraph 4 of the Vegetation Mapping section states that the "Nomenclature for G.12-2

vegetation types generally follows that of The Vegetation Classification and Mapping Program: List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database (CDFG 2010)." This title is not included in the reference section; however, the following entry is included in the reference section:

California Department of Fish and Game (CDFG). 2010 (September). *List of Vegetation Alliances and Associations, Vegetation Classification and Mapping Program.*

The actual nomenclature used in the report appears to be based on *The Vegetation Classification and Mapping Program List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database* published by The Wildlife and Habitat Data Analysis Branch of the Department of Fish and Game in September 2003. This 2003 document was superseded by the *List of Vegetation Alliances and Associations. Vegetation Classification and Mapping Program*, published by the California Department of Fish and Game in September 2010. The *List of Vegetation Alliances and Associations* is based on *A Manual of California Vegetation*, 2nd Edition, published by the California Native Plant Society, Sacramento, in 2009. Unlike the 2003 *List*, the 2009 *Manual of California Vegetation* (and likewise, the 2010 *List of Vegetation Alliances*) classifies vegetation types based on Alliances, which are floristically defined vegetation types identified by their dominant and/or characteristic species. The CNDDB numeric codes used in the 2003 publication are also no longer valid in the updated *List of Vegetation Alliances and Associations.*

The use of 2003 nomenclature and numeric coding with an apparent reference to the 2010 standards is confusing in the DEIR. For example:

G.12-2 cont.

Goldenbush Scrub (30.000.00): This code is from the 2003 list and refers to the general category of Scrub and Chaparral. Neither goldenbush scrub or this numeric code are included in the 2010 list. This vegetation type should be reclassified as *Ericameria linerifolia* alliance with the new code, 38.125.00.

Great Basin Scrub (35.000.00): Neither Great Basin Scrub or the code 35.000.00 are included in the 2010 list. The text indicates that this is a vegetation type that is 'dominated by rubber rabbitbrush (*Ericameria nauseosa*).' It should be reclassified as the *Ericameria nauseosa* alliance, 35.310.00.

Rabbitbrush Scrub (35.300.00): The text indicates that this vegetation type is dominated by 'rubber rabbitbrush,' and it appears to be the same vegetation type as 'Great Basin Scrub,' (see comment above).

Alluvial Scrub (32.070.00): Alluvial scrub does not appear in the 2010 list. The code 32.070.00 refers to Scalebroom Scrub (*Lepidospartum squamatum*) in the 2003 list and to the *Eriogonum fasciculatum-(Lepidospartum squamatum*) alluvial fan alliance in the 2010 list. The text for this vegetation type indicates that it is dominated by tarragon (*Artemisia dracunculus*) and rubber rabbitbrush. Although *Lepidospartum* is mentioned in the text, this vegetation type should probably be reclassified as *Artemisia dracunculus* alliance, 35.160.01.

Riparian Herb (45.000.00): Riparian Herb does not appear in the 2010 list. The code 45.000.00 refers to the general classification of 'Meadows and Seeps not dominated by grasses' in the 2003 list. The text indicates a variety of co-dominants, including tarragon and beardless wild-rye (*Elymus triticoides*), which is a native perennial grass. This vegetation type should be reclassified, possibly as an *Artemisia dracunculus* alliance (35.160.01) and combined with the reclassified Alluvial scrub type mentioned above.

I have not addressed every vegetation type presented in the DEIR in the above examples. Virtually all of the vegetation types and CNDDB codes included in the DEIR are based on the outdated 2003 list and should be revised to the more current 2010 published standards which are accepted by both California Department of Fish and Wildlife and the U.S. Department of Fish and Wildlife. Rare vegetation types should also be reviewed and/or revised based on the current classifications and standards. I will address the *Grass- and Herb-Dominated* vegetation type discussion separately below.

G.12-2 cont.

Delineation and Discussion of Grassland Vegetation Types

The methods section includes a discussion on the Delineation of Grasslands (Page 5.7-25). The second paragraph in this section begins with the following statement:

> There is no official operational definition of "native perennial grassland" that has been published by the CDFW, CNPS, or California Native Grass Association (CNGA).

This statement is not accurate. In the key to herbaceous vegetation included in *The Manual of California Vegetation* published by the California Native Plant Society (Sawyer, Keeler-Wolf and Evans, 2009), a perennial grassland is defined as having "Native plants diagnostically present with >10% relative cover; non-native annual plants may be present at high cover—Perennial grasslands and herblands" (page 736, dichotomous couplet 9'). These stands are further delineated as either coastal prairie or drier interior types. Among the alliances included in the drier interior climates of California are the *Nassella cernua* (provisional) alliance, the *Poa secunda* alliance, and the *Leymus triticoides* alliance, all of which are present on the Centennial project site. [Note current nomenclature for *Nassella cernua* is *Stipa cernua* and current nomenclature for *Leymus triticoides* is *Elymus triticoides* (*The Jepson Manual*, 2nd Ed 2012).]

The Centennial Specific Plan Biota Report prepared for the project in 2006 (BonTerra 2006) stated that 'field mapping of non-native annual grasslands and native perennial bunchgrass vegetation types will be completed in Spring 2006…' and that the mapping method would 'utilize a native perennial grassland definition that is based on at least 20 percent relative cover of all native perennial bunchgrass species.' The Centennial Specific Plan Biota report itself is over ten years old and is out of date. I am not aware of any updates to this Biota report which was originally prepared and submitted in 2006. Current SEATAC recommendations for Biological Constraints Analysis (BCA) and subsequent Biota reports state that a vegetation map based on the alliances and associations described in *The Manual of California Vegetation* should be included.

G.12-3

None of the grasslands within the project site were differentiated and/or quantified into appropriate native perennial or semi-natural (e.g., non-native) stands in the DEIR. Likewise, none of the grasslands in proposed on-site and off-site mitigation areas were differentiated and quantified. Over 70 percent of the undifferentiated grasslands within the project boundaries will be impacted by project implementation (approximately 6,415 acres out of 9,161 acres). Although considerable information regarding the distribution and composition of the grasslands on the project site is presented in the DEIR, there is no quantitative accounting of native perennial grasslands on the site, whether it is based on the 20 percent cover described in the Biota Report or on the more appropriate ten percent cover value described in *The Manual of California Vegetation*. There is also no legitimate rational included in the DEIR that justifies presenting these grasslands as undifferentiated. In fact, in many instances, the grassland studies include results that indicate that native perennial bunch grasses are present with high cover values in many areas (Vollmar 2004).

Native perennial grasslands are a special status vegetation type. A native perennial grassland is identified by the simple presence of a native perennial grass species. Any competent botanist is capable of delineating native perennial grasslands and non-native annual grassland vegetation types in the field based on the criteria included in *The Manual of California Vegetation*. Because these vegetation types have not been quantified on either the project site or on proposed mitigation areas, it is not possible to determine if the proposed mitigation areas adequately compensate for the loss of thousands of acres of native perennial grasslands on the project site.

G.12-3 cont.

Special Status Plant Species

Please review Table 5.7-5, Special Status Plant Species. Bakersfield cactus (*Opuntia basilaris* var. *treleasei*) is included on this table with the comment that no suitable habitat is present on the site; however, the discussion for this taxon includes the updated information that a population of Bakersfield cactus was documented within one mile of the project site, and that suitable habitat does exist on the project site.

The discussion for slender mariposa lily (*Calochortus clavatus* var. *gracilis*) is somewhat ambiguous as to the determination of presence/absence on the project site. It seems that surveys were not conducted at the appropriate time to positively identify this taxon on the site. The discussion states that the determination of slender mariposa lily for the plants observed during the focused survey cannot be ruled out; however, the locations of these plants were not included in the rare plant observations graphic, Exhibit 5.7-7a.

G.12-4

Additional General Comments

Some of the plant nomenclature included in the report is outdated. For example, the Coffeeberry Scrub vegetation type discussion identifies hoary coffeeberry as *Frangula tomentella* ssp. *cuspidata.* The most current nomenclature for this taxon is *Frangula californica* subsp. *cuspidata* (The Jepson Manual, 2nd Ed. Baldwin et al 2012).

G.12-5

The Plant and Wildlife Compendia (Appendix A-5) seems to be missing a few plant taxa that have been observed and previously reported on the project site. For example, beavertail cactus (*Opuntia basilaris* var. *basilaris*) was reported on the project site by Vollmar in 2003 (Vollmar 2004). This taxon is not included on the current Plant and Wildlife compendia. Other examples are perennial spike rush (*Eleocharis macrostachya*), mosquito fern (*Azolla filiculoides*), and common yarrow (*Achillea millefolium*). Does the plant compendium only include taxa observed during more recent surveys? G.12-6

Please feel free to contact me if you have any questions regarding these comments.

Sincerely,



Pam De Vries
Botanist

References Cited

Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti and D.H. Wilken, editors. 2012. The Jepson Manual: vascular plants of California, second edition. University of California Press, Berkeley, CA.

BonTerra Consulting. 2006. Biota Report for the Centennial Specific Plan in Northwestern Antelope Valley, Northern Los Angeles County, California. Report prepared for Centennial Founders, LLC, February 2006.

California Department of Fish and Game (CDFG) 2003. The Vegetation Classification and Mapping Program: List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database. Wildlife and Habitat Data Analysis Branch, Sacramento, CA

California Department of Fish and Game (CDFG). 2010. List of Vegetation Alliances and Associations. Vegetation Classification and Mapping Program, California Department of Fish and Game. Sacramento, CA. September 2010.

Sawyer, J.O, T. Keeler-Wolf and J. Evens. 2009. A Manual of California Vegetation, second edition. California Native Plant Society, Sacramento, CA.

Vollmar Consulting. 2004. Centennial Specific Plan Project Site 2003/2004 Botanical Survey Report. Report prepared for Impact Sciences, Inc., December 2004.

Responses to Comment Letter G.12
Pamela De Vries, Botanist
July 4, 2017

Response to Comment G.12-1:

The comment expresses concern for the length of time since the vegetation mapping was conducted on the majority of the Project site. For the vast majority of focused biological surveys, a gap in time of over five years would render them outdated and they would need to be repeated or updated. In regard to vegetation mapping, on a site with relatively stable site conditions (e.g. restricted access, no fires or other major disturbances outside cattle grazing), and with vegetation types that are typically slow growing and have adaptions to the conditions found on the Project site (e.g. desert scrub, oak woodland), a change in vegetation types or dominant species composition is highly unlikely and unexpected. Therefore, the vegetation map used in the Draft EIR is expected to reflect current conditions or may be more conservative in protecting special status vegetation types.

Response to Comment G.12-2:

The comment states there are inconsistencies between vegetation type nomenclature used throughout the document, and what is cited and referenced. Additionally, the comment states that the vegetation type nomenclature is outdated. The comment is correct that there is a citation error in Section 5.7.3, Environmental Setting, and Section 5.7.9, References, in regard to the literature used to classify the vegetation types. The vegetation types used in the Draft EIR were based on The Vegetation and Mapping Program List of California Terrestrial Natural Communities Recognized by the 2003 California Natural Diversity Database. The methods section and references section will be updated to reflect this. The Draft EIR vegetation descriptions contain sufficient information which enables the reader to understand the composition of the vegetation occurring as well impacted on the project site. Although vegetation classification systems and associated naming conventions have changed in more recent years and appear to be continually changing in regard to industry standard or scientific community acceptation, the vegetation composition has not changed.

In response to this comment, the first sentence of the last paragraph on page 5.7-24 of the Draft EIR is hereby revised as follows:

> Nomenclature for vegetation types in the areas described in the paragraph above generally follows that of The Vegetation Classification and Mapping Program: *List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database* (CDFG ~~2010~~ 2003).

In addition, page 5.7-197 in Section 5.7.9, References, of the Draft EIR is hereby revised as follows:

> California Department of Fish and Game (CDFG). ~~2010~~ 2003 (September). *List of Vegetation Alliances and Associations, Vegetation Classification and Mapping Program.* Sacramento, CA: CDFG.

Response to Comment G.12-3:

The comment requests justification in the vegetation mapping of the undifferentiated grasslands on the Project site, and states that it is unknown whether proposed mitigation lands will adequately compensate for grasslands found on the Project site. The definition of "native grasslands" has varied over time and from region to region (please see response to Comment G.12-2). Ultimately, it was determined that the most conservative approach to mapping "native grasslands" was to conduct intensive species composition studies using quadrats to measure and record species and cover as precisely as possible within randomly selected sample locations within the grasslands.[2981] This data was then used to develop a model predicting the composition of grasslands across the site and Mitigation Preserve areas.[2982] As a result, the data gathered and provided in the Draft EIR is more than just the current naming convention at the time. Additionally, the distribution of areas above and below 10 percent native absolute or relative cover is extremely mixed with areas continually shifting from above and below this threshold. In an effort to ensure the appropriate impact assessment and mitigation, the Draft EIR takes a conservative approach by identifying acreages of impacts of above and below 10 percent but requiring 2:1 mitigation for all grassland impacts.[2983] The acreage of all grasslands is substantially greater than the acreage of the above 10 percent native grass cover. In regard to the Centennial Specific Plan Biota report referred to in the comment, the document was prepared for Significant Ecological Area Technical Advisory Committee as part of the Los Angeles County permitting process for Project with impacts to Significant Ecological Areas (SEAs). Initially, the Project was proposed to impact small portions of two SEAs and was accordingly processing the Project with a biota report. However, the Project has been redesigned and SEA boundaries have also been changed by Los Angeles County such that the Project's disturbance footprint is now entirely outside of any SEA.[2984] As a result, the SEA process and the biota report are no longer required. Section 5.7, Biological Resources, of the Draft EIR contains a full technical level of baseline conditions, impact assessment, and mitigation, and no additional biological resource technical document is necessary.

Response to Comment G.12-4:

The comment notes the habitat potential for Bakersfield cactus, a special status plant species, is inconsistent between the special species plant table and the discussion for this species.

2981 DRP 2017, pp. 5.7-26 and -27
2982 *Ibid.*
2983 *Id.,* p. 5.7-180, MM 7-10
2984 *Id.,* p. 5.7-2

In response to this comment, Table 5.7-5, Special Status Plant Species Table, on page 5.7-72 of the Draft EIR is hereby revised as follows:

Opuntia basilaris var. *treleasei* Bakersfield cactus	FE	SE	1B.1	Alluvial benches and fans in arid plains. ~~No suitable habitat is present on the site. Not expected to occur.~~ In 2013, a population was discovered approximately one mile from the survey area. Potentially suitable habitat occurs on the site. Potential to occur.	Not Observed

Additionally, the comment seeks clarification on the identification of slender mariposa lily, a special status plant species, during special status plant surveys. The northern most collection record for slender mariposa lily is in the Liebre Mountains approximately 7 miles south of the Project site.[2985] Based on the only blooming records of this species in 2015, which were 1,000 feet below the elevation range of the Project site[2986], peak bloom on the Project site would be estimated at middle of May. In May, surveys were conducted on the Project site beginning May 25th. Slender mariposa lily had a low potential to occur on the project site based on limited potentially suitable habitat and being more than five miles outside the known region for the species.[2987] However, if it were present, it is highly likely it would have been found during the May surveys.[2988] Although slender mariposa lily cannot be categorically ruled out, based on the low potential to occur and micro habitat preferences for this species being limited (high ridgelines and steep slopes), it is not reasonable to assume the fruiting individuals observed were slender mariposa lily. It is more reasonable to assume fruiting individuals were of desert mariposa lily (*Calochortus kennedyi*) or butterfly mariposa lily (*Calochortus venustus*), which were observed within the Project site.[2989]

Response to Comment G.12-5:

This comment makes the statement that some of the plant nomenclature is outdated in the Draft EIR. Plant nomenclature is nearly always changing within one genus or another from month-to-month and year-to-year. The particular species mentioned in the comment will be updated, however, it is expected that any other scientific names that may be from a previous version of literature can be cross-referenced to arrive at the most current taxonomy. The taxonomy used in the Draft EIR is sufficient for assessing plant species impacts. In response to this comment, page 5.7-35 in Section 5.7.3, Environmental Setting, is hereby revised as follows:

[2985] CCH 2017
[2986] CNDDB 2017
[2987] DRP 2017, Table 5.7-5, p. 5.7-69
[2988] *Ibid.*
[2989] *Id.,* p. 5.7-75

Coffeeberry Scrub (37.000.00)

This vegetation type is dominated by hoary coffeeberry (*Frangula ~~tomentella~~ californica* ssp. *cuspidata*) and oak gooseberry (*Ribes quercetorum*).

Response to Comment G.12-6:

This comment makes the statement that some plant species may be missing from the Draft EIR plant compendia. The plant compendium is intended be inclusive of all plant species found on the project site. Depending on the current taxonomic nomenclature, some names may be different than originally reported. In addition, survey areas covered within some past reports are different than current site boundaries. In these cases, every effort has been made to ensure an accurate compendium by including species from within the current site boundaries and excluding those which are not as best can be determined from review of those reports. In order to provide clarification regarding the species mentioned in the comment, Appendix 5.7-A of the Draft EIR, is hereby revised as follows. A revised version of this Appendix has been provided as part of this Final EIR, as Appendix 5.7-A.Rev, Plant and Wildlife Compendia (Revised).

On page A-1 within the row after Asteraceae, the species below is inserted:

Asteraceae	
Achillea millefolium	Common yarrow
Achyrachaena mollis	Blow wives

On page A-3 within the row after *Xanthium strumarium*, Rough cocklebur, the family and species below are inserted:

Xanthium strumarium	Rough cocklebur
Azollaceae	
Azolla filiculoides	Mosquito fern
Boraginaceae	
Amsinckia intermedia	Common fiddleneck

On page A-4 within the row after *Tripidocarpum gracile*, Dobie pod, the family and species below are inserted:

Tropidocarpum gracile	Dobie pod
Cacteacea	
Opuntia basilaris var. *basilaris*	beavertail
Caryophyllaceae	
Minuartia douglasii	Douglas' stitchwort

On page A-5 within the row after *Cyperus eragrostis*, Tall flatsedge, the species below is inserted:

Cyperus eragrostis	Tall flatsedge
Eleocharis macrostachya	Common spikerush
Eleocharis sp.	Spikerush

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Mr. John Adargo
PO Box 1412
Lebec, CA 93243-1412

LETTER REC'D 7-12-17

Gmail

John Adargo <jadargo1@gmail.com>

Proposed Project by Quail Lake. (Centennial)

1 message

John Adargo <jadargo1@gmail.com>
Reply-To: jadargo1@gmail.com
To: centennial@planning.lacounty.gov

Sat, Jul 8, 2017 at 1:06 PM

To whom it may concern, or Mr. Jodie Sackett:

My ancestors inhabited this area, our families families, for over 4000 years. The White people Massacured, Murdered, imprisoned, enslaved and starved our families for this land. If you tear up this soil, you will expose a deadly spore hidden in the soil. It is a curse from our ancestors. It will infect the people who breathe the dust from the land, which contains the bones and blood of our families, and cause respiratory illness and even death. G.13-1

This curse exists because this land you call Tejon Ranch, belongs to our people, the people of the Earth. The Native People of the Earth, which this land belongs to, are still here, only we have intermarried and mixed our blood with you white people.

The Quail Lake area is sacred ground. You will encounter great burden if this land is scared (excavated/developed). The Birds that come here number in the hundreds of species. The frogs, lizards, snakes, rabbits, squirrels, fox, raccoon, and all the other wildlife will also be displaced. G.13-2

The water in the ground and the water in the lake will become contaminated with all the runoff. This is a very foolish thing you are trying to do, as you well know, shit runs downhill. I cannot believe that a human being, who is responsible to be the steward of the Earth will allow this project to continue, being built on sacred Indian Ground, you know you will succumb to really bad juju. G.13-3

I know that the Greed that drives you people to do these things to the Earth blinds you from the true meaning of Life. We are here only temporarily, and we must leave this Earth a better place for future generations. G.13-4

The way you are going to rape this land to put a whole bunch of people that poop and drink and shower and flush and drive and all, bunched up in a small area, crowding them in to wait in lines to get on a freeway which can barely hold the traffic it currently has, pumping more pollutants into the atmosphere, using up all the water, which is in short supply already, is simply put, CRAZY. G.13-5

You have lost your minds.

This area has no infrastructure.

Storm Drains are insufficient. Roads are insufficient. This will clog up the I-5 and the 138. People trying to get to work, who commute to the 14 will be jammed up. There is not enough water to supply this project. It takes Millions of gallons of water to do construction, excavation, compaction, soil stabilization, and finally Landscaping. That's even before anyone moves into a home and starts flushing, showering, doing laundry and watering their lawn or washing their car, not to mention filling their pool. There is just not enough water, because we are already on rations right now. G.13-6

Where are all the toilets going to flush to? Sanitation Plant? Water Reclamation? G.13-7

How are you going to mitigate the runoff from this project? How will you be able to keep it out of the Lake? G.13-8

One Spill and the Water supply will be polluted and Los Angeles will be poisoned.

You people that do this are a special breed. I am glad I do not associate with your kind. I don't know how you sleep at night, knowing the land is stolen from the Native People, they were murdered so you could take their land, you sell it off for Greed, and you Rape it until it is poison and uninhabitable. When will you people realize you cannot eat money? G.13-9

Responses to Comment Letter G.13
John Adargo
July 12, 2017

Response to Comment G.13-1:

Thank you for your comment and for your participation in this public process. With regard to the condition Valley Fever, formally known as *Coccidioidomycosis*, this is a fungal disease caused by inhalation of *Coccidioides immitis* spores that are carried in dust and is known to occur in the Antelope Valley. The potential for Valley Fever spores to be found in soils of the Antelope Valley, and the effects of contracting Valley Fever, is fully disclosed in the Draft EIR. The risks from possible exposure of both construction workers and the Project-related population to Valley Fever spores is comprehensively analyzed in Section 5.3, Hazards and Fire Safety, and Section 5.11, Air Resources, of the Draft EIR. The Draft EIR concludes there would be less than significant impacts associated with Valley Fever with implementation of MMs.

Response to Comment G.13-2:

The vast majority of these birds are attracted to the water source Quail Lake has to offer. The Project will not impact Quail Lake and is buffered to the north by approximately 2,500 feet.[2990] The Project is not expected to impact avian visitors to Quail Lake. In addition, the Draft EIR recognizes that Project implementation will displace many individual common wildlife species such as those mentioned in the comment. State CEQA Guidelines require that the Project implement conservation measures to offset this impact to a less than significant level. Mitigation measures are included in the Draft EIR to both set aside large areas of protected lands, as well as enhance existing lands, to help offset impacts to common wildlife species. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. However, because the comment does not question the adequacy of the Draft EIR, no further response is required.

Response to Comment G.13-3:

Potential Project groundwater and surface water impacts are discussed in Section 5.2, Hydrology and Flood, and Section 5.4, Water Quality of the Draft EIR. All potential hydrological and water quality impacts were determined to be less than significant with the required Project mitigation.

Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake

[2990] DRP 2017, p. 5.7-150

watershed, which includes the lake. Consequently, no runoff from Project developed areas will flow to Quail Lake and the Quail Lake drainage and watershed. The Project development will not affect the hydrology, flood or water quality conditions in the lake and the lake's watershed and drainage system.

Potential cultural resource impacts are discussed in Draft EIR Section 5.6, Cultural and Tribal Resources, and will be less than significant with mitigation (see the significance findings on page 5.6-61).

See, also, Sections 5.5 (Cultural Resources) and 5.9 (Hydrology and Water Quality) of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Sections 3.5 (Cultural Resources) and 3.10 (Hydrology and Water Quality) of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment G.13-4:

The comment and the opinions are noted. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment G.13-5:

The Project's water supplies are discussed in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. Potential freeway impacts are discussed in Draft EIR Section 5.10, Traffic Access and Circulation, and the significance findings are summarized on page 5.10-157. Potential air quality impacts are discussed in Draft EIR Section 5.11, Air Resources, and the significance findings are summarized on page 5.11-83. Potential climate change impacts are discussed in Draft EIR Section 5.21, Climate Change, and the significance findings are summarized on page 5.21-94.

Response to Comment G.13-6:

Existing public facilities and infrastructure in the Project area are discussed on pages 3-9 to 3-11 of Draft EIR Section 3.0, Environmental Setting. As discussed on page 3-22, the Project would be an entirely new and independent development and will not rely on aging infrastructure systems, obsolete structural engineering, or land planning constraints. All on-site infrastructure will be constructed by the Project. As discussed on page 1-9 in Draft EIR Section 1.0, Executive Summary, the Project storm drainage facilities have been designed to meet or exceed the Los Angeles County Municipal Separate Storm Sewer Systems Permit, Low Impact Development Standards Manual, and Low Impact Development hydromodification and hydrology (flood control) requirements for new development. MMs 2-1 and 2-2 require that compliance with these performance standards be confirmed in a Drainage System Engineering and Planning Report submitted to the County during the review and approval of each Project tract map. Project runoff will not exceed the planned

storm drain capacity and will not require construction of additional drainage facilities not considered in the Draft EIR and that could have significant environmental effects. Consequently, storm drain systems will have sufficient capacity for the Project. As discussed in Section 5.10, Traffic Access and Circulation, the Project will be required make fair share payments for off-site roadway construction required for Project plus other cumulative, future transportation demands and to maintain applicable Level of Service (LOS) standards for Interstate 5, State Route (SR) 138, and SR-14. The Project's water supplies are discussed in Section 5.18, Water Resources, and will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. As discussed on pages 5.18-50 and 5.18-51, and in Table 5.18-9, the Draft EIR analysis of Project water demand considers and includes construction period demand over a 20-year buildout period. As discussed on pages 5.18-46 to 5.18-50, and in Table 5.18-7, the Draft EIR analysis of Project water demand considers and includes landscaping and outdoor water demand for Project land uses. Consequently, the Draft EIR includes construction period water demand and landscaping demand, and water supplies are sufficient to serve the Project during construction, at full buildout, and on a sustainable basis after full buildout.

Response to Comment G.13-7:

The proposed Project would be an entirely new and independent development, and all onsite wastewater infrastructure would be constructed by the Project. The locations of the two wastewater reclamation facilities (WRFs) sites and capacities, sewer main lines, pump stations, force mains, and general treatment processes that would be implemented to serve future development under the Specific Plan are discussed on pages 4-59 through 4-61 in Section 4.0, Project Description, of the Draft EIR. Draft EIR Section 5.19, Wastewater Collection, includes a thorough discussion of the proposed Project's wastewater infrastructure. In summary, the Project will include wastewater treatment and recycled water distribution facilities to minimize potable water demand. The two WRFs would be constructed to provide solids handling and biogas reuse and would be connected through a recycled water distribution system to balance the storage and flow of recycled water for use throughout the Project site, primarily for outdoor irrigation. MM 19-2 requires that the Project either be annexed into an existing qualified public utility district (e.g. Golden Valley Municipal Water District) or that a new public utility district (e.g. Project Water Purveyor) be created to serve the Project. See, also, Section 5.17 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.18 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment G.13-8:

Potential Project runoff impacts, including hydrology, flood and water quality impacts, are discussed in Section 5.2, Hydrology and Flood, and Section 5.4, Water Quality. The Draft EIR requires that the Project implement MMs 2-1 to 2-3 to reduce potential hydrology and flood impacts to less than significant levels. Hydrology and flood control MMs 2-4 and 2-5 have been added to the hydrology and flood control mitigation required for the Project at the

request of the Lahontan Regional Water Quality Control Board (for more information, please see responses to Comments D.3-8 and D.3-9). The mitigation measures include the implementation of hydromodification control Best Management Practices (BMPs) that meet Los Angeles County LID standards and ensure that, for a capital storm event, there is no increase in peak discharge rates and no increase in runoff volume offsite compared with peak discharge rates and runoff volumes under existing, pre-development conditions. The Draft EIR requires that the Project implement MMs 4-1 and 4-2 to reduce potential water quality impacts to less than significant levels. Hydrology and flood control MMs 4-3 and 4-4 have been added to the water quality mitigation required for the Project at the request of the Lahontan Regional Water Quality Control Board (for more information, please see responses to Comments D.3-12 and D.3-13). The implementation of these mitigation measures will reduce potential Project runoff impacts to less than significant levels. Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake watershed, which includes the lake. Consequently, no runoff from Project developed areas will flow to or occur within Quail Lake and the Quail Lake drainage and watershed will not affect the hydrology, flood or water quality conditions in the lake and the lake's watershed and drainage system.

Response to Comment G.13-9:

The comment and the opinions are noted. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

From: Jodie Sackett <jsackett@planning.lacounty.gov>
Sent: Monday, July 24, 2017 10:38 AM
To: 'WILLIAMS, PAUL G GS-13 USAF AFOTEC Det 5/DTS'
Subject: RE: Centennial info request

Hello Paul, sorry you're getting this a bit late, I was out of the office last week. Note also on the below page (at top, "revised notice") we extended the comment period an extra 30 days to Wed, Aug 16, 2017.

http://planning.lacounty.gov/case/view/specific_plan_no_02_232_centennial_specific_plan

Jodie Sackett
Zoning Permits N^

-----Original Message-----
From: WILLIAMS, PAUL G GS-13 USAF AFOTEC Det 5/DTS [mailto:paul.williams.53@us.af.mil]
Sent: Tuesday, July 18, 2017 3:38 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: Centennial info request

Ms. Sackett,

I was given you name as a source of information for the Centennial project in the Western Antelope Valley. Could you please send me a link to the EIR? G.14-1

Respectfully,

Paul

//SIGNED//
Paul G. "Greg" Williams, GS-13, DAF
AFOTEC Det 5/DTS
190 S. Wolfe Ave
Edwards AFB, CA 93524

Comm: 661-277-6812
DSN: 527-6812
CELL: 661-802-3137
FAX: 661-277-6950

Response to Comment Letter G.14
Paul G. "Greg" Williams
July 18, 2017

Response to Comment G.14-1:

Thank you for your comment and for your participation in this public process. This comment does not raise a specific concern regarding the content of the Draft EIR. Rather, it requests the Lead Agency to email the Commenter a link to the Draft EIR. The Lead Agency responded to this comment by email dated July 24, 2017 with a link to the Lead Agency's website for the project, from which the Draft EIR may be downloaded. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required as the request to be included in the Project notification was accepted.

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RECEIVED
By KB Email at 2:49 pm, Jul 26, 2017

From: Colleen Boye [mailto:colleen.boye@gmail.com]
Sent: Wednesday, July 26, 2017 10:18 AM
To: Barger, Kathryn
Subject: Centennial development

Please do not allow Tejon Ranch to build the Centennial development in Antelope Valley. We don't need the traffic, pollution, and urban sprawl that a big development far away from jobs and the city center will create. Instead we must focus on building efficient housing within the city where the jobs are and creating the public transportation and infrastructure to support it and relieve overcrowding and congestion. G.15-1

Thank you,
Colleen Boye
Altadena, CA

Response to Comment Letter G.15
Colleen Boye
July 26, 2017

Response to Comment G.15-1:

Thank you for your comment and for your participation in this public process. This comment's assertion that the Project would destroy the character of the region is contrary to the Project's objectives and design features, which protect the rural character of the region, promote "smart growth," and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2991] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2992] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2993]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2994] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2995] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2996] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2997] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2998]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-

2991 DRP 2015, pp. 1-2
2992 *Id.*, p. 1-5
2993 *Id.*, p. 1-6
2994 *Id.*, p. 1-5
2995 *Ibid*.
2996 *Id.*, p. 1-6
2997 *Id.*, p. 1-7
2998 *Ibid*.

oriented commercial uses.[2999] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[3000] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[3001]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[3002] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[3003] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[3004]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[3005] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[3006] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

2999 *Ibid*.
3000 *Ibid*.
3001 *Ibid*.
3002 DRP 2017, p. 4-4
3003 DRP 2015, p. I-8
3004 *Ibid*.
3005 *Id.*, p. I-8
3006 *Ibid*.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[3007] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[3008] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[3009]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[3010] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[3011] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[3012] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[3013] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[3014] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project

3007 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
3008 *Id.,* p. 4-7
3009 *Ibid*.
3010 *Id.,* p. 4-8
3011 *Ibid*.
3012 *Ibid*.
3013 *Ibid*.
3014 SCAG 2016a

"exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[3015] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[3016] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

This comment does not raise any concerns regarding specific environmental effects of the Project or the adequacy of the Draft EIR. The Project's potential environmental effects related to traffic, air quality, and land use are analyzed in Sections 5.10, 5.11, and 5.8 of this EIR, respectively. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration

[3015] DRP 2017, p. 4-45
[3016] *Ibid*.

Jodie Sackett, AICP
Zoning Permits North
Dept. of Regional Planning
320 W. Temple St., Rm. 1348
Los Angeles, CA 90012.

Dear Ms. Sackett -

As a resident of Pine Mountain Club for several years and then a resident of Frazier Park for the last 28 years, I would like to offer my comments on the Tejon Ranch Company's construction of a major new community not far from here.

For more than a decade, I have watched the Centennial team proactively reach out to the surrounding communities, giving updates on the progress of the project. They have presented to numerous Town Councils, hosted workshops where they have reviewed every aspect of the project, and sought input from the community.

Centennial is an enormous project but is obviously a meticulously planned and a carefully laid-out combination of economic opportunity and environmental preservation which will benefit the County financially and enhance it's reputation for conscientious protection of our environment.

I urge the Planning Department to move quickly to approve the project - the sooner construction starts the sooner we will begin to reap the economic and enviromental benefits,

G.16-1

Sincerely,

Larry E. Brown
501 Wyoming Trail
Frazier Park, CA 93226

Responses to Comment Letter G.16
Larry Brown
August 10, 2017

Response to Comment G.16-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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Jodie Sackett, AICP
Zoning Permits North
Dept. of Regional Planning
320 W. Temple St., Rm. 1348
Los Angeles, CA 90012.

Dear Ms. Sackett:

As residents of Frazier park for the last 30 years we greatly value living in a rural mountain community and therefore are very sensitive to any threats to that lifestyle. But that does not mean we are adverse to improvements - and the proposed community of Centennial will bring many benefits which far outweigh any threat.

We have watched very carefully as the plans for Centennial were developed, examined, revised, and then each year as they were refined and revised again, to it's present state of a master planned, self-sustaining community where families can live and work in a community that is both environmentally sound and economically favorable.

During buildout Centennial will provide thousands of construction jobs and when completed will bring 30,000 permanent jobs to this area. The plan includes land use and zoning for residential, commercial, and light industrial development, but is what is important to us and future generations is the significant amount of conserved open space.

We deeply appreciate the careful research and planning that Tejon Ranch Corporation has put into this project and believe that the completed community of Centennial provide major benefits to nearby residents.

G.17-1

Sincerely,

Candace Huskey

Candace Huskey
500 East End
Frazier Park, CA 93225

Response to Comment Letter G.17
Candace Huskey
August 10, 2017

Response to Comment G.17-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Richard Smith <gvre@gvre.com>
Sent: Wednesday, August 16, 2017 11:57 AM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com
Subject: Centennial at Tejon Ranch

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community offers a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

There are a few features that I would like to point out to reiterate why Centennial is a much-needed community:

- Centennial is the implementation of the Antelope Valley Area Plan, by creating an environmentally and economically sustainable community to help accommodate planned regional population and economic growth.
- The project will include employment and institutional land use to reduce off-site employment-related commuter trips.
- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

G.18-1

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.
With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Sincerely,

Richard Smith, Broker/President
Golden Valley Real Estate
a division of Golden Valley Real Estate, Inc.
BRE License #01494534
Office: (661) 724-0000
Cell: (661) 803-7610
Fax: (661) 724-0212
web site: http://secure-
web.cisco.com/1H5xKshmuMUx3tvCl_fE_8yxh9WgfxLn_tMK4bMGBtJ4NVaF6peLBlZkVCvuev5sGDrtpIFkSjEMiWc1YJCgXvNX
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xRqtFzYq0hbkyS2lZCfYDXSd2VczwndokLWgCCa2BHvmwm45FE6ZvzxsQWN6ZhzdDY_byFWvCUanFiyYvlQfXwadJWuidTYLqrM
SOUA2xcKJp432esQOZ7HUiPWcxxR5-M17iWzBkw7o_RcPtAef7g/http%3A%2F%2Fwww.gvre.com
email: gvre@gvre.com

Response to Comment Letter G.18
Richard Smith
August 16, 2017

Response to Comment G.18-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Dddyasd@aol.com
Sent: Wednesday, August 16, 2017 1:38 PM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com
Subject: Centennial

To who this may concern:

I firmly believe Centennial is one of the best things that will happen to Antelope Valley, Santa Clarita Valley and the San Joaquin Valley Bakersfield area.

This project will have state of the art planning from the ground up and will be equal distant to Santa Clarita, Bakersfield, Lancaster, Palmdale and Rosamond. This is fresh and very much desired in my opinion....cannot be built soon enough to alleviate over crowding in other areas.

Donald M. Days Jr.
661-256-4828
805-358-0398

PS Ms. Barger....I am not a resident of L.A. County but am a property owner there, you have made a very big impression on me, good luck!

G.19-1

Response to Comment Letter G.19
Donald M. Days Jr.
August 16, 2017

Response to Comment G.19-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Robert Buchanan <rbuchanan@buchananspokes.com>
Sent: Wednesday, August 16, 2017 1:55 PM
To: Jodie Sackett
Subject: Centennial

Hello Mr. Sackett,

I am a property owner in the Lake Hughes area. I am writing to you to express my support for the development of Centennial .

Services and materials are so far away from us currently. The quality of life would be greatly improved for the area when Centennial can move forward.

G.20-1

Thank You for your consideration, Robert Buchanan

Response to Comment Letter G.20
Robert Buchanan
August 16, 2017

Response to Comment G.20-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Judy <jcscoper@sbcglobal.net>
Sent: Wednesday, August 16, 2017 2:05 PM
To: Jodie Sackett
Cc: centennial@tejonranch.com
Subject: Centennial Support Letter

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community offers a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

There are a few features that I would like to point out to reiterate why Centennial is a much-needed community:

- Centennial is the implementation of the Antelope Valley Area Plan, by creating an environmentally and economically sustainable community to help accommodate planned regional population and economic growth.
- The project will include employment and institutional land use to reduce off-site employment-related commuter trips.
- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the

G.21-1

approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.

With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

G.21-1 cont.

Response to Comment Letter G.21
Judy
August 16, 2017

Response to Comment G.21-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Lori - Pacific <lori@pacificprinting.com>
Sent: Wednesday, August 16, 2017 2:08 PM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com
Subject: Request for Centennial Support Letter

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community offers a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

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- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

G.22-1

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.
With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Thank you for reviewing this letter,

Mike Murphy
Frazier Park, CA resident


Virus-free. www.avg.com

Response to Comment Letter G.22
Mike Murphy
August 16, 2017

Response to Comment G.22-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Dale King <daleking@wildblue.net>
Sent: Wednesday, August 16, 2017 4:49 PM
To: Jodie Sackett
Subject: Fwd: Letter

From: "bob smith" <duxrcool048@yahoo.com>
To: "Dale King" <daleking@wildblue.net>
Sent: Wednesday, August 16, 2017 3:06:36 PM
Subject: Letter

Dear Mr. Sacket:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community offers a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

There are a few features that I would like to point out to reiterate why Centennial is a much-needed community:

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- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

G.23-1

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.
With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Response to Comment Letter G.23
Bob Smith
August 16, 2017

Response to Comment G.23-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: beatrili0118@yahoo.com
Sent: Friday, July 07, 2017 10:06 AM
To: Jodie Sackett
Subject: Re: Automatic reply: Reject Tejon's Centennial Project

He Jodie

Have a good holidays..Birth of America Month .
Thank youenjoy weekend

G.24-1

Always

Beatriz

On Jul 7, 2017 9:40 AM, Jodie Sackett wrote:

> I am currently out of the office and will return on Tuesday, July 11, 2017.

Responses to Comment Letter G.24
Beatriz
July 7, 2017

Response to Comment G.24-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: jack mcghee <jackmcghee007@gmail.com>
Sent: Friday, July 07, 2017 12:12 PM
To: Jodie Sackett
Subject: Re: Automatic reply: Reject Tejon's Centennial Project

Sign me on...thank you for all you do...👉😎✌😎

G.25-1

On Jul 7, 2017 12:02 PM, "Jodie Sackett" <jsackett@planning.lacounty.gov> wrote:

> I am currently out of the office and will return on Tuesday, July 11, 2017.

Responses to Comment Letter G.25
Jack McGhee
July 7, 2017

Response to Comment G.25-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: GER <gfconroy@yahoo.com>
Sent: Friday, July 07, 2017 5:35 PM
To: Jodie Sackett
Subject: Re: Automatic reply: Reject Tejon's Centennial Project

I support Tejon Ranch in their efforts to accommodate all stakeholders in the County.Their diligence in accommodating all parties interests is evident in the last 20+years they have surrendered 90% of the Ranch to the environmental community.STOP the MADNESS approve the Centennial project the cost of housing has been driven to unattainable levels because of hoops to jump through to satisfy the impossible hurdles created by LA County

G.26-1

On Friday, July 7, 2017, 5:26:41 PM PDT, Jodie Sackett wrote:

I am currently out of the office and will return on Tuesday, July 11, 2017.

Responses to Comment Letter G.26
GF Conroy
July 7, 2017

Response to Comment G.26-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Ashley Hillard <ashleyj.hillard@yahoo.com>
Sent: Thursday, July 20, 2017 12:42 PM
To: Jodie Sackett
Subject: Auto Response: Automatic reply: Reject Tejon's Centennial Project

Follow Up Flag: Follow up
Flag Status: Completed

My new email address is ashleyhillard7@gmail.com

G.27-1

Responses to Comment Letter G.27
Ashley Hillard
July 20, 2017

Response to Comment G.27-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Nick Jensen <nickjjensen1@gmail.com>
Sent: Friday, July 07, 2017 3:30 PM
To: Jodie Sackett
Subject: Reject Tejon's Centennial Project

Dear Mr. Sackett,

Tejon Ranch's Centennial Project is an example of the worst type of development. There are a myriad of reasons to categorically reject this project, but to cite a few: G.28-1

1. The project is sited far from urban centers. Los Angeles has the worst traffic in the U.S. Do we really need more than 19,000 homes situated more than an hour-long drive from Los Angeles and with no access to public transportation? G.28-2

2. The project is proposed at one of the most complex and important ecological transition zones in the state. Centennial is located in the westernmost portion of the Antelope Valley in the transition zone between the foothills of the Tehachapi Mountains and Liebre Mountains. In the reality of climate change we know that plants and animals will need transition zones such as this in order to migrate under changing conditions. This project will fragment habitats and vital wildlife corridors. G.28-3

3. Habitats on Tejon Ranch are currently unfragmented. The Centennial Project will fragment the state's largest contiguous piece of private land. Furthermore, edge effects from this development project including the introduction of invasive plants and increased human-caused wildfires will significantly cause impacts over far more than the project's reported acreage. G.28-4

4. The habitats on the Centennial Project are unique and irreplaceable. Some of the state's most extensive and intact native grasslands occur on this site, and should be preserved and managed in perpetuity as natural treasures. G.28-5

5. Scientific research on Tejon Ranch is in its infancy. As the state's single largest piece of land, Tejon has been vastly understudied by biologists. As an example of this, numerous new species of plants have recently been discovered on Tejon and doubtlessly more are waiting to be discovered. Biological surveys, even when done by well-qualified professionals, are woefully inadequate at accounting for undescribed species. More precise and detailed study of the biota on the Centennial Project is necessary. G.28-6

6. Traffic conditions on Highway 138 and Interstate 5 are already congested. The Centennial Project will only worsen these conditions. The solution to traffic congestion is not just adding lanes to existing freeways. Have we learned nothing from other development projects in Los Angeles County? G.28-7

7. The region of Tejon Ranch already suffers poor air quality. Adding more than 19,000 residences, commercial spaces, and associated vehicle traffic will only worsen these conditions. There is no way to mitigate for these effects.
Approving the Centennial Project would be a step in the wrong direction for Los Angeles County. We should strive for walkable cities, where residents live close to where they work. We deserve developments that don't add to our over-congested roadways. We should strive for development that does not decrease air quality and exacerbating the effects of climate change. G.28-8

We know that large, intact habitats are the solution to conserving plants and animal species. Now is the time to say no to Centennial, a project that will fragment habitats that are necessary to conserve plants and animals in the face of climate change. The site of the Centennial Project should be conserved in perpetuity. The Centennial Project site is not just a piece of land. It is a unique, important, and irreplaceable habitat that should be celebrated, studied and preserved. The Centennial Project should be rejected. G.28-9 G.28-10

Sincerely,
Nick Jensen

Nick Jensen

91711

Responses to Comment Letter G.28
Nick Jensen
July 7, 2017

Response to Comment G.28-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment G.28-2:

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. Specifically, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* and the AVAP for the purpose of sustainably accommodating regional growth projections. In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[3017] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[3018] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[3019] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[3020] The Project site is located entirely within the AVAP's West EOA.[3021] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[3022] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to

[3017] DRP 2015, p. I-5
[3018] *Id.*
[3019] *Id.,* p. I-7; DRP 2014a, p. 7-7
[3020] *Ibid.*
[3021] DRP 2017, p. 4-4
[3022] DRP 2015, p. I-8

[EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[3023]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[3024] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[3025] To ensure that this strategy is implemented, the AVAP specifies that the interpretation of [AVAP] policy should be governed by the AVAP's Rural Preservation Strategy.[3026] The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2012 and 2016 RTP/SCS documents.

As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns. Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[3027] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[3028] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80 percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[3029] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[3030] The Town Center will have a public gathering space of 1 acre or more, with street frontage on at least two sides.[3031] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be within the Village Core.[3032] High-density residential uses will be located

[3023] *Ibid.*
[3024] *Id.,* p. I-8
[3025] *Ibid.*
[3026] *Ibid.*
[3027] DRP 2017, p. 4-16
[3028] *Ibid.*
[3029] *Id.,* p. 4-17
[3030] *Ibid.*
[3031] *Ibid.*
[3032] *Ibid.*

adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[3033]

The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further reducing demand for SOV travel.[3034] The Draft EIR also notes that sufficient facilities for non-work activities such as schools, parks, library facilities, and retail have been planned on the Project site in an effort to meet the needs of residents at buildout, reducing the need to access such services by making trips external to the Project. The purpose of this discussion is to demonstrate that, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the project for work, shopping and other activities. All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site. The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[3035] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[3036] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[3037] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[3038]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[3039] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be

3033 *Id.,* p. 4-20
3034 *Id.,* p. 4-35
3035 DRP 2017, p. 4-30
3036 *Ibid.*
3037 *Id.,* p. 4-31
3038 *Ibid.*
3039 *Id.,* p. 4-30

completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[3040]

Finally, the County and the region do need the housing units to be provided by the Project. California's housing shortage has reached crisis levels.[3041] Between 1980 and 2010, the construction of new housing units in the Los Angeles metro region fell far behind the national average.[3042] During this period, new housing construction grew by 54 percent in the typical U.S. metro area, whereas new housing units in the Los Angeles metro area grew by just 20 percent.[3043] The result has been skyrocketing housing prices. In 1970, California home prices exceeded the national average by 50 percent.[3044] By 1980, the gap had widened to 80 percent.[3045] As of 2015, the average home price in California exceeds the national average by 250 percent.[3046] California rental prices are no better. Today, the average monthly rent in California exceeds the national average by 50 percent.[3047]

Predictably, the impact of the housing crisis has been hardest on the region's most vulnerable populations. Between 1990 and 2012, poverty levels in the SCAG region have increased by 69 percent, with a quarter of all children living in poverty.[3048] In the Los Angeles metro region, approximately 30 percent of the median household's total income is used to pay housing costs, 7 percent more than the national average.[3049] However, the poorest 25 percent of Los Angeles metro area households spend, on average, 67 percent of their income on housing.[3050] As a result, these low income households are forced to spend less on other essentials. According to Harvard's Joint Center for Housing Studies, low-income households who spend more than 50 percent of their income on housing also spend 39 percent less on food than do households that spend less than 50 percent of income on housing.[3051] To seriously mitigate California's housing shortage and its disproportionate impact on low income households, California must construct 100,000 additional residential units on top of the 100,000 to 140,000 housing units the state is expected to build annually, and these units must be located almost exclusively in California's costal metro areas, including Los Angeles County.[3052]

3040 *Ibid.*

3041 California, State of, Legislative Analyst's Office (LAO). 2015. California's High Housing Costs: Causes and Consequences (p. 28). Sacramento, CA: LAO. http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf.

3042 *Id.,* p. 10

3043 *Ibid.*

3044 *Id.,* p. 12

3045 *Id.,* p. 3

3046 *Id.,* p. 7

3047 *Id.,* p. 12

3048 Southern California Association of Governments (SCAG). 2015 (December). Draft Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (SCH #2015031035) (p. 3.14-13). Los Angeles, CA: SCAG. http://scagrtpscs.net/Pages/DRAFT2016PEIR.aspx.

3049 LAO 2015, p. 25

3050 *Id.,* p. 26

3051 *Id.,* p. 27

3052 *Id.,* pp. 34, 35

Response to Comment G.28-3:

Within the context of the analysis required by CEQA, the Draft EIR addressed the setting, impacts, and mitigation measures for habitat impacts including fragmentation and habitat loss,[3053] wildlife connectivity,[3054] certain predators being more likely to occur in developed areas,[3055] and invasive species avoidance and control.[3056]

It should be noted that while the Project site is within the general region of convergence of three biological regions, it does not contain this convergence within its borders. Rather, the convergence is generally occurring in the area, inclusive of on-site as well as mostly off-site lands.[3057] The geological fault line information and impacts related thereto are discuss in the Draft EIR Section 5.1, Geotechnical. In addition, although there is high biological value on portions of the Project site, much of the site has been impacted by non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*).[3058] Similarly, riparian areas are degraded in most of the low-lying drainages. Consequently, biological diversity is less than would otherwise be expected in many areas. However, native grasslands occur in a patchy distribution throughout large portions of the site. Although grassland occurrence is also a function of soils and topography, prior site studies as discussed in the Draft EIR also attribute the patchy and uneven distribution of native grasslands on the Project site to grazing, which has potentially minimized non-native growth to a level sufficient to allow persistence of native perennial bunch grasses, as described on pages 5.7-42 through 5.7-47 of the Draft EIR. Project implementation would include mitigation actions (see Section 5.7.7, Mitigation Measures, of the Draft EIR) resulting in improved functions and values of many of these resources, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR.

Various regional wildlife studies have been conducted on the Project site.[3059] The conclusion of these studies has been that the sparse vegetation occurring on the Project site, coupled with the existing barriers of the California Aqueduct (both West Branch and East Branch) and Interstate 5, is not favorable for wildlife movement across the site as part of regional migration and local movement. Most wildlife using this area likely access it for water and/or to forage by crossing SR-138 from the more vegetated upland areas to the south of SR-138. Because individuals of many of the larger wildlife species in the region tend not to cross large expanses with sparse shrub cover (typical of the majority of the Project site), the central and eastern portions of the Project site are not likely to be used by the larger species to disperse between and within the regional open space areas in the site vicinity. Please note that consideration is given to major movement deterrents in the Project area, including the SR-138 and the California aqueduct, due to their substantial potential to prevent movement of some wildlife. The Aqueduct effectively serves to block east-west movement on the site for most ground-dwelling wildlife. Accordingly, passage points (some of which are bridges) are

3053 DRP 2017, 5.7-142 to -164
3054 *Id.,* pp. 5.7-164 to -170
3055 *Id.,* p. 5.7-169
3056 *Id.,* p. 5.7-167
3057 DRP 2017, pp. 5.7-50 to -64, -164 to -170
3058 *Id.,* p. 5.7-159
3059 *Id.,* Section 5.7-3, Table 5.7-2

discussed at length accordingly. SEA 17 is widely recognized as a crucial linkage area for the region and contains many undisturbed habitats. The Project has been designed to avoid direct impacts to SEA 17 completely.[3060] Also, the Project has been designed to include green space connections between undeveloped open space areas where feasible resulting in increased mobility for such species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is considered less than significant accordingly.[3061] Please refer to responses to Comments B.4-56, and B.4-57, for additional information and more detailed responses on this issue.

In addition, the TUMSHCP will be a major contributor to ensuring the viability of the Tehachapi Landscape linkage into the future. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA). The sum of these interconnected open space commitments, development restrictions, and the measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species occur in the foothills and lowland areas as well, including the Project site. These species will benefit from the TUMSHCP, in addition to the Centennial Mitigation Preserve program described in the Draft EIR. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages across cismontane Southern California.

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[3062] to reduce impacts to biological resources to a less than significant level. Please refer to responses to Comments B.4-56, and B.4-57, for additional information and more detailed responses on this issue. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed in Section 7.0, Cumulative Impacts, of the Draft EIR.

Response to Comment G.28-4:

With respect to habitat fragmentation, please see response to Comment G.28-3.

[3060] *Id.,* Exhibit 4-11
[3061] *Id.,* p. 5.7-166
[3062] *Id.,* pp. 5.7-173 to -194

With respect to invasive plants, Project Design Feature (PDF) 7-8 requires the preparation of a list of invasive plants species to be prohibited from use within the Project site. Although the Centennial Specific Plan includes a partial list of prohibited plants, it should be noted that any list of invasive or detrimental plants is not entirely comprehensive because many non-native species, under favorable environmental conditions, can become invasive or detrimental. For this reason, this list may be modified over time by the community forester with approval from the County staff biologist. A more exhaustive list of these plants, periodically updated by region, is published by the California Invasive Plant Council (Cal-IPC). Cal-IPC's list of invasive plants will serve as the guideline for prohibited species at Centennial.

Additionally, as stated in the Centennial Specific Plan, vegetation selected for planting shall be subject to review by the County staff biologist. Prior to selecting non-native species for use, such species should be examined to see whether they have become invasive or detrimental in other areas. Species poisonous to humans and wildlife should generally be avoided. Seed mixes for herbaceous species (ground covers including lawns or hydroseed mixes) should be certified as weed-free and not containing any of the species on the prohibited species list. Please note the inclusion of Bermuda grass on the Cal-IPC inventory. With respect to wildfire risks, the Draft EIR evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance.[3063] This determination, however, is not reliant solely upon implementation of MM 3-9 or other mitigation measures identified in the Draft EIR. Rather, the Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9.

Phase I Environmental Site Assessments were prepared for the Project site to investigate potentially hazardous current and historic land uses that could adversely affect Project site development.[3064] Based on these reports, there are no adjacent land uses that represent fire hazards.[3065] However, as disclosed in the Draft EIR, portions of the Project site are designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a VHFHSZ and as

[3063] DRP 2017, p. 5.3-39
[3064] *Id.,* p. 5.3-38
[3065] *Ibid.*

a High Fire Hazard Security Zone (HFHSZ), and the potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[3066]

CAL FIRE classifies a zone as having a moderate, high, or very high fire hazard based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. As explained in the Draft EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. These characteristics would be addressed as the Project site is developed, as discussed below.[3067]

The Drat EIR explains that Project site's limited access will be significantly improved under Project conditions. The Project would construct an extensive backbone vehicular circulation system that would provide five points of access to the site via SR-138. The design of the Project's internal circulation system would implement the County's Fire Code standards, as applicable, regarding access (e.g., roadway widths, fire hydrant placement, length of single access streets, cul-de-sac dimensions, turning radius, street parking restrictions) (see Section 5.10, Traffic, Access and Circulation, for additional discussion of roadway design; see also the Mobility Plan described in Section 3.2 of the proposed Specific Plan[3068]).

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

With respect to fire flows, the Draft EIR explains that the Project would construct a Fire Code compliant water system to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires (refer to Section 5.18, Water Resources, for further discussion of the water system; see also

3066 *Id.,* pp. 5.2-35. -36
3067 *Id.,* p. 5.2-35
3068 Final EIR Appendix 4.0-A.Rev

the Water Service Plan described in Section 3.5 of the proposed Specific Plan[3069]). The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and LACFD's fire-suppression standards for improved property and development. These standard requirements must be met prior to the approval of building permits; therefore, the Project would implement a water system that would meet all County requirements in support of fire-suppression activities so that less than significant water-related fire hazards would occur. Under Project conditions, fire flows at the Project site will be substantially improved as compared to existing conditions.

With regards to vegetative cover and topography, the majority of residential development is proposed for the flatter portions of the Project site. Some residential development, however, is proposed in areas that would be adjacent to large open space areas with moderate vegetative cover. Under existing conditions, the plant communities that make up this cover are highly combustible and would therefore present a high fire hazard and pose a potentially significant impact to development in these areas. As development of the Project site proceeds, however, fire hazards associated with the natural vegetative cover would be eliminated through its replacement with urban landscape vegetation, which is irrigated and less combustible than the existing vegetation.[3070] Indeed, the Project's proposed Specific Plan includes a landscaping plant palette comprised of many plant species specifically selected for their fire resistance and requires that the Project's final plant palette be approved by the LACFD.[3071]

As explained in the Draft EIR, topography is connected to wildland fire hazards because steep slopes are not only inaccessible to fire fighting vehicles, but steep canyons can create updraft conditions (much like a chimney) and a fire in a steep canyon can spread rapidly into adjacent areas.[3072] Steep canyons that are densely covered with combustible vegetation are especially hazardous. Thus, the Draft EIR explains that the potential for wildland fire hazards would still exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[3073] Generally, fire-prevention tactics for urban development in wildland fire hazard areas focus on (1) restricting the types of building materials used; (2) appropriate building design; and (3) incorporating setbacks, including fuel-modification zones.[3074] All developments within a VHFHSZ and HFHSV are required to meet the building construction requirements specified in the County Code for these areas.

The County of Los Angeles' standards that would be applied to the Project to ensure appropriate building design and materials are specified in Chapter 7A of the County Building Code (Title 26) and in the Fire Code (Title 32). The Project's proposed Specific Plan further ensures appropriate building placement and design by requiring LACFD review of all Project

3069 *Ibid.*
3070 *Id.,* p. 5.3-36
3071 *Id.,* Appendix 4.0-A, p. 3-42; Appendix 4.0-A Table 3-8
3072 *Id.,* p. 5.3-35
3073 *Id.,* p. 5.3-36
3074 *Id.,* p. 5.3-34

tentative tract maps and amendments.[3075] Moreover, to further protect against fire, the Specific Plan's General Development expressly prohibits the use of wood-burning fireplaces on the Project site.[3076] Finally, public access would be restricted in areas of the Project site that are undeveloped and contain steep slopes in accordance with the Specific Plan's Trail Plan and Open Space Management Plan.[3077] Despite limited access to the general population, those areas of the site with the greatest topographic relief would be accessible to fire-fighting equipment via helicopter, other air transport access, and existing unpaved fire roads. As required by the LACFD, upon their Project-level review (e.g., tract map review), clearance for fire access roads and gates would be incorporated into developed areas. Finally, Project implementation of the Fuel Modification Plan required by MM 3-9 would further reduce fire hazards at the wildland/urban interface.

The County Fire Department's Forestry Division (Forestry Division) provides several fire prevention services, including vegetation management services and fuel modification planning. The purpose of fuel modification is to provide defensible space between structures and wildlands. The LACFD's Fuel Modification Plan Guidelines, last revised in 2011, were created by the Forestry Division to help the public understand the process of fuel modification plan review and approval as well as set forth landscape design criteria for applicable properties located in Fire Hazard Severity Zones.[3078] Every fuel modification plan must be reviewed by the LACFD Forestry Division for defensible space, reasonable fire safety, and compliance with Sections 325.2.1, 325.2.2, 325.10, and 503.2.1 of the County Code, the Fire Department's Fuel Modification Guidelines, and California Code of Regulations Title 14, Division 1.5, Chapter 7, subchapter 2. After the plan has been approved by the Forestry Division, a signed and notarized copy of the Project Homeowners Association's approved Covenants, Conditions, and Restrictions that include the necessary fuel modification information will be recorded at the County clerk's office and a copy given to the LAFCD Fuel Modification Unit prior to site inspection and release. The fuel modification inspection ensures compliance with applicable requirements of the Fire Code, the Building Code, Section 701A.5 (Vegetation management compliance), and the Residential Code, Section R327.1.5 (Vegetation management compliance). An on-site inspection must be conducted by the LACFD Forestry Division and a final release issued by the forestry division prior to a certificate of occupancy being granted by the County building official.

Planting proposed as part of Project along any public or private roadway that may be used for emergency access will also be reviewed to ensure compliance with applicable Fire Code requirements and safety as part of the Fuel Modification Plan review. Fuel modification distances are site specific, designed for severe fire weather scenarios, and are not intended to be a blanket requirement for all sites. The Zone A and Zone B irrigated zones encompass the minimum 30 to 50 feet of required removal of all highly flammable brush required by the Fire Code. Zone C will typically coincide with the requirement to thin from 30 to 200 feet from any structure.

3075 *Id.,* Appendix 4.0-A, pp. 4-12, -14
3076 *Id.,* p. 2-70
3077 *Id.,* pp. 3-88, -94
3078 *Id.,* p. 5.3-31

The State and County regulations that apply to the proposed Project are required regardless of CEQA. With adherence to the required and best-accepted practices for fuel-modification zone management, emergency access, building materials and methods, as well as the changes in land use, and existing mutual aid agreements, the Project's potential to constitute a potentially dangerous fire hazard, or to expose people or structures to a significant risk of loss, injury or death involving fires, would be reduced to a less than significant level.

Response to Comment G.28-5:

Please see response to Comment G.28-3.

The grasslands, and the plant and wildlife species that compose them, as well as their regional value, are described in the Draft EIR.[3079] Mitigation has been included in the Draft EIR to reduce impacts to these biological resources to a less than significant level (MM 7-10).[3080] Additionally, please refer to responses to Comments A.3-3, A.3-8, B.4-18, B.4-21, B.4-24, B.4-26, B.4-29, B.4-38, B.4-39, B.4-43, B.4-58, B.4-63, F.3A-19, F.3-14, F.3-19, F.8-113, F.8-119 through F.8-125, F.8-127, F.8-128, F.8-131, F.8-141, F.8-144,F.8-146, F.8-156, F.8-158, F.8-159, F.8-163, and G.12-3, for more detailed discussions of these species. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR.

As stated in MM 7-10 in the Draft EIR in Section 5.7, Biological Resources, mitigation ratios of at least 2:1 are required for grasslands.[3081] By requiring a minimum 2:1 ratio for the majority of impacted habitat, the intent is preservation of at least equal quantity of impacted habitat in the event that mitigation in some areas is unsuccessful. It is acknowledged that a net loss may occur for some species or habitats. The mitigation strategy proposed for the Project is current standard mitigation for upland vegetation types. Additionally, the intensive multi-year grassland studies have shown that grassland habitat if equal or greater value occurs in vast quantities in the current Mitigation Preserve.

It should be noted that, although much of the grassland acreage on the Project site contains a high percentage of non-native species, all grasslands impacted on the Project site are being treated as a special status habitat type and shall be mitigated for at no less than a 2:1 ratio.[3082] Furthermore, and as stated in MM 7-10 on page 5.7-181, mitigation for loss of those areas modeled as native perennial grassland will provide similar habitat quality as that which was lost. The result shall be native perennial grassland and wildflower field values that are equal to or greater than the overall ecological functions and values of those lost as a result of Project implementation.

[3079] DRP 2017, pp. 5.7-25 to -27, -40 to -47, -62, -67, -107, -111, -113 to -118, -121, -126, and -127
[3080] *Id.,* p. 5.7-180 to -182
[3081] *Id.,* p. 5.7-180
[3082] *Id.,* p. 5.7-160

Response to Comment G.28-6:

The entirety of the Project site has been evaluated for biological resources in numerous studies conducted over a 16-year period, all of which are described in Section 5.7, Biological Resources, of the Draft EIR. Third-party data, such as the scientific biological resources information developed as part of the Tejon Ranch Land Use and Conservation Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch and the Sierra Club, Natural Resource Defense Council, California Audubon Society, Endangered Habitats League, and Planning and Conservation League; the biological resource information developed and used in environmental impact reports (EIRs) for areas that include the Project site such as the Antelope Valley Area Plan EIR (Los Angeles County), the Northwest SR 138 Corridor Improvement Project EIR (Caltrans), and the Sustainable Communities Strategy EIR (SCAG); and relevant third-party scientific literature is cited in the extensive bibliography included in Section 5.7, Biological Resources, of the Draft EIR.[3083]

More specifically, with respect to the focused surveys done on the Project site and addressed in the Draft EIR, these have been conducted on the Project site since 1999 in potentially suitable habitat for the species being surveyed—an industry-wide methodology. Wildlife species generally inhabit certain habitats while avoiding others. For example, a survey for breeding tricolored blackbirds would focus on areas potentially containing their breeding habitat (marsh) and would avoid areas where no potential for that habitat occurs (oak woodland). A combination of tools such as vegetation and/or topography maps, aerial photograph, and historical knowledge of the site help biologists narrow down their survey area for a given species. Certain surveys, such as plant surveys, have been conducted comprehensively and cover the entire Project footprint.[3084] Other surveys are more general in nature, such as raptor surveys, and again in that instance the entire Project site would be surveyed. Focused surveys have been conducted in accordance with approved protocols.[3085] The various biologists studying the site since 1999 have had full access to the Project site. The diversity of the wildlife species is as expected for an extensively grazed landscape (compacted soil, invasive species) with relatively low vegetative cover over the majority of the Project site. As such, all plant and wildlife species observed or with potential to exist on the Project site based on the extensive site-specific and regional body of data is addressed in the Draft EIR. It is noted that, as appropriate under CEQA, the Draft EIR focuses on impacts associated with solely the Project site, and not the Tejon Ranch as a whole.

As neither a description of the "new species of plants" and/or "undescribed species", nor evidence of how the numerous site-specific surveys over many years are inadequate to capture the existing biological setting on the Project site are provided in this comment, no further response regarding the sufficiency of the biological resources assessment can be provided.

[3083] *Id.,* Section 5.7.9, p. 5.7-195
[3084] *Id.,* Table 5.7-2
[3085] *Id.,* Appendix 5.7-B

Response to Comment G.28-7:

Please see response to Comment G.28-2.

The proposed Project does not include widening existing freeways. The California Department of Transportation (Caltrans) has proposed the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"), separately from and regardless of, the Centennial Project. The NW SR-138 project was determined by Caltrans to be needed with or without the Project. Conversely, the Draft EIR is also fully consistent with Caltrans' analysis of the need to improve SR-138 under forecasted cumulative conditions with or without the Project, including the NW SR-138.

To reiterate response to Comment G.28-2, as designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns. Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[3086] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[3087] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80 percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[3088] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[3089]

The Town Center will have a public gathering space of one acre or more, with street frontage on at least two sides.[3090] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be within the Village Core.[3091] High-density residential uses will be located adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[3092] The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further

3086 *Id.,* p. 4-16
3087 *Ibid.*
3088 *Id.,* p. 4-17
3089 *Ibid.*
3090 *Ibid.*
3091 *Ibid.*
3092 *Id.,* p. 4-2

reducing demand for single occupancy vehicles (SOVs) travel.[3093] The Draft EIR also notes that sufficient facilities for non-work activities such as schools, parks, library facilities, and retail have been planned on the Project site in an effort to meet the needs of residents at buildout, reducing the need to access such services by making trips external to the Project. The purpose of this discussion is to demonstrate that, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the Project for work, shopping and other activities. All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of SOVs for trips internal to the Project site. The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and trip-ends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily trip-ends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[3094] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[3095] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[3096] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[3097]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[3098] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[3099]

Please see Section 5.10, Traffic, Access, and Circulation, of the Draft EIR for a complete analysis of the Project's related potential impacts. The Project is within the boundaries of

3093 *Id.,* p. 4-35
3094 *Id.,* p. 4-30
3095 *Ibid.*
3096 *Id.,* p. 4-31
3097 *Ibid.*
3098 *Id.,* p. 4-30
3099 *Ibid.*

and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of transportation and traffic can be found in Section 5.16, Transportation and Traffic, of the AVAP EIR and Section 3.17, Transportation and Traffic, of the RTP/SCS EIR.

Response to Comment G.28-8:

Please see responses to Comments G.28-2 and G.28-7.

To reiterate, the Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. The Project site is located entirely within the AVAP's West EOA.[3100] Specifically, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* and the AVAP for the purpose of sustainably accommodating regional growth projections.

The AVAP and the associated EOA's are necessary to accommodate anticipated population growth in the Antelope Valley area. Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[3101] As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns. The Draft EIR also notes that sufficient facilities for non-work activities such as schools, parks, library facilities, and retail have been planned on the Project site in an effort to meet the needs of residents at buildout, reducing the need to access such services by making trips external to the Project. The purpose of this discussion is to demonstrate that, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the Project for work, shopping and other activities. All of these design features encourage active transportation modes (e.g., walking

[3100] DRP 2017, p. 4-4
[3101] *Id.,* p. 4-16

and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site.

The focus of the above discussion on reducing vehicle trips is germane to air quality because vehicle emissions are a primary contributor to criteria air pollutant emissions as well as greenhouse gas (GHG) emissions. As discussed in response to Comment G.28-2, consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[3102] The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and trip-ends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily trip-ends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[3103] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[3104] The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[3105] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial.

As discussed in more detail in responses to Comments F.8-20 and F.8-193, the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS, and their accompanying EIRs, take into account cumulative regional growth projections, including the Centennial, Newhall Ranch, Tejon Mountain Village and Grapevine projects, as required by CEQA and SB 375. Both plans have been reviewed by all federal, state and regional expert agencies with jurisdiction over the air basins within the planning areas of the SCAG 2016 RTP/SCS and KernCOG 2014 RTP/SCS and both plans have been determined to be in conformity with the State Implementation Plan (which incorporates all applicable Air Quality Management Plans [AQMPs]) to achieve and maintain air quality standards. This is explained in detail in the Draft EIR, with analysis specific to the applicable AQMPs and RTP/SCS documents.[3106]

3102 *Ibid.*
3103 *Id.,* p. 4-30
3104 *Ibid.*
3105 *Ibid.*
3106 *Id.,* p. 5.11-13 to -17, -74 to -75; 7-3 to -9, -20

Further, as explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[3107] The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[3108] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016 RTP/SCS.[3109] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[3110] This would be made through the operation of low or no emission transportation systems by 2040. The 2016 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[3111] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016 RTP/SCS[3112], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2).

Response to Comment G.28-9:

With respect to habitat fragmentation, please see responses to Comments G.28-3, G.28-4, and G.28-5.

To reiterate, within the context of the analysis required by CEQA, the Draft EIR addressed the setting, impacts, and mitigation measures for habitat impacts including fragmentation and habitat loss.[3113] Although there is high biological value on portions of the Project site, much of the site has been impacted by non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*).[3114] Similarly, riparian areas are degraded in most of the low-lying drainages. Consequently, biological diversity is less than would otherwise be expected in many areas. However, native grasslands occur in a patchy distribution throughout large portions of the site which may be attributed to the grazing, which has potentially minimized non-native growth to a level sufficient to allow persistence of native perennial bunch grasses, as described on pages 5.7-42 through 5.7-47 of the Draft EIR. Project implementation would

3107 *Id.,* pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, -142; 5.11-75; 5.21-85
3108 *Id.,* p. 4-8
3109 *Ibid.*
3110 *Ibid.*
3111 *Ibid.*
3112 SCAG 2016a
3113 DRP 2017, pp. 5.7-142 to -164
3114 *Id.,* p. 5.7-159

include mitigation actions[3115] resulting in improved functions and values of many of these resources, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR.

The Project has been designed to include green space connections between undeveloped open space areas where feasible resulting in increased mobility for such species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is considered less than significant accordingly.[3116] Please also refer to responses to Comments B.4-36, B.4-56, B.4-57, B.4-75, F.3-23, F.3-25, F3A-32, F.5-2, F.5-3, F.5-4, F.5-5, F.5-7, F.7-22, F.8-109, F.8-110, F.8-172, and J.1-12 for a more detailed discussion of wildlife movement.

The Draft EIR, as found on pages 5.7-63 and 5.7-173, indicates that, in addition to the Centennial Mitigation Preserve, many species may benefit from the TUMSHCP and other open space conservation efforts, like the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) and Antelope Valley Area Plan (AVAP). The biological importance of the Tejon Ranch (Ranch) property and surrounding region are recognized and reflected in the TRCRWA, as discussed in the Draft EIR on page 5.7-18, which explains that in recognition of the biological importance of Tejon Ranch, the project Applicant voluntarily agreed to permanently preserve 90 percent of the Ranch determined to be the most ecologically important, and limit Ranch development to the less than 10 percent of the Ranch determined to be developable without compromising the biological integrity and biological values. The proposed Project is located in a development area, has relatively limited impact on oak woodland and riparian habitat, and fully mitigates its impacts to grasslands.[3117] While the TRCRWA itself is not considered mitigation for the Centennial Project, the TRCRWA allows its conservation lands to be used as mitigation lands for development, and the Centennial Mitigation Preserve is within its boundaries. Collectively, these open space dedication and acquisition areas comprise approximately 240,000 acres, or approximately 90 percent, of the 270,000-acre Ranch. The open space preservation and development constraints in the TRCRWA have been recorded on title, and comprise the reasonable foreseeable land uses on the Ranch. Under the TRCRWA, the Conservancy will adopt, update, monitor and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

In addition, the TUMSHCP will be a major contributor to ensuring the viability of the Tehachapi Landscape linkage into the future. Through the various conditions and measures

3115 *Id.,* Section 5.7.7
3116 *Id.,* p. 5.7-166
3117 *Id.,* Sections 5.7.6 and 5.7.7

stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and the measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species occur in the foothills and lowland areas as well, including the Project site. These species will benefit from the TUMSHCP, in addition to the Centennial Mitigation Preserve program described in the Draft EIR. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages across cismontane Southern California.

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[3118] to reduce impacts to biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR.

The comment to conserve the Centennial Project site and not approve the proposed Project is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment G.28-10:

The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

[3118] *Id.,* pp. 5.7-173 to -194

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From: gerard conroy <gfconroy@yahoo.com>
Sent: Friday, July 07, 2017 5:26 PM
To: Jodie Sackett
Subject: Reject Tejon's Centennial Project

Dear Mr. Sackett,

Tejon Ranch's proposed Centennial new city is a small accommodation for the surrendering of over 90% of their Land. Housing will never be affordable in LA until such time as THE WEALTHY west siders relinquish control over regional planning.I support Tejon Ranch and their responsible approach to the Centennial community as a bellwether for the new millennium. G.29-1

gerard conroy

93536

Responses to Comment Letter G.29
Gerard Conroy
July 7, 2017

Response to Comment G.29-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Sierra Alder <Bean4042@yahoo.com>
Sent: Sunday, July 09, 2017 2:04 PM
To: Jodie Sackett
Subject: Reject Tejon's Centennial Project

Dear Mr. Sackett,

i am writing to ask you to please reject and deny the Centennial project. Instead, please preserve and protect the native landscape as is. It is the right thing to do. G.30-1

Sincerely

Sierra Alder

93023

Responses to Comment Letter G.30
Sierra Alder
July 9, 2017

Response to Comment G.30-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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Dear Mr. Sackett,

Tejon Ranch's proposed Centennial new city is a bad idea for Los Angeles County and should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

G.31-1

Thank you,

Responses to Comment Letter G.31
Form Letter 1
Various Dates

Response to Comment G.31-1:

A form letter was prepared by an unknown source and was made available to the public for submittal via email. A total of 1,594 form letters were submitted via email. Of the 1,594 form letters submitted, 73 were duplicate form letter submissions. Within this form letter, commenters were encouraged to sign with their name as well as their zip code. Based on this information, the geographic breakdown of the remaining form letter commenters is as follows:

1. 19 commenters within the Antelope Valley;
2. 1,098 commenters outside of the Antelope Valley, but within Los Angeles County;
3. 33 commenters within Kern County;
4. 253 commenters outside of Los Angeles and Kern Counties, but within California;
5. 95 commenters outside of California;
6. 12 commenters outside of the United States; and
7. 11 commenters with no zip code or an unrecognized zip code.

The individual form letters can be found in Appendix A-1 of this Final EIR. The response to this form letter is as follows. Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[3119] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[3120] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[3121]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[3122] At these community meetings, area residents and other

[3119] DRP 2015, p. I-2
[3120] *Id.,* p. I-5
[3121] *Id.,* p. I-6
[3122] *Id.*, p. I-5

stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[3123] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[3124] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[3125] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[3126]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[3127] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[3128] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[3129]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[3130] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[3131] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[3132]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[3133] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town

3123 *Ibid.*
3124 *Id.*, p. I-6
3125 *Id.*, p. I-7
3126 *Ibid.*
3127 *Ibid.*
3128 *Ibid.*
3129 *Ibid.*
3130 DRP 2017, p. 4-4
3131 DRP 2015, p. I-8
3132 *Ibid.*
3133 *Id.*, p. I-8

Areas, and Rural Preserve Areas.[3134] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[3135] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[3136] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[3137]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[3138] Discussions with local

3134 *Ibid.*
3135 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, -142; 5.11-75; 5.21-85
3136 *Id.,* p. 4-7
3137 *Ibid.*
3138 *Id.,* p. 4-8

jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016 RTP/SCS.[3139] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[3140] This would be made through the operation of low or no emission transportation systems by 2040. The 2016 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[3141] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016 RTP/SCS[3142], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2).

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[3143] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[3144] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's concerns about hazards and fire safety, biological resources, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.7 (Biological Resources), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments

3139 *Ibid.*
3140 *Ibid.*
3141 *Ibid.*
3142 SCAG 2016a
3143 DRP 2017, p. 4-45
3144 *Ibid.*

2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.4 (Biological Resources), 5.8 (Hazards and Hazardous Materials), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.4 (Biological Resources), 3.9 (Hazards and Hazardous Materials), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

Out of the 1,594 form letter submittals, 59 were modified slightly by the commenter to include additional comments. These additional comments are summarized below.

- Reject the Project.
- Developers are greedy.
- Los Angeles is overbuilt and unaffordable.
- No sprawl. The Project is far from urban centers.
- Need walkable cities and sustainable development.
- Concerns about overpopulation and population growth.
- The Project destroys habitat and wildlife and will fragment habitats.
- The Project destroys grasslands.
- Concerns about air quality, traffic, and water use.
- Concerns about wildfires and fire services.

The following responses address each of the above summarized comments.

1. Reject the Project.

The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

2. Developers are greedy.

The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

3. Los Angeles is overbuilt and unaffordable.

The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

4. No sprawl. The Project is far from urban centers.

As discussed previously, the Project's objectives and design features promote "smart growth" and discourage sprawl by implementing the AVAP.

5. Need walkable cities and sustainable development.

As discussed previously, the Project's objectives and design features promote "smart growth" and discourage sprawl by implementing the AVAP. Specifically, Project Objective 3 includes sizing "the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips".[3145] Additionally, as stated in the Centennial Specific Plan, the Project is designed to "embrace the concepts of walkability, human-scale commercial centers, mixed uses, clustering of development, and opportunities for social interaction".[3146]

The Project includes a Green Development Program, which is intended to meet or exceed state, regional, and local requirements for energy efficiency and green building ordinances.[3147] The Centennial Green Development Program's Green Building component, found in Appendix 2-A of Appendix 4.0-A to the Draft EIR, requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances.[3148] Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs. Sustainable and resiliency features will be incorporated in the design from the earliest stages through the final buildout.[3149] The Green Development Program is adopted by resolution and incorporates the County's Green Building Ordinances with respect to development for the Project Site.[3150]

6. Concerns about overpopulation and population growth.

The potential of the Project to induce substantial growth is discussed on Draft EIR pages 5.9-23 through 5.9-32, which state that substantial increases in population, housing and employment would occur with the Project and this growth would be considered significant

[3145] *Id.,* p. 4-4
[3146] *Id.,* Appendix 4.0-A, p. 2-1
[3147] *Id.*, Appendix 4.0-A, p. M-6
[3148] *Id.,* Appendix 4.0-A, p. 4 of Appendix 2-A
[3149] *Id.*, Appendix 4.0-A, p. M-6
[3150] *Id.,* p. 2-60

and unavoidable. Section 6.0, Growth Inducing Impacts, of the Draft EIR also discusses growth inducement potential and the growth inducing impacts of the Project. Again, the Project is expected to result in a significant adverse indirect growth-inducing impact. However, the Project is consistent with approved growth plans in the region, including the growth projections in the 2016 RTP/SCS and the AVAP.

7. The Project destroys habitat and wildlife and will fragment habitats.

Within the context of the analysis required by CEQA, the Draft EIR addressed the setting, impacts, and mitigation measures for habitat impacts including fragmentation and habitat loss,[3151] wildlife connectivity,[3152] predators such as feral cats being more likely to occur in developed areas,[3153] and invasive species avoidance and control.[3154]

The Project has been designed to include are green space connections between undeveloped open space areas where feasible resulting in increased mobility for such species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is considered less than significant accordingly.[3155]

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[3156] to reduce impacts to biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed in Section 7.0, Cumulative Impacts, of the Draft EIR.

8. The Project destroys grasslands.

The grasslands, and the plant and wildlife species that compose them, as well as their regional value, are described in the Draft EIR.[3157] Mitigation has been included in the Draft EIR to reduce impacts to these biological resources to a less than significant level (MM 7-10).[3158] Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR.

3151 *Id.,* pp. 5.7-142 to -164
3152 *Id.,* pp. 5.7-164 to -170
3153 *Id.,* p. 5.7-169
3154 *Id.,* p. 5.7-167
3155 *Id.,* p. 5.7-166
3156 *Id.,* pp. 5.7-173 to -194
3157 *Id.,* pp. 5.7-25 to -27, -40 to -47, -62, -67, -107, -111, -113 to -118, -121, -126, -127
3158 *Id.,* p. 5.7-180

9. Concerns about air quality, traffic, and water use.

As addressed previously, with respect to the comment's concerns about transportation and traffic, air quality, and water supplies and drought, please see Sections 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

10. Concerns about wildfires and fire services.

With respect to the comment's concerns about hazards and fire safety and fire services, please see Sections 5.3 (Fire Hazards and Safety) and 5.16 (Fire and Law Enforcement Services) of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: 5.8 (Hazards and Hazardous Materials) and 5.14 (Public Services) of the AVAP EIR, and 3.9 (Hazards and Hazardous Materials) and 3.15 (Public Services) of the RTP/SCS EIR.

H. Post-Closure of Review Period Comments

CENTENNIAL

at TEJON RANCH

From: Marty Kreisler <mkreisler@ca.rr.com>
Sent: Wednesday, August 16, 2017 5:43 PM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

SUBJECT: Centennial Support Letter

Dear Mr. Sackett:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community reminds me a little of Valencia when it was just a vision on the drawing boards at Newhall Land. This new community will offer a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

I know how serious and how much effort the Tejon Ranch Management has expended to make the Tejon area a showcase for environmental preservation. There are a few features that I would like to point out to reiterate why Centennial is a much-needed community:

- Centennial is the implementation of the Antelope Valley Area Plan, by creating an environmentally and economically sustainable community to help accommodate planned regional population and economic growth.
- The project will include employment and institutional land use to reduce off-site employment-related commuter trips.
- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

H.1-1

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.

With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Thank you for your consideration,

Sincerely,

Martin Kreisler
Resident, Castaic, Ca.

Response to Comment Letter H.1
Marty Kreisler
August 16, 2017

Response to Comment H.1-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: henry wahl <hwahl234@gmail.com>
Sent: Wednesday, August 16, 2017 6:27 PM
To: Jodie Sackett
Subject: Centeniel

I support this project. We need it badly H.2-1

Sent from my iPhone

Response to Comment Letter H.2
Henry Wahl
August 16, 2017

Response to Comment H.2-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Anne (aka Weber) Burnaugh <healthystart@frazmtn.com>
Sent: Monday, August 21, 2017 3:00 PM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com
Subject: Centennial project

August 21, 2017

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

Thank you for your time today. I would like to provide you with my thoughts regarding the Centennial project at Tejon Ranch. I have lived in the Tejon Ranch/mountain area for nearly 30 years and it always surprises me that there has been little progress in our area.

I support the well planned community and what it will offer it residents and surrounding areas like Gorman, Frazier Park, as well as the Antelope Valley area residents themselves. There is much need for employment and economic growth with businesses, schools, sheriff, and fire stations. Many of our local residents in the Frazier Park area are forced to move into the city where they are closer to much needed medical facilities. Even families move from our rural area because of lack of jobs and other needed services.

Over the past 20 years, I have been involved in the local community needs as a Director of the Mountain Communities Family Resource Center and have found that families thrive when they have the opportunities that Centennial will provide. The Centennial project will enhance the area with its sustainable, self-contained community. I am asking the Regional Planning Commission to approve the Centennial and allow the developers to move to the next stage.

H.3-1

Thank you,

Anne Burnaugh
5416 Frazier Mountain Park Road
Frazier Park, CA 93225

Virus-free. www.avg.com

Response to Comment Letter H.3
Anne Burnaugh
August 21, 2017

Response to Comment H.3-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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From: Richard Despain <richard.despain@gmail.com>
Sent: Monday, August 28, 2017 9:43 AM
To: Jodie Sackett; kbarger@bos.lacounty.gov; Centennial@tejonranch.com; Tamira Palmetto-Despain
Subject: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket,

I am writing to show my support for the planned community at Centennial,Tejon Ranch. This master-planned community offers multi-use and much needed housing, business and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

The Centennial project is a much-needed community in this region for many reasons, some of the biggest are;

A planned community that implements controlled growth of development unlike the neighboring cities of Los Angeles and the San Fernando Valley. Pre-planning is always the best design. I fully agree with other points made by the Tejon Development team such as:

- "Centennial is the implementation of the Antelope Valley Area Plan, by creating an environmentally and economically sustainable community to help accommodate planned regional population and economic growth".
- "The project will include employment and institutional land use to reduce off-site employment-related commuter trips".
- "There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities".

H.4-1

My wife and I had to call the sheriff for a break-in and theft on our property, it took over two hours for the deputy to arrive! Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley._With a projected growth of over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Southern California is big and growing. Citizens, families, and the impending growth of our population are depending on the State, County and local governments to be proactive in the region.

Sincerely,

Richard & Tamira

--

G. Richard DeSpain
2108 Dallin Street
Lancaster, CA 93536
Cell 518-477-2012

Responses to Comment Letter H.4
Richard and Tamira Despain
August 28, 2017

Response to Comment H.4-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

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TEJON
INDIAN TRIBE

February 14th, 2018

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am writing to express my full support for Centennial at Tejon Ranch. It is designed to be a self-sustained community where people can live and work without having to commute long distances.

Tejon Ranch has worked side-by-side with our tribe to ensure the history behind the Ranch is not lost. From establishing conservation areas to using environmentally sensitive practices in ranching, farming, and real estate, Tejon Ranch is committed conservation.

As you know, in May of 2008 Tejon Ranch reached an agreement with five environmental resource organizations, the Sierra Club, NRDC, California Audubon, Planning and Conservation league, and Endangered Habitats League, to announce the ranch wide agreement, which resulted in the permanent conservation of up to 90% of the Ranch's land.

This led to the formation of the Tejon Ranch Conservancy. Centennial has always put an emphasis on the protection of open spaces and has taken significant steps to ensure protection of the biodiversity of the surrounding space.

We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

H.5-1

Sincerely,

Octavio Escobedo, Chairman
Tejon Indian Tribe

cc: Hon. Kathryn Barger, Supervisor 5th District

RECEIVED
APR 03 2018
BY:

Responses to Comment Letter H.5
Tejon Indian Tribe
February 14, 2018

Response to Comment H.5-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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RONALD M. COLITTI H.6

1136 Colina Vista
Ventura, CA 93003
(805)642-4189
Fax (805)658-6728

February 16, 2018

Jodie Sackett
Los Angeles County Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

RE: Centennial City

Dear Mr. Sackett:

As owners of several pieces of property in Golden Valley where Centennial City is being planned, we would like to express our strong desire to see this project move forward.

Over the years we have lived in several areas in Southern California and have seen how the cities have deteriorated because of extremely poor planning. It is encouraging to see that there is a developer with the foresight that Tejon Ranch has brought to the Centennial City project.

I sincerely hope that whatever decisions are made by the Planning Department and the L.A. Board of Supervisors, are made based on the merit of the project and not some abstract emotional determination. We have been following the Centennial City project for quite a number of years and feel that anyone with the dedication that Tejon Ranch has shown has the best interests of Golden Valley at heart.

Tejon Ranch should certainly be praised for their perseverance in moving this project forward. If you wish us to comment further, please contact us.

H.6-1

Sincerely,

Ronald M. Colitti

Benita Colitti

Responses to Comment Letter H.6
Ronald and Benita Colitti
February 16, 2018

Response to Comment H.6-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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H.7

TRI POINTE™ GROUP

TriPointeGroup.com
p 949.438.1400
f 949.438.1401
19540 Jamboree Road, Suite 300
Irvine, CA 92612

February 28, 2018

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

As you know, working-class families in the County of Los Angeles are facing a housing crisis. We need housing, and we need price-attainable housing. I am writing to express my full support for the Centennial project because it will bring more housing for working class families.

Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, retail, schools, parks, natural open space, cultural, and public uses.

Home building generates substantial economic activities. Activities include new income and jobs for residents as well as additional revenue for local governments. The National Association of Home Builders (NAHB) developed a model to estimate the economic benefits of new-home building. NAHB has estimated one year-impact on the building of 100 single-family homes include:

- $28.7 million in local income
- $3.6 million in taxes and other revenue for local governments
- 394 local jobs

Centennial will be bringing over 19,000 homes at buildout for California working-class families. On average, Centennial will bring over $30 million in annual surplus revenue for the County of Los Angeles and over 19,000 permanent local jobs.

We must alleviate our housing shortage throughout Los Angeles County. Centennial is a step in the right direction for the County to ease our housing crisis.

I ask that the Regional Planning Commission fully approve Centennial. It is the much-needed community for the working and middle-class families of Los Angeles County.

H.7-1

Sincerely,

Tom Mitchell
President & CEO, Tri Pointe Group

cc: Hon. Hilda Solis, Supervisor 1st District
Hon. Mark Ridley-Thomas, Supervisor 2nd District
Hon. Sheila Kuehl, Supervisor 3rd District
Hon. Janice Hahn, Supervisor 4th District
Hon. Kathryn Barger, Supervisor 5th District

Responses to Comment Letter H.7
Tri Pointe Group
February 28, 2018

Response to Comment H.7-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required. The County did not independently review the accuracy of the Commenter's estimates of Project economic benefits.

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From: Wes and Rachel <rabbitcastle@earthlink.net>
Sent: Friday, March 2, 2018 5:45 PM
To: Jodie Sackett
Cc: psaatzer@msn.com; 'Donald Goeschl'; ashwynne@yahoo.com
Subject: Centennial Specific Plan Project

Although I want this project to succeed for the benefit of the dependent Tejon Ranch Conservancy, the following issues should be addressed:

- Lack of water
- Proximity to the San Andreas, the San Gabriel, and the Garlock Earthquake faults, site of the two largest earthquakes in Southern California history
- Destruction of wildlife habitat, including the wildlife corridor between the Sawmill Mountains and the Tehachapi Mountains
- Disturbance of hazardous waste from a nearby cement plant, which burned hazardous waste for decades
- Naturally occurring mercury, arsenic and selenium in the volcanic soil
- Increased incidence of so-called Valley Fever, from naturally occurring fungus in the Antelope Valley soil
- Increased dust levels in the eastern Antelope Valley
- Impact of rising fuel costs for commuters in the proposed development
- Impact of increasing fuel exhausts on the environment
- Impact of increased ground water pollution on the underlying aquifer
- Increased light pollution in the Antelope Valley
- Likelihood of future slant drilling into the underlying oil deposits

Frankly, I cannot imagine why anyone would seriously consider putting a city in a place where not one person has ever chosen to live. Nevertheless, I wish you and Tejon Ranch the best of luck.

H.8-1

Sincerely,

Wes Williamson
440 W. Hillsdale Street
Inglewood, Ca. 90302-1124
310 673 2648

Responses to Comment Letter H.8
Wes Williamson
March 2, 2018

Response to Comment H.8-1:

Thank you for your comment and for your participation in this public process. The Commenter's general opposition to the Project, as well as the Commenter's general concerns regarding urban sprawl, urban/wildland conflicts, habitat loss, and fire and seismic hazards, will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required. However, please note that the Draft EIR addresses the issues listed by the Commenter in the following sections:

- The Project's potential impacts on water supplies are analyzed in Draft EIR Section 5.18, Water Resources;
- The Project's potential impacts related to earthquakes and seismicity are analyzed in Draft EIR Section 5.1, Geotechnical;
- The Project's potential impacts related to biological resources are analyzed in Draft EIR Section 5.7, Biological Resources;
- The Project's potential impacts related to hazardous waste, hazardous materials, soil quality and surface and ground water quality are analyzed in Draft EIR Sections 5.3, Hazards and Fire Safety, and 5.4, Water Quality;
- The Project's potential impacts related to Valley Fever, fugitive dust, and mobile emissions are analyzed in Draft EIR Sections 5.3, Hazards and Fire Safety, and 5.11, Air Quality;
- The Project's potential impacts related to light pollution are analyzed in Draft EIR Section 5.13, Visual Resources.

With regards to this comment's general concerns regarding rising fuel costs, such impacts are social in nature, not environmental, and thus are not required to be analyzed in the Draft EIR under CEQA. Finally, the Project does not propose future slant drilling on the Project site, although the Project's potential impacts on mineral resources are analyzed in Draft EIR Section 5.4, Land Resources.

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MAJESTIC REALTY CO.

R.E. License #00255328 (CA)

13191 Crossroads Parkway North • City of Industry, CA 91746-3497
Office (562) 692-9581 • FAX (562) 695-2329

March 6, 2018

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sackett:

Demonstrating the strength in this growing region, Majestic Realty just finished construction on a new 480,000 square foot industrial building at the Tejon Ranch Commerce Center. We believe so strongly in the future growth of this area that our company has developed this new facility on a speculative basis in partnership with Tejon Ranch. Since project completion, we have already seen strong tenant demand.

As this region continues to expand and grow well beyond the initial 4,000 jobs at the Commerce Center, those working-class families will need affordably priced homes. Centennial is designed to bring in first-time buyers, as well as families who are looking for a more inclusive community. It will offer small lot single-family detached residences, single-family and multi-family attached residences, including townhomes, condominiums, and apartments.

Centennial is the missing puzzle piece of Tejon Ranch, as well as a master-plan development that Los Angeles County so direly needs. When you have a community that allows you to work and live, it eliminates the biggest factors that LA County is facing: traffic, congestion and pollution.

Centennial would offer housing, schools, parks, commercial support and open space. It is designed to be a sustainable, self-contained community. Over 19,000 homes will be developed upon final build out. If we observe the median home price throughout Los Angeles County, Centennial becomes the County's attainable housing solution.

I ask that the Regional Planning Commission approve this project and allow for Centennial to begin its development.

H.9-1

Sincerely,

MAJESTIC REALTY CO.

Edward P. Roski, Jr.
President and Chairman of the Board

Brett Tremaine
Senior Vice President

cc: Hon. Hilda Solis, Supervisor 1st District
Hon. Mark Ridley-Thomas, Supervisor 2nd District
Hon. Sheila Kuehl, Supervisor 3rd District
Hon. Janice Hahn, Supervisor 4th District
Hon. Kathryn Barger, Supervisor 5th District

Responses to Comment Letter H.9
Majestic Realty Co.
March 6, 2018

Response to Comment H.9-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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From: Luapjerome Katie <luapjerome@gmail.com>
Sent: Monday, March 12, 2018 3:22 PM
To: Jodie Sackett
Subject: Centennial Project

The Tejon Company owners are not Developers. Take a look at The Outlets at Tejon? No trees, No walking paths,No picnic areas. No park setting? All that is there are commercial tilt ups and fast food? Embedded in a concrete jungle that is almost impossible to get out of. The Tejon Company should stick to growing Almonds!! That is even stupid? Almond crops take more water than any other crop? Please, please do not let these Armature wannabe Developers destroy the project. perhaps you could bring in someone like Steve Carruso of "The Legacy Group" who has designed beautiful shopping areas such as The Commons in Calabassas, Ca. To illustrate the Stupid, greedy mindset of the Tejon CEO. Please note that he wants to charge 30 grand a year per household to access the Tejon Ranch property? Please push for competent, thoughtful, proven consultants and FREE access to Tejon Ranch Wilderness areas. One other note. Tejon people are big on hunting and want to cater to rich, egomaniac hunters. How is this going to work with Families going for a nature hike? H.10-1

Thank you,

Paul Jerome

Responses to Comment Letter H.10
Paul Jerome
March 12, 2018

Response to Comment H.10-1:

Thank you for your comment and for your participation in this public process. The Commenter's general opposition to the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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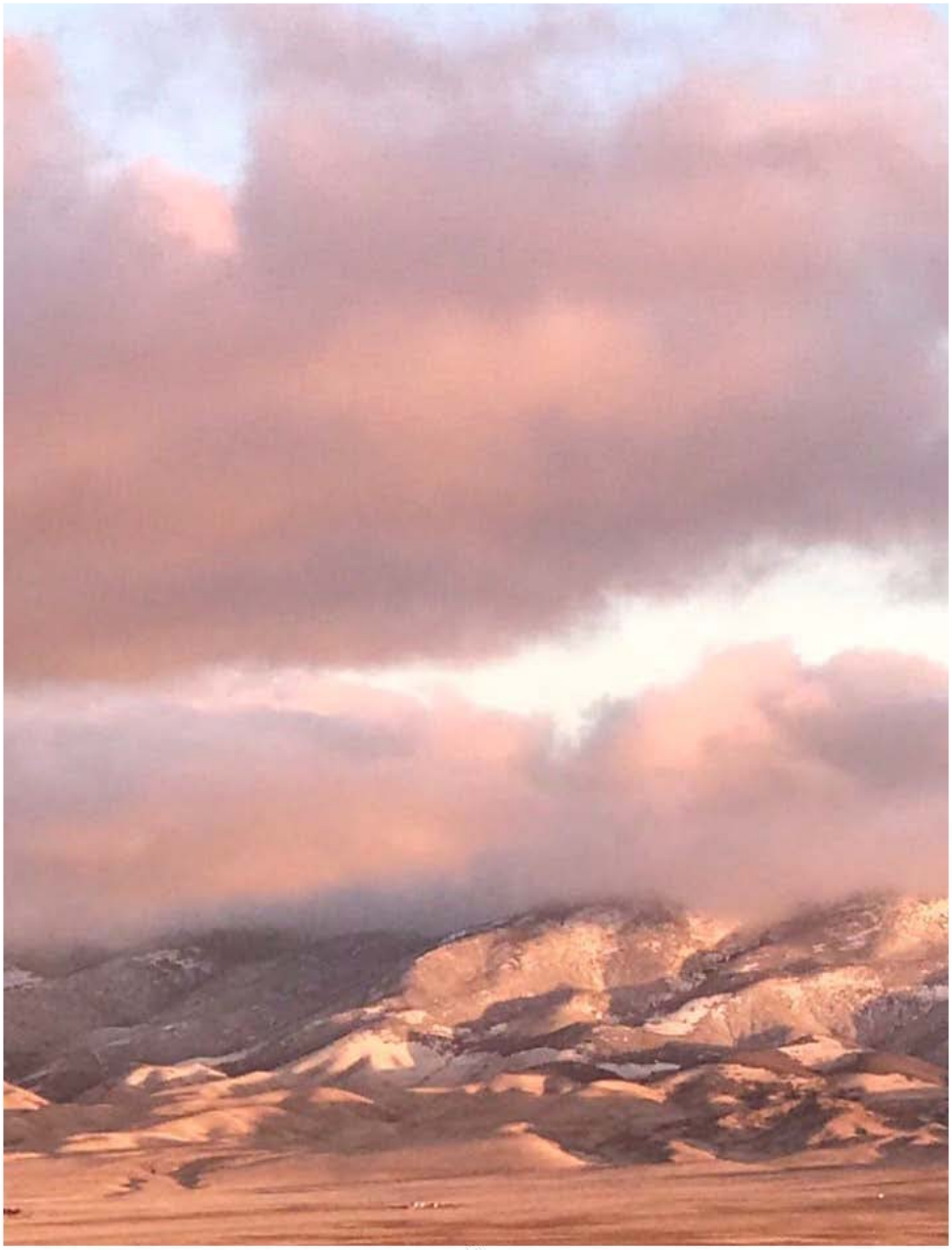
From: Jeff Zimmerman <epn409@gmail.com>
Sent: Saturday, March 17, 2018 10:14 AM
To: Jodie Sackett
Subject: Centennial Plan

Re:Centennial Plan,

There is not enough water resources in this valley to handle 60,000 additional people. West Valley County Water District for the existing town if Neenach is only allotted 40 acre feet from AVEK. How do you propose you are going to be allotted 30,000 acre feet of water per year? The grasslands are critical habitat for the entire ecosystem, concrete tilt up buildings and industry hurt the fragile ecosystem, it will bring traffic, pollution and destroy the view shed. Thank you, Jeff Zimmerman

H.11-1



Responses to Comment Letter H.11
Jeff Zimmerman
March 17, 2018

Response to Comment H.11-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[3159] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan environmental impact reports prepared by Los Angeles County concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The environmental impact reports further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The environmental impact reports found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the environmental impact reports found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan environmental impact reports because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan environmental impact reports would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan environmental impact reports, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

[3159] DRP 2017, Appendix 5.18-C

The draft 2017 State Water Project Delivery Capability Report (2017 DCR) was published by the California Department of Water Resources in December 2017. In contrast with the 2015 DCR[3160], the 2017 DCR provides a single analysis of State Water Project (SWP) delivery reliability during average, single-dry and multiple-dry years. The 2017 draft Technical Addendum to The State Water Project Delivery Capability Report also provides an analysis of SWP delivery reliability during average, single-dry and multiple-dry years for the Antelope Valley – East Kern Water Agency (AVEK). As discussed in Section 5.18 of the Draft EIR, the analysis of Project SWP supplies utilizes the same average, single-dry and multiple-dry year delivery reliability factors used by AVEK in the agency's most recent and current Urban Water Management Plan (UMWP).[3161] The UWMP and the Draft EIR utilize the Extended Long Term (ELT) SWP delivery reliability scenario for AVEK in the 2015 DCR, with the inclusion of a more conservative 5 percent delivery factor for a single-dry year. The SWP delivery scenario used in the Draft EIR includes lower average year (59 percent versus 61 percent), single-dry year (5 percent versus 8 percent) and multiple-dry year (average of 17 percent per year for 3 years versus 19 percent for 3 years) delivery rates than estimated for AVEK in the 2017 DCR. Consequently, the 2017 DCR estimates that more SWP water will be delivered to AVEK in average, single-dry and multiple-dry years than assumed in the Draft EIR and does not affect the Draft EIR analysis of Project water supplies.

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Frazier Park and Gorman area water supplies referenced in this comment. Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 UWMP adopted by AVEK, the SWP contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast with the base scenario in the Delivery Capability Report, the Early Long Term scenario incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year SWP delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base scenario rate. Consistent with AVEK methodology used in the Agency's 2015 UWMP, the Early Long Term scenario is further modified to incorporate a single-dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The UWMP was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single-dry year reliability level, used in AVEK's 2015 UWMP.

3160 *Ibid.*
3161 *Id.,* Appendix 5.18-F

The Commenter is directed to Draft EIR Section 5.7 for analysis of the Project's potential impacts on biological resources, Section 5.10 for analysis of the Project's potential impacts related to traffic, Section 5.11 for analysis of the Project's potential impacts on air quality, and Section 5.13 for analysis of the Project's potential impacts on visual resources.

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From: Corina Roberts <redbirds_vision@hotmail.com>
Sent: Sunday, March 18, 2018 1:59 AM
To: Jodie Sackett
Subject: Centennial project

I recently became aware of the Centennial Development and the tour of the proposed development site. I am relatively familiar with this area.

A 19,000 plus home development is not sustainable with the primary and obvious reason being the water resource.

While California has always known periods of drought, those periods are becoming more frequent and more intense, with mandatory water rationing giving rise to the de-greening of whole regions and the death of urban and suburban trees; something which may seem insignificant until one takes into account the cooling effect of trees and grass and the quantitive feedback loop of their loss...more heat, and more loss...so although one might think the Centennial Project is sufficiently in the middle of nowhere to not have a real impact on anyone, that is not true. Any development of this magnitude impacts all of the Californians who will have to share resources with it.

The Gorman area is valuable precisely because it is open and primarily undeveloped. The value of open space is often overlooked in the desire to create more housing and with the financial gain potential for the developers. Open space has value for wildlife, human recreation, aquifer recharge, migratory birds and other species, and air quality. While trees are well known for their oxygen producing qualities, chaparral environs not only produce oxygen but have carbon sequestering benefits as well. H.12-1

The impact on the existing communities and the infrastructure must also be taken into consideration. The additional traffic impact on the single major ingress and egress road, Interstate 5, will be substantial. And as we have seen repeatedly in other parts of the state, in an emergency situation, a single major ingress and egress corridor can be a recipe for even more disaster.

Nineteen thousand homes is not just a sprawling neighborhood. It's a city. Everything will have to come with this housing development. All forms of service including fire and police. Stores. Recreation facilities. Because the people who move here will not be like the residents who are already there. They will be urban-oriented; they will be moving to the area because it has been transformed from a rural paradise into a housing complex. They will not bring with them an inherent understanding of living in harmony with a natural environment, nor will they need to; that environment will be forever destroyed by the presence of this development.

I oppose the Centennial Development and would appreciate it if my concerns and comments could be shared as a part of the public record. Thank you for your time and consideration.

Sincerely,

Corina Roberts

Corina Roberts, Founder
Redbird
http://secure-web.cisco.com/1UTiA6KC185eU4p-T55zJFO76iFsvBs_PFb6LTaR3iqx-dnxUysvB75KZR6vlKl7kzyRd5TeFtLt6ltcP9LJuJymPDYIcy-e6M3GGvx35QwSqHv57UidOq6eqCDKXScAdaBB42B_-lUSJbS9_G12_sf_B9C4JyS0EQTQZsqpFCBOwKm8d1oVh15VAC9YhqOwQ0sICC-elwk8awReSGumJvIGXjTJQ6ktW2a5HfddHrXa6ZDPQjMaP68p0DIeSHiA1FKSYJCR8OqMOBQMf9uQBcf3GtJ2m5Ju6e4p8xCBPdqJ1Y4pEI6mkpESKjm6M1QHx_v0hdP7UVjskS3UF2v7kcJmL9UbOJ4OHItk1q26NwF_xLI6_zfw3ZJACZhqPJwN6oT3zvRM33asyquLsi2XcmQ/http%3A%2F%2Fwww.RedbirdsVision.org
Forest Recovery Project Photographer
http://secure-web.cisco.com/1HjAA5ybzIKX2uYHm5MOgekhAT9083a-bvInIHHwRNfJ65x26AXeDxv66qWWpSkqrhUHfvl7oMdc6dSV3YsYA51fn-o4j0V9J3iTaN1ILGs0RZQGblsi5EEj_uuiVWBCnt9sMR5n3i7ler1_eJAFcwE8qcxObCZp81CoqAB5VVjT5jc0zjuj_34cFntDloOjfW6AtVBpMBwtmJ-UBFfzJji1V8z1TfMO7H5ScnyMpHq250Z7npSclL-Csn_wrbw_kfKjzGMowVNn55YapDnKa2rK-QX0KwFHWM4E_XCY1yAUOj8XGmsPahqxtwRzS6eQRBDzRFI_RVou-h8FVtU-_8LwU_KTvJelZ5VGoi3t0GNWwo83ci28Hbdi4S-0SaZJaYLhoj6CjiOVOBns4qw3MfA/http%3A%2F%2Fforest-recovery-project.smuqmuq.com%2FFireEcology%2FFeature-Gallery-the-best-of-th%2FForest-Recovery-Project

With gratitude to the sponsors who make our work possible - The Jiji Foundation(Forest Recovery Project), SCE International (Chilao School, Forest Recovery Project), The Barbara Barnard Smith Fund for World Musics/Ventura County Community Foundation (Children of Many Colors Powwow), the California Arts Council (Children of Many Colors Powwow), Moorpark College (Children of Many Colors Powwow), the Moon Family Trust (Chilao School, Forest Recovery Project, Children of Many Colors Powwow)

Responses to Comment Letter H.12
Corina Roberts
March 18, 2018

Response to Comment H.12-1:

Thank you for your comment and for your participation in this public process. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[3162] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan environmental impact reports prepared by Los Angeles County concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The environmental impact reports further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The environmental impact reports found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the environmental impact reports found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan environmental impact reports because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan environmental impact reports would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan environmental impact reports, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

[3162] DRP 2017, Appendix 5.18-C

The draft 2017 State Water Project Delivery Capability Report (2017 DCR) was published by the California Department of Water Resources in December 2017. In contrast with the 2015 DCR[3163], the 2017 DCR provides a single analysis of State Water Project (SWP) delivery reliability during average, single-dry and multiple-dry years. The 2017 draft Technical Addendum to The State Water Project Delivery Capability Report also provides an analysis of SWP delivery reliability during average, single dry and multiple dry years for the Antelope Valley – East Kern Water Agency (AVEK). As discussed in Section 5.18 of the Draft EIR, the analysis of Project SWP supplies utilizes the same average, single-dry and multiple-dry year delivery reliability factors used by AVEK in the agency's most recent and current Urban Water Management Plan (UMWP).[3164] The UWMP and the Draft EIR utilize the Extended Long Term (ELT) SWP delivery reliability scenario for AVEK in the 2015 DCR, with the inclusion of a more conservative 5 percent delivery factor for a single dry year. The SWP delivery scenario used in the Draft EIR includes lower average year (59 percent versus 61 percent), single-dry year (5 percent versus 8 percent) and multiple-dry year (average of 17 percent per year for 3 years versus 19 percent for 3 years) delivery rates than estimated for AVEK in the 2017 DCR. Consequently, the 2017 DCR estimates that more SWP water will be delivered to AVEK in average, single-dry and multiple-dry years than assumed in the Draft EIR and does not affect the Draft EIR analysis of Project water supplies.

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Frazier Park and Gorman area water supplies referenced in this comment. Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 UWMP adopted by the AVEK, the SWP contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast with the base scenario in the Delivery Capability Report, the Early Long Term scenario incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year SWP delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base scenario rate. Consistent with the AVEK methodology used in the Agency's 2015 UWMP, the Early Long Term scenario is further modified to incorporate a single-dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The UWMP was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single-dry year reliability level, used in the AVEK's 2015 UWMP.

3163 *Ibid.*
3164 *Id.,* Appendix 5.18-F

The Commenter is directed to Draft EIR Section 5.7 for analysis of the Project's potential impacts on biological resources, Section 5.10 for analysis of the Project's potential impacts related to traffic, Section 5.14 for an analysis of the Project's potential impacts related to parks and recreation, and Sections 5-16 and 5.17 for an analysis of the Project's potential impacts related to public services and police and fire services.

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CALIFORNIA WILDLIFE FOUNDATION
428 13th Street, Suite 10A
Oakland, CA 94612

WWW.CALIFORNIAWILDLIFEFOUNDATION.ORG
tel 510.208.4436
fax 510.268.9948

March 20, 2018

David W. Louie, Chair, Planning Commission
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

(Via email: c/o Jodie Sackett, jsackett@planning.lacounty.gov)

RE: Centennial Specific Plan Project, State Clearinghouse No. 2004031072, Project no. 02-232-(5), Specific Plan no. 02-232, General Plan Amendment no. 02-232, Zone Change No. 02-232, Vesting Tentative Parcel Map No. 060022, Conditional Use Permit No. 02-232, Development Agreement No. RPPL2016003940

Dear Commissioner Louie:

The California Oaks program of California Wildlife Foundation works to conserve oak ecosystems because of their critical role in sequestering carbon, maintaining healthy watersheds, and providing sustainable wildlife habitat. We understand that the Centennial development is moving forward in the context of the land conserved by Tejon Ranch. However, we are writing out of consideration for the future residents of the development and because of the growing threats to climatic stability from conversion of oak woodlands.

As construed, the project removes vital habitat in a sensitive landscape and the project fails to comprehensively analyze or feasibly and proportionally mitigate terrestrial conversion vegetation and soil organic carbon direct/indirect greenhouse gas emissions pursuant to California Environmental Quality Act requirements. Specifically, the failure to fully account for the foreseeable carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), black carbon and hydrofluorocarbon emission effects due to biomass disposal decomposition, combustion, and transportation, and the soil CO_2 emissions associated with ground disturbing activities. These omissions represent a failure to proceed in the manner prescribed by CEQA.

H.13-1

Looking at Table 5.21-4, which supposedly reports on Vegetation Change and Greenhouse Gas Emissions in the chapter on that addresses Climate Change impacts, one would not know that this is the same project that will negatively impact the Biological Resources, including oak resources, as described in 5.7.

We welcome you to contact us if we can be of assistance.

Sincerely,

Janet Cobb

Janet Cobb
Executive Officer, California Wildlife Foundation/California Oaks

cc: The Honorable Governor Brown

Responses to Comment Letter H.13
California Wildlife Foundation/California Oaks
March 20, 2018

Response to Comment H.13-1:

Thank you for your comment and for your participation in this public process. The County disagrees with the Commenter's opinion that the Draft EIR failed to adequately disclose and analyze the Project's potential greenhouse gas (GHG) impacts related to vegetation conversion. As explained in Section 5.21, Climate Change, total Project GHG emissions were calculated using the California Emissions Estimator Model (CalEEMod), inclusive of CO2 CH4, N2O, particular matter (which includes black carbon), and hydrofluorocarbon emissions, for all Project activities.[3165] In addition to the construction and operation emission inputs described in Section 5.11, Air Resources, the GHG emissions analysis input data included carbon sequestration loss from vegetation removal associated with ground disturbing activities, as well as carbon sequestration gain from tree planting.[3166]

As disclosed on Draft EIR page 5.21-54, permanent vegetation changes that would occur as a result of Project development constitute a change in the carbon sequestration capacity of the Project site. The loss of vegetation would occur concurrently with Project construction. Accordingly, the increase in GHG emissions attributable to the loss of carbon sequestration was amortized over 30 years. However, the reduction in GHG emissions resulting from the planning of new trees would occur more slowly and, therefore, the Draft EIR conservatively amortized such reduction over 100 years in accordance with the recommendations of the International Panel on Climate Change (IPCC).

As shown in Draft EIR Table 5.21-4, the Project's removal of an estimated 6,416 acres of grassland and other vegetation covers on the Project site during construction would result in an estimated reduction in current levels of sequestration of 27,653 $MTCO_2$.[3167] As also shown in Table 5.21-4, the planting of an estimated 35,123 new trees, as required by the adopted County Tree Planting Ordinance, would result in an estimated long-term sequestration of 24,867 $MTCO_2e$. Therefore, in total, the Project would result in an overall reduction in the amount of carbon sequestration on the Project site, resulting in an overall increase in GHG emissions of 2,786 $MTCO_2$ (27,653–24,867 $MTCO_2$).

To mitigate Project GHG impacts, including emissions related to vegetation conversion, the Draft EIR sets forth 46 mitigation measures to reduce GHG emissions from Project operations/construction activities and the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions. In addition, the mitigation measures have been revised and added in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures set forth in responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3-34, and F.8-189.

3165 DRP 2017, pp. 5.21-5, 5.21-50; DRP 2017, Appendix 5.11-A.
3166 *Ibid.*
3167 *Id.,* p. 5.21-54

With respect to the Commenter's general statement regarding the Project's purported "negative" impact on oak trees, Section 5.7 of the Draft EIR explains that the Project would not impact any oak trees located off-site.[3168] Of the approximately 33,861 oak trees that are present on the Project site and which are under the jurisdiction of the County's Oak Tree Ordinance, an estimated 91 regulated oaks would be impacted by the Project (only 7 of which qualify as "heritage" trees). These impacts would, however, be reduced to a less than significant level with implementation of PDFs 7-4 and 7-5, and MMs 7-11, 7-20, and 7-21.[3169]

[3168] *Id.,* p. 5.7-172
[3169] *Ibid.*

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

March 27, 2018

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

Dear Ms. Sackett:

This is in response to your request for comments regarding Revised Notice of Public Hearing for project known as Centennial Specific Plan Project No. 02-232-(5).

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043), Maps revised April 4, 2018. Please note that the County of Los Angeles, California is participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

H.14-1

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

H.14-1 cont.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles County floodplain manager can be reached by calling Pat Wood, Senior Civil Engineer, at (626) 458-6131.

If you have any questions or concerns, please do not hesitate to call Brian Trushinski of the Mitigation staff at (510) 627-7183.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Pat Wood, Senior Civil Engineer, County of Los Angeles
Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern Region Office
Brian Trushinski, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

RECEIVED
APR 03 2018
BY:

Responses to Comment Letter H.14
FEMA Region IX
March 27, 2018

Response to Comment H.14-1:

Thank you for your comments and for your participation in this public process. This comment summarizes certain floodplain management building requirements set forth in the Federal Code of Regulations, Volume 44, Sections 59 through 65. As discussed in Section 5.2, Hydrology and Flood, the Project requires that a Floodplain Safety Overlay be implemented for the mapped floodplain portions of the Project site that precludes placement of housing within a 100-year floodplain, which requirement has been incorporated into MM 2-3. No Project housing will be placed in a 100-year floodplain, or other floodway or floodplain identified on other hazard delineation maps and no off-site housing will be constructed as part of the Project.[3170] Moreover, MM 2-3 requires that, prior to the recordation of any tract map that would locate any structure within a mapped 100-year floodplain, the floodplain boundaries must be more precisely determined and an engineering study must be conducted to identify applicable flood-control and floodplain development protection measures. Per MM 2-3 the study must demonstrate that all applicable FEMA and County of Los Angeles floodplain flood flow and development standards will be met after the proposed construction has been completed (including all applicable FEMA standards and requirements cited by the Commenter). Also, MM 2-3 requires that a conditional letter of map revision be obtained from FEMA indicating that any proposed facility that would modify a mapped floodplain would be recognized by FEMA if built as proposed. The floodplain map would subsequently be revised based on as-built conditions in accordance with FEMA and County floodplain map revision requirements. The Commenter's offer of assistance is noted with appreciation, as is the Commenter's provision of its relevant contact information.

[3170] DRP 2017, p. 5.2-45

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SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL Company

RECEIVED
MAR 27 2018

H.15

County of Los Angeles
320 W. Temple Street
Los Angeles, CA 90012

March 7, 2017

Attention: Jodie Sackett- Department of Regional Planning

Subject: Centennial Specific Plan Project
State Clearinghouse No. 2004031072 project No. 02-232-(5)
Specific Plan No. 02-232, General Plan Amendment No. 02-232
Zone Change No. 02-232,
Vesting Tentative Parcel Map No. 060022, CUP No. 02-232
Development Agreement No. RPPL2016003940

Our review of the subject subdivision map reveals that the proposed development may interfere with easement rights, and/or facilities held by Southern California Edison within the subdivision boundaries. Until such time as arrangements have been made with the developer to eliminate this interference, the development of the subdivision may unreasonably interfere with the complete and free exercise of Edison's rights.

Two copies of the following maps in hardcopy with scaled plans (1"=50' maximum), including all maps submitted on a disc in .pdf format: including grading, drainage, landscape and street improvement plans are required to be submitted by the developer to determine the extent of the interference. The Edison facilities and the easements should be plotted on the above reference maps. Included with the above referenced plans, the developer must state the proposed method to eliminate any interference. Plans should be forwarded to my attention at the following address:

H.15-1

Southern California Edison Company
Real Properties, PIV2
2 Innovation Way
Pomona, CA 91768
Attention: Jeremy Beard

If you have any questions, or need additional information in connection with the subject subdivision, please contact me at (909) 274-1072.

Jeremy Beard
Title and Real Estate Services
Real Properties

Responses to Comment Letter H.15
Southern California Edison
March 27, 2018

Response to Comment H.15-1:

Thank you for your comment and for your participation in this public process. As disclosed on page 5.20-10 of the Draft EIR, and consistent with this comment, Southern California Edison (SCE) has an existing right-of-way easement for its facilities within and surround the Project boundaries. As shown on Draft EIR Exhibit 5.20-1, the vast majority of this right-of-way easement affect portions of the Project site that will be designated for open space uses and, therefore, are not expected to be affected by development of the Project. Moreover, consistent with this comment, MM 20.2-1 obligates the Project Applicant/Developer to coordinate with SCE as part of the subdivision map application process to ensure that there are no prolonged disruptions to the existing transmission lines that extend through the Project study area and to coordinate the design and implementation of future electrical service and facilities (e.g., transmission lines, access road) in the Project study area. This will ensure that (1) no prolonged service disruptions during the extension and upgrading of these services would arise, (2) the nature, design, and timing of electrical system improvements are in accordance with all SCE requirements (including those described in this comment); and (3) the improvements are adequate to serve the proposed land uses and are available to the first occupied land uses.

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Association of Rural Town Councils
Susan Zahnter, Director
Jeffrey Hillinger, Assistant Director
Merrylou Nelson, Secretary
C/O Three Points/Liebre Mountain Town Council
P.O. Box 76
Lake Hughes, CA 93532
ourartc@gmail.com
661.724.2043

25 March 2018

SENT VIA EMAIL

Mr. Jodie Sackett, Senior Planner
County of Los Angeles
Department of Regional Planning
Hall of Records, Thirteenth Floor
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Dear Mr. Sackett,

Subject: Centennial Project SP 02-0232 April 25th Regional Planning Commission Hearing

The Association of Rural Town Councils duly requests Regional Planning reschedule the April 25th revised hearing date for the Centennial Project, and that the hearing be held in the Antelope Valley, on a date and time that will not incur hardship for many working residents. Since a majority of project impacts will occur in the North County, it seems fair to request such a change. We also request a minimum 60 day review period, due to the large volume of documents associated with this project. Ten days allowed by law, indicated in the Revised Hearing Notice, dated March 8, 2018, is far from adequate time, especially considering project proponents and planners have worked nearly *twenty years* on this massive specific plan. We look forward to your response. H.16-1

Sincerely,

Susan Zahnter

Susan Zahnter, Director

Copy to: Fifth District Supervisor Kathryn Barger, Fifth District Planning Deputy Chris Perry, Fifth District Senior Field Deputy Donna Termeer, Regional Planning Commission via Ms. Rosie Ruiz, Community Studies North Section Supervising Regional Planner Susan Tae

Responses to Comment Letter H.16
Association of Rural Town Councils
March 28, 2018

Response to Comment H.16-1:

Thank you for your comment and for your participation in this public process. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required. The Commenter's request that the Regional Planning Commission hearing to consider the Centennial Project be rescheduled and relocated is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration, as will the Commenter's request regarding the 10-day notice period for such hearing. It should be noted that the April 25, 2018 hearing date described in the Commenter's letter has been rescheduled to occur on June 6, 2018.

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From: Jack T. <jacktca@gmail.com>
Sent: Tuesday, April 3, 2018 11:50 AM
To: Jodie Sackett
Subject: Centennial EIR

The EIR is incomplete. It does not specify the damage done to the neighboring communities as Tejon excersizes its right to build based on market forces. I am middle class and I pay property tax. I cannot decide whether or not to pay property tax based on how the market is doing or not. Tejon avoids paying property tax on 20,000 house lots. As a result of their great giant tax break Tejon can wait for the market to be just right before taking the final step to turn the tentative tracts into actual building lots. I have to pay LA county for a house lot and building lot no matter what.

Tejon (TRC) is a way for the super rich to be able to move their earnings in the stock market into real estate without cashing out and actually buying real estate. What if the 1% club decides that there is more money to be made by not building just yet? That option is not in the EIR. The entire plan is based the assumption that Centennial will be built. All the while there is no penalty or pressure on TRC to build.

There are no stores out there. There are no gas stations. No jobs. No nothing. The last time Los Angeles County paved a street in the local area was NEVER! In many ways Neenach resembles a third world country.

If Tejon decides not to build this community there will continue to be nothing out there. But the plans say there's a library, huge shopping center, park, etc. etc.

If TRC (Tejon) does what is good for their investors they might just hold off on their plans to build. Logic 101 business 101 but not in your EIR plan.

There needs to be a use-it-or-lose-it clause in this deal with Tejon ranch.

H.17-1

Responses to Comment Letter H.17
Jack T.
April 3, 2018

Response to Comment H.17-1:

Thank you for your comment and for your participation in this public process. With respect to this comments assertion that the EIR should have evaluated the Project's potential economic effects on neighboring communities, it is noted that Public Resources Code § 21100 requires that the EIR evaluate the environmental impacts of project. However, CEQA Guidelines § 15131(a) expressly provides that "[e]conomic or social effects of a project shall not be treated as significant effects on the environment." Accordingly, the EIR is not permitted to consider purported adverse economic effects of the Project "based on market forces" unless such economic effects are found to cause a significant environmental effect.[3171] This comment provides no substantial evidence, however, that the Project would cause an adverse economic effect on neighboring communities, or evidence that any such economic effect would cause a significant environmental effect that was not adequately analyzed in the Draft EIR. Nevertheless, this comment will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

[3171] 14CCR § 15131(a)

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From: Test User <user@test.zzz>
Sent: Friday, April 6, 2018 10:41 AM
To: Jodie Sackett; cperry@bos.lacounty.gov; Kathryn@bos.lacounty.gov
Subject: Centennial Letter

Name : Test User
Email : user@test.zzz
Address : 13 Main
City : California
Zip:90010

Dear Mr. Sacket:

I'm writing in support of Centennial at Tejon Ranch. The County of Los Angeles is facing a housing crisis and we need a variety of housing types in various locations throughout Los Angeles County. Centennial's master-plan will do just that; create more price-attainable housing and it will help accommodate the planned regional population and economic growth in our county.

As you know, Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, commercial, schools, parks, natural open space, cultural, and public uses.

The community masterplan is simply the implementation of the AVAP, a balanced plan of economic opportunity and conservation. Centennial has also been at the table with the Golden State Gateway Coalition in regards to fast tracking the I-5 improvements before this new community has been set.

It is important to define the project location in terms of synergy with the growing populations near the Centennial project. There is great synergy between other Tejon Ranch projects in Kern County, including Grapevine and Tejon Mountain Village, as well as the Antelope Valley and Santa Clarita.

Centennial is LA County's opportunity to take advantage of growth at Tejon Ranch in Kern County by increasing tax revenue for the general fund and providing increased public services to North LA County, but also providing diverse working-class and middle-income families an opportunity for homeownership.

In addition, Centennial includes plans to focus on water conservation through the use of recycled water and several other sustainable sources. The project's Green Development program requires reduced potable water consumption through the use of drought-tolerant plants, low-flow showerheads, faucets, and toilets. The Centennial master plan will also use recycled water for landscape irrigation in residential common areas.

I urge the Regional Planning Commission to approve and allow Centennial to move forward. We need to finally begin development on this much-needed community.

H.18-1

Responses to Comment Letter H.18
Test User
April 6, 2018

Response to Comment H.18-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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From: asenseman@everyactioncustom.com on behalf of Ariel Senseman <asenseman@everyactioncustom.com>
Sent: Monday, April 16, 2018 2:39 PM
To: Jodie Sackett
Subject: Please Vote No on the Centennial Development

Dear Jodie Sackett,

I write to ask you to deny the development because of the additional cars it will undoubtedly add to our already crowded roads, adding to some of the longest commute times in the US. Furthermore, the added emissions these commuters will add to our air will cement Los Angeles' place atop the list of US cities with the worst air quality.

We need sustainable development in Los Angeles county. Please say no to Centennial.

We are losing our native plants and animals. Our wilderness areas are rapidly diminishing. In addition, building in this very high fire severity zone area creates the real possibility for even more massive fires, further draining firefighting resources already stretched thin in this state.

Please protect our natural resources, and the health of our citizens. Do not allow the Centennial development to destroy both in a misguided effort to create jobs and housing. Instread, find a better way to create both, while furthering the sustainable development we need in our county.

H.19-1

Sincerely,
Ariel Senseman
Pasadena, CA 91106
asenseman@gmail.com

Responses to Comment Letter H.19
Ariel Senseman
April 16, 2018

Response to Comment H.19-1:

Thank you for your comment and for your participation in this public process. The Commenter's general opposition to the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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RECEIVED
APR 30 2018
BY:

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

April 20, 2018

Jodie Sackett
Department of Regional Planning
County of Los Angeles
Hall of Records, 13th Floor, Room 1340
320 West Temple Street
Los Angeles. California 90012

Dear Ms. Sackett:

This is in response to your request for comments regarding Los Angeles County Revised Notice of Public Hearing Centennial Specific Plan Project SCH2004031072.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the Counties of Los Angeles (Community Number 065043), Maps revised April 4, 2018 and Kern (Community Number 060075), Maps revised September 26, 2008. Please note that the Counties of Los Angeles and Kern, California are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

H.20-1

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

H.20-1 cont.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles County floodplain manager can be reached by calling Pat Wood. Senior Civil Engineer, at (626) 458-6131. The Kern County floodplain manager can be reached by calling Aaron Leicht, Engineer III, at (661) 862-5093.

If you have any questions or concerns, please do not hesitate to call me at (510) 627-7186.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Pat Wood, Senior Civil Engineer, Los Angeles County
Aaron Leicht, Engineer III, Kern County
Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern Region Office
Brian Trushinski, NFIP Planner, DHS/FEMA Region IX
Eugene Greenberg, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

Responses to Comment Letter H.20
FEMA Region IX
April 30, 2018

Response to Comment H.20-1:

Thank you for your comments and for your participation in this public process. This comment summarizes certain floodplain management building requirements set forth in the Federal Code of Regulations, Volume 44, Sections 59 through 65. As discussed in Section 5.2, Hydrology and Flood, the Project requires that a Floodplain Safety Overlay be implemented for the mapped floodplain portions of the Project site that precludes placement of housing within a 100-year floodplain, which requirement has been incorporated into MM 2-3. No Project housing will be placed in a 100-year floodplain, or other floodway or floodplain identified on other hazard delineation maps and no off-site housing will be constructed as part of the Project.[3172] Moreover, MM 2-3 requires that, prior to the recordation of any tract map that would locate any structure within a mapped 100-year floodplain, the floodplain boundaries must be more precisely determined and an engineering study must be conducted to identify applicable flood-control and floodplain development protection measures. Per MM 2-3 the study must demonstrate that all applicable FEMA and County of Los Angeles floodplain flood flow and development standards will be met after the proposed construction has been completed (including all applicable FEMA standards and requirements cited by the Commenter). Also, MM 2-3 requires that a conditional letter of map revision be obtained from FEMA indicating that any proposed facility that would modify a mapped floodplain would be recognized by FEMA if built as proposed. The floodplain map would subsequently be revised based on as-built conditions in accordance with FEMA and County floodplain map revision requirements. The Commenter's offer of assistance is noted with appreciation, as is the Commenter's provision of its relevant contact information.

[3172] DRP 2017, p. 5.2-45

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Dear Jodie Sackett,

Scientists warn that we're in the middle of a climate crisis. Because transportation is the single largest driver of carbon pollution in California, new development located far from existing cities has disproportionately large climate impacts. Centennial exemplifies poor, outdated land-use planning on an unprecedented scale. This isolated new city would lock in at least 75,000 new vehicle trips per day with an average trip length of over 45 miles.

If you're committed to a sustainable future for L.A., then you need to say no to Centennial.

L.A.'s wildlands are rapidly diminishing. Ninety-nine percent of California's native grasslands are already gone forever, paved over by similar sprawl development. The Centennial project site contains the last, largest and best native grassland and wildflower fields left in California. Rare wildlife such as California condors, bald eagles, kit foxes and pronghorn also will be harmed if Centennial is built.

It's your job to protect our communities and natural resources, not sell them out to developers.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, urban, affordable housing. Centennial is a poster child of 20th-century sprawl development that exacerbates threats to our population through increasing greenhouse gas production and climate change, air pollution and a deteriorating quality of life.

The proposed site is in "high" and "very high" fire hazard severity zones. And it's directly on top of California's two major earthquake faults. The area was rated by the U.S. Geological Survey as having the highest level of earthquake hazard.

The county and its taxpayers will be on the hook for millions to provide basic public and emergency services to this remote area.

Instead of allowing isolated sprawl development on irreplaceable grasslands in an area at extremely high risk for fires and earthquakes, L.A. should focus on creating safe housing and economic opportunities in or near existing cities.

Please say no to Centennial: It's the wrong vision for L.A.

H.21-1

Responses to Comment Letter H.21
Form Letter 2
Various Dates

Response to Comment H.21-1:

A form letter was prepared by an unknown source and was made available to the public for submittal via email. A total of 610 form letters were submitted via email. Of the 610 form letters submitted, 6 were duplicate form letter submissions. Within this form letter, commenters were encouraged to sign with their name as well as their city, state, and zip code. Based on this information, the geographic breakdown of the remaining form letter commenters is as follows:

1. 10 commenters within the Antelope Valley;
2. 503 commenters outside of the Antelope Valley, but within Los Angeles County;
3. 21 commenters within Kern County;
4. 65 commenters outside of Los Angeles and Kern Counties, but within California; and
5. 5 commenters outside of California.

The individual form letters can be found in Appendix A-2 of this Final EIR. The response to this form letter is as follows. Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote sustainability and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

With respect to this comment's general concerns that the Project exemplifies poor, outdated land use planning, as stated throughout the Draft EIR, the Project is consistent with the AVAP, which was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[3173] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[3174] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[3175] The AVAP updates and supersedes the 1986 Antelope Valley Areawide General Plan (AVAGP), the previous community plan applicable to the Antelope Valley planning area.[3176]

3173 DRP 2015, p. 1-2
3174 *Id.,* p. I-5
3175 *Id.,* p. I-6
3176 *Ibid.*

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[3177] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[3178] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2016-2040 Regional Transportation Plan/Sustainable Communities Plan (2016 RTP/SCS) prepared by the Southern California Association of Governments (SCAG). For example, the AVAP reduces the projected number of new residential housing units in the planning area by 62 percent, locates housing units closer to jobs, and increases the AVAP's jobs/housing ratio from 0.18 to 1.3 at buildout, as compared to the 1986 AVAGP it replaces.[3179] As a result, implementation of the AVAP would generate just 17,065,721 vehicle miles traveled (VMT), a 50 percent reduction below the 33,787,619 VMT generated by the 1986 AVAGP.[3180]

The Commenter's claim that the Project would have an average trip length of over 45 miles is inaccurate. As described on Table 3-5: Project VMT and Trip Length Summary, on page 3.9 of the Traffic Study included in Appendix 5.10-A of the Draft EIR, states that the Project would generate an average trip length of 25.5 miles, which takes into account the 3.4-mile average trip for internal Project-related trips, and the 45.9-mile average trip for external Project-related trips. Table 3-2 of the Traffic Study included in Appendix 5.10-A of the Draft EIR shows an estimate of average daily trips (ADT) and peak hour trips for the Specific Plan area and the corresponding internal and external components that produce the overall internal trip capture percentages derived by the North County sub-area traffic model. Many of the internal trips are directed to locally serving uses such as schools and retail shopping centers, and the approximately 10.1 million square feet of commercial office, shopping center and industrial land uses will provide jobs, many of which are anticipated to be filled by future residents of Centennial. Overall, around 65 percent of the daily trip generation (as measured by tripends [i.e. total trips entering and leaving a location]) will be internal, as shown in Table 3-2. When converted to trips (travel between two points [i.e. one origin and one destination]), this translates to 48 percent of the total Project trips being internal since each internal trip is counted twice in the trip generation (i.e., one internal trip has two internal tripends, a beginning tripend and an ending tripend).

As discussed in the Traffic Study included in Appendix 5.10-A of the Draft EIR, the VMT estimate represents a worst-case assumption without taking into account the anticipated mode shift of residents using alternative travel modes such as walking, biking, transit, and neighborhood electric vehicles (NEVs). Similarly, an estimate of VMT for project trips that leave the Project site has been made using the North County sub-area traffic model. This gives the total VMT produced by the Project at a regional level, along with the average trip

3177 DRP 2015, p. I-5
3178 *Ibid.*
3179 DRP 2014a, p. 7-7
3180 *Ibid.*

length. The Project's total VMT estimate is the sum of the VMT for the internal trips and the external trips, as shown in Table 3-5. Note that this VMT, as calculated by the traffic model, does not reflect the VMT reducing Transportation Demand Management (TDM) measures to be implemented by the Project (see PDF 10-1 and MM 10-26 of the Draft EIR). The following is a listing of some key TDM elements that help form the Project's overall circulation plan:

- Rideshare incentives/Rideshare matching
- Parking management and parking cash-out policies
- Preferential parking or parking subsidies for carpoolers
- Promotion of Guaranteed Ride Home program
- Telecommuting incentives
- Flexible work schedules
- Integrated mobility hubs
- Other First Mile/Last Miles Strategies
- Incentives for employees who bike to work
- Investments in bicycling and walking infrastructure
- Promote active transportation options for trips less than 3 miles, such as biking or using an electric vehicle
- Community Delivery Program
- Electric Vehicle Service Stations

While the TDM elements would result in a reduction in volume of single occupancy vehicles, at the direction of the County, for purposes of the Draft EIR and Traffic Study analysis, no trip reductions were made to the baseline Project trip generation estimates. In summary, the Project is specifically designed to protect the natural environment by implementing an attractive and compact development pattern that places homes near jobs and commercial uses, all connected by a multi-modal circulation system that will reduce VMT.

With respect to this comment's general concerns regarding native grasslands and wildflowers, please see Section 5.7, Biological Resources, of the Draft EIR, which disclosed the Project's potential direct and indirect impact to native grasslands and determined that such impacts would be mitigated to a less than significant level, while cumulative impacts would be significant after mitigation.[3181] As stated in MM 7-10 in the Draft EIR in Section 5.7, Biological Resources, mitigation ratios of at least 2:1 are required for grasslands.[3182] The ratio of 2:1 was developed over multiple years of discussion and grassland studies, as listed in Table 5.7-2 on page 5.7-19 of the Draft EIR. The grassland studies conducted on the Project site and in portions of the mitigation lands provide a detailed understanding of the botanical composition of grasslands within these areas as summarized on pages 5.7-25 to 5.7-27, 5.7-42 to 5.7-47, and 5.7-158 to 5.7-160 of the Draft EIR. These studies indicate roughly 26 percent of the grasslands on site would be considered native grasslands and 74 percent would be considered non-native grasslands based on the most common definitions. The 2:1 ratio was applied to all 6,415 acres of impacted grasslands, rather than to the smaller native grassland acreages scattered on the Project site and surrounded by non-native grassland, as a way to provide for a greater total grassland mitigation obligation as well as a more like-for-

[3181] DRP 2017, pp. 5.7-158 and -162
[3182] *Id.,* p. 5.7-180

like mitigation scenario by avoiding preservation of many small patches of widely distributed native grasslands, as discussed in the first paragraph on page 5.7-160 of the Draft EIR. Furthermore, sampling studies and assessments of the 14,908 acres of preserved grasslands indicate a high degree of similarity to that of the impacted grasslands.[3183]

Grassland and wildflower studies of the proposed mitigation areas (including on-site mitigation lands, the offsite mitigation lands included in the Draft EIR, and the additional off-site mitigation lands included in this Final EIR), indicate an acceptable degree of similarity in vegetation species composition at varying degrees consistent with Project impact areas.[3184] Furthermore, the 14,375 acres are preserved as part of a contiguous open space area inclusive of 28,171 additional acres of other vegetation types in a mosaic of regional biological resources. In addition, the 14,375 of preserved grasslands is actually greater than the 12,832 acres of grasslands which would be required with the 2:1 resulting in 2,076 additional acres of grassland preservation. The additional acreage provides still greater assurance of full mitigation for the Project's grassland and wildflower field impacts.

The Project's Mitigation Preserve would provide for the preservation of grasslands and wildflower fields, as demonstrated in the Draft EIR. As shown on revised Exhibit 5.7-10, Mitigation Preserve, included in this Final EIR following page 3-116 (Volume 2) and originally on page 5.7-135 of the Draft EIR, immediately adjacent lands that represent as close a proximity as feasible are captured within the Mitigation Preserve. The lands, including the grasslands within them, are not only contiguous with the Project site, but also with other open space lands set aside by the Tejon Ranch Company. As described in Appendix 5.7-C of the Draft EIR, a reconnaissance survey of the Mitigation Preserve in 2015, conducted during peak bloom as part of a Mitigation Lands Review, confirmed that native wildflower fields, larger than any observed on the Projects site, were observed within the mitigation preserve.[3185]

With respect to the comment's concern about the Project harming condors, the California condor is a federally and State-listed species and a California fully protected species, and no condor will be killed; please see Section 5.7 of the Draft EIR. In addition, in order to be responsive to comments from the California Department of Fish and Wildlife (CDFW) and U.S. Department of Fish and Wildlife (USFWS) comments regarding the addition of Project efforts to further reduce any potential adverse effects of the Project on the California condor, MM 7-6 on Draft EIR pages 5.7-177 and 5.7-178 is revised in regard to construction monitoring, utility hazards, condor educational curriculum, microtrash, condor deterrent activities, and condor tracking as described in response to Comment B.4-21. See also, responses to Comments A.3-3, A.3-4, A.3-5, A.3-7, B.4-20, B.4-21, B.4-22, and B.4-23 of this Final EIR.

With respect to the comment's concern about the Project harming bald eagles, the documented lack of observations on site, the infrequent detections of this species adjacent to the site, and the lack of any known nesting in the area, as outlined in the Draft EIR, attests

[3183] *Id.,* pp. 5.7-135 to -138, PDFs 7.1 and 7.2
[3184] *Id.,* Appendix 5.7-B, Plant-8
[3185] *Id.,* Appendix 5.7-C

to the limited utilization of the Project area by bald eagle. Further corroboration is provided in the recent publication regarding the breeding birds of Los Angeles County which described bald eagles as rare migrants and winter visitors in the Project area from November to April, and mostly occurring around the larger lakes in the northwest part of the County.[3186] In fact, prior to the 2016-2017 breeding season, when a pair of bald eagles successfully nested in the San Gabriel Mountains, approximately 65 miles southwest of the Project site, bald eagles had not been detected nesting on the mainland in Los Angeles County since 1930.[3187] This supplemental information further demonstrates the extremely limited use of the Project area by bald eagle.

With respect to the comment's concern about the Project harming the kit fox, this species does not occur on the Project site or in the Project region. The Project will not impact the kit fox.

With respect to the comment's concern about the Project harming pronghorn, the species is not included on the CDFW list of Special Animals. However, the Draft EIR takes a conservative approach and assesses impacts on the pronghorn stating on page 5.7-153 of the Draft EIR "although not classified as a special status species (CDFW 2017b), the relatively small population of reintroduced pronghorn antelope on the Project site is considered of interest due to limited numbers and historical presence..." The pronghorn CEQA impact analysis provided in Draft EIR is appropriate and consistent with standard practice for sensitive species as well as best available scientific information, including on-site observations. Additional population distribution information has been obtained from the Tejon Ranch Conservancy since release of the Draft EIR for review. Data show a distribution concentrated northeast of the Project site, and within the Mitigation Preserve, with much more infrequent occurrence on the Project site (see new Exhibit B.4-34). New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. The Draft EIR adequately assesses pronghorn impacts and the determination of less than significant impacts remains appropriate inclusive of all available species data. In addition, as stated on page 5.7-153 of the Draft EIR, as part of the Ranch-wide Management Plan[3188], which is an implementation tool of the Ranch-Wide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures, which could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation; completing further evaluation of modeling tools at a site-specific level, and incorporating volunteer involvement with supportive activities such as fencing retrofits.

With respect to this comment's general concerns regarding sprawl development, greenhouse gas and climate change, air pollution, and a deteriorating quality of life, according to SCAG, 'smart growth' is a term that covers a range of development and conservation strategies that help protect the natural environment and make communities

[3186] Allen et al. 2016
[3187] *Ibid.*
[3188] Final EIR Appendix 5.7-D

more attractive, economically stronger, and more socially diverse".[3189] The Commenter's claim that the Project represents exemplifies outdated land use planning because of the new vehicle trips per day and average trip length disregards the fact that the Project is consistent with, and implements, regional and County plans to strategically locate future growth in a manner that both achieves statewide GHG reduction goals and relieves the potential adverse and social effects of focusing too much future growth in both agricultural areas and in infill, transit oriented areas.

As an initial matter, the County disagrees with this comment's assertion that the Draft EIR fails to adequately analyze, disclose and mitigate the Project's GHG emissions. The Project's potential GHG impacts were fully quantified and analyzed in Section 5.21, Climate Change, of the Draft EIR. Moreover, the Draft EIR includes mitigation measures which require compliance with a non-exclusive list of laws and regulations requiring GHG reductions in equipment, activities, facilities, and services associated with the Project (MM 21-20) The Draft EIR also includes 45 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and 21-1 through 21-19). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in response to Comment F.8-204, and mitigation measures have been revised in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures as set forth in responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3A-46, and F.8-189.

Moreover, Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[3190] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[3191] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80 percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[3192] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[3193] The Town Center will have a public gathering space of 1 acre or more, with street frontage on at least two sides.[3194] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be

[3189] Southern California Association of Governments (SCAG). 2016d (April). *Final Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (SCH #2015031035) (p. 3.11-11). Los Angeles, CA: SCAG. http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx.

[3190] DRP 2017, p. 4-16

[3191] *Ibid.*

[3192] *Id.,* 4-17

[3193] *Ibid.*

[3194] *Ibid.*

within the Village Core.[3195] High-density residential uses will be located adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[3196] The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further reducing demand for SOV travel.[3197] All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[3198] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[3199] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[3200] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[3201]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[3202] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[3203]

The AVAP substantially limits the potential for "urban sprawl" development patterns in the Antelope Valley by focusing new development into compact and sustainably designed mixed-use Economic Opportunity Area (EOA) communities that place houses in close proximity to jobs and commercial uses while expanding SEA boundaries and preserving wildlife movement corridors and agricultural land.[3204] Consistent with the AVAP's Rural Preservation Strategy, the Project would ensure the preservation and management of natural resources and open space in and around the Project site. Specifically, no Project development would occur within the 3,866 acres of the San Andreas Significant Ecological

3195 *Ibid.*
3196 *Id.,* p. 4-20
3197 *Id.,* p. 4-35
3198 *Id.,* p. 4-30
3199 *Ibid.*
3200 *Id.,* p. 4-31
3201 *Ibid.*
3202 *Id.,* p. 4-30
3203 *Ibid.*
3204 DRP 2014a, p. 7-7

Area (SEA 17) located on the Project site, which land would be permanently protected by a conservation easement provided by the Applicant/Developer.[3205]

Moreover, all buildings within the Specific Plan will be required to comply with state, regional, and local laws applicable to their design and construction including, without limitation, Pavley Motor Vehicle Standards (AB 1493); Low Carbon Fuel Standard;[3206] Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations; Renewable Portfolio Standard (SB X1 2 and SB 350); Natural Gas Cooking Stoves and Fireplaces (SCAQMD Rule 445); Solid Waste Diversion (AB 939, AB 341, AB 1826, SB 1383); statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15); Model Water Efficient Landscape Ordinance (MWELO);[3207] California Water Code;[3208] EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles[3209] and for medium- and heavy-duty vehicles;[3210] Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels;[3211] Advanced Clean Cars Program;[3212] Under Inflated Vehicle Tires;[3213] Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation;[3214] Management of High Global Warming Potential Refrigerants for Stationary Sources;[3215] Small Containers of Automotive Refrigerant;[3216] High-Global Warming Potential Greenhouse Gases in Consumer Products;[3217] Los Angeles Tree Planting Ordinance;[3218] Los Angeles Green Building Standards Code;[3219] and Los Angeles County Community Climate Action Plan.

In addition, the Project would be subject to Title 24 and CALGreen Code energy efficiency standards. However, as discussed in the Specific Plan and Section 5.21, Climate Change, the Project has committed to compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings, resulting in buildings that would exceed 2016 Title 24 requirements by 15 percent (see PDF 11-3 in Section 5.11, Air Resources), and with CALGreen voluntary measure A5.203.1.2.1 for non-residential buildings and residential buildings taller than four stories, resulting in buildings that would exceed 2016 Title 24 requirements by 10 percent (PDF 11-2). Renewable energy produced on the Project site will be primarily rooftop solar, and a minimum of 50 percent of the Project's anticipated electricity demand must be satisfied from on-site renewable energy generation (PDF 21-3). With this approach, development within the Specific Plan will meet and exceed the standards

3205 DRP 2017, p. 4-43
3206 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.
3207 *Id.,* Title 23, Division 2, Chapter 2.7
3208 *Id.,* Division 6, Part 2.10, Sections 10910–10915
3209 75 Federal Register (FR) 25324–25728 and 77 FR 62624–63200
3210 76 FR 57106–57513
3211 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 5, Section 95801 et seq.
3212 *Id.,* Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts), Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts), Chapter 4.4 (parts), Chapter 8 (parts)
3213 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.
3214 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.
3215 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.
3216 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.
3217 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 2
3218 Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.
3219 *Id.,* Title 31, Chapter 1, Sections 100 et seq.

of 2016 CALGreen Tier 1 as well as the requirements of the County's Green Building Ordinances.

For the reasons discussed above, the Project cannot fairly be described as "sprawl." As clearly demonstrated by the its long planning history at the regional and County level, the Project is anything but "uncoordinated growth" undertaken without regard for its environmental consequences. The Project has been carefully designed to promote regional "smart growth" planning principles established by the 2016 RTP/SCS and the AVAP's Rural Preservation Strategy and will aid the County in its effort to accommodate its fair share of the regional housing need in a manner that reduces reliance on the automobile, reduces per capita GHG emissions, and promotes public health. The Project will also be required to implement an extensive list of Green Development design measures and to comply with and, in some cases exceed, applicable laws mandating efficient building design and construction. Finally, the Project will permanently preserve thousands of acres of sensitive habitat. By any measure, the Project is not "sprawl", particularly when viewed from a regional perspective that includes full consideration of regional planning priorities.

With respect to this comment's general concerns regarding fire hazard severity zones, the Project's potential impacts related to fire safety and fuel modification are discussed in Section 5.3, Hazards and Fire Safety, and Section 5.16, Fire and Law Enforcement. With adherence to requirements for fuel modification zone management (MM 3-9) and emergency access (MM 3-7), the Project's potential impact related to wildfires would be less than significant. MM 3-9 requires property owner notification of their responsibilities for maintaining the fuel modification zone(s) on their property. The Project would not result in significant impacts related to proximity of a land use representing a potential fire hazard.

The Project includes conceptual site locations for up to four new fire stations on the Project site. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department's (LACFD's) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Project Applicant/Developer would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project.

With respect to this comment's general concerns regarding earthquake faults and hazards, the presence of on-site, nearby, and regional faults is clearly disclosed in Section 5.1, Geotechnical. As discussed on pages 5.1-16 and 5.1-17, consistent with State regulations, there would no building on or within the required setback of the Alquist-Priolo Earthquake Fault Zone for the San Andreas Fault. The setback zone for the San Andreas Fault is incorporated into the Geologic Safety Zone, which also establishes building setbacks for the two unnamed on-site faults. Due to the proximity of both the San Andreas Fault and Garlock Fault to the Project site, a fault research company called Earth Consultants International (ECI) conducted a detailed fault investigation on the Project site and evaluated potential hazards as a result of fault locations in relation to the Project site and planned development

areas.[3220] Per the Geocon report, earthquakes that might occur on the San Andrea Fault Rift Zone are potential generators of significant ground accelerations at the site (0.73 g for a 10 percent probability in 50-year occurrence) should an earthquake on the fault occur.[3221] However, foundation systems can be designed to withstand these relatively high ground accelerations, and secondary impacts such as liquefaction can be mitigated by remedial grading, structural design and foundations or ground improvement techniques; active fault zones including this one can also be mitigated by implementing setback zones from Alquist-Priolo Earthquake Fault Zones.[3222] Accordingly, as shown on Draft EIR Exhibit 5.1-2, the Project has been designed to avoid development in areas near the San Andreas Earthquake Fault Zone, which are instead proposed as open space and drainage areas.[3223]

With respect to this comment's general concerns regarding public and emergency services, the Project site is situated near the junction of Interstate 5 and the Northwest SR-138 Improvement Project, which links western Los Angeles County the major communities of Palmdale and Lancaster.[3224] Thus, the Project site will not require major off-site roadway extensions to provide access to regional freeways. As shown on Draft EIR Exhibit 4-18, there are existing gas, power and telecom transmission facilities to serve the Project located on or immediately adjacent to the Project site. The Project will also construct two on-site wastewater treatment and recycled water distribution facilities to minimize potable water demand to treat Project wastewater and supply recycled water to the Project site.[3225] To ensure adequate potable water service, the Applicant/Developer will design, permit, finance, and construct an on-site water treatment plant adjacent to the West Branch of the California Aqueduct, which is located on-site.[3226] School, fire, police, emergency medical and library facilities needed to serve the Project will all be constructed on site, and in some cases, will be available to also serve existing Mountain Communities in accordance with existing mutual aid agreements.[3227] Finally, none of the Project's backbone infrastructure will be sized to accommodate growth beyond that which is proposed by the Project.[3228]

Under Project conditions, there will be far greater access to fire protection and emergency services in the vicinity of the Project site than currently exists. Such access will contribute to County of Los Angeles Fire Department (LACFD) performance of its obligations under the *Cooperative Fire Protection Agreement Between The County of Los Angeles Fire Department and The U.S. Forest Service Angeles National Forest* approved by the Los Angeles County Board of Supervisors on December 20, 2016 (Mutual Aid Agreement). The purpose of the Mutual Aid Agreement is to provide for cooperation between LACFD and U.S. Forest Service Angeles National Forest (ANF) in the prevention, detection, and suppression of wildland fires, fuels treatment and prescribed fires with both agencies' respective fire protection areas. The Mutual Agreement also describes the conditions in which "mutual aid" periods

[3220] DRP 2017, Appendix E of Appendix 5.1-A; *Id.,* Appendix 5.1-A, p. 8
[3221] *Id.,* Appendix 5.1-A, p. 13
[3222] *Ibid*.
[3223] *Id.,* p. 5.1-16
[3224] *Id.,* p. 4-2
[3225] *Id.,* p. 4-59
[3226] *Id.,* p. 4-55
[3227] *Id.,* p. 4-75
[3228] *Id.,* p. 5.8-22

are established to provide resources to each on a non-reimbursable basis, as well as the conditions of "Assistance by Hire" on a reimbursable basis. The Project's fire service improvements described above will significantly enhance the LACFD's ability to perform its obligations under the Mutual Aid Agreement to the benefit of the Angeles Forest, further reducing the risk of forest fires in the vicinity of the Project site.

Additional Comments

Out of the 610 form letter submittals, 40 were modified slightly by the Commenter to include additional comments. These additional comments are summarized below.

- Reject the Project.
- No sprawl.
- Need sustainable development.
- The Project destroys habitat, wildlife, and grasslands.
- Concerns about air quality, traffic, and water use/availability.
- Concerns about wildfire and seismic hazards.
- Need infill and affordable housing.
- Concerns about insufficient infrastructure.
- This is not Centennial's first application to build.

The following responses address each of the above summarized comments.

1. Reject the Project.

The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

2. No sprawl.

As discussed previously, the Project's objectives and design features promote "smart growth" and discourage sprawl by implementing the AVAP.

3. Need sustainable development.

The Project includes a Green Development Program, which is intended to meet or exceed state, regional, and local requirements for energy efficiency and green building ordinances.[3229] The Centennial Green Development Program's Green Building component,

[3229] *Id.*, Appendix 4.0-A, p. M-6

found in Appendix 2-A of Appendix 4.0-A to the Draft EIR, requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances.[3230] Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs. Sustainable and resiliency features will be incorporated in the design from the earliest stages through the final buildout.[3231] The Green Development Program is adopted by resolution and incorporates the County's Green Building Ordinances with respect to development for the Project Site.[3232]

4. The Project destroys habitat, wildlife, and grasslands.

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[3233] to reduce impacts to biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed in Section 7.0, Cumulative Impacts, of the Draft EIR.

Additionally, the comment's concerns regarding native grasslands, wildflowers, and harm to wildlife species were addressed earlier in this response to Comment G.32-1. Please also see Section 5.7, Biological Resources, of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of biological resources can be found in Section 5.4, Biological Resources, of the AVAP EIR and Section 3.4, Biological Resources, of the RTP/SCS EIR.

5. Concerns about air quality, traffic, and water use/availability.

As addressed previously, with respect to the comment's concerns about transportation and traffic, air quality, and water supplies and drought, please see Sections 5.10 (Traffic, Access,

3230 *Id.,* Appendix 4.0-A, p. 4 of Appendix 2-A
3231 *Id.*, Appendix 4.0-A, p. M-6
3232 *Id.,* p. 2-60
3233 *Id.,* pp. 5.7-173 to -194

and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with AVAP and is within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

6. Concerns about wildfire and seismic hazards.

As discussed previously, the Project's potential impact related to wildfires would be less than significant and the proposed fire stations on the site would provide adequate fire service to the Project. With regard to the comment's concerns regarding seismic hazards, the Project has been designed to avoid development in areas near the San Andreas Earthquake Fault Zone, which are instead proposed as open space and drainage areas, as further discussed in Section 5.1, Geotechnical, of the Draft EIR.

7. Need infill and affordable housing.

When it adopted the 2012 RTP/SCS, SCAG ultimately settled on a balanced land use plan that assumes a significant increase in multi-family housing to be constructed in urban infill areas and so-called High Quality Transit Areas (HQTA), but also targets some suburban and rural pockets of the region for additional housing and employment growth.[3234] Under SCAG's balanced land use plan, 68 percent of all new homes in the region would be constructed as multi-family units, and over 50 percent of new housing and employment growth would be located in urban infill areas and HQTAs.[3235] The balanced land use plan also provides for approximately 33 percent of all new housing units to be constructed in suburban and rural residential areas of the region.[3236]

SCAG has carefully considered land use policies that would promote aggressive regional infill development, but ultimately determined that the balanced land use plan described in the 2016 RTP/SCS better protects low income populations from the adverse effects associated with aggressive infill development, most notably gentrification while also achieving the region's GHG emissions reduction targets. SCAG's findings regarding the adverse environmental, social and economic impacts of aggressive infill development are consistent with recent research on the subject. While infill development is an important component of

[3234] SCAG 2012a, pp. 129, 130
[3235] SCAG 2011, p. 2-27
[3236] *Id.,* p. 2-30

regional land use policy designed to achieve mandated emissions reductions, the environmental impact reports for the 2012 and 2016 RTP/SCS documents demonstrate that too much infill development risks significant adverse environmental and social impacts within the communities targeted for such development.[3237]

With regard to the comment's concerns about affordable housing, the proposed Project does include affordable housing. Per MM 21-14, "Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan..."[3238] Per Specific Plan Section 3.13, the affordability status of homes will be annually monitored through the County of Los Angeles who shall report to the HCD and Los Angeles Community Development Commission.[3239] The Specific Plan specifies that the units shall be constructed simultaneously with overall residential development.[3240]

8. Concerns about insufficient infrastructure.

As discussed previously, the all infrastructure required for the proposed Project either currently exist in the Project area or would be constructed under the proposed Project. All infrastructure to be constructed under the proposed Project has been analyzed in the Draft EIR.

9. This is not Centennial's first application to build.

The comment states that "the application to build [the Centennial Project] is not new" and notes that the "disapproved application" should be reviewed by the Board of Supervisors. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

[3237] SCAG 2011, pp. 4-4, -37; SCAG 2012a, p. 129; SCAG 2012d, p. 5-63; SCAG 2016a, p. 69
[3238] DRP 2017, p. 5.21-91
[3239] *Id.,* Appendix 4.0-A, p. 3-101
[3240] *Id.,* Appendix 4.0-A, p. 3-102

I. Time Extension Comments

CENTENNIAL

at TEJON RANCH

From: Helen Henry <helenhenry@mac.com>
Sent: Saturday, July 08, 2017 1:54 PM
To: Samuel Dea
Subject: Extension please

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review for an additional 30 days. The document is 2,000 pages long, and the public needs more time to make comments, since this project will pose long-term significant impacts to our rural community, and across the Antelope Valley. I.1-1

Sincerely,
Helen Henry

Response to Comment Letter I.1
Helen Henry
July 8, 2017

Response to Comment I.1-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Alice Wollman <AliceWollman@roadrunner.com>
Sent: Saturday, July 08, 2017 2:43 PM
To: Jodie Sackett; Samuel Dea
Subject: Subject: Extension of Centennial DEIR deadline

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review for an additional 30 days. The document is 2,000 pages long, and the public needs more time to make comments, since this project will pose long-term significant impacts to our rural community, and across the Antelope Valley. I.2-1

Sincerely,

Alice Wollman
Sommer Appraisal Service
12304 Santa Monica Boulevard
Suite 300
Los Angeles, California 90025
(310) 207-4857, extension 137

Response to Comment Letter I.2
Alice Wollman
July 8, 2017

Response to Comment I.2-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: jane randall <jr_ranch@live.com>
Sent: Saturday, July 08, 2017 3:56 PM
To: Jodie Sackett; Samuel Dea
Subject: Extension of Centennial DEIR deadline PLEASE

Email: JSackett@planning.lacounty.gov
sdea@planning.lacounty.gov

Subject: Extension of Centennial DEIR deadline

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review for an additional 30 days. The document is 2,000 pages long, and the public needs more time to make comments, since this project will pose long-term significant impacts to our rural community, and across the Antelope Valley. I.3-1

Thank you for this consideration. Several of my neighbors tried to attend the Gorman Elementary School meeting. . . but wasn't possible. We all have busy lives, trying to stay afloat.

Sincerely,
Jane Randall

Response to Comment Letter I.3
Jane Randall
July 8, 2017

Response to Comment I.3-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Samuel Dea <sdea@planning.lacounty.gov>
Sent: Monday, July 10, 2017 7:00 AM
To: Kristin Starbird
Subject: FW: Extension of Centennial DEIR deadline

One more.

From: Lakes & Valleys Gazette [mailto:lvgazette@hotmail.com]
Sent: Sunday, July 09, 2017 2:40 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>; Samuel Dea <sdea@planning.lacounty.gov>
Subject: Extension of Centennial DEIR deadline

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review for an additional 30 days. The document is 2,000 pages long, and the public needs more time to make comments, since this project will pose long-term significant impacts to our rural community, and across the Antelope Valley. I.4-1

Sincerely,
Debbie Ehms
Editor - Lakes & Valleys Gazette

Lakes & Valleys Gazette
P.O. Box 366
Lake Hughes, CA 93532
661.917.5996

Response to Comment Letter I.4
Lakes & Valleys Gazette
July 9, 2017

Response to Comment I.4-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Kristin Starbird
Sent: Monday, July 10, 2017 11:29 AM
To: Joan Kelly; Ashley McCoy
Subject: FW: Extension of Centennial DEIR deadline

Kristin L. Starbird
PSOMAS | Balancing the Natural and Built Environment
Vice President, Environmental Planning
225 South Lake Avenue, Suite 1000
Pasadena, CA 91101
626.351.2000 | www.Psomas.com

From: Samuel Dea [mailto:sdea@planning.lacounty.gov]
Sent: Monday, July 10, 2017 11:20 AM
To: Kristin Starbird <kristin.starbird@psomas.com>; Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: FW: Extension of Centennial DEIR deadline

Here's a comment against an extension.

From: Richard Despain [mailto:richard.despain@gmail.com]
Sent: Monday, July 10, 2017 11:03 AM
To: Jodie Sackett <jsackett@planning.lacounty.gov>; Samuel Dea <sdea@planning.lacounty.gov>
Subject: Extension of Centennial DEIR deadline

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review NOT BE extended. As you know, this project has been in the planning stages for several long years, is well thought out and a much needed addition to the ever growing needs of the Antelope Valley region. Please expedite this plan as this will bring much needed economic growth and a new well planned community to Southern California. I.5-1

All the Best,

Richard

--

G. Richard DeSpain
2108 Dallin Street
Lancaster, CA 93536
Cell 518-477-2012
richard.despain@gmail.com

https://www.linkedin.com/in/richard-despain-63710415

Response to Comment Letter I.5
G. Richard DeSpain
July 10, 2017

Response to Comment I.5-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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I.6

CENTER for BIOLOGICAL DIVERSITY Because life is good.

Protecting and restoring natural ecosystems and imperiled species through Science, education, policy, and environmental law

Via email

6/30/2017

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, California 90012
JSackett@planning.lacounty.gov

RE: Request for Comment Deadline Extension on Centennial Project Draft Environmental Impact Report State Clearinghouse No. 2004031072 County Project No. 02-232

Dear Mr. Sackett,

On behalf of the staff, members and supporters of the Center for Biological Diversity (Center), we request a comment deadline extension of 90 days on the Centennial Project Draft Environmental Impact Report State Clearinghouse No. 2004031072 County Project No. 02-232. We believe that such an extension is warranted because the over 2,000 page draft EIR, the almost 2,000 page Specific Plan and the numerous technical appendices include highly technical, scientific and lengthy data sets and analyses that require thorough review that cannot be accomplished adequately by the July 17th, 2017 deadline. Processing and commenting on the relevant hydrological, biological, air quality and greenhouse gas data and analyses is taking much more time than the currently allotted comment period allows.

In order to provide meaningful, detailed public comments on this controversial project, the additional 90 days is needed for the public to adequately submit thoughtful comments. The current public comment timeframe coincides with the summer vacation season for many of the interested public and for that reason alone should be extended.

We know Los Angeles County is committed to making the voluminous draft EIR accessible to diverse communities and stakeholders and enable them to submit meaningful comments about its scope and impact. This goal cannot be fully realized without more time.

Please respond to us regarding this extension request by July 7th, 2017.

I.6-1

Arizona • California • Nevada • New Mexico • Alaska • Oregon • Washington • Illinois • Minnesota • Vermont • Washington, DC

Center for Biological Diversity
660 S. Figueroa, Suite 1000, Los Angeles, CA 90017
phone: (323) 654.5943 *fax:* (323) 650.4620 *email:* ianderson@biologicaldiversity.org
www.BiologicalDiversity.org

Respectfully submitted,

Ileene Anderson
Senior Scientist
ianderson@biologicaldiversity.org

/S/
John P. Rose
Staff Attorney
jrose@biologicaldiversity.org

cc via email: Richard Bruckner, Planning Director zoningldcc@planning.lacounty.gov; dslavin@planning.lacounty.gov

Response to Comment Letter I.6
Center for Biological Diversity
June 30, 2017

Response to Comment I.6-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Three Points-Liebre Mountain Town Council <3pointsliebremountain@gmail.com>
Sent: Monday, July 10, 2017 10:48 AM
To: Jodie Sackett; Samuel Dea
Cc: Termeer, Donna
Subject: Centennial DEIR

Dear Mr. Sackett and Mr. Dea,

I have received several comments regarding the meeting at Gorman relating to lack of notification, and difficulties downloading information from the Centennial webpages at Regional Planning's website.

My concern is the Draft Environmental Impact Review document, due to these issues, and the 2,000 pages for the individual reader to review while tending work, family, and other commitments, makes the sixty day review period too short. I understand the sixty day period is longer than the law requires, but the Centennial Project has been moving forward for seventeen years with their own paid professional staff, and Regional Planning staff as well. Our council, residents of our community, and others who will experience this project's impacts have no such advantage.

On behalf of our council, I formally request a thirty day extension of the comment period to August 17th, so interested members of the public, and our council, may have more time to make pertinent and valuable comments on this massive project.

I.7-1

I appreciate your consideration. Please confirm receipt of our email, and keep us apprised of any decision on this matter.

Sincerely,
Susan Zahnter
Vice President
Three Points-Liebre Mountain Town Council

Response to Comment Letter I.7
Three Points-Liebre Mountain Town Council
July 10, 2017

Response to Comment I.7-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: merrylou nelson <merrylou.nelson@gmail.com>
Sent: Wednesday, July 05, 2017 4:49 PM
To: Jodie Sackett
Cc: Ginger Stout; Irwin Pascul; Julie Schuder; windie murphy; Jacki Ayer; Patric Hedlund; Robin Kennard; lsun@aqmd.gov
Subject: Centennial DEIR Review

Dear Mr. Sackett: I am writing you to request an extension of the DEIR review past the deadline of July 17, 2017. I believe that Planning is fast tracking the passage of this massive document. A 60 day review period is insufficient to accomplish this huge review. I have learned that the Planning Hearing officer meeting of June 29th was not well attended. No doubt some people could not find the school in Gorman! I believe that Planning should extend the review period and schedule additional local meetings with interested parties thus giving them an opportunity to digest this massive document and be allowed to add their valid comments. I.8-1

Mr. Sackett-I contacted the South Coast Air Quality District and spoke with Ms. L. Sun (909) 396-3308. She informed me that they have no records of being given distribution of the Centennial DEIR. That fact alone should give pause to the fact that if proper distribution of the DEIR did not happen it can still be remedied! Please respond to this letter ASAP as time is padding quickly. Sincerly Merrylou Nelson 661-942-5085 I.8-2

Responses to Comment Letter I.8
Merrylou Nelson
July 5, 2017

Response to Comment I.8-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The public will have opportunities for public comment at duly noticed public hearings before the Regional Planning Commission and Board of Supervisors. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment I.8-2:

The County of Los Angeles (County) sent the Draft EIR Notice of Availability, which contains a link to the Draft EIR document for review, via overnight mail to the SCAQMD on May 17, 2017. The County subsequently received a comment letter from the SCAQMD on July 13, 2017.

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From: Rose Bryan <rmr27@me.com>
Sent: Friday, July 07, 2017 2:14 PM
To: Jodie Sackett
Subject: Deir Centennial project

Jodie
Dept. Regional Planning

Dear Sir,
Thank you for presentation on the Centennial Project. I was disappointed with the lack of information in your presentation, And the blank CD you gave us that night,told us you did not want this community to respond to your DEIR. GVMWD was also left out until I contacted Mr.Springer a week Before your meeting and you than sent them the the Information. I.9-1
GVMWD is the led agency in your document! The GVMWD has A New Board who will have to be informed about our part in your Project.
The community needs more time to respond! I.9-2

Respectfully,
Rose Bryan

Responses to Comment Letter I.9
Rose Bryan
July 7, 2017

Response to Comment I.9-1:

Thank you for your comment and participation in this public process. Upon request, at the June 29, 2017 Hearing Examiner meeting, the Lead Agency distributed several CDs, which contained PDF files of the Draft EIR, to meeting attendees. Prior to the June 29 meeting, the Lead Agency also uploaded the Draft EIR to its public website and, after the meeting, upon request, further arranged the online material to be more accessible by breaking the Draft EIR into its individual sections for faster downloading and reviewing.

The Golden Valley Municipal Water District (GVMWD) has subsequently been added to the Project's distribution mailing list for future notifications. As mentioned in your comment, GVMWD has been in receipt of the Draft EIR since the Hearing Examiner meeting on June 29, 2017. The County of Los Angeles extended the office review period by 30 days to end on August 16, 2017, giving GVMWD 49 days to review and comment on the Draft EIR. Additionally, since the Hearing Examiner meeting, the Project Applicant has had multiple communications with the GVMWD Engineer regarding the proposed Project and the Draft EIR, and has offered to make a presentation to the new GVMWD Board Members about the proposed Project. Therefore, the GVMWD had adequate time to review and comment on the Draft EIR pursuant to the requirements of the California Environmental Quality Act (CEQA) Statute Section 21091.

Response to Comment I.9-2:

The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days.

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From: Virginia Stout <briaspirit@hotmail.com>
Sent: Friday, July 07, 2017 5:53 PM
To: Jodie Sackett; Merrylou Nelson
Subject: Centennial
Attachments: Centennila DEIR AATC Request for Extension 1.docx

Dear Mr. Sackett:

Please review the enclosed request . Several other Town Councils also agree. Thank you for your prompt attention.

Virginia Stout
Antelope Acres Town Council, President

Subject: Centennial DEIR Review July 6, 2017

To Mr. Jodi Sackett:

This is to inform you that on Wednesday, July 5, 2017 the Antelope Acres Town Council considered the issue of the Centennial DEIR.

Due to the importance of the project and its impact on our community, we have determined that there needs to be additional public outreach on the part of the L. A. County Planning Dept.

Additionally, the DEIR is a massive document and the amount of information to review and comment on is requires a considerable effort.

We have learned and confirmed that the South Coast Air Quality District (responsible agency) did not receive distribution of the DEIR and therefore have not had an opportunity to review and comment on the air quality aspects of the document.

We are formally requesting an extension for an additional thirty days beyond the current deadline of July 17, 2017.

Please respond to this request as soon as is possible. My contact information is Virginia Stout, briaspirit@hotmail.com, 551-609-9993. Thank you for your consideration.

I.10-1

Virginia Stout, President
Antelope Acres Town Council

Response to Comment Letter I.10
Antelope Acres Town Council
July 7, 2017

Response to Comment I.10-1:

Extensive community outreach has been conducted for the Centennial Project. In addition to meetings held with agencies and municipalities, the Project Applicant conducted 12 community outreach meetings in the Antelope Valley between 2015 and 2017. The Project Applicant presented on the proposed Project at the Fairmont Town Council, Oso Town Council, Antelope Acres Town Council, Three Points Town Council, Association of Rural Town Councils, Lakes Town Council, Farm Bureau, and Greater Antelope Valley Association of Realtors.

The County of Los Angeles (County) conducted a public Scoping Meeting to solicit suggestions from the public as to the content of the Draft EIR. The meeting was held at the Gorman Elementary School (49847 Gorman School Rd), on Wednesday, October 21, 2015 from 6:30 PM to 8:30 PM. Additionally, a public hearing on the Draft EIR was held before the Los Angeles County Department of Regional Planning Hearing Examiner on June 29, 2017, starting at 6:00 PM at Gorman Elementary School. The County has satisfied all requirements for public notifications and meeting.

The South Coast Air Quality Management District (SCAQMD) was provided the Notice of Availability of the Draft EIR and is on the Project's distribution mailing list. Confirmation of receipt by the SCAQMD has been received and a comment letter was received from the District on July 13, 2017.

Thank you for your comment and for your participation in this public process. The County extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days.

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From: Dean Canfield <dnacanfield@verizon.net>
Sent: Saturday, July 08, 2017 3:37 PM
To: Jodie Sackett
Subject: Centineal EIR

Please extend the review period for at least 30 days. I.11-1
Thank you,

Dean Canfield
dnacanfield@ieee.org

Response to Comment Letter I.11
Dean Canfield
July 8, 2017

Response to Comment I.11-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: King, Katherine <king@humnet.ucla.edu>
Sent: Saturday, July 08, 2017 6:16 PM
To: Jodie Sackett
Cc: Terry _ Cliff Kelling; Rose Bryan (rmr27@me.com); leslie bricker (bricker21 @frazmtn.com); Edie & Lynn Stafford <stafford@frazmtn.com> (stafford@frazmtn.com); Eric Anderson (eric.roy.anderson@gmail.com); William Hopper (IMAB6CF@gmail.com); 'Mar Preston'; 'thomas@hungerhurst.com'; 'Victoria Hungerford'
Subject: Request extension for Centennial DEIR comments

Dear Mr Sackett,

It Is essential that the community most affected by the proposed Centennial project be given 30 more days to comment.

The body of the DEIR is over 2000 pages, and Appendix 5.18-A (water) is itself over 1500 pages. How can we be expected to comprehend the monumental effect of this project in the short time we have been given?

In addition, the hearing you held on June 29 was not noticed to our community in the Frazier Park area. Some of us heard that there would be some sort of meeting for Tejon Ranchcorp to explain its project, but no one knew it was a hearing put on by the lead agency.

Folks in Neenach found out about it by accident, too. Apparently, the only notification was signs with print too tiny to read posted alongside the highway.

Members of the Golden Valley Municipal Water District in Gorman, which prepared the WSA in 2011, were not notified.

I write on behalf of myself and on behalf of my group, the Tri-County Watchdogs of the Frazier Park area, whose members come from Los Angeles County as well as Kern County. We will be submitting comments, but I feel impelled to write now to request an extension. Fairness demands it.

I-12-1

I look forward to hearing from you.

Katherine King,
Frazier Park and Los Angeles
Secretary, Tri-County Watchdogs

Response to Comment Letter I.12
Tri-County Watchdogs
July 8, 2017

Response to Comment I.12-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days.

The Notice of Availability of the Draft EIR (NOA) and a hardcopy of the Draft EIR were made available for public review at the Kern County Library- Frazier Park Branch. The NOA was mailed to the following entities located in Frazier Park: U.S. Forest Service District Ranger; Kern County Sheriff's Office; Lake of the Woods Mutual Water Company; Lake of the Woods Property Owners; Mountain Communities Health Start; Frazier Park Public Utility District; Humane Society; VFW Post 9791; Mountain Communities Chamber of Commerce; Pine Mountain Town Hall; Ridge Route Communities Museum and Historical Society; Mountain Communities Town Council; Pine Mountain Club Property Owners; Mountain Communities Chamber of Commerce; and 19 individuals that had requested to be notified in writing about the Centennial Project. Adequate notification was provided to the communities of Frazier Park. Members of the community of Neenach that requested to be notified in writing were also provided an NOA.

Pursuant to the requirements of CEQA Section 15087(a)(2), notice was posted on the Project site about the availability of the Draft EIR for public review.

The Golden Valley Municipal Water District (GVMWD) has been added to the Project's distribution mailing list and has been contacted and provided the Draft EIR with adequate time for review and comment pursuant to California Environmental Quality Act (CEQA) Statute Section 21091. Additionally, the GVMWD has been working on the Project, including approval by the GVMWD Board of Directors of the Project's Water Supply Assessment, which was included as Appendix 5.18-A of the Draft EIR.

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From: Mar Preston <marpreston@frazmtn.com>
Sent: Monday, July 10, 2017 12:29 PM
To: Jodie Sackett; Samuel Dea
Subject: Centennial DEIR

Along with others, I am requesting a 30-day extension of the comment period. I struggled with downloading sections while those who prepared the lengthy and dense document had the advantage of being paid 40 hours a week on for 17 years to put 2000 pages together.

My computer froze. I am a citizen who will be greatly affected by this development and I can't even read what is planned.

Please offer a 30-day extension of the comment period to August 17th so that we can at least read the document.

I.13-1

Thank you.

Sincerely

Mar Preston
1408 Banff Dr, #6751
Pine Mountain Club, Ca 93222

Response to Comment Letter I.13
Mar Preston
July 10, 2017

Response to Comment I.13-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. Additionally, after the June 29 Hearing Examiner meeting, the Lead Agency arranged the online material to be more accessible by breaking the Draft EIR into its individual sections for faster downloading and reviewing. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Rose Bryan <rmr27@me.com>
Sent: Thursday, July 13, 2017 6:38 PM
To: Jodie Sackett
Subject: Centennial DEIR extension

Dear Mr. Sachet.

Thank you for the extension of 30 day
It was greatly appreciated by all our group. I.14-1

TCW member
Rose Bryan

Response to Comment Letter I.14
Rose Bryan
July 13, 2017

Response to Comment I.14-1:

Thank you for your comment and for your participation in this public process. The comment is noted. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Virginia Stout <briaspirit@hotmail.com>
Sent: Tuesday, July 18, 2017 2:10 PM
To: Jodie Sackett
Subject: Centennial

Thank you for the extension for comment on the Centennial EIR. These documents take a long time to read and collaborate on with community members, who do not have the time that those who create the documents have. Thank you for making it a little easier for residents to be a part of the planning for the land they so deeply care about. I.15-1

Ginger Stout
Antelope Acres Town Council

Response to Comment Letter I.15
Antelope Acres Town Council
July 18, 2017

Response to Comment I.15-1:

Thank you for your comment and for your participation in this public process. The comment is noted. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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J. Public Hearing Transcript and Responses

CENTENNIAL

at TEJON RANCH

--oOo--

PUBLIC HEARING EXAMINER MEETING IN RE)
)
THE CENTENNIAL SPECIFIC PLAN PROJECT)
)
_____)

THURSDAY, JUNE 29, 2017
GORMAN, CALIFORNIA
6:15 P.M.

Reported by: Timothy Scott, CSR No. 8517

Public Hearing Examiner meeting in re the Centennial Specific Plan Project, at Gorman Elementary School, 49847 Gorman School Road, Gorman, California, on Thursday, June 29, 2017, at 6:15 P.M., before Timothy Scott, a Certified Shorthand Reporter for the State of California, holding Certificate No. 8517, pursuant to Notice.

APPEARANCES:

HEARING EXAMINER:
MS. GINA M. NATOLI

STAFF:
MR. JODIE SACKETT
MR. SAM DEA
MS. ROSIE O. RUIZ

APPLICANT:
MS. KRISTIN STARBIRD

COMMENTS BY:
MR. JERRY GLEASON
MR. MATTHEW MISENHIMER
MS. ROSE BRYAN
MS. PATRIC HEDLUND
MR. ANDRE HOLLINGS
MR. DALE KING
MS. TERRY KELLING

GORMAN, CALIFORNIA
THURSDAY, JUNE 29, 2017
6:00 P.M.

HEARING OFFICER NATOLI: This Thursday, June 29th, 2017, Hearing Examiner meeting is called to order.

The county would like to start our public hearing with the Pledge of Allegiance. So at this time I would like to ask you to please rise, if you are able, and join me in the pledge.

(Pledge of Allegiance.)

HEARING OFFICER NATOLI: Thank you.

Good evening. I am Regional Planning staff member Gina Natoli. I will be the hearing examiner on all agenda items tonight.

I would like to go through some administrative items first.

Please turn off or silence all electronic communication devices. If you would like to follow along with the proceedings tonight, agendas are available on the table where you first came into the building.

It's possible that there were materials

submitted for tonight's items after the release of documents. If there were additional items available, they can be reviewed at the table in the lobby.

There are established time limits for testimony on the hearing examiner agenda items. For the public hearing, applicants will have up to fifteen minutes and all others will have three minutes apiece, and there will be no ceding of time.

Anyone wishing to speak tonight on any agenda item, that includes the public comment period, needs to fill out a speaker card. You can always fill out a speaker card, and you are not obligated to speak if you change your mind, or if something comes up during the presentations by either staff or the applicant tonight and something pops into your head, if you do come up and speak and haven't yet filled out a speaker card, I would just ask that afterwards you obtain a speaker card so we can keep track of that later.

It's possible that questions may come up during testimony that prompt questions that I'll call the applicant back up or staff back up after the speakers have had their chance to give the testimony, and there may be time for rebuttal.

Per the county code a hearing examiner makes no decisions; so the Centennial Project Specific Plan will

J.1-1

not be decided tonight.

The hearing examiner administers the meeting, takes testimony, and then reports on that testimony to the decision-maker. And in this instance the decision-maker will be the Regional Planning Commission. Per the public hearing notice, this public hearing can take testimony on the project's Draft EIR for the Centennial Project's Specific Plan, is just part of the process.

The hearing on the specific plan itself and the environmental document will be scheduled before the Regional Planning Commission at a future date.

If you did not receive a notice for this meeting and would like to be on the public notice list for the Regional Planning Commission public hearing, please see Mr. Sackett after the meeting and make sure he gets your address so you can receive that notice.

Also, per the public hearing notice, testimony will be taken tonight until last person has spoken or until 9:00 p.m., whichever comes first.

If you intend to speak tonight on any item on the agenda that includes the public comment period, I'm going to ask that you stand at this time to be sworn in by staff, by Mr. Dea.

Again, if you decide afterwards that -- or

during the meeting -- that you don't want to speak, that's fine. Being sworn in does not obligato you to speak.

So again, at this time I would ask that anyone who's going to speak on any agenda item please stand to be sworn in.

MR. SAM DEA: Please stand if you're able.

Do each of you swear or affirm under the penalty of perjury that the testimony you may give in the matters now pending before the hearing examiner shall be the truth, the whole truth and nothing but the truth? If so, please say "I do."

(I dos.)

MR. SAM DEA: Please be seated.

HEARING OFFICER NATOLI: Thank you very much.

Moving on to part 2 of the public hearing, Item 2, Project Number 02-232-(5). The applicant is Tejon Ranch.

Mr. Sackett, please proceed.

MR. JODIE SACKETT: Yes, thank you.

My name is Jodie Sackett. I'm a Senior Regional Planning assistant with the Los Angeles County Department of Regional Planning.

Item Number 2 on tonight's agenda is the Centennial Specific Plan Project, Specific Plan Number

02-232, along with the following entitlements: General Plan Amendment Number 02-232, Zone Change Number 02-232, Vesting Tentative Parcel Map Number 060022, Conditional Use Permit Number 02-232, and Development Agreement Number RPPL2016003940.

The location of the project is the upper northwest corner of Los Angeles County, south of Kern County, near the unincorporated community of Gorman, approximately 35 miles north of Santa Clarita, one mile east, approximately, of the I-5 freeway, and abutting and mainly north of Highway SR-138.

Project Description: The project encompasses a total of 12,323 acres, which is approximately 19.3 square miles, and the project proposes to develop up to 1,900 -- excuse me -- 19,333 dwelling units sited in nine different villages, and the village map is what's shown on the screen here.

4,098 single family attached, 2,643 single family attached, and 2,592 multi-family units. An estimated build-out population of 57,150 people. There's approximately 7,363,818 square feet of business park uses, which includes office, research and development, and warehousing or light manufacturing uses on approximately 597 gross acres.

1,034,550 square feet of commercial uses on

approximately 102 acres.

Institutional civic land uses such as schools for higher education, medical facilities, library, other civic uses.

Approximately 1,000 -- excuse me -- 1,568,106 square feet on approximately 110 acres. Four fire stations, a sheriff station, two waste water reclamation facilities for the tertiary treatment of all waste water. 5,624 acres on-site open space with an additional 209 acres of active park and recreation space. And the project will have approximately 100 million cubic yards of on-site grading.

The project entitlements include the specific plan for the new master planned community. The general plan amendment to amend the Antelope Valley Area Plan Land Use Designations. The zone change to change the zoning from open space A-1-2, RPD, and other zones to Specific Plan Zone.

There's also a Vesting Tentative Parcel Map to create 21 large-lot parcels for lease and financing purposes, and a Conditional Use Permit to authorize the grading for the project and for infrastructure related to circulation sewer, water, flood control, electrical, gas, composting, solid waste, water retention and treatment, road realignment, bridge construction and

J.1-1

J.1-2

J.1-2 cont.

highway intersection improvements.
The existing land uses include to the north open space and conservation, water and rural land use. To the south you have rural land use 20 acres or larger, again, with water and open space conservation.
To the east we have rural land. And to the west we have BLM land, again, rural land and open space.
Existing zoning to the north we have open space, heavy agricultural with two-acre minimum lot sizes. To the south we have light agricultural, two-acre minimum lot sizes along with heavy agricultural and spaces zoned for open space. To the east we have zoned open space, again, heavy agricultural and light agricultural. And to the west we have open space and heavy agricultural.
Previous Cases and Zoning History: The project site has been primarily used for livestock raising for 150 years. In addition to cattle grazing, the Tejon Ranch Company owns and cultivates approximately 1,000 acres of agricultural land in the eastern portion of the project site.
Project entitlements were originally filed in 2002.
In 2004 a Draft EIR Scoping Meeting was held. The project was updated and revised several times until

J.1-2 cont.

the most recent scoping meeting was held in 2015, and an updated Draft Environmental Impact Report was subsequently prepared.
The areas analyzed in the Draft EIR: The current environmental review is for A Draft Environmental Impact Report associated with the project and all of its required entitlements.
The project's initial study determined that all areas of analysis should be reviewed. These include geotechnical; hydrology and flood; hazards and fire safety; water quality; land resources, which include under-land resources; agricultural; forestry; mineral resources; cultural and tribal resources; biological resources; land use entitlements and planning; population, housing and employment; traffic access and circulation; air resources; noise; visual resources; parks and recreation; education; fire and law enforcement services; other public services such as library, solid waste and other public facilities; water resources; wastewater collection; dry utilities such as electrical, fossil fuels, natural gas and petroleum; telephone and cable service; climate change; growth-inducing impacts; and cumulative impacts.
As identified in the Draft Environmental Impact Report, the project will have several areas that have

less than significant impacts, and these include: Geotechnical; hydrology; hazards and fire safety; water quality, cultural and tribal resources; biological resources; land use; entitlements and planning; traffic; access and circulation; parks and recreation; education; fire and law enforcement services; water resources; waste water collection; dry utilities; and growth inducing impacts.
Several areas of analysis in the Draft Environmental Impact Report concluded that the project will result in significant and unavoidable impacts to the environment. Following is a summary of impacts associated with the project determined in the Environmental Impact Report to be significant and unavoidable after implementation of the project's design features and mitigation measures. These areas are: Agricultural and forest resources; population housing and employment; air resources; noise; visual resources; solid waste management and climate change.
The project will also have cumulatively significant and unavoidable impacts. The following environmental factors would result in cumulatively significant and unavoidable impacts to the environment. Those include: Land resources; biological resources; population housing and employment; traffic access and

J.1-2 cont.

circulation; air resources; noise; visual resources; solid waste; water resources; climate change.
Planning Process and Next Steps: The Draft Environmental Impact Report public comments will be received until July 17, 2017. The next step will be to prepare a final Environmental Impact Report with response to all public comments.
After that will be -- the project will be presented at the county, L. A. County Regional Planning Commission, and they will make a decision to either approve or deny the Environmental Impact Report along with the associated project entitlements.
And the project must eventually go to the Los Angeles County Board of Supervisors, which will, based upon the recommendation or the Regional Planning Commission and the public testimony received, either approve or deny the Environmental Impact Report along with the project's entitlements.
And this concludes staff's presentation. Thank you.
HEARING OFFICER NATOLI: Thank you, Mr. Sackett.
At this time I'm going to open the public hearing and ask the applicant to come forward and make their presentation.

J.1-3

J.1-3 cont.

Thank you for coming and taking a seat. Please state your name for the record before you begin.

MS. KRISTIN STARBIRD: Sure. I'm Kristen Starbird. I'm with Psomas. I'm a senior project manager and I worked on the CEQA documentation for the proposed Centennial project. And we also have Greg Margaris and Nathan Keith that are here and available to answer any questions if anyone has any questions about Tejon Ranch or the project itself.

So Tejon Ranch is the largest privately owned land holding in California with 270,000 total acres of land in that shroud between Los Angeles and the Kern County border. It's been a working ranch for over 150 years with farming, cattle grazing, hunting, et cetera. And Tejon is also known for being a steward of the land resources and for conservation within their property.

In 2008, Tejon entered into a conservation land use agreement that would preserve approximately 90 percent of their acreage, 240,000 acres as undeveloped. That includes approximately 145,000 that's dedicated conservation easement land, 33,000 acres preserved within development areas, and environmental groups have acquired an additional 62,000 acres of land.

Tejon Ranch conservancy board manages this land and coordinates the five major environmental groups for

the protection and enhancement of native ecosystems on the property.

Because Tejon Ranch has preserved 240,000 acres, there's 30,000 approximately remaining acres for development. Of course, in the right location, which is close to freeways. Tejon Ranch spans 28 miles of frontage along the Interstate 5 corridor, and development along the transportation corridor will help establish jobs and housing for working Californians in Kern County, Los Angeles County and beyond.

Tejon is already moving forward with four other projects in Kern County, including Tejon Commerce Center, Outlets at Tejon, Grapevine, and the Tejon Mountain Village projects.

Which brings us to the Centennial Project. Centennial is the final development component of the Tejon Ranch property build-out. It includes 19 square miles of land bisected by State Route 138 and is entirely located within Los Angeles County.

Centennial is intended to be a self-sustained community due to the internal balance of residential and employment land uses.

This graphic depicts the Antelope Valley Area Plan land use designations for the site and surrounding areas.

In 2014 the AVA was approved by the L. A. County Board of Supervisors. And the AVA directs that the majority of the unincorporated Antelope Valley's future growth be diverted into rural town areas, rural town centers and economic opportunity areas.

The AVA approval established the west economic opportunity area, or EOA, which contains the Centennial Project site, and also requires the approval of specific plan for the orderly development within the EOA.

Here's another depiction of the land use designation with an overlay also for the significant ecological area and hatching, that's SEA Number 17, San Andreas.

The project site contains 3,861 acres of SEA land that would be conserved on preserved and not affected by the site's development.

So in summary, Centennial's Land Use Plan implements the requirements of the AVAP by including a balance of land uses and public facilities and is consistent with the goals of the West EOA and the future rural town identification site.

Centennial preserves the majority of the site's most biologically sensitive lands including pristine oak woodlands and drainages in Oso Canyon.

Overall the site contains 12,323 acres, and of

this almost half is preserved as open space.

The project includes residential areas. Not to be repetitive, but 19,333 residential units that range from low density and very low density to high density residential organized into nine villages.

Again, the villages are phased over time over a 20-year build-out time frame.

The primary village, Village 3, is kind of the center of downtown of the Centennial Project site and is near the entrance, the primary entrance to the property.

The project would include approximately 10 million square feet of nonresidential development and create approximately 23,600 permanent jobs. That square footage development includes 7.4 million square feet of business park, research and development, light industrial manufacturing, office, trade schools, hotels, et cetera, 1.4 million square feet of institutional and civic uses, including higher education, post secondary school, hospitals, medical centers, libraries, et cetera, and approximately 90,000 square feet of commercial development.

As mentioned earlier, the site includes 5,624 acres of open space. Of that we've got 163 gross acres of park overlay that provides a variety of recreational amenities, including public neighborhood

J.1-3 cont.

parks, community parks and community regional parks. There is an additional 46 acres of recreation centers and county multi-use trails for pedestrians and bicyclists that ultimately connect to the Pacific Crest.

As a broad overview of the project objectives, the primary goals are to implement the development anticipated in the Antelope Valley Area Plan; to maximize the efficient use of regional infrastructure; to provide a balance of employment, residential and institutional recreational land uses; and create public services and infrastructure funded by the project.

The project benefits, in summary, include approximately 23,000 permanent jobs and 25,000 construction jobs, 31 million annual public revenue for L. A. County.

Benefits for the surrounding community are made through the Centennial Project, as well, including the development of public parks, pocket parks, private parks, 95 miles of public trails, and public infrastructure and public services; up to four fire stations on the site, one sheriff's station, one library located in the town center Village 3, land available for medical facilities, all of these services in surrounding communities, too.

The project has approved school agreements with

J.1-3 cont.

the Gorman Joint School District and Antelope Valley Union High School District, and will develop seven new schools.

So in summary, Centennial is a master planned community that will be phased over a 20-year build-out time frame. It implements the requirements of the AVAP by providing a balance of land uses that fulfill the economic objectives of the West EOA and comply with the land use goals and policies set forth in the Antelope Valley Area Plan.

Thank you very much.

HEARING OFFICER NATOLI: Thank you. I understand you have not yet filled out a speaker card, is that correct?

MS. KRISTIN STARBIRD: I'll fill it out right now.

HEARING OFFICER NATOLI: Thank you. Thank you very much.

J.1-4

I'm going to ask Mr. Dea to call speakers now, those of you that signed up.

What I would like you to do, the first two names that are called, come on up and take a seat at the table. The other folks that he calls, maybe call five at a time.

MR. SAM DEA: Four or five.

HEARING OFFICER NATOLI: Four or five at a time.

Numbers 3, 4 and 5, if you could come up to the front row, we have seats reserved for those who are speaking. Come on up and take a seat.

Those of you at the table, you'll state your name for the record. Just between the two of you, you can decide who's going to start first.

When you finish your testimony, please, I would ask that you vacate the seat, and the next person who was called, if you could please come up and take that seat so we can keep things moving along.

There's a timer here on the table. You'll have three minutes to speak. The green light will come on after you stated your name. When you have 30 seconds left, that yellow light will come on. So you want to make sure you wrap up your testimony, get in your crucial statements. And the red light means it's time to stop.

I also do want to say that there is a transcript being made of tonight's hearing. In addition, there is a video/audio recording that's being made.

The transcript is normally available about ten working days after the meeting. And the video is

J.1-4 cont.

normally up on our website, planning.LACounty.gov, within about three working days. So with this being Thursday, Regional Planning is closed on Fridays, and the 4th of July holiday coming up, it should be up by the end of next week.

So at this time, Mr. Dea, if you could call our first speakers.

MR. SAM DEA: Thank you. First four speakers: Jerry Gleason, Patrick Hedlund, Matthew Misenhimer, Rose Bryan.

HEARING OFFICER NATOLI: Mr. Gleason, if you would like to start, please, go ahead.

MR. JERRY GLEASON: Yes, my name is Jerry Gleason and I live here in the Neenach/Three Points area.

J.1-5

And as a commuter I would like to voice my disapproval for this project based on the traffic burden that it's going to cause.

I'm aware of the project to improve the 138, which I think would handle most of the east/west traffic just fine, but I commute down Interstate 5, which as we know, is the only artery from north to south that runs through this area. The next closest one would be Interstate 14, or State Route 14, which is about 50 miles to the east, and Highway 101, which is about

J.1-6

100 miles to the west.

As you may have noticed today, there was a truck accident on the 5 causing quite a bit of traffic. That is not an isolated incident; that happens frequently.

We also have weather-related closures to Interstate 5. We have brushfires and we have a large amount of truck traffic, like I stated. So one overturned truck literally brings the freeway to a halt. I personally have been stuck in traffic for as much as four hours at a time because there's no relief; you can't get off the freeway.

There's -- in some places there's six, seven miles between exits and you can't get off of freeway; you're stuck there. It doesn't matter if it's 110 degrees out or 20 degrees out; you're stuck there in your car for that amount of time.

So unless the State of California, the Department of Transportation, has some plan in the works to make a relief route to get through this area, I think it's insane to build a housing project and dump a couple more thousand vehicles on that freeway.

As a homeowner in the area, I see people pulling over on the side of the road taking pictures of the beautiful area. It's scenic. I feel like I'm

driving through Colorado or New Mexico when I come through this area.

And I think the day that this construction begins, if it's approved, all that is going to be gone. And you can kiss all this beauty good-bye.

So that's my emotional side. As a homeowner I object to it. But really, the traffic issue I think needs to be addressed. There has to be a permanent solution to that. And unless they come up with something to address that, I say this project should not go forward.

Thank you.

HEARING OFFICER NATOLI: Thank you, Mr. Gleason.

Hi.

MS. ROSE BRYAN: Hello. I'm Rose Bryan. And I'm a resident here in Gorman. And I've been here for almost forty years. And through the forty years I have been in so many of these developments that have come and gone for one of the main reasons, and that's water.

Water issues have been a real problem here in Gorman, not only for us residents, but also any project that's ever, ever come through here, and believe me, I have been at the forefront of every single one of them. One of the main things is the area that -- or the water,

unless you bring it in from Kern, unless you bring it in from an outside source, is all apparently allocated. As many of the other EIRs I have read from the Antelope Valley, from state water project, from the wells, the aquifer, every single one of them, and I know, I'm on one of them myself, the drought has really collapsed a lot of our wells in this community all up and down the hill, in Gorman, and where ever else you have a well, the Antelope Valley.

And so I'm asking if they put in nine wells in the Antelope Valley down to a thousand feet of a pipe of 14 inches, how are you going to mitigate all the other private wells and agriculture and all the other uses for water in the Antelope Valley, let alone in Gorman, to allow such a huge development? I just don't understand it. To me it's just almost an impossibility.

I mean, the developments have come and gone for that particular reason. And I'm not just -- you know, I've been living here long enough to go through all of these.

So consequently, even this year, State Bill 88, which is the state bill that Mr. Brown put in because of the drought to mitigate all the basins in California and to be able to recognize the overdraft that all these basins have incurred through the years, and especially

through the drought.

Now, if you pull out X amount of water through any of these basins or aquifers, who's going to manage that? I'm concerned about that because no one thinks about managing the water sources and the amount of water that is pumped out of those aquifers. Because if there is no recharge, and we had a good rain this year, and all the water in sag ponds have now dried out. This is July. It shouldn't have dried out until August, September, if we have water.

Now we have to have substantial amounts of years of water for it to replicate a lot of the water that we have taken out.

HEARING OFFICER NATOLI: Miss Bryan, I'm going to ask you to wrap up.

THE WITNESS: Oh, I'm sorry. I'm going on and on.

Anyway, the wells that they are putting in, I'm really concerned about that. And also the biological resources, they haven't even enough corridors for the animals to traverse from one land to another. Therefore, it is very difficult for me to understand how you could possibly put in this huge development without more regulations as to the biological resources.

And I thank you very much

J.1-6 cont.

J.1-7

J.1-8

J.1-9

J.1-9 cont.

J.1-10

J.1-11

J.1-12

HEARING OFFICER NATOLI: Thank you, Miss Bryan. Please, sir.

MR. MATTHEW MISENHIMER: Hi. My name is Matt Misenhimer. And I moved --

HEARING OFFICER NATOLI: Could I ask you, Matt, for the benefit of our court reporter, to spell your last name.

MR. MATTHEW MISENHIMER: Yeah, it's M-I-S-E-N-H-I-M-E-R.

HEARING OFFICER NATOLI: Thank you.

MR. MATTHEW MISENHIMER: So I'm mainly concerned about the effects of urban sprawl in the area due to the communities that are already up here, as well as the prices up here, and just I kind of see any developments as an eyesore.

I moved up here from Ventura last year. One of the main reasons is Ventura has undergone changes in the population that made it not a very good place, in my opinion. It went from being a great place when I was younger to being now overpopulated, and the culture that existed there before no longer exists. It's been drowned out by people imported from other areas.

And I believe the same thing will happen with this as -- the 50 to 70,000 people that may move into this new development, that's going to greatly outnumber

the populations that are already up here and the cultures that already exist.

And one main reason that a lot of people like to live up here is to get away from all the headaches and the overpopulation in L. A. and Ventura and, you know, Bakersfield.

So I would definitely -- I would hate to see the development happen, honestly, because I just -- I know it will bring great things, more jobs. People do need jobs in the area. A hospital, too. The closest hospital is pretty far away.

But at the same time I think you're going to -- if the development goes forward, you will see all the areas up here, Frazier Park, Neenach, Lake of the Woods, all of them are going to be severely impacted. Maybe in a positive way, maybe negative. It's all going to be chaotic for a while. People will not know what to expect.

Are property values going to drop? Are they going to rise? Will they be able to find jobs in that community, or is it just going to be, you know, wishful thinking?

Anyway, I just -- and since the area has so many unique attributes with regard to wildlife, like we have things that exist up in this area that don't exist

anywhere else, I know that that's going to be examined by the council and probably continued to be examined, but that's a serious concern.

And I think my time is up.

HEARING OFFICER NATOLI: Thank you, Mr. Misenhimer.

MR. SAM DEA: Okay. Last call for Patrick Hedlund.

And the next three speakers: Andre Hollings Terry Kelling, and Dale King.

HEARING OFFICER NATOLI: Please go ahead.

MISS PATRIC HEDLUND: My name is Patric Hedlund. And I'm speaking only on the issue of notification regarding this hearing.

As Mr. Misenhimer indicated, he was thinking about people that live here now and the people that will be most impacted by the changes.

He indicated Frazier Park, Lake of the Woods, that is Pine Mountain, there's Lebec, there's Gorman, and there's Neenach and there's Fairmont.

So all of those areas are within the coverage area of the Tri-County newspaper called the Mountain Enterprise.

And the reason I bring it up is because we are the adjudicated legal publisher for the region, and

we're also the only newspaper with its feet on the ground typically reporting in these areas.

There was no notification in our newspaper. And my concern is when we've had meetings in this same venue over the last several years, with Mr. Dea's assistance, we usually had a very full house. We don't have a full house today. And one of the reasons is I'm concerned, even though as Mr. Dea mentioned, we had an updated website by the planning staff, which I appreciate very much. But people -- that's kind of having to search for it. It's not coming to their venue and into the news environment, which CEQA says is still required.

So I just wanted to point that out. And it makes me a bit concerned about the possibility of whether the community will be asking for an extension of the review period for the DEIR.

So I wanted to bring that up to ask you to consider that because in the past when I've covered table ranches and other developers' projects and proposals, we do tend to have a very engaged community. We have groups that get together and gets committees put together and they go through the EIRs carefully.

So I just want to respect that and I know you folks do, too, and I know that CEQA, of course, cares

J.1-13

J.1-14

J.1-14 cont.

J.1-15

J.1-15 cont.

about that as well.

So I thank you very much for your hearing.

HEARING OFFICER NATOLI: Thank you. Please go ahead, sir.

MR. ANDRE HOLLINGS: Good evening. My name is Andre Hollings, and I am here to speak in favor of the Centennial Project.

Centennial is the county's implementation of the Antelope Valley Area Plan. Centennial supports the Antelope Valley Area Plan's goal of reducing vehicle use.

The community will offer alternatives to automobile use, such as public transit, a bicycle network and a pedestrian system, which will minimize traffic pollution and green house gases.

J.1-16

Centennial will provide an integrated network of roadways, walking and biking trails to reduce the use of automobiles and facilitate safe and efficient travel. Sidewalks, greenway trails and community trails will link to residential, schools, shopping and employment areas.

In support of the Antelope Valley Area Plan's prioritization for the preservation of open space resources there will be minimal development in areas of significant biological value.

to go 100 feet. So all our wells up here are suffering. But I did have the foresight to put in a reservoir on my five acres and I was able to catch thousands of gallons of water, and my well is better than it's ever been from just this last year. I know it will take several years for us all to recuperate.

The sad portion about it is it's just not the communities up here suffering from water, it's the entire city of L. A. and the whole county of L. A. But we just all need to work smarter and think smarter, and that is one thing I believe Centennial has done in regards to the conservation.

Each house will have drought-tolerant plants and a program, that irrigation, which is something I don't know any community in anyplace in the United States has.

Medical is a big issue with me due to my age. I have to go to Santa Clarita for my local physician. I would love to have one up here.

Banking is another issue up here; there's only one bank in this community. I have heard nothing but negativity, maybe it's a great bank, but unfortunately no credit union; that's where I bank.

I just want to wrap it up in saying that everything I know about Centennial is good, and I'm all

J.1-17 cont.

As one of the three Economic Opportunity Areas established by the Antelope Valley Area Plan, Centennial is within the West Economic Opportunity Area.

The main goal for the Antelope Valley Area Plan is to provide a balanced plan, economic opportunity and conservation, and that is exactly what Centennial proves to be.

There is support for this project throughout the county. And we ask for your approval on this project. Thank you.

HEARING OFFICER NATOLI: Thank you, Mr. Hollings.

MR. DALE KING: My name is Dale King. For the last five or six years I have attended every meeting that Centennial has put on. I believe that the people who have stated negativity toward it probably have not attended any of these meetings, or very few, or they would know how well Centennial Project as far as water and water sharing is set up.

J.1-17

I don't want to sit here and tear down other people because I think it's great there is a turnout. There may not be a full house in here, but the parking lot is full. So I hope I don't get towed because there was no place to park.

Water takes six months to a year for one drop

for the plan. There's going to be traffic no matter where we live. People will continue to populate. We just need to control the population. I think Centennial bent over backwards to make sure that this is going to happen.

I have toured the site, and the residential area will not even be visible from the I-5 or 138. I don't think it will create any type of eyesore whatsoever, and their plan is to keep Tejon Ranch in the same condition that it has been.

Thank you very much.

HEARING OFFICER NATOLI: Thank you, Mr. King.

MS. TERRY KELLING: Yes, my name is Terry Kelling, and I'm here to speak to the clean air, and we enjoy our clean air up here. One of the reasons that I live here rather than in Santa Clarita or Bakersfield.

J.1-18

And with the project going in, I've had several friends come down with valley fever when they were putting in some of these solar farms, and I'm really concerned that with Centennial going in, that will rise. It has risen horribly here in Kern County over the last year. And I know that you guys have put in the Draft EIR about notifying and having most windy days somebody who can shutdown the grading and so forth and letting people know that you guys are going to be grading.

J.1-19

J.1-19 cont.

I think that needs to be extended out to include up to PMC, into our mountains, because that wind carries. We need to notify people. The wind carries clear over to Ventura. And so we need to let people know that this stuff is going on and that there's a high risk of them contacting valley fever, and they need to be aware. And I think that's something that Tejon needs to let people know that they are going to be grading and moving all this earth, and that we need somehow to protect ourselves. And getting out the word, as they say they are trying to do, doesn't necessarily help. I mean, they got to inform much more than just the TV ad. Mega links or something, I don't know what the answer is. But they need to inform the mountain communities that they are going to be grading and we're at a high risk.

And I mean, I can't -- I don't know if the project will be good or bad. It's just going to be one. Thank you.

HEARING OFFICER NATOLI: Thank you, Miss Kelling.

MR. SAM DEA: We have one last speaker, and that's the representative, Nathan Keith, only if they are able to answer questions.

That concludes the last speaker for this item.

HEARING OFFICER NATOLI: I would like to ask you, Mr. Dea, do you have any comments or responses to the issues raised by those who testified?

MR. SAM DEA: No. Just wanted to add that these issues will be responded to in the response comments of the final EIR, and many of these issues have been anticipated in the Draft Environmental document, and it's been analyzed, and the impacts and the -- any feasible mitigation has been incorporated into the Draft EIR. But we're open to any comments based on information you presented either tonight and in the Draft EIR.

J.1-20

HEARING OFFICER NATOLI: Thank you.

And does the applicant have any comments, any responses, based on the testimony given tonight?

Seeing that you do not, let me go over the next steps that Mr. Sackett had in his slide.

Again, you've presented testimony on the Draft EIR. Your comments will be taken and responses to those comments will be drafted, written up and included in the final EIR that will go before the Regional Planning Commission along with the project, which is the Centennial Specific Plan.

The comment period for this Draft EIR is 60 days. It's more than the 45 that is -- 30 is required by CEQA. 45 is often. And this is up to sixty.

The comment period for this Draft EIR closes on the 17th of July. That's about another two-and-a-half weeks from tonight.

So if you do have comments, something comes up that you think of after the meeting tonight, you can always contact Mr. Dea or Mr. Sackett to provide your comments.

With that, what I'm going to do now is close the public hearing for Item 2. And you know what's going to be happening next on that. And move on to Part 3, which is the public comment period.

Do we have anyone signed up for public comment period?

J.1-20 cont.

MR. SAM DEA: No one signed up.

HEARING OFFICER NATOLI: All right. With that, we move into Part 4, which is adjournment of the meeting. And this Hearing Examiner Meeting is adjourned.

Thank you very much for coming.

(PROCEEDINGS CONCLUDED AT 7:04 P.M.)

CERTIFICATE
OF
CERTIFIED SHORTHAND REPORTER

I, TIMOTHY SCOTT, CERTIFIED SHORTHAND REPORTER, CERTIFICATE NO 8517, DO HEREBY CERTIFY THAT SAID PROCEEDINGS WERE TAKEN BEFORE ME AT THE TIME AND PLACE THEREIN SET FORTH AND WERE TAKEN DOWN BY ME IN SHORTHAND AND THEREAFTER TRANSCRIBED, SAID TRANSCRIPT BEING A TRUE COPY OF MY SHORTHAND NOTES THEREOF

I FURTHER CERTIFY THAT I AM NEITHER COUNSEL FOR, NOR RELATED TO, ANY PARTY TO SAID PROCEEDINGS, NOR IN ANY WAY INTERESTED IN THE OUTCOME THEREOF

IN WITNESS WHEREOF, I HAVE HEREUNTO SUBSCRIBED MY NAME THIS DATE JULY 10, 2017

CERTIFICATE NUMBER 8517

Responses to Comment Letter J.1
Public Hearing Examiner Meeting in re
The Centennial Specific Plan Project
July 29, 2017

Regional Planning staff member Gina Natoli

Response to Comment J.1-1:

This is an introductory comment by the County Hearing Examiner. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Senior Regional Planning Assistant Jodie Sackett

Response to Comment J.1-2:

This is an introductory comment by the County Senior Planning Assistant. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Regional Planning staff member Gina Natoli; Kristin Starbird Senior Project Manager at Psomas

Response to Comment J.1-3:

This is an introductory comment by the Project EIR consultant. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Regional Planning staff member Gina Natoli

Response to Comment J.1-4:

This is an introductory comment by the County Hearing Examiner. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Jerry Gleason

Response to Comment J.5-5:

Thank you for your comment and for participating in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment J.1-6:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not raise a specific concern regarding the content of the Draft EIR, and no further response is required.

The following information summarizes the analysis of potential Interstate-5 (I-5) traffic impacts in the Draft EIR, which are discussed in detail in Section 5.10, Traffic, Access, and Circulation, including the text and tables on pages 5.10-56 to 5.10-119. The analysis compares the applicable Level of Service (LOS) standards for I-5 freeway segments and onramps and off-ramps located north and south of the Project site using well-established analysis methodologies under existing conditions, existing conditions with the Project, and under future (cumulative) with Project conditions based on future I-5 traffic projections prepared by applicable transportation and transit planning agencies for Los Angeles County and Kern County. The Draft EIR determined that no significant impacts to freeway segments or interchange ramps would occur under existing plus Project conditions, and that the Project could contribute to an exceedance of capacity on the westbound State Route 138 (SR-138) to southbound I-5 ramp. The Draft EIR determined that, under cumulative plus Project conditions, the Project could contribute to impacts at six mainline segments along I-5 and to the interchange connector ramps from westbound SR-138 to southbound I-5 and from I-5 to eastbound SR-138. The Draft EIR found that all potentially affected I-5 segments and ramps under existing plus Project and cumulative plus Project conditions would operate within acceptable performance criteria with certain specific improvements (see Draft EIR page 5.10-80 for existing plus Project ramp improvements; Draft EIR page 5.10-103 for cumulative I-5 segment improvements; and Draft EIR page 5.10-119 for cumulative I-5 ramp improvements). Draft EIR mitigation measures, including MMs 10-2, 10-3, 10-4, 10-21, 10-23, 10-26, and 10-28 to 10-35 requires that the Project provide fair share funding for all these improvements and also implement on-site programs to reduce Project vehicle trips. The Draft EIR found that compliance with these mitigation measures and the fair share contributions towards the improvements described above would reduce potential Project impacts to I-5 freeway segments and ramps to less than significant levels.

Response to Comment J.1-7:

Thank you for your comment and for participating in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. For reference purposes, the Project's potential environmental effects related to visual resources were fully analyzed in Section 5.13, Visual Resources, of the Draft EIR, which discloses that the Project would cause a significant and unavoidable impact related to visual resources.

Response to Comment J.1-8:

Thank you for your comment and for participating in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. Please see response to Comment J-6.

Rose Bryan

Response to Comment J.1-9:

The comment does not raise a specific concern regarding the content of the Draft EIR and no further response is required. The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Gorman area water supplies referenced in this comment. The Draft EIR found that the Project's available water supplies would sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved and that Project water supply impacts would be less than significant with mitigation.

Response to Comment J.1-10:

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Gorman area water supplies referenced in this comment. All Project groundwater use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[3241] The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution also takes account of and avoids potential long-term, cumulative impacts to the Antelope Valley Basin. Section 1.5 of the Adjudication Judgment and Physical Solution states that after the Phase 3 trial of the proceedings, the Court determined that the

[3241] DRP 2017, Appendix 5.18-D

safe yield of the Antelope Valley Basin is 110,000 acre-feet per year. Section 3.5.43 of the Adjudication Judgment and Physical Solution defines safe yield to mean the amount of annual extractions of water from the Basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Section 3.4 of the Adjudication Judgment and Physical Solution states that the physical solution governs groundwater, imported water and Antelope Valley Basin storage space to ensure that the Antelope Valley Basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield and provides that, after a seven-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the amount of the overlying production right of 1,634 acre feet per year allocated to Tejon Ranch Company in the adjudication. The fact that the Adjudication Judgment and Physical Solution, including the annual groundwater allocation to the Tejon Ranch Company, takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids long term, cumulative groundwater impacts and ensures that cumulative groundwater use will be sustainable over time. Consequently, Project groundwater use in accordance with the Adjudication Judgment and Physical Solution will not conflict with groundwater use by other parties in the Antelope Valley over time.

Response to Comment J.1-11:

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the sag ponds referenced in this comment. The comment reference to Senate Bill 88 appears to pertain to certain California legislation enacted in June 2015 that provides for, among other measures, the consolidation of smaller water providers under certain circumstances and for water use measurement. As Discussed in the Draft EIR, all Project indoor and outdoor water use will be metered, and the references do not appear to be applicable to the Project.[3242] With respect to the comment references to managing aquifer extractions, Section 5.18, Water Resources, of the Draft EIR provides a discussion of the Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015 which will govern all Project and other groundwater use in the Antelope Valley Basin.[3243] The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater

[3242] DRP 2017, p. 5.18-40
[3243] DRP 2017, Appendix 5.18-D

resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution also takes account of and avoids potential long-term, cumulative impacts to the Antelope Valley Basin. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield as determined by the Court and provides that, after a seven-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the amount of the overlying production right of 1,634 acre feet per year allocated to Tejon Ranch Company in the adjudication. Consequently, groundwater use by the Project and other parties in the Antelope Valley is governed and managed by the Adjudication Judgment and Physical Solution to ensure the long-term sustainability of the Antelope Valley Basin resources.

Response to Comment J.1-12:

Numerous studies on wildlife movement have been conducted on the Project site, as well as throughout the Project region, and were used to inform the wildlife movement discussions in Section 5.7.3, Environmental Setting, and Section 5.7.6, Environmental Impacts.[3244,3245,3246,3247,3248] Studies on wildlife movement in the Project region have generally shown the Project area as a whole to be largely outside important corridor linking the Sierra Nevada-Cascade Cordillera with the Sierra Madre-Transverse-Peninsular Range Cordillera. SEA 17, which is considered an important corridor for wildlife, will not be impacted by the Project.[3249] Wildlife moving from north of the Project across the SR-138 are expected to use either the crossing at the west side of the Project where the Aqueduct intersects the SR-138, or to travel around the Project and cross to the east of the Project.[3250] In addition, the aqueduct represents a substantial barrier for most species rendering the site less than suitable for substantial movement.[3251] In addition, many green ways will be retained and created on the site, natural and unnatural, which will allow for common urbanized wildlife to move about the Project lands. All applicable State and federal regulations have been applied to the Project and reviewed in the Draft EIR. The combination of mitigation measures and applicable regulations sufficiently reduce impacts of the Project.[3252]

[3244] DRP 2017, Table 5.7-2
[3245] Beier 2003
[3246] Penrod et al. 2003, 2004, and 2005
[3247] Pioneer Environmental Services 2004
[3248] Trust for Public Lands 2004
[3249] DRP 2017, pp. 5.7-8, -155, -194
[3250] *Id.,* p. 5.7-165
[3251] *Ibid.*
[3252] *Id.,* p. 5.7-194

Matt Misenhimer

Response to Comment J.1-13:

Thank you for your comment and for participating in in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. For reference purposes, the Project's potential environmental effects related to visual resources were fully analyzed in Section 5.13, Visual Resources, of the Draft EIR, which discloses that the Project would cause a significant and unavoidable impact related to visual resources. The Project's potential to affect real estate prices is an economic and social issue, rather than an effect on the environment. Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself shall not be considered a significant effect on the environment and this comment provides no indication of how the Project's potential effects on real estate prices may cause a physical change in the environment. Nevertheless, this comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment J.1-14:

This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. For reference, the Project's potential effects related to population, housing and employment are fully analyzed in Section 5.9, Population, Housing, and Employment, of the Draft EIR. The Project's potential effects related to visual resources are fully analyzed in Section 5.13, Visual Resources, of the Draft EIR. The Project's potential effects related to biological resources are fully analyzed in Section 5.7, Biological Resources, of the Draft EIR. Please see response to Comment J-13. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Patric Hedlund

Response to Comment J.1-15:

Thank you for participation in the public process. The county acknowledges the request for public notices for the Project to be placed in the *Mountain Enterprises* newspaper. The County will attempt to publish any further notices for this Project in the *Mountain Enterprises* newspaper. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Andre Hollings

Response to Comment J.1-16:

Thank for your comment and for your participation in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially

significant environmental effects of the Project or the adequacy of the Draft EIR. No further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Dale King

Response to Comment J.1-17:

Thank for your comment and for your participation in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR. No further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Terry Kelling

Response to Comment J.1-18:

Thank for your comment and for your participation in this public process. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR. No further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment J.1-19:

Please refer to response to Comment F.3-29 discussing new MM 3-11 requiring creation of a website with regularly updated information on ground-disturbing activities and the notification of off-site persons to the presence of this website to seek out information, if desired.

Hearing Officer

Response to Comment J.1-20:

This comment is comprised of closing comments by the County Hearing Examiner and staff. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

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CENTENNIAL
at TEJON RANCH

Centennial Project

Consolidated Final Environmental Impact Report

Volume 3

State Clearinghouse No. 2004031072
Specific Plan No. 02-232
County Project No. 02-232-(5)
General Plan Amendment No. 02-232
Zone Change No. 02-232
Vesting Tentative Parcel Map No. 060022
Conditional Use Permit No. 02-232
Development Agreement No. RPPL2016003940

Lead Agency:

County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, California 90012

November 2018

Consolidated
Final Environmental Impact Report

Centennial Project

Los Angeles County, California

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November 2018

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3.0 RESPONSES TO CORRESPONDENCE RECEIVED AND PUBLIC TESTIMONY GIVEN AFTER CLOSE OF OFFICIAL DRAFT EIR PUBLIC COMMENT PERIOD

3.1 RESPONSES TO CORRESPONDENCE RECEIVED PRIOR TO JUNE 6, 2018 REGIONAL PLANNING COMMISSION HEARING

All comment letters received by the County between May 21, 2018 and June 12, 2018, as well as letters presented to the County at the June 6, 2018 Regional Planning Commission hearing, have been included and responded to herein. Comments that raise environmental issues pertinent to the analysis presented in the EIR have been thoroughly addressed in these responses.

With respect to the new comments letters received, individual comments within the body of each letter have been identified and numbered. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. Responses to each bracketed comment are included on the page(s) following each comment letter, and the electronic PDF file includes hyperlinks between the comment and the associated response to facilitate ease of review.

Table 1 below presents a summary listing of all additional comment letters received, including the commenting agency/individual; the assigned numbering for each comment letter; the date of the correspondence; and the page number where the comment letter can be found herein.

TABLE 3.1-1
ADDITIONAL LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
A. Federal Agencies			
-	-	-	-
B. State Agencies			
ADD-B.1	Department of Water Resources	June 5, 2018	3-3
C. County Agencies			
ADD-C.1	County of Los Angeles Fire Department	June 12, 2018	3-6
D. Regional Agencies			
-	-	-	-
E. Local Agencies			
ADD-E.1	Gorman Joint School District	May 29, 2018	3-8
F. Organizations			
ADD-F.1	Castaic Area Town Council	May 21, 2018	3-10
ADD-F.2	Center for Biological Diversity / California Native Plant Society	June 5, 2018	3-12

TABLE 3.1-1
ADDITIONAL LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
ADD-F.3	Three Points-Liebre Mountain Town Council	June 5, 2018	3-43
ADD-F.4	Association of Rural Town Councils	June 5, 2018	3-46
ADD-F.5	Southern California Leadership Council	June 5, 2018	3-48
ADD-F.6	Advocates for the Environment	June 5, 2018	3-50
G. Individuals			
ADD-G.1	Senator Scott Wilk	June 6, 2018	3-52
ADD-G.2	Judith Fuentes	June 5, 2018	3-54
ADD-G.3	Form Letter 3 – Various Commenters	Various Dates	3-56
ADD-G.4	Form Letter 4 – Various Commenters	Various Dates	3-58
ADD-G.5	Sidney Stone	May 24, 2018	3-60
ADD-G.6	Christie Brown	May 24, 2018	3-62
ADD-G.7	Mihai Craioveanu	May 24, 2018	3-64
ADD-G.8	James Tresevant	May 24, 2018	3-66
ADD-G.9	Bruce Baldwin	May 29, 2018	3-68
ADD-G.10	Dan S	May 29, 2018	3-70
ADD-G.11	Susan Sundberg	May 30, 2018	3-72
ADD-G.12	Katherine Pakradouni	May 30, 2018	3-74
ADD-G.13	Amy Plesetz	May 31, 2018	3-76
ADD-G.14	Brien Brennan	May 31, 2018	3-78
ADD-G.15	Tish Brown	May 31, 2018	3-80
ADD-G.16	Linda Curry	June 1, 2018	3-82
ADD-G.17	Elnura Maine	June 2, 2018	3-84
ADD-G.18	Jacob Lemus	June 2, 2018	3-86
ADD-G.19	Michelle MacKenzie	June 3, 2018	3-88
ADD-G.20	Timothy Moore	June 3, 2018	3-90
ADD-G.21	Dominique Ferguson	June 3, 2018	3-92
ADD-G.22	Francisco Villa	June 3, 2018	3-94
ADD-G.23	Rosie Beers	June 3, 2018	3-96
ADD-G.24	Ann Dorsey	June 4, 2018	3-98
ADD-G.25	Mary Shabbott	June 4, 2018	3-100
ADD-G.26	Andrew Hemphill	June 4, 2018	3-102
ADD-G.27	Aaron Echols	June 4, 2018	3-104
ADD-G.28	Dawn Crumley	June 4, 2018	3-106
ADD-G.29	Kristine Karnos	June 4, 2018	3-108
ADD-G.30	Martha Lindsey	June 5, 2018	3-110
ADD-G.31	John Martin	June 5, 2018	3-112
ADD-G.32	Anir Burenjargal	June 5, 2018	3-114
ADD-G.33	Ksenya Gurshtein	June 5, 2018	3-116
ADD-G.34	Carolyn Longstreth	June 6, 2018	3-118
ADD-G.35	George and Joan Paulikas	June 6, 2018	3-120
ADD-G.36	David Shluker	June 7, 2018	3-122
ADD-G.37	Jack T.	June 8, 2018	3-124

TABLE 3.1-1
ADDITIONAL LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
ADD-G.38	Stacey Flowerdew	June 4, 2018	3-126
ADD-G.39	Margaret Rhyne	June 4, 2018	3-128
ADD-G.40	Jessica T	June 4, 2018	3-130
ADD-G.41	George Nanoski	June 5, 2018	3-132
ADD-G.42	Susan Zahnter	June 5, 2018	3-134

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B. State Agencies

CENTENNIAL

at TEJON RANCH

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY
EDMUND G. BROWN JR., Governor

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

June 5, 2018

County of Los Angeles
Department of Regional Planning
Attn: Jodie Sackett
320 West Temple Street
Los Angeles, CA 90012

Mr. Sackett:

Notice of Public Hearing for the Specific Plan, Final Environmental Impact Report (EIR) for SCH2004031072, General Plan Amendment, Zone Change, Vesting Tentative Parcel Map, Conditional Use Permit and Development Agreement for the Centennial development in Los Angeles County

We received the above notice for the June 6, 2018 public hearing and have reviewed the final EIR and supporting documents located on the Department of Regional Planning website for the project. Thank you for including the Department of Water Resources' (DWR) previous comments and the responses to those comments in the body of the Final EIR (FEIR). We have enclosed copies of our prior responses, dated October 30, 2015 and July 10, 2017.

Because our comments were not included in the Draft EIR, this is the first time that the DWR has been able to review the responses to the concerns raised in our original comment letters. Upon review of the FEIR responses, DWR has additional concerns about the Centennial project. We request that the following comment be entered in the FEIR record and encourage the developer to acknowledge DWR's concerns.

ADD-B.1-1

Stormwater and Nuisance Water Discharged On Department Right-of-Way:

Our initial comments about potential contamination of waters within the State Water Project (SWP) were based on initial impressions that drainage from the western portion of the Centennial project had the potential to impact the open channel waters of Gorman Creek watershed and the West Branch of the SWP. Further review of the topography confirmed that a majority of the run-off from the project would flow to the east and across the East Branch of the SWP. The FEIR responses adequately addressed DWR concerns about impacts to the West Branch of the SWP, however the text of the responses raises new concerns about stormwater/contaminant issues that could impact the East Branch of the SWP. There are several instances (first occurring on Page 2-64 of the FEIR) where the following statement was used in responding to DWR concerns about the discharging of stormwater, nuisance water, or contaminants into or across DWR right-of-way:

ADD-B.1-2

ADD-B.1-3

"The California Aqueduct contains a levee system that protects its waters from stormwater flooding or other surface flows and the aqueduct channel is constructed with cement and other impervious materials. Consequently, Project development area runoff will not directly flow into or indirectly affect (e.g. by groundwater infiltration) water quality in the California Aqueduct."

Our concern is that the above statement incorrectly characterizes the function and capabilities of the SWP Aqueduct embankments. DWR's earth-filled Aqueduct embankments were primarily designed for water retention and not specifically to manage external water flows or ponding against the embankments.

Some of our principal concerns, based on experience with subdivision development neighboring the Aqueduct, are peak stormwater run-off and stormwater discharges into DWR right-of-way. DWR also has concerns about year-round residential run-off that has the potential to create a perennially wet condition in the cross-drainage features that cross the Aqueduct and DWR right-of-way. Runoff from the project shall not damage DWR right-of-way or interfere with the safe operation of the State Water Project (SWP). Therefore, all runoff from the proposed project shall be managed outside of DWR right-of-way and discharged to DWR right-of-way perpendicular and in-line with existing cross-drainage structures at or below the existing capacity of these structures

ADD-B.1-3 cont.

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available. Any future correspondence relating to this project shall be directed to:

Leroy Ellinghouse, Chief
SWP Right-of-Way Management Section
Division of Operations & Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-1
Sacramento, CA 95814

If you have any questions, please contact Scott Williams at (916) 653-5746 or Leroy Ellinghouse of my staff at (916) 653-7168.

ADD-B.1-4

Sincerely,

Dale R

Dale Brown, Chief
Project Management Office
Division of Operations and Maintenance

Enclosure

cc: Tejon Ranch Company
4436 Lebec Road
Tejon Ranch, CA 93243

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY
EDMUND G. BROWN JR., Governor

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

July 10, 2017

County of Los Angeles
Department of Regional Planning
Attn: Samuel Dea
320 West Temple Street
Los Angeles, California 90012

Draft Environmental Impact Report for the Proposed Centennial Project, Community of Gorman, Los Angeles County, Southern Field Division, West Branch of California Aqueduct Milepost 4.0, SCH2004031072

Dear Mr. Dea:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Proposed Centennial Project within the County of Los Angeles. The document describes a proposal by the Tejon Ranch Company to develop 19,333 residential units, in addition to business parks, commercial use spaces and institutional/civic structures and spaces within approximately 12,323 acres east of Interstate Route 5. The project is located approximately 25 miles north of the Community of Castaic. The Department of Water Resources' (DWR) West Branch California Aqueduct (Aqueduct), a part of the State Water Project (SWP), is located within the project boundaries on the north side of Hwy 138.

DWR responded with comments to the 2015 Notice of Preparation (NOP) for this project in an October 30, 2015 letter to your office. Our letter does not appear within the State Agency comments appendix of the DEIR. We have enclosed a copy of our original comment letter and we reiterate the concerns addressed in the letter. Tejon Ranch Company will be required to comply with any and all provisions of Water Code Section 12899-12899.11 or California Code of Regulations, Title 23, Section 630-635 regarding encroachments within, or affecting, the SWP right-of-way.

In addition to our earlier comments on the NOP, which need to be addressed in the DEIR, DWR has amended wildlife comments after reviewing the DEIR. This includes, but is not limited to, analysis and implementation of a buffer of natural habitat between the development and DWR right-of-way wide enough to prevent impacts to DWR maintenance and repair work during nesting bird season; and the addition of wildlife overpasses that begin and end outside DWR right-of-way.

Buffers should take into consideration standard requirements by California Department of Fish and Wildlife for nesting raptors. Overpasses dedicated to wildlife movement will reduce the risk to DWR personnel from vehicle collision with large mammals, reduce the risk of accidents trying to avoid hitting wildlife, reduce the risk of animals hit by vehicles on bridges from falling into the Aqueduct, and prevent an increase in wildlife being trapped in the Aqueduct while trying to access open space.

ADD-B.1-5

As indicated in our previous letter, portions of this project may require the issuance of an encroachment permit from DWR.

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available for public review. Any future correspondence relating to this proposed project shall be directed to:

Leroy Ellinghouse, Chief
SWP Right-of-Way Management Section
Division of Operations and Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-1
Sacramento, CA 95814

ADD-B.1-5 cont.

If you have any questions, please contact Scott Williams at (916) 653-5746, or Leroy Ellinghouse of my staff at (916) 653-7168.

Sincerely,

for David M. Samson, Chief
State Water Project Operations Support Office
Division of Operations and Maintenance

Enclosure

cc: Tejon Ranch Company
4436 Lebec Road
Tejon Ranch, California 93243

bcc: Sheree Edwards, 631-7
Leroy Ellinghouse, 641-1
Gabino Velazquez, SFD
Joseph Cruz, SFD
Megan Evans, SFD
Nadell Gayou, 901 P Street
Alejandra Lopez, 425
Scott Goebl, HLPCO, JOC

October 30, 2015

Samuel Dea
Special Projects Section
Department of Regional Planning
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Revised Notice of Preparation, Centennial Project, East of the Community of Gorman, North of Quail Lake, Los Angeles County, Southern Field Division, SCH2004031072

Dear Mr. Dea:

Thank you for the opportunity to review and comment on the Revised Notice of Preparation (NOP) of the Centennial Project (Project) located in an unincorporated area north of Quail Lake and south of Tehachapi Afterbay in Los Angeles County. The Project includes development of 12,323-acre master planned community with residential, business park, commercial, civic and institutional, and recreation and entertainment uses within the privately-owned Tejon Ranch. Community infrastructure facilities that will serve the Project include construction of wastewater reclamation facilities, water treatment facility, water bank, and materials recovery facility. A new bridge crossing over the West Branch of the California Aqueduct (Aqueduct) is also proposed in the Project.

The Notice of Preparation of the Project was originally submitted in 2004 and is revised to include reduction in development area and no development in the northwest area of the Project site.

ADD-B.1-6

California Department of Water Resources (DWR) has concerns about the Project at the following areas:

Biological Resources

DWR personnel conduct routine maintenance and repairs adjacent to the Project. DWR requests impacts to wildlife that cause migration into DWR right-of-way be analyzed as nesting birds and special-status species relocating into DWR right-of-way will impact our ability to maintain and improve State Water Project (SWP) facilities. Nesting birds, including ground nesting raptors, and special status species moving into DWR right-of-way due to loss of habitat would likely require DWR having to consult with wildlife control agencies in order to perform the routine maintenance and repair. Movement of

wildlife into DWR right of way has the potential to stop work until take permits are secured, whereas prior to development no take permits were required.

Antelope, deer, and badgers are often seen in the area of the Project. Movement of wildlife species into the DWR right-of-way could result in increased accidents with large mammals and road kill. The environmental impact report (EIR) shall address wildlife movement caused by the Project. Page 6 of the NOP states that the Aqueduct is a barrier to wildlife movement; however, many species have been observed finding ways to cross the Aqueduct and an increased number of bridges along the Aqueduct could promote crossings by wildlife.

Hydrology and Water Quality

Two golf courses are planned for each side of the Aqueduct. Golf courses traditionally use fertilizers and pesticides for maintenance. Fertilizers and pesticides could have a major impact on water quality to the California Aqueduct. Impacts to water quality caused by maintenance of the golf courses and project drainage need to be addressed in the EIR. In addition, the Project will increase use of fertilizers and pesticides used by residents. Fertilizers and pesticides could have a major impact on water quality to the California Aqueduct. Impacts to water quality caused by residential use need to be addressed as well.

ADD-B.1-6 cont.

The Project also has the potential to increase the risk of household chemicals and hydrocarbons entering the Aqueduct. Improper disposal of motor oil and household chemicals is a recognized problem in many California communities and may have a significant impact to the Aqueduct as a result of the Project. Impacts to water quality of the Aqueduct shall be addressed.

New bridge development and improvements to existing bridges over the Aqueduct have the potential to impact water quality during construction. Impacts to water quality due to construction shall be addressed.

Drainages need to be designed to avoid the California Aqueduct, and must be specifically discussed in the EIR.

The Project would be located adjacent to the California Aqueduct and Quail Lake. In addition, the western portion of the Project site is located within the watershed of Gorman Creek, which drains to Pyramid Lake. The EIR should evaluate whether the Project would cause erosion and introduce sediment into the Aqueduct or Quail Lake, and whether the Project would cause other pollutants to flow into these waters or

Gorman Creek. Introduction of sediment into the SWP system could reduce the capacity of the SWP water storage and conveyance facilities, damage SWP mechanisms, and/or require DWR to perform additional, unnecessary, and potentially costly maintenance on the SWP facilities. Also, introduction of sediment and other pollutants into the SWP system could impair the quality of the water transported by the SWP.

Geology and Soils

Ground subsidence due to overdraft of ground water is a problem that impacts canals throughout California. Ground subsidence near the Project could cause impacts to the Aqueduct that may result in the need to increase maintenance or call for major repairs. Groundwater use and overdraft prevention shall be addressed in the EIR document.

Some portions of the Project would be built in close proximity to SWP facilities. The EIR should evaluate whether the Project would affect the geology and/or soils in the vicinity of the SWP facilities in a manner that would impair the geological stability of the SWP or the quality of the water flowing through the SWP.

Hazards

The Project would be located near several SWP facilities, most of which are closed to the public for safety and infrastructure security reasons. The Project would substantially increase the number of people living, working, shopping, recreating, and otherwise visiting the Project area. The EIR should evaluate whether the Project would substantially increase the potential for public safety hazards (e.g., drowning), vandalism, or infrastructure security concerns attributable to the proposed population increase near the SWP. The Project should be designed to discourage and prevent unauthorized access to SWP facilities.

The EIR should also evaluate the potential for the Project to introduce hazardous materials (e.g., construction fuels and chemicals) onto SWP land and into the water carried by the system.

Land Use

The Project would be located adjacent to the California Aqueduct and Quail Lake. The Project should be designed to avoid unauthorized encroachment onto SWP facilities and to not interfere with DWR's ability to access and maintain the SWP. If the Project encroaches onto land owned or managed by DWR (e.g., the proposed access road, bridges, and water pipeline), the Project sponsor should coordinate with DWR during

ADD-B.1-6 cont.

the early stages of the planning process about securing authorization for the encroachment(s).

Any construction activity in the vicinity of the California Aqueduct may require an encroachment permit issued by DWR. Information regarding regulations and forms for submitting an application for an encroachment permit to DWR can be found at:

http://www.water.ca.gov/engineering/Services/Real_Estate/Encroach_Rel/

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available for public review. Any future correspondence relating to this proposed project shall be sent to:

ADD-B.1-6 cont.

Leroy Ellinghouse, Chief
SWP Encroachments Section
Division of Operations and Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-2
Sacramento, California 95814

If you have any questions, please contact Leroy Ellinghouse, Chief of the SWP Encroachments Section, at (916) 653-7168 or Jonathan Canuela at (916) 653-5095.

Sincerely,

David M. Samson, Chief
State Water Project Operations Support Office
Division of Operations and Maintenance

cc: State Clearinghouse
Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, California 95814

bcc: Sheree Edwards, 641-1
Anthony Chu, 620
David Panec, 604
Earl Nelson, HLPCO, 2033 Howe Avenue, Room 220, Sacramento
Megan Evans, Southern FD
John Bunce, Southern FD
Jaime De Santiago, Southern FD
Nadell Gayou, 901 P Street

Response to Comment Letter ADD-B.1
Department of Water Resources
June 5, 2018

Response to Comment ADD-B.1-1:

Thank you for your continued participation in this public process. As this comment accurately notes, the Final EIR includes responses to all of the comments raised in Commenter's letters dated October 20, 2015 and July 10, 2017 (see Final EIR, Section 2.0, responses to Comments B.2-1 through B.2-20). Per the Commenter's request, their letter dated June 5, 2018 is included in the Project administrative record. Regarding the Commenter's additional concerns, please also see responses to Comments ADD-B.1-2 through ADD-B.1-6.

Response to Comment ADD-B.1-2:

The Commenter's acknowledgement that the Final EIR adequately addresses the Commenter's prior comments regarding impacts to the West Branch of the State Water Project is noted with appreciated and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment ADD-B.1-3:

The quoted sentence from Final EIR page 2-64 is not intended to be read in isolation, without regard for the required implementation of Project mitigation measures and is not intended to suggest that the Project is relying on existing levee construction techniques to protect the California Aqueduct from Project development area runoff. All runoff from the proposed Project will be managed on-site, outside of DWR right-of way, and discharged to DWR right-of-way perpendicular and in-line with existing cross-drainage structures at or below the existing capacity of these structures. As stated in Draft EIR Section 5.2.6 (page 5.2-43), "[p]otential impacts related to the creation or contribution of runoff water that exceeds the capacity of existing or planned storm water drainage systems will be less than significant with implementation of MM 2-1, MM 2-2, and MM 4-1." Indeed, MM 2-2 expressly requires that "BMPs must be implemented to ensure that, for the capital storm event, there is no increase in peak discharge rates and no increase in runoff volume offsite compared with peak discharge rates and runoff volumes under existing, pre-development, conditions." This less-than-significant impact determination is supported by Section 5.5 of Draft EIR Appendix 5.2-A, *Centennial Master Plan Hydrology* (page 32), which determined that "[t]he Project will not increase off-site peak flow rate and flow volume for the LID, 2-, 5-, 10-, 25-, and 50-year runoff events and will not alter the off-site morphology of these channels. This result demonstrates no negative impact to off-site property based on an event-based analysis."

Regarding DWR's concerns about year-round residential runoff that has the potential to create a perennially wet condition in the cross-drainage features that cross the Aqueduct and DWR right-of-way, dry weather flows will be infiltrated within the project via onsite BMPs required by MM 2-1. As stated in Draft EIR Section 5.4.6 (page 5.4-88), "[t]he proposed

regional and distributed LID BMPs would infiltrate and provide treatment for dry weather flows and small storm events." Additionally, the on-site BMPs will be designed to drain in an amount of time to avoid perennially wet conditions. As stated in EIR Section 5.2.6 (page 5.2-48), "[a]ll soft-bottom drainage facilities – including regional and distributed basins and stream channels – would be designed to fully drain or infiltrate captured water in less than four days… ." As explained in the Project MMRP, and in EIR Appendix 4.0-A - *Centennial Specific Plan* (page 3-59), MM 2-1, MM 2-2, and MM 4-1 will be monitored and enforced by the Los Angeles County Department of Public Works as part of the tentative subdivision map approval process.

Based on the above response and information in the EIR, the proposed Project would not have significant direct or indirect hydrology or water quality impacts associated with DWR or SWP facilities or rights-of-way.

Response to Comment ADD-B.1-4:

The Commenter's contact information described in this comment, and its request for any subsequent environmental documents related to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment ADD-B.1-5:

Please see responses to Comments B.2-1 through B.2-6 (Final EIR page 2-59) which address all of the comments raised in this Comment ADD-B.1-5.

Response to Comment ADD-B.1-6:

Please see responses to Comments B.2-7 through B.2-10 (Final EIR pages 2-60 through 2-72) which address all of the comments raised in this Comment ADD-B.1-6.

C. County Agencies

CENTENNIAL

at TEJON RANCH

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
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THIRD DISTRICT

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FOURTH DISTRICT

KATHRYN BARGER
FIFTH DISTRICT

June 12, 2018

Jodie Sackett, Analyst
Department of Regional Planning
Planning Department
320 West Temple Street
Los Angeles, CA 90012

Dear Mr. Sackett:

FINAL ENVIRONMENTAL IMPACT REPORT, "CENTENNIAL PROJECT," INVOLVES THE DEVELOPMENT OF A NEW COMMUNITY WITH RESIDENTIAL, COMMERCIAL, BUSINESS PARK, RECREATIONAL/ENTERTAINMENT, AND INSTITUTIONAL/CIVIC USES, CITYWIDE, ANTELOPE VALLEY, FFER 201800059

The Final Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no further comments.

LAND DEVELOPMENT UNIT:

The Land Development Unit has no additional comments to the June 6, 2017 "Fire Department comment letter." For any questions regarding the report, please contact FPEA Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.

ADD-C.1-1

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

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

The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division have been addressed.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

ADD-C.1-1 cont.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department previously provided comments regarding the project draft environmental impact report (EIR) in June 2017. HHMD has no additional comments or requirements pertaining to the final project EIR at this time.

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

Very truly yours,

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

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Response to Comment Letter ADD-C.1
County of Los Angeles Fire Department
June 12, 2018

Response to Comment ADD-C.1-1:

Thank you for your comment and for your continued participation in this public process. This comment confirms that the County of Los Angeles Fire Department's Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division have all reviewed the Centennial Project Final EIR and have no additional comments. This comment does not raise any specific concerns regarding the adequacy of the EIR and thus no further response is required.

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E. Local Agencies

CENTENNIAL

at TEJON RANCH

ADD-E.1

Steve Sonder, President
Patricia Edwards, Clerk
Julie Ralphs, Member

Gorman Joint School District
49847 Gorman School Road
P.O. Box 104
Gorman, CA 93243
(661) 248-6441 – FAX (661) 248-0604

Johannis L. Andrews II
Superintendent/Principal

May 29, 2018

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am sorry that I will not be able to attend the June 6, 2018 Regional Planning Commission Hearing. As the Superintendent of the Gorman Joint School District, I'm writing in support of Centennial at Tejon Ranch. The County of Los Angeles is facing a housing crisis and we need a variety of housing types in various locations throughout Los Angeles County. Centennial's master-plan will do just that; create more price-attainable housing and it will help accommodate the planned regional population and economic growth in our county.

As you know, Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, commercial, schools, parks, natural open space, cultural, and public uses. The community masterplan is simply, the implementation of the AVAP, a balanced plan of economic opportunity and conservation. Centennial has also been at the table with the Golden State Gateway Coalition in regards to fast tracking the I-5 improvements before this new community has been set.

It is important to define the project location in terms of synergy with the growing populations near the Centennial project. There is great synergy between other Tejon Ranch projects in Kern County, including Grapevine and Tejon Mountain Village, as well as the Antelope Valley and Santa Clarita.

ADD-E.1-1

Centennial is LA County's opportunity to take advantage of growth at Tejon Ranch in Kern County by increasing tax revenue for the general fund and providing increased public services to North LA County, but also providing diverse working-class and middle-income families an opportunity for homeownership.

In addition, Centennial includes plans to focus on water conservation through the use of recycled water and several other sustainable sources. The project's Green Development program requires reduced potable water consumption through the use of drought-tolerant plants, low-flow showerheads, faucets, and toilets. The Centennial master plan will also use recycled water for landscape irrigation in residential common areas.

I urge the Regional Planning Commission to approve and allow Centennial to move forward. We need to finally begin development on this much-needed community.

Sincerely,

Johannis L. Andrews II
Gorman Joint School District
Superintendent/Principal

Response to Comment Letter ADD-E.1
Gorman Joint School District
May 29, 2018

Response to Comment ADD-E.1-1:

Thank you for your comment and for your participation in this public process. According to the Commenter, the Gorman Joint School District, the Project implements the AVAP with a balanced plan of economic opportunity and conservation while providing needed housing in North Los Angeles County. This comment's stated support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

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F. Organizations

CENTENNIAL

at TEJON RANCH

ADD-F.1

CASTAIC AREA TOWN COUNCIL
Mailing Address: P.O. Box 325 – 20281 Franklin Parkway, Santa Clarita, CA 91383
Contact: castaictowncouncil@gmail.com - castaictowncouncil.org

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1340
320 West Temple Street
Los Angeles, California 90012

Dear Mr. Sackett,

The Castaic Town Council has received the Revised Notice of Public Hearing for the "Centennial Specific Plan Project" (4/18/18). Although the project is located a number of miles north from Castaic town center, the community will be impacted from the potential traffic coming from this development.

The current sound levels from Interstate 5 southbound cars and trucks is pretty significant. For the last mile the grade is at 5% with cars and trucks applying their brakes. Many houses located on the west side of the freeway shake during compression brake application.

ADD-F.1-1

With added traffic in this particular area bounding off the Double C Ranch and Hidden Lake developments, we would like to request a study to see if a sound wall is viable and appropriate. The requested area would be South Interstate 5, starting one mile before the Lake Hughes off-ramp.

ADD-F.1-2

Thanks for your consideration.

Jessica Rousel Chambers
President, Castaic Area Town Council

Response to Comment Letter ADD-F.1
Castaic Area Town Council
May 21, 2018

Response to Comment ADD-F.1-1:

Thank you for your comment and for your participation in this public process. As shown in Final EIR Appendix 5.10-C, Tables 4-1 and 5-1, under both the "Existing Public Project" and "Long Range Cumulative with Project" scenarios, with mitigation, traffic levels of service (LOS) along Interstate 5 between Templin Highway and Lake Hughes Road in the vicinity of Castaic would not exceed the applicable LOS threshold of significance. This comment's observations regarding existing sound levels along Interstate 5 in the vicinity of Castaic are noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. However, as shown in Final EIR Appendix 5.12-C, Table 3, under the cumulative "With Project" scenario there would not be a significant noise impact associated with Project-generated traffic at sensitive noise receptors located adjacent to Interstate 5 between Templin Highway and Lake Hughes Road, which is the location of receptors of concern to the Commenter.

Response to Comment ADD-F.1-2:

As shown in Final EIR Appendix 5.12-C, Table 3, under the cumulative "With Project" scenario there would not be a significant noise impact associated with Project-generated traffic at sensitive noise receptors located adjacent to Interstate 5 between Templin Highway and Lake Hughes Road, which is the location of receptors of concern to the Commenter. Accordingly, there is no basis for requiring the Project to provide a sound wall along Interstate 5 starting one mile north of, and extending to, the Lake Hughes Road off-ramp.

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CALIFORNIA
NATIVE PLANT SOCIETY

June 5, 2018

Via Electronic Mail and Hand Delivery (with references)

Los Angeles County Regional Planning Commission
c/o Ms. Rosie O. Ruiz
320 West Temple Street, 13th Floor
Los Angeles, California 90012
rruiz@planning.lacounty.gov

Re: Centennial Specific Plan

Dear Commissioners:

These comments are submitted on behalf of the Center for Biological Diversity ("Center") and the California Native Plant Society regarding the proposed Centennial Project ("Project").

Tejon Ranchcorp and its talented team of lawyers and consultants have performed an amazing feat—they have packaged this incredibly harmful city-sized sprawl project as "sustainable" and environmentally-friendly, when in fact it is the exact opposite.

We ask that you look past this packaging and reject Centennial for what it is—a sprawl city in a remote, fire- and earthquake-prone area that will destroy some of California's last remaining native grasslands. This sprawl city—which is an hour drive (with no traffic) from the LA Metro area—will not provide housing for people already living in Los Angeles communities, nor will it provide any benefit to existing communities. Instead, it will redirect scarce County resources for schools, public safety, and social services to a remote corner of the County.

We ask that you remember that you have no duty to satisfy Tejon and its Wall Street shareholders by approving this proposal. **The people of LA County want real solutions to the housing shortage, not far-flung cities that eliminate California's irreplaceable wildlands. Please listen to the thousands of community members that have taken the time to write to the County and voice their objections to this project.**

You should also reject this Project because the Project's Final Environmental Impact Report ("FEIR") does not cure the Draft Environmental Impact Report ("DEIR")'s failure to

ADD-F.2-1

adequately analyze a range of environmental impacts, mitigation measures, and alternatives; and to adequately describe the Project, its impacts, and mitigation. Indeed, the vast majority of the Conservation Groups' comments on the DEIR have not been effectively addressed in the FEIR and responses to comments. Some of the continuing errors are detailed below but most other issues raised in the Conservation Groups' DEIR comments remain outstanding and so those comments are incorporated herein by reference. The Conservation Groups will be submitting additional comments on the FEIR once they have had adequate time to review the thousands of pages of additional documents that were released on May 24, 2018.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over one million members and online activists throughout California and the United Sates. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County.

The California Native Plant Society ("CNPS") is a non-profit environmental organization with 10,000 members in 35 Chapters across California and Baja California, Mexico. CNPS' mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

ADD-F.2-1 cont.

I. The FEIR Does Not Mitigate the Severe Traffic Impacts of the Project on the County's Already-Burdened Freeways.

Centennial is the poster child for 20th century sprawl. Even by the FEIR's own terms, the FEIR states that only 20 percent of commutes need to occur by some form of transit other than single occupancy vehicles ("SOVs"). This means that 80 percent of trips will occur by SOVs, with the nearest metro centers in Santa Clarita and Los Angeles 35 and 65 miles away, respectively. Even this "mitigation" of achieving 20 percent of trips by non-SOVs is not likely achievable; while the FEIR purports to commit to this goal, there are no plans or policies identified in the FEIR to actually achieve this goal except for unspecified "measures." (FEIR at 2-98.) Similarly, there is no consequence if this measure is found to be infeasible in the real world. Nor does there appear to be monitoring to ensure this goal is reached. And how could there be? Will Tejon or developers to which Tejon sells the project entitlements be requiring residents to mandatorily report what manner of transportation they use to leave the project site? Such mandatory reporting would obviously implicate privacy concerns and likely be infeasible. CEQA requires that mitigation measures be "viable solution[s]" that are "effective in remedying" the project's effects. (See *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1116; see also *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1170 ["Whether a measure is effective requires not just quantification, but also an assessment of the likelihood of implementation."]; CEQA Guidelines, § 15364 [defining "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time," in light of various factors].) Here, Tejon's promises do not begin to meet CEQA's standard.

ADD-F.2-2

In the Conservation Groups' comments on the DEIR, the Conservation Groups highlighted that there is no mechanism to ensure that commercial development and residential development are built concurrently; such concurrent development would be necessary to ensure

ADD-F.2-3

at least some residents have an opportunity to seek jobs onsite and therefore avoid multi-hour commutes to the LA Metro. This concern is shared by Caltrans, which similarly commented:

> If residential development occurs prior to the commercial, business, and employment center, the typical morning and evening commutes could occur, thus establishing a sprawl type of development. To avoid an unsustainable scenario, the County as lead agency should plan the phasing of the development accordingly. Both residential and employment centers should be developed concurrently. (FEIR, Vol. I at PDF 116.)

ADD-F.2-3 cont.

The FEIR attempts to address this issue by claiming that the approval process for tentative tract map ("TTM") applications will ensure that commercial and residential development occur concurrently. (FEIR at 2-73 – 76.) However, it is unclear from the FEIR whether TTM applications would implicate discretionary or ministerial decision by the County, such that CEQA does not necessarily apply. The EIR does state that approval of final subdivision maps will only amount to a ministerial decision by the County. (DEIR at 4-105.) Quite tellingly, the FEIR sharply limits which County actions would be construed as "discretionary" such that CEQA would likely only apply to "major transfers between villages" and "conditional use permits." (FEIR at 3-100.)

ADD-F.2-4

Likewise, section 4.5 of the Specific Plan purports to describe the scope of ministerial and discretionary authority of the County. In that section, the Specific Plan states:

> If an applicant requests a change to the phasing design (order of phasing or configuration of each phase map) of an approved Tentative Map, the Director, in consultation with the subdivision committee, ***shall approve*** such change if the Director determines that the new order or configuration substantially conforms to the approved Tentative Map. (Specific Plan at 4-5.)

While the import of this section is not completely clear, it suggests that the configuration and timing of phase maps would only be ministerial decisions which the County would be required ("shall") to approve. In short, the FEIR and Specific Plan suggest that Tejon or future owners of the entitlements can make significant changes to the project design ***and*** to project phasing without any discretionary decision-making processes of the County, and thus without any public hearings, public participation, or CEQA review. This undermines the FEIR's claims that commercial and residential development will occur in tandem.

ADD-F.2-5

In an attempt to alleviate the enormous amount of traffic generated by this Project, the FEIR claims that an expanded SR-138 "would be required to accommodate the full buildout of the Project under cumulative traffic conditions." (FEIR at 2-106.) The FEIR accordingly promises to add more lanes to Highway 138 as a mitigation measure. (FEIR at 2-84.) But the profound environmental impacts of this "mitigation" are not appropriately analyzed or considered—LA County is already dealing with the legacy of existing freeways and sprawl built with little regard for their effects on wildlife movement. For instance, our local mountain lion population is hanging on by a thread due to poorly planned freeway development, necessitating a $60 million wildlife crossing to help undo the damage. **Should we really be building another freeway on one of the most important habitat linkages in the state in order to accommodate the desire of Tejon and its shareholders to make money?** Expanding Highway 138 into a full-size freeway will categorically have profound effects on wildlife movement, which will become even more important for species survival as climate change alters the region's ecology.

ADD-F.2-6

In addition, while Caltrans recently finalized an EIR/EIS for the SR-138 expansion, there would be little reason to actually build this costly highway expansion project unless Centennial is approved by the County. The EIR/EIS for the Northwest State Route 138 Corridor Improvement Project ("SR 138 EIR") indicates as much, noting in the "development trends" for the project vicinity that the only "planned" development is Centennial and Tejon Mountain Village (which Kern County approved years ago, but has not yet been built). (SR 138 EIR at 31, 47.) The SR-138 expansion is currently on hold and will be "be built in phases as need or as demand require" accordingly to LA Metro.[1] In short, it will likely not be built unless Centennial is approved by the County. **With an extensive backlog in maintenance on existing roads in California, should the County be approving a massive development that will be dependent upon the construction of what will essentially be a new freeway, paid for with scarce taxpayer resources?**

ADD-F.2-7

Likewise, the FEIR abjectly fails to put forward any workable plan to reduce the enormous traffic generated by Centennial. The FEIR's key mitigation proposal is a "Traffic Mitigation Agreement" that Tejon will negotiate with Caltrans without public input or hearings. (FEIR at 2-87.) Tejon engaged in a similar practice with the Grapevine project in northern Kern County, in which it executed a mitigation agreement with Caltrans many months after the EIR was approved by the Kern County Board of Supervisors. While such agreements will provide some (likely significant) funds to Caltrans to build or expand existing freeways, they do nothing to fulfill CEQA's purposes of analyzing the impacts of the Project ***prior*** to project approval. CEQA requires that the impacts of the Project ***and*** of project mitigation measures be analyzed. Promises to pay Caltrans to expand freeways short-circuits the CEQA process by avoiding analysis of the impacts of such additional freeways and road projects on wildlife, air quality, and California's irreplaceable landscapes.

ADD-F.2-8

The FEIR clings to the unrealistic exception that—despite Southern California's car culture—significant numbers of people will work onsite and that a full 65 percent of trips will be "captured" internally. (FEIR at 2-1480.) This position is particularly striking because the County arrived at virtually the opposite conclusion regarding a similar (yet smaller) sprawl project in northern LA County. In particular, the Northlake Specific Plan Project Final Supplemental Environmental Impact Report proposed both residential and industrial uses, but concluded that it was "speculative" to assume ***anyone*** would work onsite:

> Regarding to employment, the Project does include employment opportunities associated with the on-site light industrial, commercial, recreational and institutional uses. ***While it is possible that some of these jobs may be filled by future residents of the Project, it is too speculative to conclude that***. It is noted that the Project Objectives (refer to page 4-3 of the Draft SEIR) identify that jobs would be created and do not identify that these jobs would necessarily be filled by future residents of the Project.[2]

ADD-F.2-9

While Centennial is a larger project, the County never explains how (1) it is speculative to assume that ***anyone*** would work onsite for the smaller Northlake sprawl project while (2) it is

ADD-F.2-10

[1] Los Angeles County Metropolitan Transportation Authority, Northwest 138 Corridor, available at https://www.metro.net/projects/nw138/ (last visited on June 5, 2018).

[2] Los Angeles County Department of Regional Planning, *NorthLake Specific Plan, Final Supplemental Environmental Impact Report* (January 2018), http://planning.lacounty.gov/assets/upl/case/tr073336_seir.pdf.

assured that a full 65 percent of trips will be internal at Centennial. The FEIR even goes a step further and suggests that this 65 percent internal trip capture rate is a "worst case scenario." (FEIR at 2-1480.) Moreover, as discussed above, the FEIR never considers a scenario in which the residential and commercial development do not occur concurrently. ADD-F.2-10 cont.

On a relate note, the EIR claims that no project alternative would generate more VMT and convert more wildlands to development. (FEIR at 2-540.) This statement is not supportable. Clearly less VMT would be generated by leaving the Project area undeveloped as opposed to building a city of 60,000 people. ADD-F.2-11

II. The FEIR Does Not Adequately Analyze and Provide Appropriate Mitigation for the Project's Impacts to Habitat Connectivity for Wildlife Movement.

Multiple state agencies and environmental organizations have identified the DEIR's failure to adequately analyze and mitigate project impacts to habitat connectivity and wildlife movement. The Center, along with CNPS, Center for Food Safety ("CFS"), the Santa Monica Mountains Conservancy ("SMMC"), TriCounty Watchdogs ("TCW"), the Three Points-Liebre Mountain Town Council ("TPLMTC"), the California Department of Fish and Wildlife ("CDFW"), and the Department of Water Resources ("DWR"), have expressed their concerns regarding this matter through public comment, yet the FEIR continues to downplay the Project's impacts to the unique, intact landscape where several bioregions converge, including the San Joaquin Valley, Tehachapi Mountains, Mojave Desert, Transverse Ranges, Coast Ranges, and the Southern California Coastal Plains. It is more than reasonable for agencies and organizations to demand more thorough analyses of the project area's importance for wildlife movement given that it is surrounded by SEA 17 on three sides (to the north, west, and south, DEIR Exhibit 5.7-15) and the June Administrative Draft of the Antelope Valley Regional Conservation Investment Strategy (AV RCIS) identifies the project area as core habitat with important biological value and intactness. ADD-F.2-12

The FEIR argues that the AV RCIS erroneously identifies the project area as having biological and intact habitat value because they do not trust that their comments and requested changes were taken into consideration at the time of the June 2017 Administrative Draft since they (the County) are no longer involved in the AV RCIS Steering Committee (FEIR at 2-788). The FEIR claims that the use of the Environmental Evaluation Modeling System ("EEMS") in the preparation of the AV RCIS to identify areas of high biological value within Antelope Valley is inadequate because they could not assess the methods used to generate the model, and they dismiss the findings that the project area falls within valuable core habitat (FEIR at 2-788-789). ADD-F.2-13

The FEIR asserts that the AV RCIS's designation of the project area is incorrect because there is high quality habitat outside of the AV RCIS's evaluation area (FEIR at 2-789). However, the presence of high quality habitat outside of the project area does not negate the biological value within the project area. Furthermore, if Tejon disagrees with the use of the EEMS in identifying areas of high biological value, then it is unclear why Tejon goes on to laud that its On- and Off-site Mitigation Preserve includes core habitat identified by the AV RCIS (FEIR at 2-789). It seems that Tejon will accept the reported results of the AV RCIS only when it is in its favor to do so. ADD-F.2-14 ADD-F.2-15

The project area constitutes important habitat that connects the Tehachapi Mountains with the San Gabriel Mountains/Angeles National Forest and allows for the movement of ADD-F.2-16

wildlife, like pronghorn, coyotes, mountain lions, and bears, between these regions. The AV RCIS identifies the project area as being an important corridor where wildlife can move between landscapes easily, yet the FEIR provides little to avoid impacts to habitat connectivity. The FEIR asserts that the California Aqueduct is already a substantive barrier to wildlife movement (FEIR at 2-415), minimizing the importance of two locations where the west branch of the aqueduct goes underground and allows for wildlife movement. Yet multiple species with large home ranges are known to use the habitat in the project area. For example, pronghorn from the southern-most herd in California have been observed over the past few years in scattered locations in the project area (FEIR Exhibit B.4-34). The project area is within the pronghorn's historical range, and the nearby population is already struggling and needs to be afforded opportunities to expand its range and mix with other populations. Despite this, the FEIR continues to dismiss the potential impacts of the Project on movement by pronghorn (FEIR page 2-783), suggesting that mitigation to improve connectivity would actually harm the population (FEIR at 2-147). The FEIR also states that individuals found outside of known occurrence areas (i.e., a pronghorn was observed on the Peterson Ranch Habitat Mitigation Bank in July 2017, FEIR comment B.4-37 by CDFW) are outliers that likely do not represent a potential range expansion (FEIR at 2-147-148). These comments are unfounded and further downplay project impacts to wildlife movement.

ADD-F.2-16 cont.

ADD-F.2-17

ADD-F.2-18

In addition, there is evidence that other large mammals requiring large tracts of land for movement, including mountain lions, black bears, and bobcats, use the project area (FEIR at 2-415). The FEIR argues that species like mountain lions and black bears have large home ranges that would preclude them from occurring on site in concentrated numbers, insinuating that because those species would be uncommon, the impact to their movement would be minimal. However, habitat connectivity that allows for movement between areas with quality habitat are especially important for those species that have large home ranges and occur in relatively low density because individuals need more intact space to find food, shelter, and mates. The FEIR provides insufficient analyses of project impacts to wildlife movement and downplays the need for effective mitigation measures to enhance connectivity between the Tehachapi Mountains and the Angeles National Forest. The FEIR argues that the project only fragments natural open space within the project footprint (FEIR 2-735), not acknowledging that the project itself fragments the greater landscape, ultimately impacting wildlife movement. The lack of intact habitat that would allow wildlife to move north and south in the project area and the provision for just one wildlife crossing where State Route 138 and Cement Plant Road intersect is insufficient to sustain wildlife movement in the area.

ADD-F.2-19

III. The FEIR Does Not Adequately Analyze or Mitigate Potential Project Impacts to Wildlife.

The project area is located in an area with rich biodiversity. Although the FEIR acknowledges this, reporting that 19 of 33 potentially occurring special status species were observed utilizing habitat in the project area (DEIR Table 5.7-8), it fails to provide adequate analysis of project impacts to special status species and lacks appropriate mitigation to avoid or minimize impacts. In addition to the Center, CNPS, and CFS, other government agencies and organizations have shared their concern about the inadequate analysis of impacts to important biological resources, including the USFWS, CDFW, SMMC, TCW, and TPLMTC. And while the FEIR accommodates several comments and concerns regarding species known to occur in the

ADD-F.2-20

project area (per CDFW comments), mitigation measures to avoid or minimize impacts to special status species are still inadequate.

ADD-F.2-20 cont.

The FEIR asserts that many special status species are unlikely, and, if present, they are uncommon, based upon survey data collected between 2000 and 2015 (e.g., FEIR page 2-779-780). However, many of the focused surveys were conducted more than 10 years ago (DEIR Table 5.7-2), which makes it difficult to understand what the environmental baseline is for many of the special status species. For example, breeding and non-breeding burrowing owls are known to occur in and near the project area, but focused surveys were only conducted in 2003 and 2006. Is it possible that conditions have changed in the last 12 years? Similarly, focused surveys for least Bell's vireo and southwestern willow flycatchers were last conducted in 2008, and at that time migrants (i.e., non-nesting individuals) were observed on the project site. The most recent focused surveys were conducted in 2005 for western spadefoot toads and 2006 for arroyo toads and red-legged frogs west of the aqueduct and south of SR 138, and it is unclear why the bog/marsh/riparian habitat identified just north of SR 138 was not surveyed (DEIR Exhibit 5.7-1). Population dynamics are just that – dynamic. It would be helpful to have more recent data to better understand how these species are using the habitat in the project area, if species ranges are potentially expanding, and how the Project would impact them.

ADD-F.2-21

ADD-F.2-22

IV. The FEIR Does Not Adequately Analyze Impacts on Native Grasslands, Wildflower Fields, and Rare Plants.

The FEIR has now jettisoned the requirement for a Grassland Management Plan and replaced that requirement simply with compliance with the Ranch Wide Management Plan (RWMP) included in the Final EIR at Appendix 5.7-D. The RWMP refers to the Grazing Management Recommendations in Appendix B to guide the grazing regime for the mitigation/preservation areas, but Appendix B is included only as a cover page with no actual grazing management recommendations provided (FEIR pdf at 244). This is clearly inadequate in order to evaluate the grazing management and how it may impact or conserve the impacted plants and plant communities for two reasons: 1) the obvious lack of providing information in Appendix B of the RWMP on how the grazing is going to be implemented and 2) Appendix B are only recommendations, not binding requirements for managing the grazing in the mitigation/preservation areas. In addition, the existing RWMP does not provide adequate safeguards to protect the native grasslands and wildflower fields because it is focused on grazing management, not resource management. Because the goal of the mitigation/preservation lands are to offset the impacts of the development, the highest priority needs to be for resource conservation, not grazing. Grazing still needs to be evaluated for appropriateness as a management tool, because in the arid Mojave Desert where the project site and mitigation sites are located, grazing has been documented as an impact to habitat of native plants and animals.

ADD-F.2-23

ADD-F.2-24

ADD-F.2-25

The FEIR is now proposing a 2:1 ratio of <u>individual plants</u> preserved:impacted (FEIR at 2-153). This approach may work with the perennial plant species (*Perideridia pringlei*), but is totally inadequate for the remaining special status plant species, which are annual plant species. Annual plant species rely on a single year to germinate, grow, flower and produce seeds. Most of the time they are present only as seeds. Because the Project is in the arid western Mojave desert, many of the annual plants are "bet hedgers" and only germinate and complete their lifecycle in years of optimum environmental conditions (appropriate amount of precipitation, at appropriate times to see the plants through see production with appropriate temperatures for both

ADD-F.2-26

the plants and their pollinators [only one special status annual plant is wind pollinated]). Therefore, the metric that needs to be used to mitigate annual plants is the maximum area of occupancy. Because of the vagaries of rainfall in the arid western Mojave desert, identification of the extent of the occupied habitat is often only identifiable through consistent studies undertaken over a number of years (often a decade), although seedbank studies could also identify the extent of the occupied habitat. Because the County's goal is to maintain the biodiversity of the flora and fauna of Los Angeles County, it needs to initially be able to evaluate the extent of the special status annual plant occupancy on the proposed project site by area and then apply the mitigation ratio to the mitigation area.

ADD-F.2-26 cont.

It is also unclear how the County determined that a 2:1 mitigation ratio is adequate to mitigate impacts to all the special status plant species – a blanket approach that fails to address the variety of special status plant species that will be impacted by this project. Some of these plant species are so rare in California and elsewhere that they are strong candidates for federal and/or state Endangered Species Act protections, and it is mystifying why the County would want to push them closer to that threshold by requiring substandard conservation. Please justify the use of a single mitigation ratio for all the rare plants. While the FEIR mentions the mitigation ratios for special status plant species from three other projects, two of which are in the western Mojave desert, to our knowledge, none of the projects have actually successfully achieved the required mitigation.

ADD-F.2-27

It is still unclear from what we could find in the FEIR if there is actually adequate habitat to set aside for the special status plant species in the mitigation/preservation lands. Instead the FEIR relies on unquantified amounts on occupied habitat in the mitigation/preservation lands for the impacted plant areas and instead uses terms such as "vast", "largest", "many acres". It is impossible for decision makers or the public to be able to evaluate if even the proposed 2:1 mitigation is actually achievable. As state above, we believe that a higher mitigation ratio is needed for the less common/more threatened special status plant species, so a quantifiable evaluation of habitat by species is necessary in a supplemental EIR.

ADD-F.2-28

In addition, because so little is known about the habitat preferences of these special status plant species coupled with the documented failure of transplanting plants into unoccupied habitat (see our comment letter on the DEIR), the proposal of "creation" as a mitigation option fails to meet the standard of mitigation. It is also unclear what measures would be used to enhance the existing populations of the rare plants. The RWMP does even mention the crownscale or Mojave spineflower. While it mentions the California androsace, round-leaved filaree, sylvan scorzonella and adobe yampah (RWMP -Appendix B - pdf pg. 125), it does not provide any information on how enhancement would be done. Lastly, the FEIR relies on unproven "expansion" of the location population to provide the assurances that the local populations of each special status plant species would "be sustained in perpetuity". Please provide the documentation of successful "expansions" of existing special status plant species populations in the revised and updated EIR.

ADD-F.2-29

As with many of the plans that are identified but not provided in the DEIR, and that we identified in our comments on the DEIR, here again, the Special Status Plant Species Restoration Plan (DEIR MM 7-1 beginning on page 5.7-173 as modified in the FEIR at 2-158) needs to be drafted and made available for public review and comment, in order for decision-makers and the

ADD-F.2-30

public to be able to evaluate the effectiveness of the proposed plan to reach the goals of mitigation efforts. ADD-F.2-30 cont.

We failed to find the documentation that supports the statement in the FEIR (FEIR at 2-155) that "Grassland communities in the Mitigation Preserve were subsequently studied to ensure their composition was similar and the quality was the same or better." Please provide these data in a supplemental EIR. ADD-F.2-31

V. The FEIR Does Not Adequately Mitigate Impacts Native Grasslands, Wildflower Fields, and Rare Plants.

The approach presented in the FEIR at Appendix 5.7-E pg 5.7-62, as edited, appears to set up a conflict of interest for the mitigation. While it allows the Tejon Ranch Conservancy to "adopt, update...and enforce the implementation of the RWMP", the Conservancy is almost wholly reliant upon Tejon Ranchcorp for funding for implementation of the RWMP. A worst case scenario could occur where funding for updating, monitoring and enforcement of the mitigation may simply not be provided by Tejon Ranchcorp in order for the Conservancy to follow through on the proposed mitigation and management in perpetuity. Any Tejon Ranchcorp pressure on the Tejon Ranch Conservancy may result in the adoption of RWMP update where subsequent monitoring and enforcement is insufficient to assure that the goals of the mitigation requirements are met in perpetuity. Therefore, the County, as the responsible lead agency, needs to include requirements for financial endowments and necessary mitigation plans as part of the EIR process in order to assure that the mitigation requirements will actually be implemented to off-set impacts from this new remote development. In addition, the RWMP does not qualify as "mitigation" under CEQA because it can be changed by Tejon and is thus vague and not necessarily enforceable against Tejon or future entitlement holders. ADD-F.2-32

The approach to the proposed mitigation—"regardless of the specific resource impacts" (FEIR at 2-123)—is a wholly inadequate. This approach fails to assure that adequate conservation will occur to off-set the proposed project impacts. For example, if the initial development phase impacts native grasslands, wildflower fields and rare plants and the initial mitigation/preservation area puts a conservation easement on oak woodland-dominated landscape, that does nothing for conserving the impacted native grasslands/wildflower fields/rare plants. Because there is no guarantee that the proposed project will actually be developed as proposed, the County needs to require a "lock-step" approach to project impacts and project mitigation, by requiring that the impacted resources are actually mitigated by the mitigation action. This mitigation strategy assures that the impacted resource is actually mitigated and is the standard operating procedure for projects though out the State. The proposed inadequate mitigation strategy must be revised in an updated and recirculated EIR. ADD-F.2-33

The FEIR goes into great discussion about the resources that will be conserved by the Tehachapi Uplands Multiple Species Habitat Conservation Plan (TUMSHCP). However, the Centennial project is not a "covered" project under that TUMSHCP and therefore the lands set aside under that plan for conservation purposes only mitigate for the "covered activities" identified in the HCP. ADD-F.2-34

The FEIR still fails to address the temporal loss of oak woodlands. It is also unclear how the proposal to mitigate oak/oak woodlands loss within the project footprint will be adequately ADD-F.2-35

mitigated by planting more oaks within existing oak woodlands. In fact this approach may impact the existing oak woodlands. If oaks are recruiting naturally within the existing oak woodlands, adding additional oaks as part of the mitigation may impact the existing oak woodland by exceeding the carrying capacity of the oak woodland landscape. If oaks are not recruiting naturally within the existing open space areas, then the implementation of the RWMP is not achieving its goals and that situation does not support reliance on the RWMP to conserve the mitigation/preservation areas. A better strategy would be to avoid the oaks/oak woodlands. ADD-F.2-35 cont.

The mitigation strategy for wetlands is unclear. On Page 2-163 which states "Wetland Waters: 2:1, including 1:1 restoration and 1:1 enhancement, of wetland waters", does that mean restoration of existing on-site wetland waters coupled with enhancing wetland waters will mitigate impacts to all types of impacted wetlands? How does this simplistic strategy mitigate the diversity of wetland waters that will be impacted on the site? The proposed 1:1 preservation: disturbance mitigation ratio also fails to ensure no net loss of wetlands, because it allows half of the currently existing wetlands to be lost. ADD-F.2-36

The FEIR states that a Streambed and Wetland Habitat Creation and Enhancement Plan will describe the performance criteria (FEIR at 2-164), yet this critically important plan is not available in the FEIR and therefore unavailable for County decisionmakers and public to review in order to evaluate the effectiveness of the proposed mitigation. ADD-F.2-37

While the FEIR now recognizes that all the lands already under Conservation Easement held by the State of California's Wildlife Conservation Board and paid for by California taxpayers are inappropriate to be used for mitigation/preservation, these lands are also unsuitable to be used for "creation" of habitat as well. Despite the documented overwhelming failures of habitat "creation", in this instance, the conservation easement was acquired to protect the existing on-site resources. Any "creation" of habitat for mitigation would impact and displace existing functional habitat. Therefore the County needs to remove habitat creation as an activity on preservation lands with Wildlife Conservation Board Conservation Easements and only allow habitat enhancement and restoration to occur in existing degraded habitat. We note that the existing degraded habitat is a result of current RWMP implementation, so the County needs to require a management plan for the mitigation/preservation lands that have a much higher standard of appropriate stewardship than is included in the RWMP in order to reach the County's mitigation goals. ADD-F.2-38

We also question the County's commitment to protecting resources within Los Angeles County by letting the mitigation occur primarily outside the boundaries of the County – in this case in Kern County. This precedent is deeply troubling and does nothing to help preserve the incredible biodiversity in Los Angeles County that the County purports to care about conserving. ADD-F.2-39

Finally, many of the mitigation measures in the FEIR rely upon future homeowner associations (HOAs) for enforcement via Covenants, Conditions, and Restrictions (CC&Rs). Yet, CC&Rs can quite easily be modified by a vote of an HOA board or by the property owners. As such, such mitigation measures do not meet CEQA's standard of being binding and enforceable. ADD-F.2-40

VI. The FEIR Does Not Adequately Inform the Decisionmakers of the Growth-Inducing Impacts of the Project.

The FEIR continues to claim that the Project will not result in significant growth-inducing impacts. This is belied by common sense—surely a city of 60,000 people in a previously undeveloped area is likely to lead to additional development near to that city. Although not disclosed in the FEIR, the SR 138 EIR notes that "The proposed Centennial development in Tejon Ranch would include a Kaiser Permanente facility…" (SR 138 EIR at 88.) Large facilities such as hospitals are likely to serve as "anchors" that facilitate or lead to additional development in that area. ADD-F.2-41

The FEIR similarly repeats the fiction that merely because infrastructure would be "sized" to fit the Project, the Project would not lead to growth in the surrounding area. (FEIR at 2-618.) This simplistic outlook ignores the fact that that extending existing infrastructure is far easier and less costly than developing entirely new infrastructure. ADD-F.2-42

The FEIR likewise suggests that current zoning and land use plans would limit any future growth. (FEIR at 2-618.) This type of reliance upon existing zoning was expressly rejected in *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 152 which held that the development of a golf course triggers the need to study potential growth-inducing impacts such as residential development even if no such development is currently proposed. In that case, the agency claimed that the proposed project could not be growth-inducing because the acreage surrounding the site was not developable given that it was zoned for agriculture. (*Id.* at 157.) The Court held that fact was not determinative. (*Ibid.*) Here, the mere fact that lands surrounding the Project may currently be zoned for (or protected as) open space or agriculture does not excuse the County from taking a hard look at how developing a city here could lead to growth in the surrounding area. ADD-F.2-43

VII. The FEIR Does Not Disclose The Environmental Impacts of Centennial's Water Usage.

The Project will require constant annual groundwater extraction of 1,634 acre-feet per year, which is the equivalent of over 532 million gallons. The Regional Water Quality Control Board expressly disagreed with the FEIR's conclusion that water supply impacts were "less than significant." (DEIR at PDF 270) The Board further concluded that "**the cumulative groundwater demand from the projected development across the Antelope Valley as a whole may not be sustainable in the long-term**." (FEIR at PDF 270, emphasis added.) The FEIR offers no persuasive justification of why the Board is incorrect. ADD-F.2-44

The FEIR attempts to gloss over the massive amounts of water usage needed for the Project by indicating that Tejon has already executed contracts for water supplies and that the local water district is obligated to supply certain amounts of water to Tejon. (FEIR at 2-1178.) However, whether Tejon has executed certain contracts is irrelevant to the environmental effects of the Project's water usage. Water in California is an extremely limited and finite resource, and the allocation of water to the Project likely will mean that water will not be available for other purposes such as agriculture, instream flows and environmental benefits, or urban use. The mere fact that Tejon has executed contracts does not in any way account for the environmental effects of this water usage. ADD-F.2-45

VIII. The FEIR Fails to Provide Any Justification For This Environmentally Harmful Sprawl Project.

In attempting to provide a justification this harmful sprawl project, the EIR grossly distorts the findings of a California State Legislative Analyst's Office Report (the "Report"). The FEIR claims that the report concludes that an additional 100,000 units must be built annually and "and these units must be located almost exclusively in California's costal metro areas, including Los Angeles County." (FEIR at 2-537.)

The report actually states: "On top of the 100,000 to 140,000 housing units California is currently expected to build, our analysis suggests that the state probably would have to build as many as 100,000 additional units annually—***almost exclusively in its coastal communities***—to seriously mitigate the state's problems with housing affordability. Adding this many new homes, however, could place strains on the state's infrastructure and natural resources and could alter the longstanding and prized character of California's coastal communities."[3]

At over 50 miles from the coast, the project site is not in a coastal community, nor in proximity to a coastal community. In fact, the desert city of Palmdale is closer to the coast than the project site. The Report defines "coastal communities" as land beyond the 25 mile radius of California coastal metros (which would almost surely exclude the Project site, which is 65 miles from downtown Los Angeles). (Report at 19.) The report further recommends "building on coast, less inland," and "***more building in central cities, less in outlying areas***." (Report at 21-22, emphasis added.) In short, the report recommends the opposite of the type of development proposed here.

ADD-F.2-46

While California has a housing shortage, that shortage is specific to locations in which existing jobs are located, such as the LA Metro. The Centennial site is at least an hour's drive from the LA Metro, and thus will do nothing to alleviate the housing shortage in the LA Metro. To the extent some people living in Centennial will work in the LA Metro, they will necessarily endure sitting in their cars for multiple hours each day, further adding to our County's air pollution, greenhouse gas, and traffic burdens. Studies show that the long commutes that Centennial residents will necessarily endure lead to higher depression rates, obesity, and even higher divorce rates.[4] Tejon's promises of bike trails and walking paths will not change the fact that Centennial is a sprawl project necessitating unhealthy commutes. Housing growth should be centered near existing jobs.

ADD-F.2-47

On a broader level, there will likely always be a shortage of housing in California because California's natural resources and diverse economy make it a desirable place to live. Yet, we cannot pretend that California's wildlands and water resources are infinite and can accommodate more sprawl development without inflicting serious damage on California's natural heritage and degrading the quality of life for Californians.

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[3] Legislative Analyst's Office, *California's High Housing Costs: Causes and Consequences* (March 2017), http://lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf.

[4] *See* Matthews, Stephen, *Do YOU have a long commute? You're more likely to be depressed and stressed, study finds*, DAILY POST, May 22, 2017, http://www.dailymail.co.uk/health/article-4529480/Do-commute-work-likely-depressed.html (last visited June 5, 2018); *Divorce Study Shows that Couples with Longer Commutes are More Likely to Divorce*, HUFFINGTON POST, Aug. 13, 2013, https://www.huffingtonpost.com/2013/08/13/divorce-study_n_3751641.html (last visited June 5, 2018); Sandow, Erika, *Till Work Do Us Part- The Social Fallacy of Long Distance Commuting*, 51 Urban Studies 3 (2014), available at http://www-sre.wu.ac.at/ersa/ersaconfs/ersa10/ERSA2010finalpaper732.pdf.

IX. The FEIR Includes an Incomplete Analysis of Potential Alternatives to the Project.

As the Conservation Groups' and other members of the public described in their comments, the Project as currently proposed will result in significant impacts on a host of environmental issues. Nonetheless, when analyzing potential alternatives that could eliminate or minimize these impacts the FEIR includes an incomplete analysis and dismisses earlier concerns raised by the Conservation Groups.

In particular, Conservation Groups noted that the EIR lacked a thorough and well-supported infeasibility analysis for the alternatives, including the No Project Alternative and the Public Input Alternative. The Public Input Alternative offered a pathway for the Project to reduce its impacts on vulnerable wildlife and sensitive species but was summarily dismissed. (DEIR at 8-13.) Other alternatives such as Alternative C and E that would also have reduced environmental impacts were also rejected with limited and incomplete analysis. (DEIR at 8-44; 8-59-60.) Most troublingly, the EIR failed to consider alternatives that would significantly reduce the Project's development footprint and thereby truly address the Project's significant environmental impacts. The EIR cites overly narrow project objectives to reject potential alternatives and fails to provide substantial evidence to support its claim that a smaller project would be infeasible. This approach violates CEQA. Under CEQA, "the public agency bears the burden of affirmatively demonstrating that, notwithstanding a project's impact on the environment, the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134.)

ADD-F.2-48

Similarly, other commenters noted the EIR's failure to consider a proper range of alternatives improperly left out less ecologically damaging development alternatives. (FEIR at 621-22 [Letter from Santa Monica Mountain Conservancy at 3-4].) The alternatives analysis also fails to consider a single alternative that would maintain contiguous habitat linkage from project-adjacent overcrossing to Highway 138 and open space south of the highway. (*Id.*)

In response, however, the FEIR provides conclusory responses and repeatedly claims the DEIR's limited alternatives analysis and related infeasibility conclusions are sufficient. (FEIR 2-417.) When pushed on why the EIR failed to consider a smaller development footprint and less ecologically damaging, the FEIR attempts to pass the blame on the "policies and "community vision" of the AVAP. (FEIR 2-422-423; 2-654-56.) However, the FEIR presents an overly narrow interpretation of the AVAP that mandates the development footprint as currently proposed Project and rejects a smaller scale version Project. (FEIR 2-423-24; 2-663-669.) This approach is not supported by the text of the AVAP or CEQA.

ADD-F.2-49

X. The FEIR Remains Inconsistent with the Antelope Valley Area Plan.

While the FEIR touts, in part, the proposed Project's consistency with the AVAP to justify its alternative analysis, it is clear that elsewhere in the EIR the Project remains inconsistent with the polices of the AVAP. As the Conservation Groups noted the Project is inconsistent with the Land Use and Mobility element policies that emphasize the need to reduce GHG emissions, promote alternatives to automobile or minimize vehicle trips. Similarly, the proposed Project conflicts with the Conservation and Open Space or Public Safety, Services and

ADD-F.2-50

Facilities Element by failing to identify sustainable water sources or avoid natural hazards including seismic and fire prone areas.

These concerns were not unique to the Conservation Groups. CDFW raised similar concerns about inconsistencies between the proposed Project and the AVAP. (FEIR at 177 [CDFW DEIR Letter at 20-22.) CDFW noted that AVAP Goal Land Use 2 is a "land use pattern that protects environmental resources" and the DEIR claims the Project is consistent with that goal throughout the preservation of the SEA, biological mitigation lands and Tejon Ranch Land Use and Conservation Agreement. (Id. at 21.) However, the proposed Project allows for lands deemed "open space" to be used for a variety of uses, including but not limited to, gold courses, fish hatcheries, nurseries for growth and sale, stables, helispots, helipads, wineries, cemeteries, amuset rides, outdoor festivals and fair, crop production and model home complexes. None of these potential uses will adequately protect environmental resources. Additionally, CDFW points to the proposed Project's failure to protect wildlife corridors and movements, sufficiently avoid riparian areas and sensitive habitat. (*See* CDFW DEIR Letter at 21-22.) These failures are in conflict with the AVAP Land Use goals as well as the Conservation and Open Space goals.

ADD-F.2-50 cont.

Though the FEIR attempts to address some of these concerns by making minor changes to the EIR, many of the inconsistencies raised by Conservation Groups and CDFW remain unaddressed. (FEIR at 2-174-5.) Rather than revise the EIR to address the gaps and inconsistencies and gaps pointed out in comments, the FEIR dismisses the comments as misinterpreting or interpreting the AVAP policies too strictly or pointing to other policies in the AVAP that the Project does comply with. (FEIR 2-180-181; FEIR 2-1203-6.) Consistency with *some* of the AVAP plan does not absolve the EIR of inconsistencies of the AVAP elsewhere. Despite the FEIR's claim otherwise, the Project's numerous inconsistencies with the AVAP will result in significant impacts on the physical environment because those inconsistencies undermine the AVAP goals to protect vulnerable species, wildlife connectivity and habitat—all necessary for species to survive and thrive. (FEIR 2-1207.)

ADD-F.2-51

XI. The FEIR's GHG Emissions Analysis and Mitigation Measures are Inadequate.

Conservation Groups, along with other commenters, raised concerns with the Project's tremendous GHG emissions and inadequate mitigation measures. In particular, the EIR's assumption on vehicle miles traveled (VMT) and underestimates of offsite trip by residents suggest as well as the EIR's failure to adopt all feasible mitigation measures to address VMT, energy use, waste, water consumption, construction and on-site renewable energy generation. While the FEIR provided lengthy responses to those concerns, it failed to adequately address or revise the EIR in response to those comments. The Conservation Groups are still reviewing the hundreds of pages of responses to comments in the FEIR addressing GHG emissions and will provide more comprehensive comments once the Conservation Groups have completed their review. In the meantime, the Conservation Groups remain concerned about the Project's substantial GHG emissions, missed mitigation opportunities for those emissions and the Project's impact on California's ability to meet its climate change goals.

ADD-F.2-52

XII. Conclusion.

In light of many significant, unavoidable environmental impacts that will result from the Project, we strongly urge the Project not be approved. Please vote for a sustainable LA County by saying no to Centennial. ADD-F.2-53

Sincerely,

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References
(Attached on USB)

California Department of Transportation, Northwest State Route 138 Corridor Improvement Project, *Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation* (June 2017).

Huffington Post, *Divorce Study Shows that Couples with Longer Commutes are More Likely to Divorce*, HUFFINGTON POST, Aug. 13, 2013.

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Los Angeles County Metropolitan Transportation Authority, Northwest 138 Corridor.

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Matthews, Stephen, *Do YOU have a long commute? You're more likely to be depressed and stressed, study finds*, DAILY POST, May 22, 2017.

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Response to Comment Letter ADD-F.2
Center for Biological Diversity/California Native Plant Society
June 5, 2018

Response to Comment ADD-F.2-1:

Thank you for your comment and for your participation in this public process. This introductory comment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment claims that the Final EIR did not adequately respond to comments raised in the letter designated as "F.8" in the Final EIR. Since this comment fails to identify specific examples of the purportedly deficient responses and does not otherwise raise any specific concerns regarding the adequacy of the EIR, no further response is required. Please also see response to Comment F.8-20, which considers whether the Project is fairly characterized as sprawl development in the context of long-range regional planning documents implemented by the Project, such as Southern California Association of Government's (SCAG's) Sustainable Communities Strategy/Regional Transportation Plan and the Los Angeles County General Plan.

Response to Comment ADD-F.2-2:

This comment is substantially similar to Comments F.8-15 and F.8-16 set forth in the Final EIR. This comment references MM 10-25, which obligates the Project to implement a Mobility Plan that requires the establishment of a Transit Management Association (TMA) charged with implementing transit and transportation measures intended to ensure that a minimum of 20 percent of total off-site peak hour commutes are completed by using transit modes other than single occupancy vehicles. Final EIR responses to Comments B.3-2, F.9-11, F.8-15, and F.8-16 comprehensively explain how the TMA will be required to implement a monitoring and adaptive management process to verify compliance with MM 10-25's performance standard over time, as well as the County's authority to deny the approval of any tentative tract map (TTM) application, and/or require additional CEQA analysis, should monitoring demonstrate that such performance standards are not being achieved. Thus, the EIR does describe plans and policies to achieve and enforce MM 10-25's performance standards, and does demonstrate a high likelihood of MM 10-25 implementation, despite this comment's claim to the contrary. With respect to this comment's assertion that the Project constitutes "urban sprawl," please see response to Comment F.8-20, which considers whether the Project is fairly characterized as sprawl development in the context of the long-range regional planning implemented by the Project.

Response to Comment ADD-F.2-3:

Contrary to this comment, responses to Comment B.3-2 and F.8-11 comprehensively explain how the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the County's enforcement of the MMRP will together ensure that future Project development, including residential, commercial and employment-generating land uses, occurs in a balanced manner, with traffic levels that do not deviate significantly from projected levels. If Project development does not proceed as

projected, the County may deny the TTM application, or additional CEQA analysis would be required if any significant deviation were to occur.

Response to Comment ADD-F.2-4:

With regard to this comment's concerns regarding the TTM approval process and its ability to ensure that commercial and residential development will occur in a balanced form, please see responses to Comments ADD-F.2-3, ADD-B.3-2, and ADD-F.8-11. With regard to this comment's request for clarification as to whether TTM applications will be treated as ministerial or discretionary actions, both Specific Plan Section 4.53 and Specific Plan Appendix 3-B are clear that TTM applications will be treated as discretionary actions subject to CEQA compliance. Indeed, Public Resources Code § 21080(a) expressly states that tentative subdivision map approvals are discretionary actions subject to CEQA. With respect to this comment's request for clarification as to whether final subdivision maps will be treated as ministerial actions, both Specific Plan Section 4.53 and Specific Plan Appendix 3-B, Implementation Matrix, are clear that final maps will be treated as ministerial actions. This is consistent with CEQA Guidelines § 15268(b), which expressly states that all final map approvals are presumed to be ministerial and thus not subject to CEQA. This comment's claim that the "Final EIR sharply limits which County actions would be construed as 'discretionary'" is incorrect. The Final EIR is an informational document that has no independent regulatory effect.

Response to Comment ADD-F.2-5:

As explained in response to Comment B.3-2, in the event that the Project's residential development were to occur prior to the proposed onsite employment or commercial land uses, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the EIR. If these differences are found to generate new or more severe significant impacts, a subsequent environmental impact report, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved. This comment references a provision of Centennial Specific Plan Section 4.5, which requires the County's Planning Director to approve certain requested changes to the phasing design of an approved Tentative Map, as evidence that the response to Comment B.3-2's conclusion is unsound. However, Section 4.5 provision would not allow the applicant to "make significant changes to the project design and to project without any discretionary decision-making by the County," as this comment claims. Rather, Section 4.5 expressly states that it applies only to requested changes to the order or configuration of project phasing that are in "substantial conformance" with the approved Tentative Map and thus would not allow "significant changes" to the project design without discretionary review. Indeed, as provided in Specific Plan Sections 4.5.3.2 and 4.5.3.3, any requested "significant change" to an approved Tentative Map would require either a discretionary Tentative Map Amendment approval or a discretionary Revised Tentative Map approval, depending on the nature of the requested change.

Response to Comment ADD-F.2-6:

Contrary to this comment, the environmental effects of expanding SR-138 in accordance with Caltrans' Northwest 138 Corridor Improvement Project have been fully analyzed in the *Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation* (the "NW 138 FEIR"). As discussed in response to Comment B.3-6 and Final EIR Appendix 5.10-C, implementation of Caltrans' preferred alternative for the Northwest 138 Corridor Improvement Project, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW 138 FEIR. The Project's potential impacts on wildlife movement were also fully analyzed in Draft EIR Section 5.7, Biological Resources. Please also see responses to Comments B.2-9, B.4-56, B.4-57, F.3-23, F.3-25, F.5-2 through F.5-7, F.7-16, F.7-21, F.8-168, F.8-109, and F.8-110, which respond to prior comments concerning the Project's impact on wildlife movement in relation to SR-138.

Response to Comment ADD-F.2-7:

This comment's suggestion that that Caltrans' Northwest 138 Corridor Improvement Project would not be constructed but for the Project is not supported by fact. As explained in response to Comment F.8-28, the Northwest 138 Corridor Improvement Project has been under consideration by Caltrans since 2004 to accommodate projected growth in North Los Angeles County that will occur whether or not the Project is ever approved. See also responses to Comments F.8-7, F.8-20, and F.8-28, which detail the history and purpose of the Northwest 138 Corridor Improvement Project.

Response to Comment ADD-F.2-8:

Contrary to this comment, as discussed Draft EIR Section 5.10, Traffic, Access, and Circulation, mitigation measures identified in the EIR would reduce traffic impacts to a less than significant level. However, as discussed on Draft EIR page 5.10-130, although mitigation measures identified for Caltrans facilities would reduce direct Project impacts to a less than significant level, it is outside the control of the County to implement these measures and this direct impact is thus conservatively considered to be significant and unavoidable. Similarly, as discussed on EIR page 7-19, for 2035 cumulative conditions, the SR-138 was analyzed consistent with the Northwest 138 Corridor Project being advanced by Caltrans, and while the Project's cumulative traffic impacts would be less than significant with implementation of identified mitigation measures, the EIR conservatively determined that this cumulative Project impact would be significant and unavoidable because the County cannot require Caltrans to implement planned and needed improvements to State highway facilities. The Traffic Mitigation Agreement referenced in this comment would provide funding for the planning, design, and construction of certain improvements. However, if the improvements are not constructed by Caltrans, potential Project impacts would be significant and unavoidable. However, as discussed above, and as explained on page 5.10-130 of the Draft EIR, the County (as the Lead Agency) lacks jurisdiction and control over Caltrans and State highway facilities and thus cannot mandate the construction of improvements to these

facilities or require that Caltrans and the Project Applicant/Developer enter into a Traffic Mitigation Agreement as a condition of Project approval. Please see responses to Comments F.8-22 through F.8-33 for further discussion of this issue. With respect to this comment's concerns regarding the impacts associated with the construction of the Northwest 138 Corridor Project, both the NW SR-138 Draft EIR and Final EIR and the Antelope Valley Area Plan EIR evaluate the environmental effects of the Northwest 138 Corridor Improvement Project, as discussed in response to Comment F.8-33. Furthermore, as discussed in response to Comment B.3-6 and Final EIR Appendix 5.10-C, implementation of Caltrans' preferred alternative for the Northwest 138 Corridor Improvement Project, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR.

Response to Comment ADD-F.2-9:

With respect to this comment's concerns regarding the EIR's internal vehicle trip determinations, please see response to Comment F.8-23, which explains the substantial evidence supporting the EIR's trip counts. This comment's suggestion that the EIR's internal trip assumptions are unsupported by substantial evidence based on the Commenter's interpretation of the Northlake Specific Plan EIR misses the mark for at least two reasons: first, it is falsely presumes that the Centennial EIR's internal vehicle trip counts relies on a determination that "significant numbers of people will work onsite" and, second, it is predicated on the false notion that the Northlake Specific Plan is comparable to the Centennial Specific Plan in terms of on-site amenities that incentivize internal trips. Responses to Comments E.1-2, F.7-15, F.8-9, F.8-22, F.8-23, F.8-45, F.8-82, F.8-197, and F.8-200 detail the expert modeling and substantial evidence that support the EIR's traffic impact determinations and address the Commenter's claim that the EIR's traffic counts rely on an expectation that most on-site jobs will be staffed by project residents. Moreover, as compared to the Northlake Specific Plan, the Centennial Specific Plan proposes far more on-site commercial, employment, recreational, educational and institutional land uses[3253] to encourage internal travel patterns by Project residents similar to those projected to occur in the Lancaster/Palmdale and Santa Clarita Valley areas when the region is built out, as discussed in response to Comment F.8-13.[3254, 3255, 3256] Finally, contrary to this comment, the EIR never claims that the Project is "assured" to achieve the EIR's projected internal average trip count. In fact, as discussed in responses to Comments F.8-15 and F.8-16, the Project will be required to implement a monitoring and adaptive management process to verify compliance with the MMRP's mobility performance standards, which will be enforced

[3253] Compare Northlake Specific Plan EIR pages 4-5 through 4-24 with Centennial Specific Plan EIR pages 4-12 through 4-44.

[3254] H. Schroeder, SCV *Growth Is It's Future*, The Signal: Santa Clarita Valley, Nov. 7, 2016: https://signalscv.com/2016/11/scvs-growth-future/

[3255] Shlomo Angel, Alejandro M. Blei, The Productivity of American Cities: How densification, relocation, and greater mobility sustain the productive advantage of large U.S. metropolitan labor markets. Cities, Volume 51, January 2016, pages 36-51.

[3256] Shlomo Angel, Alejandro M. Blei, The Spatial Structure of American Cities: The great majority of workplaces are no longer in CBDs, employment sub-centers, or live-work communities. Cities, Volume 51, January 2016, pages 21-35.

through the TTM approval process if monitoring demonstrates that such performance standards are not being achieved.

Response to Comment ADD-F.2-10:

This comment inaccurately claims that the EIR determined that 65 percent of Project trips would be internal to the Project. In fact, the EIR's traffic modeling shows that only 48 percent of total project trips would be internal to the Project, as discussed in response to Comment F.8-9. With respect to this comment's concerns regarding the evidentiary basis for the EIR's assumptions regarding internal trips, please see responses to Comments ADD-F.2-9, E.1-2, F.7-15, F.8-9, F.8-22, F.8-23, F.8-45, F.8-82, F.8-197, and F.8-200. With respect to this comment's concerns regarding the rates and sequence of residential and commercial development within the Project site, please see responses to Comments ADD-F.2-2 through ADD-F.2-5. In addition, CEQA does not require the EIR to analyze a scenario in which residential and commercial development do not occur concurrently. Substantial evidence supports the reasonable traffic modeling assumptions used in the Draft EIR. An EIR lead agency may make reasonable assumptions about future conditions based on substantial evidence without guaranteeing that those assumptions will remain true. See *Environmental Council of Sacramento v City of Sacramento* (2006) 142 Cal.App.4th 1018, 1036.

Response to Comment ADD-F.2-11:

This comment references Final EIR page 2-540 and its discussion of the various Project alternatives analyzed in SCAG's 2012 RTP/SCS EIR. The referenced discussion, however, does implicate the alternatives analysis included in the Centennial Specific Plan EIR, although this comment mistakenly asserts otherwise. In point of fact, the Project EIR never states that it's "No Project" alternative would generate more VMT or impact more wetlands than would the proposed Project, despite this comment's mistaken assertion to the contrary. As discussed on Final EIR page 2-540, however, the 2012 RTP/SCS EIR did in fact determine that the business-as-usual "No Project" alternative analyzed in that EIR would result in greater VMT and environmental impacts than would 2012 RTP/SCS EIR's preferred "balanced land use plan" alternative.

Response to Comment ADD-F.2-12:

The Commenter's opinion that more thorough analysis is needed regarding the Project site's importance for wildlife movement is noted, but the lead agency disagrees. The Commenter notes that other agencies and organizations commented on the Draft EIR with regard to habitat connectivity and wildlife movement. The lead agency has thoroughly responded to those comments and has revised the EIR in response to them where appropriate. See Final EIR, responses to Comments B.2-3 (letter B.2 is from DWR), B.4-34 through B.4-37, B.4-56 and B.4-57, B.4-75 (letter B.4 is from CDFW), F.3-23 through F.3-25, and F.3A-32 through F.3A-34 (letters F.3 and F.3A are from the Tri-County Watchdogs), F.5-2 (letter F.5 is from the SMMC), F.7-22 (letter F.7 is from the TPLMTC), F.8-109 and F.8-110, and F.8-165 through F.8-169 (letter F.8 is from CBD, CNPS, and CFS). The comment provides no evidence for its assertion that the EIR analysis is inadequate, and no further response is required. With

regard to the AV RCIS, please see Final EIR, response to Comment F.8-172. See also response to Comment ADD-F.2-16 for further discussion of wildlife movement.

Response to Comment ADD-F.2-13:

The Final EIR does not argue that the Project area's biological habitat value is erroneously identified within the AVRCIS. Instead, it is the County's assertion that because of the numerous inaccuracies within the AVRCIS's biological description of the Project site, the scientific integrity of the document is called in to question. The intent of the Draft EIR is to accurately describe the biological value of the Project site, in context to the region in which it occurs. In numerous instances within the Draft EIR, Project impacts were deemed potentially significant and mitigation measures were set forth to bring potential impacts to a less than significant level. At no point does the Draft EIR or Final EIR attempt to argue that the Project area does not have biological value.

The comment is correct that the Final EIR states that a detailed response to the EEMS results map cannot be provided due to the AVRCIS's missing methodology and so precludes the ability for the lead agency to evaluate the methodological details that may have explained the factual errors in this map as confirmed by biological resource experts who completed detailed ground surveys of the project site. A lead agency is not required to accept or validate assertions about the biological value of the Project area given these factual inaccuracies and missing methodologies. Additionally, and as mentioned in the paragraph above, at no point does the Draft EIR or Final EIR attempt to argue that the Project area does not have biological value.

Response to Comment ADD-F.2-14:

This comment incorrectly summarizes the points made in the Final EIR regarding the AVRCIS's evaluation of the Project site. The Final EIR highlights several issues with the AVRCIS, one example being that the Project site is evaluated in a piecemeal fashion by the AVRCIS, while the Draft EIR analyzed the biological region of Western Antelope Valley, including northward into Kern County and up into the Tehachapi Mountains ridgeline. As stated in the Final EIR, the biological resource values on the Project site were considered as part of the mosaic of habitat areas in the region, which vary in quality and connectivity throughout. The Draft EIR includes all the biological resources, inclusive of the three species groups (desert, agriculture/grassland, and foothill/riparian) included in the June Admin Draft AVRCIS.

Response to Comment ADD-F.2-15:

The presence (or absence) of high quality habitat outside of the Project area does not negate the biological value within the Project area. As stated in response to Comment ADD F.2-13, the intent of the Draft EIR is to accurately describe the biological value of the Project site, in context to the region in which it occurs, and in numerous instances within the Draft EIR, Project impacts were deemed potentially significant and mitigation measures were set forth to reduce potential impacts to a less than significant level. At no point do the Draft EIR or Final EIR attempt to argue that the Project area does not have biological value.

The Final EIR prepared by Los Angeles County highlighted certain specific inconsistencies and errors within the biological conditions described in the AVRCIS and noted that the results of the EEMS model could not be reviewed or validated without disclosure of the methodology used (particularly given the clear factual errors created by the model output information included in the AVRCIS. The Final EIR's statement that the Mitigation Preserve areas are identified by the AVRCIS as habitat core areas is accurate but is not a validation or endorsement of the results of the EEMS methodology.

Response to Comment ADD-F.2-16:

The EIR appropriately analyzes potential impacts to habitat connectivity, and the Project design and mitigation would ensure less than significant impacts. In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains was considered in detail (Draft EIR, pages 5.7-50 to -64, -164 to -170). The thorough assessment concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions (Draft EIR, page 5.7-166). The wildlife movement impact analysis beginning on page 5.7-164 of the Draft EIR does conclude that development of the Project site will result in some losses of areas that may be used for foraging and/or breeding for species; pathways to or from foraging or breeding grounds on the Project site, such as along ridge-lines or canyon bottoms, may become "dead ends" to through dispersal. However, these losses are not expected to significantly impact wildlife movement, and sufficient habitat connectivity would be retained in the region for these species, especially given the substantial amount of similar terrain in the northwestern Antelope Valley area. Further, two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement and the TUMSHCP, although not providing mitigation for Centennial, would act in concert with the Centennial mitigation preserves to help sustain the functionality of the regional landscape linkage for future wildlife populations. Multi-generational gene flow (a series of connected wildlife movement events over time, allowing for genes to pass within and between populations) among wildlife populations in the region is expected to be sustained in the open spaces on and off the site that will remain following Project implementation. These open spaces provide sufficient habitat connectivity to allow for such gene flow. Implementation of MM 7-14, which designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) where the current intersection with National Cement Plant Road exists, will also allow for local wildlife movement to pass through the Project area down to SEA 17. The direct impacts of Project development on wildlife movement, therefore, are considered less than significant after mitigation for local wildlife movement impacts. Nonetheless, the Draft EIR (page 7-17) discloses that the Project when combined with other projects in the region would result in a cumulatively significant impact on wildlife movement. Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP) including with regard to open space designations, SEA protection, and preservation of habitat linkages.

For a more detailed discussion of wildlife movement within the Project and regionally, please see Final EIR, responses to Comments F.3-23 through F.3-25, B.4-34 through B.4-37, B.4-56 and B.4-57, and F.8-165 through F.8-169.

Response to Comment ADD-F.2-17:

The Final EIR statement that the aqueduct is a substantive barrier to wildlife movement does not minimize the two crossing locations; rather, it is simply a statement of fact. The Final EIR acknowledges the westernmost crossing, stating that wildlife is most likely to pass from the Tehachapi Mountains in the north to the Angeles National Forest in the south (and vice versa) west of the aqueduct where the habitat provides greater cover (see Draft EIR pages 5.7-58 through 5.7-60). The Draft EIR also recognizes the two areas where crossing may be attempted by wildlife by stating that although I-5 and the California Aqueduct substantially reduce the permeability of the linkage for many wildlife species, it remains functional for many species to some degree (see Draft EIR page 5.7-62). The Project EIR analysis is also consistent with the AVAP and its independent EIR with regard to the limited impact on wildlife movement, inclusive of the aqueduct crossings, and that sufficient habitat connectivity would be retained. As stated in the Draft EIR in Section 8.0, Alternatives to the Proposed Project (see page 8-10) and in the Final EIR (page 2-414), the Project's development area was substantially reduced to conform to the boundaries of the West Economic Opportunity Area (EOA) in the Antelope Valley Area Plan (AVAP). The AVAP designated more acres as Sensitive Ecological Areas (SEAs) west of the aqueduct, and the EOA constrained the Project's development footprint and thereby impacts to wildlife movement as well as impacts to other biological resources such as oak woodlands. The County's AVAP was informed by an independent EIR prepared by and for the County and included an assessment of wildlife movement in establishing both SEA and EOA boundaries. Commenter's lawsuit challenging the AVAP and EIR was recently rejected by the California appellate court, which upheld the AVAP, SEA boundaries, and specific challenges raised by the Commenter in the litigation context to the West EOA Project area. (See *Center for Biological Diversity v. County of Los Angeles*, No. B284427 (Los Angeles Super. Ct. 2nd Dist. June 19, 2018).)

Response to Comment ADD-F.2-18:

The pronghorn is not on the CDFW list of Special Animals, and CDFW in fact occasionally issues permits for hunting of the Antelope Valley pronghorn population, but the Draft and Final EIR specifically acknowledge that there is an interest in maintaining this herd. (Draft EIR page 5.7-153; Final EIR, response to Comment B.4-35) The EIR therefore provides an impact analysis which is consistent with standard practices for sensitive species and the best available scientific information, including on-site observations, in suitable habitat areas. Pronghorn have reportedly been seen on rare occasions in random locations in the region but have been commonly observed and are known to primarily occupy the western portion of the site (upper Oso Canyon in particular), which is preserved mitigation open space and other locations along the foothills continuing to the northeast, which is also preserved mitigation open space. (Draft EIR, pages 5.7-128, 5.7-153) Since release of the Draft EIR, additional population distribution information has also been obtained from the Tejon Ranch Conservancy and is presented in the Final EIR (see Final EIR, Exhibit B.4-34, which indicates the primary usage area for pronghorn along the Tehachapi foothills, predominantly northeast of the Project site). As noted in the Final EIR, the Project's crossing opportunity under SR-138 connecting areas of appropriate habitat would serve the pronghorn. (Final

EIR, response to Comment B.4-36) Further, the RWMP requires the Project Applicant to work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures for pronghorn that are also supported by CDFW. (Final EIR, response to Comment B.4-35) Creating additional crossings over the California Aqueduct within the interior of developed portions of the Project could cause harm to pronghorn by creating greater risk for interaction with humans, vehicular traffic, and other potential conflicts associated with development. (*Ibid.*) Avoidance of developed areas is preferred to minimize such potential harm to this species. The Commenter provides no evidence that this is "unfounded," and no further response is required. With regard to the solo male pronghorn observed at Peterson ranch, individual pronghorn are considered outliers that have been found outside the known occurrence area – unless occurrence is repeated, it is typically considered a single event and not evidence of a population trend or expanded distribution. (Final EIR, response to Comment B.4-37) The Final EIR recognizes it is possible this observation is evidence of as-yet unidentified expansion, but no further analysis is required given the species' regionally limited but non-special status and scope of analysis already contained in the EIR. (*Ibid.*; Draft EIR, page 5.7-127) The Commenter provides no evidence to the contrary, and no further response is required.

Response to Comment ADD-F.2-19:

Numerous studies on wildlife movement have been conducted on the Project site as well as throughout the Project region and were used to inform the wildlife movement discussions in Section 5.7.3, Environmental Setting, and Section 5.7.6, Environmental Impacts, of the Draft EIR.

In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains/Angeles National Forest was considered. The assessment, which used various scientific studies, concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions. (Draft EIR, page 5.7-166). However, in order to lessen Project impacts on wildlife movement, MM 7-14 designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) at the current intersection of the California Aqueduct and National Cement Plant Road; the width of the underpass shall be 100 feet and flare out on both sides of the highway to a 150-foot width in the Project open space adjacent to the highway. This will let local wildlife pass between open space areas on opposite sides of the highway and accommodate infrequent regional movement from areas northwest of the Project site to areas south of the Project site. The additional underpass to be constructed under SR-138 further to the east is also expected to provide some local movement for animals within the Project area. This undercrossing is consistent with the Antelope Valley Area Plan, and both undercrossings provide for connectivity for local wildlife movement across SR-138. Commenter's generalized assertions provide no evidence to the contrary, and no further response is required. See Final EIR, responses to Comments B.4-56, B.4-57, F.3-23 through F.3-25, F.5-2 through F.5-7, F.7-16, F.7-21, F.8-109, F.8-110, and F.8-168 for further discussion.

Response to Comment ADD-F.2-20:

The Commenter's opinion that the EIR analysis, Final EIR revisions to Draft EIR and mitigation measure text, and responses to government agency and organization comments are inadequate is noted, but the lead agency disagrees with this assessment. The lead agency has thoroughly and appropriately analyzed potential impacts to special status species and evaluated and incorporated all feasible mitigation including in many cases as suggested by the agencies and others listed in this comment. This comment does not provide specific examples or evidence of inadequate analysis or mitigation, and no further response is required.

Response to Comment ADD-F.2-21:

As the Commenter notes, Draft EIR Table 5.7-2 catalogs and describes surveys conducted on the Project site from 1999 to 2015. (Draft EIR pages 5.7-21 through 5.7-23) Several biological surveys and assessments were updated in 2015 because it was determined that this was necessary, including the California condor assessment, special status plant survey, jurisdictional delineation with functional assessment/California Rapid Assessment Method (CRAM) analysis, and tricolored blackbird surveys and analysis. Resources surveys were not updated where previous data remains accurate due to one or more of the following reasons: new Project areas are not expected to contain the resource; lack of measurable change in site conditions; past surveys were conducted within acceptable timeframe typical for that resource; surveys have been repeated in the past with identical results; regulatory status/survey requirements have not changed in a manner that would require a survey update; and/or drought conditions have contributed to general consistency of site conditions over the past five to six years. (Draft EIR pages 5.7-23, 5.7-24) Further, MM 7-5 requires focused surveys for applicable special status species within the appropriate season in the year prior to the initiation of activities that would cause impacts. An appropriate environmental baseline has been established for EIR analysis of potential impacts to special status species. The Commenter's generalized assertion provides no evidence to the contrary, and no further discussion is required. Please see also Final EIR, response to Comment B.4-58.

Response to Comment ADD-F.2-22:

It is certainly true that species populations can shift or expand over time, assuming that potentially suitable habitat evolves to accommodate such shifts. However, environmental conditions on the Project site have not notably changed and, therefore, there is no evidence that the suitability for occupation of the various species on the Project site has changed. For example, earlier surveys occurred during non-drought years when vegetation was more plentiful and could potentially support higher wildlife population levels for this species. During the extended drought years that occurred after the most recent field surveys, less vegetation and lower population levels are likely, but relying solely on drought-year (e.g., 2015) survey data could understate the population and occurrence of this species during normal and wet years. In addition, multiple focused protocol surveys have been conducted for special status species with higher potential for variability in occupation such as the least Bell's vireo, southwestern willow flycatcher. and tri-colored blackbird. To

provide still greater certainty that these species are not impacted, the Draft EIR contains mitigation requiring focused surveys within the year prior to construction, in the appropriate season for that species, for many of the special status species with potential to occur on site such as burrowing owl, least Bell's vireo, southwestern willow flycatcher, arroyo toad, and California red-legged frog to name just a few. Although pre-construction surveys and related mitigation requirements are provided to ensure that individuals of these special status species are not impacted by Project construction, the survey history on the Project site has provided a robust understanding of the biological conditions on the Project site. Many different biologists have combed the site for many years, and special status species are reported regardless of the specific species being surveyed. This approach leads to many years of incidental evidence of how these species may or may not be using the site. Although incidental data does not replace focused protocol-level species-specific surveys, it provides an additional layer of data that is considered when assessing the site for occupation by special status species. Lastly, although focused surveys for the burrowing owl have been negative, the project assumes presence of this species based on detections immediately adjacent and the high potential for occupation regardless of negative survey results. Mitigation is included to reduce impact to the burrowing owl to less than significant levels. (see pages 2-133 and 2-134 of the Final EIR). It should also be noted that mitigation measures require pre-construction surveys and avoidance and mitigation if detected for all applicable species including silvery legless lizard, coast horned lizard, two-striped garter snake, burrowing owl, Swainson's hawk, golden eagle, American badger, and ring-tailed cat (see pages 3-16 through 3-20 of the Final EIR). As demonstrated, the Project's mitigation fully addresses population dynamics and the potential for changes in the status of special status species impacts at the time of project construction and implementation. The comment provides no evidence that the age of some wildlife surveys cited in the EIR means that the Draft EIR's description of baseline conditions was inaccurate, or that impacts to the particular species surveyed would be substantially more severe than disclosed in the Draft EIR.

Response to Comment ADD-F.2-23:

In an effort to make the plan for implementing grassland preservation and management available immediately, as requested by Draft EIR comments, the requirement for preparation of a separate Grassland Management Plan has been replaced in MM 7-10 by adoption of the Ranchwide Management Plan (RWMP) as the management plan; it has been included in the Final EIR. (See Final EIR, response to Comment B.4-17; Final EIR, Section 3.0, Draft EIR Clarifications and Revisions, page 3-33; Final EIR Appendix 5.7-D.) The RWMP discusses grazing practices and provides specific BMPs for grazing, including residual dry matter targets and weed management, with invasive plant mapping and targeted removal actions. (See Final EIR Appendix 5.7-D, Volume II, Sections 5.1 and 5.2.) The RWMP has been submitted for review and approval to CDFW and USFWS, as applicable. It includes appropriate standards for management of the grasslands that will preserve them in perpetuity. With regard to Appendix B and other appendices to the RWMP, please see response to Comment ADD-F.2-24.

Response to Comment ADD-F.2-24:

The RWMP Volume 2 does refer to an Appendix B, *Grazing Management Recommendations.* The appendix was inadvertently omitted from the Final EIR. The complete RWMP, inclusive of appendices, is attached as Appendix C of this document. Additionally, the entirety of the RWMP, inclusive of Appendix B to Volume 2, is also readily available to the public on the website maintained by the Tejon Ranch Conservancy, located at www.tejonconservancy.org/index_htm_files/Vol.%202_Appx%20B_final.pdf.

The main body of the RWMP Volume 1, which was included in the Final EIR (Appendix 5.7-D), provides the general approach of grazing to be used within the preserved lands on the Tejon Ranch, along with extensive background science guiding the approach, which includes the Centennial Mitigation Preserve (see sub-section *Grazing* under *Management Approaches* section on page 3-31 of Volume 1). In addition, the main body of Volume 2 of the RWMP, also included in the Final EIR (Appendix 5.7-D), includes a series of Conservation Activities and Best Management Practices specific to Antelope Valley grasslands to be implemented within the Mitigation Preserve (Section 3.1.1, Antelope Valley Grasslands, pages 3-2 through 3-7). The various Conservation Activities described include grazing considerations such as Conservation Activity NC-1.1 (page 3-5 of Volume 2), which states that the Conservancy will develop and evaluate standards for residual dry matter (RDM) and vegetation height applicable to grazing management in Antelope Valley grassland. It goes onto to say that these standards will be used to achieve multiple goals, including enhancing native plant species. Based on the results of this work, the Conservancy and TRC will work to implement grazing management trials to evaluate management prescriptions that may enhance pronghorn habitat, native plant species, and other target species.

Response to Comment ADD-F.2-25:

The Commenter's opinion that the RWMP does not provide adequate resource management for native grasslands and wildflower fields is noted, but the lead agency disagrees. The RWMP includes standards for management of the grasslands areas that will preserve the grasslands in perpetuity. The RWMP has been submitted for review and approval to CDFW and USFWS. The RWMP provides a comprehensive framework, within the context of the Ranchwide Agreement, for the effective preservation and management of the preserved open space lands located on Tejon Ranch, including the mitigation lands for the Project site. The Commenter's negative opinion about grazing, and the role of grazing in the RWMP, is also noted. However, the lead agency disagrees. Grazing practices have largely resulted in the conditions that exist currently in the area. (Draft EIR pages 5.7-11, -45, -159) Grazing is anticipated to continue to be a key component of the management of these open space lands, and the value of grazing as a means of protecting plant species has been consistently recognized by federal and State biological protection agencies. For further discussion regarding grazing and open space resource management, see Final EIR, responses to Comments B.4-17 and B.4-60, F.8-10, F.8-131, and F.8-173.

Response to Comment ADD-F.2-26:

It is recognized that areas occupied by annual plant populations fluctuate in detectability due to varying germination between years. With regard to species presence, special status plant surveys were repeated multiple times throughout the Project site impact area between 2003 and 2015, as described on pages 5.7-29 to 5.7-31 in the Special Status Species Surveys section of the Draft EIR. With regard to exact species location, Specific location data gathered during older surveys for the Project cannot represent current conditions with a sufficient level of accuracy and may misrepresent species' true locations. More recent surveys conducted using current methodologies and more sophisticated global positioning tools provide the best current evidence of occupation, and should not be combined with older, less accurate data (i.e. "maximum area of occupancy" approach). The 2015 focused plant survey was conducted using the most current recommended methods of the California Native Plant Society. Accordingly, reference populations in the region were monitored to ensure that the timing of surveys were appropriate. Results of the surveys were consistent with previous years and encompassed previously mapped areas and added a greater level of mapping accuracy due to higher resolution aerial photography availability and use of higher resolution hand held global positions system units. As a result of the increased accuracy, estimated numbers of individuals within occupied areas increased. Using the multiple years of plant survey data coupled with using the most current methods and reference population verification, the areas and numbers of individual special status plants identified as impacted is sufficiently accurate and consistent with scientific land management biological practices. Please also see Final EIR, response to Comment B.4-43 for further discussion of this topic. Please see response to Comment ADD-F.2-27 for further discussion regarding the 2:1 mitigation ratio.

Response to Comment ADD-F.2-27:

The 2:1 mitigation ratio for special status plants was arrived at after considering impacts for each special-status plant individually and is intended to ensure at least an equal or greater population of each species is preserved. Other recent large projects in the region, such as the SR-138 widening and the Tehachapi Renewable Transmission Project, have 2:1 mitigation for rare plants, as is more thoroughly discussed in Final EIR, response to Comment B.4-43. As described in MM 7-1 on page 5.7-173 of the Draft EIR, the Special Status Plant Species Restoration Plan shall include methods for enhancement and restoration such as direct seeding, transplantation, non-native invasive weed control, grazing management, etc. The Plan shall also include appropriate locations for restoration that match the parameters of existing populations. The Special Status Plant Species Restoration Plan and MM 7-1 include specific performance objectives and identifies feasible means of achieving those performance objectives, which is a form of mitigation measure commonly used and has been repeatedly confirmed as legally adequate in CEQA court cases. Please see Final EIR, response to Comment B.4-44, which discusses performance objectives for this mitigation plan. The performance objectives provided are those necessary to ensure impacts to special status plant species are properly mitigated for, and functions and values of these communities are preserved and managed in perpetuity.

A further redesign of the Project with regard to the preservation of special status plants is unwarranted. The Project design has been modified substantially to reduce impacts on special status plants through multiple years of consultation with the Significant Ecological Area Technical Advisory Committee (SEATAC). The Project was redesigned to be consistent with and avoid all SEA designated areas. Furthermore, in response to comments submitted by CDFW, much more grassland was preserved, and plant mitigation measures were modified to require more preservation. These efforts have reduced the Project's impacts on special status plants considerably by avoiding a greater percentage of impacted populations along the southern boundary and avoiding some species entirely. (Final EIR, response to Comment B.4-75; see also Appendix 5.7-B, which represents an earlier proposed Project footprint with greater impacts on special-status plants which was submitted to the County as part of the SEATAC process.)

Response to Comment ADD-F.2-28:

An EIR is intended to be an informational document that is understandable to non-expert members of the public as well as decision-makers. The appendices to the EIR include much more detailed technical studies prepared by subject-area experts. Page 5.7-3 of the Draft EIR refers to multiple EIR biological resources appendices which include expanded discussions, detailed methodologies, and the biological surveys conducted within the Project site and off-site areas (see Appendix 5.7-B of the Draft EIR). The Mitigation Preserve Review is presented in Appendix 5.7-C of the Draft EIR. The Mitigation Preserve Review outlines the methods and resources used to determine the viability of the mitigation lands to support many of the mitigation target resources, such as special status plants. Draft EIR Appendix 5.7-C, page C-11 includes a subsection titled Spatial Analysis of Rare Plant Habitat Parameters, which describes the analysis of soils, slope, and aspect comparing the impacted sites to the mitigation lands. Results of the analysis support the conclusion that potentially suitable habitat exists within the Mitigation Preserve to support a 2:1 mitigation ratio. The document goes on to detail the results of a reconnaissance survey within high suitability match areas in some of the mitigation lands which identified presence of many populations of the target rare plant species. In addition, MM 7-1 (page 5.7-174 of the Draft EIR) requires that a focused survey for special status plants within the Mitigation Preserve be conducted prior to Project impacts on special status plant species. The Final EIR rare plant mitigation evaluation provides sufficient data to support the approach of conservation of rare plant populations within identified potentially suitable habitat in the Mitigation Preserve.

As described above, the Draft EIR presents sufficient data indicating the presence of existing special status plant populations and suitable habitat within the Mitigation Preserve. In addition, as described in the Final EIR, page 2-796, the MM 7-1 includes the following requirements: (7) for creation or enhancement area(s), monitoring to confirm successful implementation of the 2:1 mitigation ratio; (8) contingency measures to further create or enhance plantings in creation or enhancement areas where monitoring results do not show successful 2:1 mitigation, which shall remain in effect until such time as the 2:1 mitigation ratio has been achieved. As a result, the special status plant mitigation measure, inclusive of the 2:1 ratio, is expected to quantifiably demonstrate full mitigation by species to less than

significant levels. Please also see response to Comment ADD-F.2-27 for further discussion regarding the 2:1 mitigation ratio.

Response to Comment ADD-F.2-29:

The grassland community, as a whole, on the Project site, is being treated as special status, and the appropriate mitigation is provided in the EIR, with appropriate management under the RWMP. Rather than splitting up the grasslands into sensitive and non-sensitive sections, the Project is treating the grasslands as a whole, with the functions and values being mitigated for by the preservation and enhancement of grassland areas nearby that are composed of the same mosaic distribution of non-native and native dominated communities. As shown on revised Exhibit 5.7-10, Mitigation Preserve, included in the Final EIR (page 3-116) and page 5.7-135 of the Draft EIR, immediately adjacent lands that represent as close a proximity as feasible are captured within the Mitigation Preserve. Grassland studies of the site and adjacent lands provide data indicating that the highest quality communities occur in the Mitigation Preserve. As described in Appendix 5.7-C of the Draft EIR, a reconnaissance survey of the preserve in 2015, conducted during peak bloom, confirmed this finding. Vast native wildflower fields, larger than any observed on the Project site, were observed within the preserve. The Project's priority will be to preserve these in perpetuity. Enhancement or creation to expand preserved populations within the Mitigation Preserve is *only* necessary if the existing preservation ratio is documented to be less than the minimum 2:1 ratio for any of the six impacted special-status species.

With regard to method of enhancement, the lead agency disagrees with the Commenter's assertion that the RWMP and Project mitigation measures do not provide appropriate detail. The lead agency notes, as is further discussed in responses to Comments ADD-F.2-30 and ADD-F.2-37, that mitigation plans are not required to be circulated with the EIR so long as the mitigation measure identifies the criteria for determining that the impact will be mitigated, and includes specified performance standard and identifies a range of feasible measures that may be implemented to achieve the performance standards and meet mitigation commitments. Such details are appropriately provided in MM 7-1. (Final EIR, Appendix 2.0-C.Rev Mitigation Monitoring and Reporting Program, pages C-27 to C-29) Contrary to the Commenter's assertion, several successful rare plant restoration projects as well as studies which identify preferred methods have been documented, as the lead agency has already thoroughly explained to the Commenter in Final EIR, response to

Comment F.8-128.[3257,3258,3259,3260,3261,3262,3263] Please also see Final EIR, responses to Comments B.4-75, F.8-124, F.8-128, and F.8-173 for further discussion of these topics.

Response to Comment ADD-F.2-30:

Mitigation plans, including the Special Status Plant Species Restoration Plan, are not required to be circulated with the EIR, if the relevant mitigation measure identifies the criteria the lead agency will apply in determining that the impact will be mitigated. This mitigation approach is consistent with CEQA requirements, which permits the formulation of detailed plans at a future date as long as the mitigation measure includes specified performance standards and identifies a range of feasible measures that may be implemented to achieve the performance standard and meet mitigation commitments. Such details are appropriately provided in MM 7-1. (Final EIR, Appendix 2.0-C.Rev Mitigation Monitoring and Reporting Program, pages C-27 to C-29) It is impractical and premature to prepare this mitigation plan at this time because it is site-specific and dependent on the results of other components of the required mitigation measure, including pre-disturbance surveys and further County and resource agency review and approval. Please see also Final EIR, response to Comment F.8-173 for further discussion of this issue.

Response to Comment ADD-F.2-31:

The Final EIR is referencing the multi-year grassland studies that have occurred on the Project site and within the Mitigation Preserve lands. These studies are compiled in Appendix 5.7-B of the Draft EIR. Specific attention should be paid to Plant-3, Plant-5, Plant-6, Plant-7, Plant-8 within Appendix 5.7-B of the Draft EIR. Please refer to the immediately preceding response for more detailed references to the EIR documentation relevant to this comment.

Response to Comment ADD-F.2-32:

The EIR establishes mitigation measures that are fully enforceable against the Project Applicant independent of the existence or funding status of the Tejon Ranch Conservancy. These County mitigation requirements cannot lawfully be modified by the third-party actions of either Tejon Ranchcorp or the Conservancy. Under the TRCRWA, performance of

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3257 Godefroid, et al. 2011. "How successful are plant species reintroductions?" *Biological Conservation* Volume 144. Issue 2 (2011): 672–682.

3258 Shropshire, F.M.; Jones, C.E.; Allen, R.L.; Atallah, Y.C.; Sandquist, D.R.; and Walker, S.E. (Shropshire, et al.). "Significance of Bulb Polarity in Survival of Transplanted Mitigation Bulbs." *Bulletin of the Southern California Academy of Sciences* Vol. 115. Issue 2 (2016).

3259 Haskins, K.E. "Alternative perspectives on reintroduction success." *Animal Conservation*. Issue 1367-9430 (2015): 409-410. Print.

3260 Center for Plant Conservation. 2012. *Plant Reintroduction in a Changing Climate: Promises and Perils*. Edited by J. Maschinski and K.E. Haskins. Washington, D.C.: Island Press.

3261 Kaye, T.N. 2011. Toward Successful Reintroductions: The combined importance of Species Traits, site Quality and restoration Technique (pp. 99-106). Proceedings of the CNPS Conservation Conference, 17–19 Jan 2009.

3262 Stephens, T. 2014 (March 17). Reintroduction experiments give new hope for a plant on the brink of extinction. Santa Cruz, CA: UC Santa Cruz. https://news.ucsc.edu/2014/03/endangered-plant.html.

3263 Dunwiddie, P.W. and R. Adam Martin. "Microsites Matter: Improving the Success of Rare Species Reintroductions." (2016). https://doi.org/10.1371/journal.pone.0150417.

mitigation activities required by public agencies including but not limited to the County is an obligation that must be performed, and the TRCRWA allocates performance responsibilities and creates an in-perpetuity source of funding for the performance of these tasks. For example, the Conservancy has, as its long-term funding source, transfer fees that are collected as homes are sold on all three of the master plan community projects included in the Tejon Ranch Land Use and Conservation Plan, inclusive of Tejon Mountain Village, Grapevine, and Centennial. The transfer fee funding obligation is a recorded covenant that applies to the developed projects, and the collection of these transfer fees is not dependent on any independent management or funding decisions by Tejon Ranchcorp. The TRCRWA is accurately described and referenced in the EIR, but it does not create any legal authority to relieve the applicant of full performance and funding of the mitigation measure obligations included in the EIR.

Response to Comment ADD-F.2-33:

The Mitigation Preserve primarily consists of areas that cannot be developed pursuant to the TRCRWA, which at minimum assures the conservation of all of these lands at all times from the start of the Project buildout period (which is expected to take more than 20 years). The County has not authorized, and is not proposing as part of this Project, to authorize any development within such conserved lands. The Project site also includes more open space than what was prescribed in the TRCRWA, and the conserved lands on the Ranch are already subject to a recorded prohibition on unauthorized activities such as residential and other development. In short, the entirety of the Project mitigation lands are off limits to development if the Project is approved, which creates contiguous open space acres of more than 200,000 acres as well as a funding source to appropriately manage and protect the resource values of these preserved lands. In addition, the Final EIR (page 2-123) states that "the specific location of the acreage to be dedicated within a particular phase will be chosen to maximize the replacement of resource values lost during that phase of construction while maintaining as much contiguous acreage as possible." The more detailed and phased "lock in" of such lands as proposed by Commenter is accordingly not warranted.

Response to Comment ADD-F.2-34:

The comment is correct that the proposed Project is not included in the TUMSHCP, which is designed for species that occur within the "Tehachapi Uplands" (the "TU" portion of the TUMSHCP) in the higher elevations of Tejon Ranch. Neither the Draft EIR nor the Final EIR indicate that the TUMSHCP provides mitigation for proposed Project impacts. Rather, the Draft EIR includes discussion of the TUMSHCP lands to highlight the interconnectedness of lands set aside for protection when coupled with the TRCRWA. Page 5.7-63 of the Draft EIR states that "lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and mitigation measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife." The point of the TUMSHCP discussion within the Draft EIR and Final EIR is not to imply that the proposed

Project is a covered activity, but instead to capture the great biological benefit of having large conjoined areas of high quality preserved lands. The EIR's disclosure and discussion of the TRCRWA and TUMSHCP is also relevant to the cumulative analysis, given the permanent preservation of these lands immediately adjacent to the Project site.

Response to Comment ADD-F.2-35:

The Draft EIR (pages 5.7-182 through 5.7-187) address the loss of oak woodlands, permanent and temporal, in several ways. First, the Project disturbance area has been modified since its original design to substantially reduce impacts on oak woodlands, as discussed in the Draft EIR in Section 8.0, Alternatives to the Proposed Project (see page 8-10). Secondly, the Project's mitigation incorporates preservation of oak woodlands exceeding requirements and ensuring the long-term preservation of 3,090 acres of oak woodlands in the region, as noted on page 2-174 of the Final EIR. Lastly, the Project's oak mitigation is designed to meet the requirements of Section 21083.4 of the California Public Resources Code (PRC) (enacted by California Senate Bill (SB) 1334), and the County of Los Angeles Oak Tree Ordinance (CLAOTO) (page 5.7-182 through 5.7-187 of the Draft EIR). As such, the mitigation plan must be approved by the County prior to implementation, and monitoring reports must be submitted to the County annually to ensure mitigation success. While the creation element of the oak mitigation requires the replacement of half the acreage of lost oak woodland resources in the long-term, it does not, and is not required to, specifically eliminate the temporal loss of mature oak woodlands. However, at maturity, the created oak woodlands will replace the lost oak woodland resources.

Page 5.7-183 of the Draft EIR describes the lack of evidence of recruitment within the existing oak woodlands and the projected eventually type conversion to a non-woodland vegetation types as a direct result. As noted above, oak woodland is a slow growing vegetation type and creating a mature oak woodland takes decades. Similarly, it can take many decades without recruitment before mature trees die and are not replaced. However, lack of recruitment is occurring now, and without intensive focused efforts, conversion to non-woodland vegetation types is inevitable. Therefore, oak tree establishment within the existing oak woodland is intended to create the oak woodlands in this area in the future. Furthermore, the methods outlined in MM 7-11 (page 5.7-182 through 5.7-187 of the Draft EIR) demonstrate an approach that minimizes disturbance within the existing oak woodlands and attempts to match existing oak woodland carrying capacity with future mature oak woodland carrying capacity. For example, planting acorns on site and protecting in place substantially reduces risk and disturbance associate with planting larger container plants (page 5.7-183 of the Draft EIR). In addition, the approach ensures a higher rate of success due to the acclimated conditions for growth for young trees thereby minimizing need for irrigation and associated disturbance within the existing oak woodland.

While the RWMP has many goals and implements many methods to preserve existing biological resources within preserved lands, the intensive focused effort to create future oak woodlands in a particular area as quickly as feasible is not an expectation of the RWMP. Rather, the RWMP implements management strategies adaptively to maintain and preserve the existing resources over the long term and over an expansive area. Without any evidence

of the contrary, the existing oak woodlands on the Project site appear to have been preserved in the current condition through implementation of the RWMP. The Project's reliance on the RWMP is intended to ensure the long-term preservation of biological resources within the Mitigation Preserve while implementation of specific resource mitigation plans per various migration measures provide the required enhancement, restorations, and creation to reduce impacts to less than significant levels.

Regarding the final note of the comment that avoidance would be a better strategy, as described above, avoidance has been implemented to the extent feasible (see Draft EIR in Section 8.0, Alternatives to the Proposed Project, page 8-10) and a substantial reduction of oak woodland impacts has been achieved by the reduced Project development area to comply with the Antelope Valley Area Plan provisions allowing for development in the Western Economic Opportunity Area (proposed for Project development), and prioritizing preservation in Significant Ecological Areas (preserved as Project open space).

Response to Comment ADD-F.2-36:

The mitigation approach for wetland waters (i.e. U.S. Army Corps of Engineers ["USACE"] jurisdictional wetlands) is 2:1 in total with one half of the mitigation to be restoration of existing or former wetland waters and the other half to be enhancement of existing or former wetland waters. In response to the first question, yes, it does mean restoration of existing (but may also include former) and it is not limited to on-site but rather any existing or former wetland waters in the Mitigation Preserve lands which are located on and/or off-site. This mitigation approach is intended to mitigate for all "types" of wetlands. However, the use of the term "wetland" in the Final EIR specifically refers to jurisdictional wetlands based on Clean Water Act and the USACE definition. Other types of drainages (i.e. non-wetland jurisdictional waters, or "streams") are mitigated differently as described at the top of page 2-165 of the Final EIR. Furthermore, the Project is not expected to impact any jurisdictional wetlands as described on pages 5.7-162 through 5.7-164 of the Draft EIR.

Regarding the efficacy of the 1:1 preservation:disturbance mitigation ratio, if the Commenter's term "wetlands" refers to the technical definition, it is incorrect because there are no impacts to "wetland" waters from the Project. However, if the Commenter's term "wetlands" refers to the more general use of the term for all waterways or drainages, then it is true. As anticipated to be required by USACE, CDFW, and Regional Water Quality Control Board (RWQCB) regulatory permits, the Project Applicant/Developer shall create, enhance, and/or restore jurisdictional wetlands and jurisdictional riparian vegetated waters to ensure that net habitat values are at least equal to those lost from Project implementation Although there is a general USACE policy of no net loss of wetlands, there are no USACE wetlands impacted by the Project. Lastly, non-wetland USACE regulated waters impacted by the Project are extremely limited and restricted to 0.04 acres, which will be mitigated using the approach described in MM 7-12 on pages 2-163 and 2-164 of the Final EIR.

Response to Comment ADD-F.2-37:

Mitigation plans, including the Streambed and Wetland Habitat Creation and Enhancement Plan, are not required to be circulated with the EIR, if the relevant mitigation measure identifies the criteria the lead agency will apply in determining that the impact will be mitigated. This mitigation approach is consistent with CEQA requirements, which permits the formulation of detailed plans at a future date as long as the mitigation measure includes specified performance standards and identifies a range of feasible measures that may be implemented to achieve the performance standard and meet mitigation commitments. Such details are appropriately provided in MM 7-12. (Final EIR, Appendix 2.0-C.Rev Mitigation Monitoring and Reporting Program, pages C-70 to C-76) It is impractical and premature to prepare this mitigation plan at this time because it is site-specific and dependent on the results of other components of the required mitigation measure, including pre-disturbance surveys and further County and resource agency review and approval. Please see also Final EIR, response to Comment F.8-173 for further discussion of this issue.

Response to Comment ADD-F.2-38:

If creation of habitat were to be implemented within the Mitigation Preserve areas, it would be limited to areas that provide no functional habitat in their existing condition (see Final EIR pages 2-170 and 2-171). As such, there would be no impacts to existing functional values and overall values would be expected only to increase. In addition, all potential habitat creation activities would require approval of the County and most would require State approval through the California Department of Fish and Wildlife as described in MM 7-12 on page 5.7-190 of the Draft EIR. Creation resulting in increased functional value without temporary or permanent impacts would be considered suitable for these areas. Habitat

creation has been documented in multiple documents as an effective approach to successfully replace lost vegetation/habitat.[3264],[3265],[3266],[3267],[3268],[3269],[3270],[3271],[3272],[3273],[3274]

The Commenter provides no data or evidence to support the claim of degradation within the Mitigation Preserve being due to RWMP implementation. Based on the conservation activities listed in the RWMP, it is highly unlikely to be the cause of degradation. The RWMP is more than adequate to meet the goals of maintaining biological resource values at existing levels. Greater levels of management are required for enhancement, restoration and creation efforts, which is why separate mitigation plans are required for these instances as described in the Draft EIR in MMs 7-1, 7-2, 7-11, and 7-12.

Response to Comment ADD-F.2-39:

The comment fails to take in to account the substantial quantity of high-quality lands, 8,973 acres, set aside in the Mitigation Preserve in Los Angeles County. Not only are these lands within Los Angeles County, but 8,913 acres are also lands identified by Los Angeles County as a Significant Ecological Area containing a wide array of importation biological resources. Additionally, the requirement for the proposed Project to mitigate for impacts to biological resources is based on CEQA mitigation requirements, which appropriately focus on biological resource values and not the jurisdictional boundaries of a local jurisdiction – therefore, the location of mitigation lands in Kern County is irrelevant. Further, preservation of large blocks of contiguous open space lands which connect differing habitat types at a landscape level has been widely endorsed by scientific experts, as well as endorsed by the many state and federal agencies that endorsed the TRCRWA for its proactive approach to voluntary advance conservation in anticipation of very limited future development

[3264] Psomas. 2017 (August). Second Annual Monitoring Report, Oak Woodland Habitat Revegetation/Mitigation Program for the Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project. Pasadena, CA: Psomas.

[3265] Lewis. 2016. "Hundreds of Years of Ecology Now: The Santa Anita Oak Woodland Project." *The Environmental Monitor*, Fall 2016, AEP

[3266] Purcell, A.H., Friedrich, C. and R., Vincent H. 2002. *An Assessment of a Small Urban Stream Restoration Project in Northern California*. Restoration Ecology. Volume10, Issue 4, December, Pages 685-694.

[3267] Morrison, **M.**L., Scott, Thomas A., and Tennant, **T**. 1994. **"**Wildlife-Habitat Restoration in an Urban Park in Southern California.**"** *Restoration Ecology* Volume 2**.** Issue 1 **(**March**): p**ages 17-30.

[3268] Kus, Barbara E. 2002. Use of Restored Riparian Habitat by the Endangered Least Bell's Vireo (Vireo bellii pusillus). Restoration Ecology. Volume 6, Issue 1, March 1998, Pages 75-82.

[3269] Rao, Nalini. 2000. Revegetation Methods for Urban Streams: The Use of Salix laevigata and Populus fremontii. www.nature.berkeley.edu.

[3270] Lennox, Michael S. 2007. Native Tree response to Riparian Restoration Techniques in Coastal Northern California. Sonoma State University, http://cesonoma.ucanr.edu/files/27468.pdf.

[3271] Trowbridge, Wendy B., Kalmanovitz, Sara, and Mark W. Schwartz. "Growth of Valley Oak (*Quercus Lobata Nee*) in Four Floodplain Environments in the Central Valley of California." *Plant Ecology* 176.2 (2005): 157 – 164.

[3272] Bernhardt, Elizabeth and Tedmund J. Swiecki. 2014 "Long-Term Performance of Minimum-Input Oak Restoration Plantings." In: Standiford, Richard B.; Purcell, Kathryn L., tech. cords. Proceedings of the seventh California oak symposium: managing oak woodlands in a dynamic world. Gen. Tech. Rep. PSW-GTR-251. Berkeley, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station: 397-406.

[3273] Holmes, Katherine A., Veblen, Kari E., Berry, Alison M., and Truman P. Young. "Effects of Prescribed Fires on Young Valley Oak Trees at a Research Restoration Site in the Central Valley of California." *Restoration Ecology* 19.1 (2011): 118 – 125.

[3274] Mahall, B.E., Davis, F.W., and C.M. Tyler. "Santa Barbara County Oak Restoration Program: August 1994 - August 2005". University of California, Santa Barbara, 2005.

activities.[3275,3276,3277,3278,3279,3280] Lastly, the Project site is at the very northern border of Los Angeles County and is immediately adjacent to areas within Kern County in the Mitigation Preserve and have a high degree of similarity in biological resources, which is the highest priority for the County when determining appropriate mitigation lands per CEQA Guidelines.

Response to Comment ADD-F.2-40:

All Project mitigation measures meet CEQA requirements, and Commenter's assertion that mitigation measures with CC&R requirements are neither binding nor enforceable is incorrect. CC&Rs are a binding enforcement mechanism, and violations of said CC&Rs are subject to private enforcement by the master developer and HOA. All mitigation measures which have CC&R requirements (MMs 3-9, 4-2, 7-6, 17-10, 21-6, and 21-7) will also be appropriately monitored and enforced by the County, as specified in the Mitigation Monitoring and Reporting Program, to ensure their requirements continue to be met. (Final EIR Appendix 2.0-C.Rev Mitigation Monitoring and Reporting Program (Revised), pages C-8, C-11, C-12, C-46, C-47, C-143 to C-145, C-155 to C-157).

Response to Comment ADD-F.2-41:

The Commenter falsely asserts that the Final EIR claims the Project would not result in significant growth-inducing impacts. Rather, the Final EIR, and specifically the responses to the Commenter's own comments on the Draft EIR, explicitly acknowledge that the Project would induce growth through substantial increases in population, housing, and employment on the Project site, and that this impact would be significant and unavoidable. (See Final EIR, responses to Comments F.8-46 to F.8-49.)

Growth constraints would limit the ability of the Project to influence growth outside the Project site – these constraints include the 2008 Conservation and Land Use Agreement between Tejon Ranch Company and resource groups that precludes development in approximately 240,000 acres of open space set aside in the agreement, the San Gabriel Mountains and Angles National Forest south of the Project site, the Los Padres National Forest and Hungry Valley State Vehicular Recreation Area to the west of the Project site, legally limited water supply in the Antelope Valley, and related provisions in the County

[3275] Kong, Fanhua, Yin, Haiwei, Nakagoshi, Nobukazu, and Yueguang Zong. "Urban green space network development for biodiversity conservation: Identification based on graph theory and gravity modeling." *Landscape and Urban Planning* 95 (2010): 16 – 27.

[3276] Koomen, Eric, Dekkers, Jasper, and Terry van Dijk. "Open-space preservation in the Netherlands: Planning, practice and prospects." *Land Use Policy* 25 (2008): 361 – 377.

[3277] Parker, Kellie, Head, Lesley, Chisholma, Laurie A., and Nick Feneley. "A conceptual model of ecological connectivity in the Shellharbour Local Government Area, New South Wales, Australia." *Landscape and Urban Planning* 86 (2008): 47 – 59.

[3278] Rudd, Hillary, Vala, Jamie, and Valentin Schaefer. "Importance of backyard habitat in a comprehensive biodiversity conservation strategy: a connectivity analysis of urban green spaces." *Restoration Ecology* 10 (2002): 368 – 375.

[3279] Snep, Robbert P.H., Kooijmans, Jip L., Kwak, Robert G.M., Foppen, Ruud P.B., Parsons, Holly, Awasthy, Monica, Sierdsema, Henk L.K., Marzluff, John M., Fernandez-Juricic, Esteban, de Laet, Jenny, and Yolanda M. van Heezik. "Urban bird conservation: presenting stakeholder-specific arguments for the development of bird-friendly cities." *Urban Ecosystems* 19 (2016): 1535 – 1550.

[3280] Soule, Michael E. "Land Use Planning and Wildlife Maintenance: Guidelines for Conserving Wildlife in an Urban Landscape." *Journal of the American Planning Association* 57.3 (1991): 313 – 323.

General Plan which require focusing new development in designated locations including the West EOA in which the Project site is located. As a result of the above constraints, the Draft EIR identifies the limited locations near the Project site where the only foreseeable induced growth could occur – these include areas west of the Project site from Quail Lake along SR-138 to the I-5 and northward along the eastern side to Gorman, areas east of the Project site along the SR-138 corridor and inside the West EOA, and areas east of the Project site that are outside of the West EOA near Neenach and toward the cities of Lancaster and Palmdale. (Draft EIR pages 6-6 to 6-8).

Taking all of the above into account, the Draft EIR and Final EIR do conservatively and explicitly conclude that the existence of the Project makes it reasonably foreseeable that additional development proposals, which could result in a significant impact on the environment, would be made outside the Project site, which is considered a significant, adverse, indirect growth-inducing impact. (See Draft EIR, page 6-9; Final EIR, response to Comment F.8-49.)

There are no Kaiser Permanente facilities currently proposed to be located on the Project site and the Caltran's Northwest SR-138 Corridor Improvement Project EIR is in error to the extent it states otherwise. However, hospitals and medical centers are a permitted use within the Centennial Specific Plan's Institutional land use designation and, if constructed, would contribute to the Project's significant and unavoidable growth inducing impacts discussed above and disclosed in the EIR.

Response to Comment ADD-F.2-42:

The EIR does not assert that the Project would not lead to growth in the surrounding area. Rather, the Draft EIR notes that Project infrastructure and services would be sized to accommodate the Project population only, and as such would not *directly* lead to growth in surrounding areas. (Draft EIR, pages 6-7 and 6-8) No new electrical production plants or natural gas facilities are part of the proposed Project, and renewable energy generated onsite would be used only by the Project; The Project would not generate extra potable water that could be used to support additional development, and the Project's wastewater reclamation facilities would only treat Project-related water; Internal Project roads would not be sized to support regional traffic flows and would not provide access to other areas outside of Project boundaries; The Project will add fire and police stations, libraries, and schools to support the anticipated population associated with the Project, but these service facilities will be scaled to serve the Project only. (*Ibid.*) The Draft EIR conclusion that sizing infrastructure to serve only the Project would not lead to a direct, growth-inducing impact is consistent with CEQA requirements, as is discussed more fully in Final EIR, response to Comment F.8-52.

However, the Draft EIR also recognizes the possibility that future nearby landowners could propose to connect to or build upon the Project's infrastructure to serve future development and could recognize the benefits of Project services and propose further services and development. (*Ibid.*) The Draft EIR discusses these possibilities for indirect impacts in an appropriate amount of detail, and further discussion would be unduly speculative because they are uncertain events, are not part of the Project, and are outside of the Project

Applicant's control. Further, the potential for these impacts to occur is limited by the growth constraints near the Project site, as discussed above in response to Comment ADD-F.2-41, and as noted in the Draft EIR, such proposals would be subject to environmental analysis under CEQA and a discretionary approval process by the lead agency. For further discussion, please see Final EIR, response to Comments F.8-48, F.8-49, and F.8-52.

Response to Comment ADD-F.2-43:

The EIR does indicate that AVAP and General Plan policies focusing new development in designated locations including the West EOA contribute to growth constraints near the Project site, which somewhat limit the Project's ability to influence growth around the site. (Draft EIR, pages 6-7 to 6-8; Final EIR, responses to Comments F.8-47, F.8-49) However, this EIR is not like the situation in *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 152-157, wherein the lead agency prepared a negative declaration despite evidence in the record of potentially significant growth-inducing impacts, and argued that growth inducement would not occur because of Williamson Act contracting and zoning around the site. Rather, a detailed EIR has been prepared for the Project, and it does not avoid the appropriate study of potential indirect growth inducement, but rather evaluates potential impacts with an appropriate level of detail. (See Final EIR, response to Comment F.8-47 regarding the appropriate depth of analysis) The EIR also explicitly evaluates and acknowledges the possibility that future nearby landowners could propose to connect to or build upon the Project's infrastructure to serve future development and could recognize the benefits of Project services and propose further services and development. (Draft EIR, pages 6-6 to 6-8) Taking this into account, the EIR concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals, which could result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant, adverse, indirect growth-inducing impact. (Draft EIR, page 6-9; Final EIR, response to Comment F.8-49)

Response to Comment ADD-F.2-44:

Despite this comment's claim to the contrary, the Lahontan Regional Water Quality Control Board (Board) comment letter on the Draft EIR did not make any conclusion about the long-term impacts to, or sustainability of, project and other groundwater use in the Antelope Valley. Rather, in Comment D.3-2, the Board requested that the Project EIR "[c]larify how the Project water supply will be sustained in the long-term considering the cumulative groundwater demand from all current and projected future development activities." The information requested by the Board is provided in response to Comment D.3-2 and includes a thorough discussion of the project and other groundwater use in accordance with the Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015. Regarding long-term sustainability, response to Comment D.3-2 also discusses the possibility that the amount of groundwater allocated to Antelope Valley Basin users, including the project, under the Adjudication Judgment and Physical Solution may be adjusted by the court-appointed watermaster in the future to ensure long-term sustainability. As discussed in response to Comment D.3-2, MM 18-2 requires the preparation of periodic water supply and demand reports by the Project Water Purveyor. If

water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-68 to 5.18-71 of the Draft EIR. MM 18-2 specifically requires that no additional development will occur until sufficient supplies are identified. Final EIR response to Comment D.3-2 also summarizes other Project water supplies, and provides substantial evidence that the Project, with mitigation, will not cause significant impacts to water supplies. In spring 2018 the California Department of Water Resources (DWR) released the final 2017 State Water Project (SWP) Delivery Capability Report (DWR 2018). The normal or average, single-dry and multiple-dry year SWP delivery rates in the 2017 report are all higher than the more conservative normal or average, single dry and multiple dry year SWP delivery rates used in the analysis of Project water supplies, including the rates referenced in response to Comment D.3-2.

Response to Comment ADD-F.2-45:

This comment references a portion of response to Comment F.8-221, which was included as one of several responses to comments submitted by the Commenter in comment letter "F.8." Response to Comment F.8-221 specifically addressed the Commenter's inaccurate assertion that water supplies characterized in comment letter F.8 as "Nickel water" would be used by the Project. Response to Comment F.8-221 explains in detail that because no Nickel water will be used by the Project, no analysis of potential impacts related to the potential use of Nickel water is required. Comment F.8-221 does not address any specific with the potential environmental impacts of the water supplies that will be used to meet Project demand. The Commenter previously provided comments on the analysis of the Project's water supplies, including environmental impacts, in Comments F.8-212 to F.8-226. The Final EIR provides comprehensive and thorough responses to all of these comments (see Final EIR pages 2-1142 to 2-1200). The responses demonstrate that the Final EIR analysis of water supplies takes account of all applicable impacts, and that the Project will implement significant, enforceable water conservation, monitoring and adaptive management mitigation measures to ensure that projected water supplies and demand levels are being achieved before additional construction can occur. Please also see response to Comment ADD-F.2-44, as well as response to Comment F.8-212, which address the Commenter's incorrect assertion in Comment F.8-212 that the analysis of Project water supplies "fails to consider all potential significant impacts."

Also, the comment fails to provide any evidence to support the assertion that allocation of water to the Project will mean that water will not be available for other purposes or that the EIR fails to account for the environmental effects of the Project's water usage. On the contrary, Draft EIR Section 5.18, Water Resources, pages 5.18-40 through 5.18-75, demonstrates that, with mitigation, the Project would have sufficient reliable water supplies available to serve the Project's demands, considering existing and projected water demands from other land uses. See, also, Draft EIR Appendix 5.18-A, Centennial Specific Plan Water Supply Assessment, pages 1-14 through 1-16. However, as disclosed in Draft EIR Section 7.13.19, cumulative regional water demand could exceed existing and planned supplies under post-2035 conditions, assuming buildout of the AVAP and Los Angeles County General Plan and the Project's contribution to this cumulative impact would be significant and

unavoidable. Draft EIR Section 5.18 also discloses the biological and hydrological impacts to the Sacramento River Delta associated with the water supply transfers and imports, as well as socioeconomic impacts associated with the transfer of water from agricultural to urban use, and describes the state and federal environmental review process associated with various regulatory programs designed to address such impacts, including, but not limited to, the Water Quality Control Plan for the San Francisco/Sacramento – San Joaquin Delta, the Delta Plan, the Delta Levees Investment Strategy, the Antelope Valley Integrated Regional Water Management Plan, and the pending Bay Delta Conservation Plan and Cal WaterFix projects (see Draft EIR pages 5.18-20 through 5.18-20, 5.18-36 through 5.18-37).

See also, California Department of Water Resources/U.S. Bureau of Reclamation, December 2016, Final Environmental Impact Report/Environmental Impact Statement for the Bay Delta Conservation Plan/California WaterFix (SCH# 2008032062); California Department of Water Resources/U.S. Bureau of Reclamation, January 2017, Addendum to the Final Environmental Impact Report/Environmental Impact Statement for the Bay Delta Conservation Plan/California WaterFix (SCH# 2008032062); California Department of Water Resources/U.S. Bureau of Reclamation, June 2018, Administrative Draft Supplemental Environmental Impact Report/Environmental Impact Statement for the Bay Delta Conservation Plan/California Water Fix (SCH# 2008023062); CALFED, July 200, Final Programmatic Environmental Impact Statement/Environmental Impact Report for the CALFED Bay-Delta Program (SCH# 96032083).

Response to Comment ADD-F.2-46:

This comment misrepresents the California State Legislative Analyst's Office's 2017 report *California's High Housing Costs: Causes and Consequences* (the "Report") to support its inaccurate claim that North Los Angeles County is not a coastal community for purposes of the Report simply because the Project site is not located on the coast. As an initial matter, the Report never defines the terms "coastal communities," much less defines that term as "land beyond the 25 mile radius of California coastal metros," as this comment inaccurately claims. In fact, this comment's purported definition of "coastal communities" misstates a section of the Report explaining that the lack of available land is an existing constraint on new home construction. The Report text cited in this comment actually states that "[l]and in the *center* of California's major metros (defined as land within a 25 mile radius of the city hall of the metro's largest city) contains housing built at densities similar to metros in the rest of the country. By comparison, land in the *outlying areas* of California coastal metros (land beyond the 25 mile radius) has housing at about twice the density as outlying areas in metros elsewhere in the country" (Report at 19, emphasis added). And while the Report does not define the term "coastal communities" at all, it does define the term "metros." As stated on page 7, the Report, it "use[s] the U.S. census definitions of metropolitan areas – or metros. Census metros *are comprised of counties* – or, in some cases, a single county – that share similar socio-economic characteristics and surround a common urban corps." (Report at 7, emphasis added.) Indeed, the Report expressly states that, between 1980 and 2010, "most of California's coastal *counties* needed to build three times as much (or more) housing as they did" and that "insufficient housing was built in California's coastal *counties*, causing demand to spill over into inland areas." (Report at 21-22, emphasis added). Indeed, Figure 8 of the

Report clearly shows that, more than any other county in the state, Los Angeles County's housing need was orders of magnitude greater than the number of new homes built in the County between 1980 and 2010 (Report at 22). Finally, to the extent that the Report expresses a preference that most new housing in Los Angeles County be constructed in the urban core, and that less new housing be built outside of the urban core, such preference is embodied in the regional planning policies that inform the "balanced land use plan" described in SCAG's Regional Traffic Plan/Sustainable Communities Strategy (RTP/SCS). As explained in response to Comment F.8-20, the Project is consistent with, and would implement, the RTP/SCS and its balanced land use plan.

Response to Comment ADD-F.2-47:

This comment is noted and will be provided to County decision makers for their consideration. The County disagrees with this comment's assertion that the Project is sprawl development that will do nothing to alleviate the County's housing shortage. This comment does not raise specific concerns regarding the adequacy of the EIR and thus no further response is required. Please also see response to Comment F.8-20 for further discussion of this issue.

Response to Comment ADD-F.2-48:

The Final EIR analyzes a reasonable range of Project alternatives in full compliance with CEQA and adequately explains the infeasibility of Alternatives A, B, C and E. Moreover, contrary to this comment, the EIR did consider an alternative with a significantly reduced project footprint, i.e., Alternative E, which would reduce by 656 acres the Project's development footprint by relocating proposed development from west portions of the Project site to the portion of the Project site east of the California Aqueduct (see Draft EIR pages 8-52 through 8-60). To the extent that this comment suggests that CEQA requires the EIR to consider a smaller reduced density alternative, commenter is mistaken for the reasons discussed in Final EIR response to Comment F.8-72. Moreover, per CEQA Guidelines § 15126.6(c), the EIR may exclude and need not consider any alternative that would not substantially reduce the Project's significant impacts. A reduced density alternative to the Project – for example, an alternative constructed on the same reduced development footprint assumed by Alternative E, but which would also reduce the Project's residential units and non-residential square footage by 25 percent (the "Reduced Density Alternative") – would not substantially reduce any of the Project's significantly environmental effects identified in the EIR, and thus need not be included in the EIR, as discussed below:

Land Resources - Agricultural: The Reduced Density Alternative would not substantially reduce the Project's significant impacts to agricultural land resources because the same farmlands would be converted to urban uses. As with the Project, direct and cumulative impacts related to the conversion of farmland would be significant and unavoidable under this alternative.

Population, Housing, and Employment: Although the Reduced Density Alternative would have fewer residential units and less non-residential development than the Project, this

alternative would not substantially reduce the Project's significant population impacts because it would substantially increase population and housing on the Project site relative to existing conditions, similar to the Project. Likewise, this alternative would not substantially reduce the Project's growth-inducing impacts because it is reasonably foreseeable that this alternative would induce additional development proposals seeking AVAP amendments made outside of the West Economic Opportunity Area, similar to the proposed Project. As with this Project, impacts related to population, housing, and employment would be significant and unavoidable.

Traffic, Access, and Circulation: Although the Reduced Density Alternative would have fewer residential units and less non-residential development than the Project, this alternative would not substantially reduce the Project's significant traffic impacts. This alternative would somewhat reduce the number of off-site vehicle trips, as compared to the Project, but it would nevertheless increase the volume of traffic on the central and western intersections with SR-138 as compared to existing conditions. As with the Project, the payment of fair-share fees for needed improvements to Caltrans facilities would be made as mitigation, and this impact would be less than significant if such improvements are timely constructed. However, the needed improvements at impacted access points on SR-138 are within Caltrans' control, not the County. If such improvements are not constructed by Caltrans, this alternative's direct and cumulative impacts to the impacted SR-138 facilities would be significant and unavoidable, like the Project.

Air Resources: Although implementation of the Reduced Density Alternative would involve less grading on the site compared to the Project, this alternative would not substantially reduce the Project's significant air resources impacts related to construction activities because the SCAQMD thresholds are based on daily construction emissions, and this alternative would implement the same daily construction activities as the proposed Project. Therefore, as with the proposed Project, this alternative would result in direct and cumulative significant and unavoidable construction-related emissions associated with CO, VOCs, NOx, PM10 and PM2.5. Likewise, this alternative would not substantially reduce the Project's operational air resource impacts as long-term operational emissions of CO, VOCs, NOx, PM10 and PM2.5 would result in significant impacts. Mitigation measures would be implemented to reduce emissions, but the impacts would remain significant and unavoidable.

Biological Resources: Although the Reduced Density Alternative would disturb approximately 656 acres less than the proposed Project, it would not substantially reduce the Project's significant cumulative impacts related to native grasslands and wildlife movement. Like the Project, this alternative's cumulative impact on native grasslands would be significant and unavoidable due to the cumulative loss of native grasslands in the larger region and the State as a whole, and due to the lack of a widely adopted definition of "native grassland" or a published standard for a mitigation ratio. Also, like the Project, this alternative conservatively considered to potentially result in a significant cumulative impact on regional wildlife movement due to the potentially heightened sensitivity of movement though the region for some species and the greater potential for a project or set of projects to substantially interfere with a wildlife corridor under cumulative conditions.

Noise: Although the Reduced Density Alternative would have fewer residential units and less non-residential development than the Project, this alternative would not substantially reduce the Project's significant noise impacts. This alternative would somewhat reduce the number of off-site vehicle trips, as compared to the Project, but it would nevertheless increase the ambient noise environment adjacent to SR-138 between Gorman Post Road and Old Ridge Route Road in excess of the applicable noise criterion at identified noise receptors. Feasible mitigation measures that could reduce this impact to less than significant levels involve alterations to private property and/or within Caltrans' right-of-way, but these areas not in the County's or Project Applicant's control and the County lacks jurisdiction to require the implementation of such mitigation. Accordingly, this direct and cumulative impact would be significant and unavoidable for both the Project and the Reduced Density Alternative.

Visual Resources: The Reduced Density Alternative would not substantially reduce the Project's significant impacts to visual resources. Both the proposed Project and this alternative, would result in significant and unavoidable impacts with respect to alterations to a scenic vista, the degradation of the visual quality of the Project site, and the creation of light and glare due to the size and intensity of development that would occur in a largely undeveloped area.

Other Public Services – Solid Waste: Although the solid waste demands of the Reduced Density Alternative would be reduced as compared to the Project, this alternative's direct and cumulative impacts related to the demand for landfill capacity would, like the Project, be significant and unavoidable because permitted landfill capacity at existing County landfills cannot be guaranteed at the time of buildout and through its operational life, which would occur beyond the required 15-year LACDPW planning horizon.

Climate Change: The Reduced Density Alternative would have few residential units, less non-residential development, and few vehicle trips than the proposed Project and would thus result in reduced greenhouse gas (GHG) emissions as compared to the proposed Project and, like the Project, would satisfy many of the CEQA "pathways to compliance" identified by *Newhall* court and described on pages 5.21-11 through 5.21-13 of the EIR. Like the Project, the Reduced Density Alternative would not conflict with an applicable plan, policy or regulations adopted for the purpose of reducing GHG emissions and, like the Project, this alternative would comply with applicable regulatory programs designed to reduce GHG emissions and that contribute to achievement of the State's GHG reduction goals. However, the County has no jurisdictional control or responsibility for GHG reductions in other parts of California (and certainly not in the context of global action), which all contribute to climate change. In addition, the County does not have jurisdiction to enforce statewide implementation of all of the applicable GHG-reducing regulatory programs with which this alternative (and the proposed Project) must comply. Although many other agencies with the necessary jurisdiction are currently taking action to reduce GHG emissions, the County cannot assure that these measures would ultimately be implemented or sufficient to address climate change. In light of these considerations, as well as the global nature of climate change, this alternative's incremental contribution to the global GHG inventory would be considered cumulatively considerable and this cumulative impact would be significant and unavoidable, similar to the proposed Project.

Water Resources: Like the proposed Project, the Reduced Density Alternative's water supplies would sustainably meet buildout potable and recycled water demands and maintain an average annual reserve supply of at least 79,000 acre-feet after buildout has been achieved. Thus, this alternative's direct impacts to water supplies would be less than significant with mitigation, like the proposed Project. However, as determined during the AVAP and General Plan update CEQA review process, assuming buildout of the AVAP and General Plan within the Antelope Valley, regional water demands could exceed existing and planned supplies under post-2035 conditions. Like the Project, this alternative would result in a increment of regional growth that incorporates state of the art water use and conservation measures that would reduce per capita demand below existing levels. Nevertheless, this increment of regional growth and its associated water demand would be cumulatively considerable and, like the proposed Project, would contribute to cumulative regional water supply impacts identified in the AVAP and General Plan EIRs, which is a significant and unavoidable impact. Thus, this alternative would not substantially reduce the Project's significant and unavoidable cumulative impact on regional water supplies.

This comment reasserts many of the same comments raised in the Commenter's letter identified as letter "F.8" in the Final EIR. Please see responses to Comments F.5-11 and F.8-65 through F.8-78 in the Final EIR for further discussion of this issue.

Response to Comment ADD-F.2-49:

Contrary to this comment, the Final EIR does, in fact, evaluate an alternative that would maintain contiguous habitat linkage from the north to SR-138 and open space to the south and determined that it would not office significant environmental advantages with respect to the Project's impact on wildlife movement corridors at the cumulative level for the reasons explained in response to Comment F.5-13. This comment reasserts many of the same comments raised in the Commenter's letter identified as letter "F.8" in the Final EIR and which are addressed in responses to Comments F.5-11 and F.8-65 through F.8-78 in the Final EIR. Please also see response to Comment ADD-F.3-48.

Response to Comment ADD-F.2-50:

This comment summarizes many of the same comments raised in the Commenter's letter identified as letter "F.8" in the Final EIR, as well as certain comments included in the letter identified as "B.4" in the Final EIR. The lead agency disagrees with this comment's assertion that such comments were not adequately addressed. Indeed, the Final EIR contains thorough and lengthy responses that explain why such comments are without merit, as set forth in responses to Comments B.4-64 through B.4-70, F.7-1, and F.8-227 through F.8-241, for example. With regard to this comment's reference to certain CDFW comments regarding uses allowed on Project open space land, the Specific Plan was extensively revised to add four open space subdesignations (and new mitigation measure MM 7-23 was added to the EIR) to ensure that the scope of permitted uses within Project open space areas is appropriately restricted, as discussed at length in response to Comment B.4-64. This comment's claim that Final EIR only makes "minor changes to the EIR" to address the CDFW's concerns is thus without merit.

Response to Comment ADD-F.2-51:

This comment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. Please also see response to Comment ADD-F.2-50, which also addresses this comment.

Response to Comment ADD-F.2-52:

This comment acknowledges that the Final EIR includes "hundreds of pages" of "lengthy responses" to various comments received on the Draft EIR regarding Project impacts related to greenhouse gas (GHG) emissions. This comment also acknowledges that the Commenter is "still reviewing" these responses, but nevertheless claims that the responses are inadequate without providing any specific examples to support this claim. The lead agency disagrees with the Commenter's assertion that the Final EIR revisions did not adequately respond to all Draft EIR comments concerning Project GHG emissions but acknowledges the Commenter's statement that it will provide more comprehensive comments concerning GHG emissions once it completes its review of the Final EIR. The Commenter's on-going concern regarding Project GHG emissions is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. Please see Draft EIR responses to Comments F.8-79 through F.8-96, which address the Commenter's GHG-related comments on the Draft EIR.

Response to Comment ADD-F.2-53:

This comment's stated opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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Three Points-Liebre Mountain Town Council
P O Box 76
Lake Hughes, CA 93532
3pointsliebremountain@Gmail.com

5 June 2018

SENT VIA EMAIL

Mr. Jodie Sackett
Los Angeles County
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov
213.974.6443

Dear Mr. Sackett,

Subject: Project Number 02-232; Centennial Signage

I traveled Northwest Highway 138 recently, and would like to point out some difficulties I have detected with the signage associated with the Centennial Project Hearing. This evaluation is made with the realization changes have been made with regard to the hearing date and an additional remote hearing location. Given that the hearing date was ultimately changed to June 6th, it also appears the additional time between March 21st, April 24th, and June 6th would allow the project proponent to provide updated, easily legible information on the signs for those passing on Northwestern Highway 138.

Generally speaking, Sign 1 is suitably placed for ease in viewing from the roadway, and has available space for parking safely. However, there is no new information posted beyond April 25th on 8.5 x 11 sheets of paper taped to the original signs, which only appears on Sign 1 (mile marker 7.50), and is impossible to read from the highway. This supports the impression the hearing date of March 21st, also painted on Signs 2 and 3, has passed, and might not draw interest from drivers or residents driving through the area. No large printed paper signs show any other revised hearing date, or even the final June 6th date or additional hearing location posted on any of the signs. This might easily be construed as obfuscation, and perhaps a violation of Regional Planning signage requirements, or even CEQA statutes regarding public notices, especially regarding environmental impact review of such a large project. (Photographs provided below for all signs.) (All signs have "Development" misspelled.)

Sign 2, placed near mile marker 6.0, on the north side of the road, oddly, faces eastbound traffic. In order for individuals traveling eastbound to see or read the sign, they must park on the south side of the road and cross the highway, or drive across the highway and park illegally facing traffic, or make a U-turn and park facing west with traffic flow. This makes it difficult, and possibly dangerous, for eastbound traffic to see or access the sign. This Sign 2 and the 8.5 x 11 paper notice show only the March 21st hearing date.

Sign 3, on the north side of Hwy. 138, placed near mile marker 2.0, faces west. This part of the highway consists of a divided four-lane road; it is impossible for eastbound drivers to read the sign across four lanes; and should eastbound drivers seek to read the sign placed east of Gorman Post Road, they will have

ADD-F.3-1

passed the only place to safely turn on to the Post Road. Otherwise, interested persons must park on the south shoulder of the highway, exit their vehicles, and cross four lanes of traffic. Westbound drivers see the back of the sign. I traveled westbound on Hwy 138, knew to look for the sign, could only see the plywood colored back, (since it faces west) parked on the north shoulder, exited my car, and walked along the road-right-of way to get close enough to read the sign. For drivers looking east near Gorman Post Road/Hwy 138 intersection, the sign is illegible and partially obscured by brush. Drivers must then hike a trail at the dead end of the Post Road.

I admit a lack of expertise in the design and placement of signs with regard to Regional Planning requirements, or those of the California Environmental Quality Act. I can, however, assess the difficulties I experienced in safely accessing or even being able to read two out of the three signs from Highway 138 or Gorman Post Road. In addition, and significantly, there are no signs for eastbound traffic on the south side of Highway 138 in the area proposed for 10 million square feet of industrial/commercial space, east of Old Ridge Route Road. Documentation was made Sunday April 8th, and reconnaissance of the signs on June 2nd indicate no changes to the signs to inform the public as to the revised hearings of April 24th, on June 6th, or the remote hearing location in Lancaster at City Council Chambers.

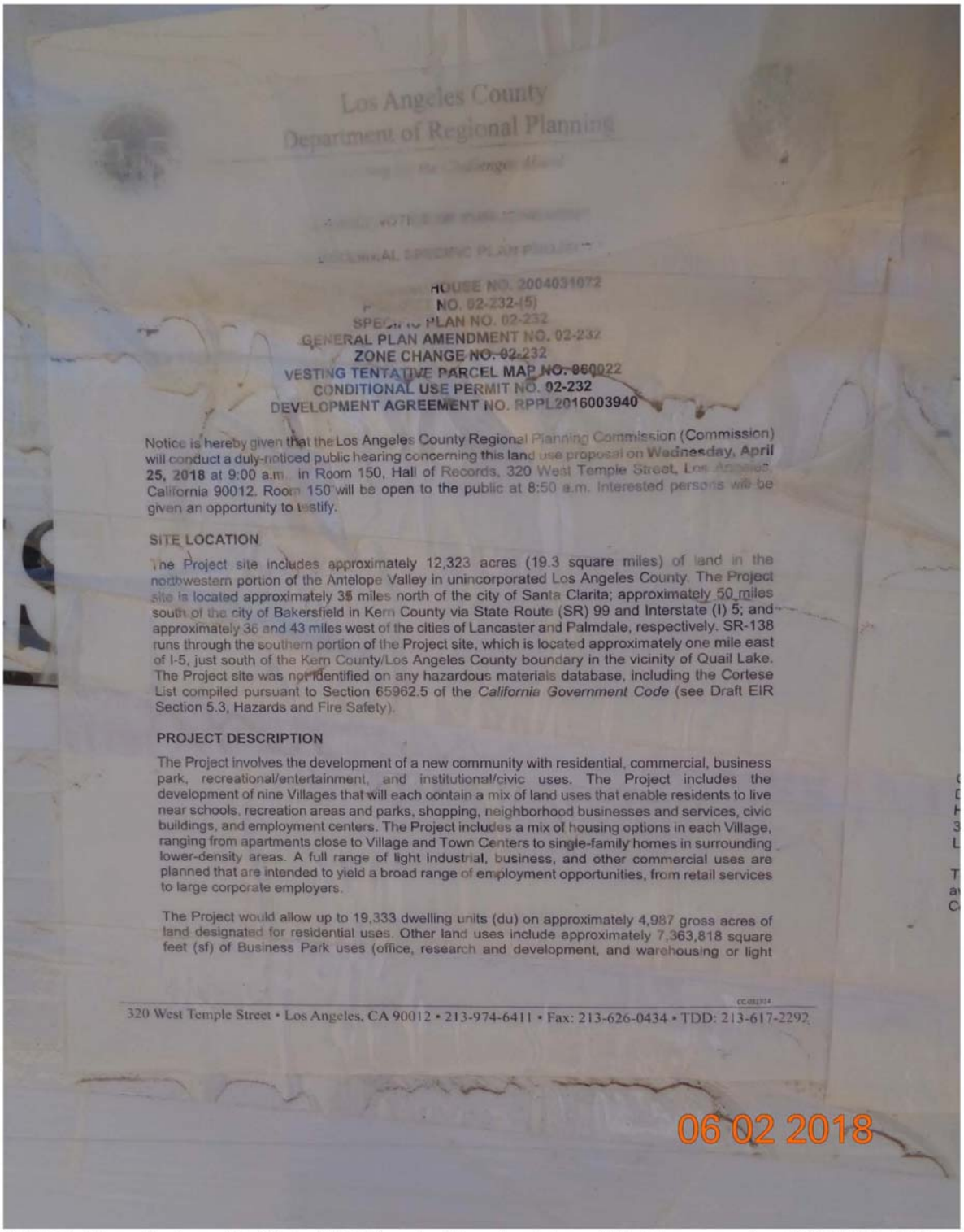
ADD-F.3-1 cont.

Sincerely,

Susan Zahnter
Vice President



SIGN 1, LOOKING WEST, NORTH SIDE OF HWY 138, 2 June 2018, MM7.5



Los Angeles County
Department of Regional Planning

HOUSE NO. 2004031072
NO. 02-232-(5)
SPECIFIC PLAN NO. 02-232
GENERAL PLAN AMENDMENT NO. 02-232
ZONE CHANGE NO. 02-232
VESTING TENTATIVE PARCEL MAP NO. 060022
CONDITIONAL USE PERMIT NO. 02-232
DEVELOPMENT AGREEMENT NO. RPPL2016003940

Notice is hereby given that the Los Angeles County Regional Planning Commission (Commission) will conduct a duly-noticed public hearing concerning this land use proposal on **Wednesday, April 25, 2018** at 9:00 a.m. in Room 150, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. Room 150 will be open to the public at 8:50 a.m. Interested persons will be given an opportunity to testify.

SITE LOCATION

The Project site includes approximately 12,323 acres (19.3 square miles) of land in the northwestern portion of the Antelope Valley in unincorporated Los Angeles County. The Project site is located approximately 35 miles north of the city of Santa Clarita; approximately 50 miles south of the city of Bakersfield in Kern County via State Route (SR) 99 and Interstate (I) 5; and approximately 36 and 43 miles west of the cities of Lancaster and Palmdale, respectively. SR-138 runs through the southern portion of the Project site, which is located approximately one mile east of I-5, just south of the Kern County/Los Angeles County boundary in the vicinity of Quail Lake. The Project site was not identified on any hazardous materials database, including the Cortese List compiled pursuant to Section 65962.5 of the *California Government Code* (see Draft EIR Section 5.3, Hazards and Fire Safety).

PROJECT DESCRIPTION

The Project involves the development of a new community with residential, commercial, business park, recreational/entertainment, and institutional/civic uses. The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, recreation areas and parks, shopping, neighborhood businesses and services, civic buildings, and employment centers. The Project includes a mix of housing options in each Village, ranging from apartments close to Village and Town Centers to single-family homes in surrounding lower-density areas. A full range of light industrial, business, and other commercial uses are planned that are intended to yield a broad range of employment opportunities, from retail services to large corporate employers.

The Project would allow up to 19,333 dwelling units (du) on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light

320 West Temple Street • Los Angeles, CA 90012 • 213-974-6411 • Fax: 213-626-0434 • TDD: 213-617-2292

06 02 2018

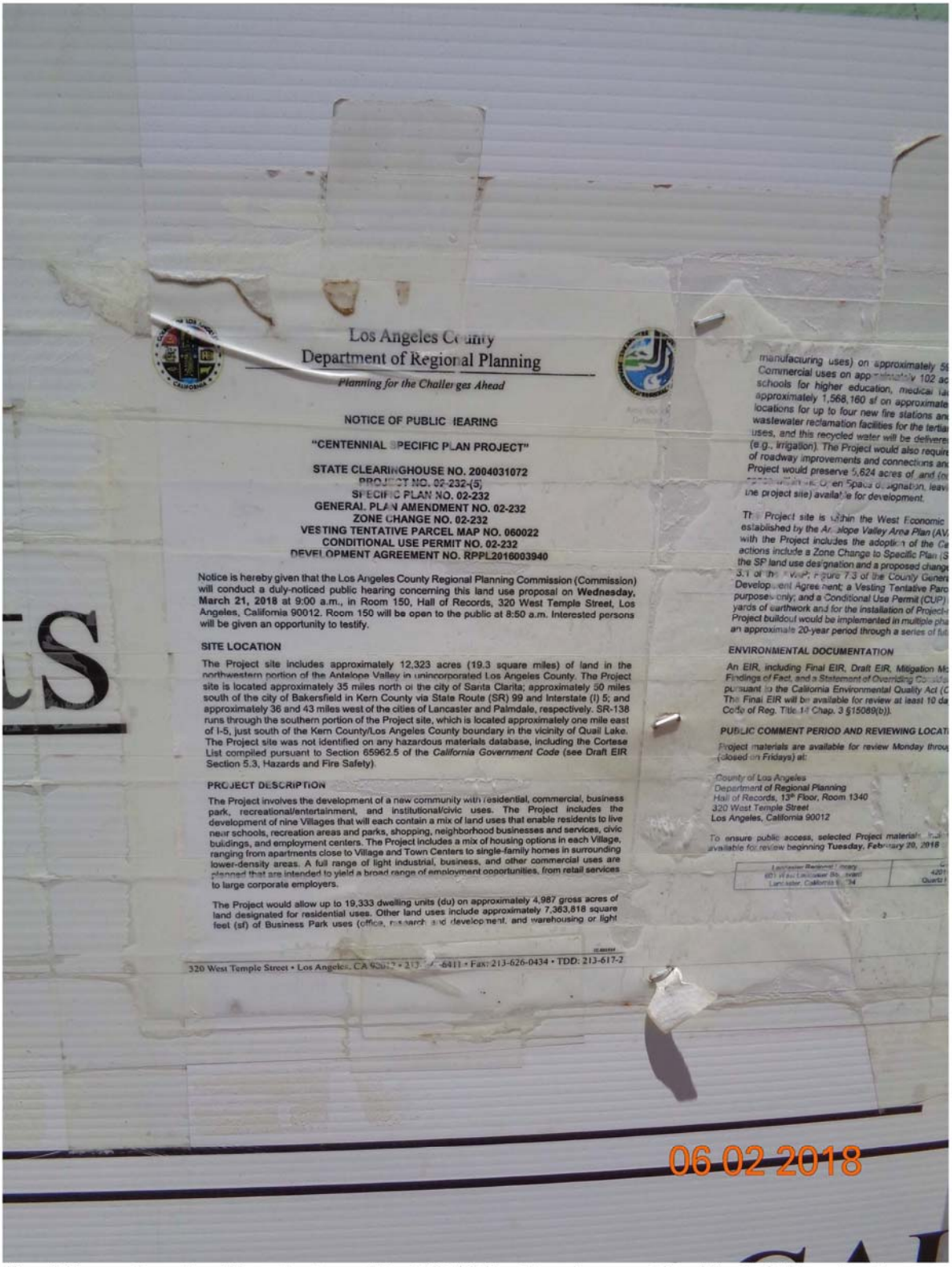
SIGN 1, The only sign with 25 April 2018 revised hearing date on 8.5x11 paper notice. NO JUNE 6TH hearing date paper notice, sign still reads March 21st hearing date.



Sign 2, North of 138, looking west, positioned for eastbound traffic (?), June 2nd, 2018, MM 6.0



Sign 2, facing eastbound traffic, on north side of highway 138. Drivers must cross the hwy on foot to read.



Sign 2 for east bound traffic, only shows March 21st 8.5 x 11 notice, matching March 21st hearing date on left corner of sign. NO April 21st or JUNE 6TH HEARING notice, or remote hearing location.





Sign 3, facing west for eastbound 138 traffic and Gorman Post Road, just east of Gorman Post Road. MM 2.0.

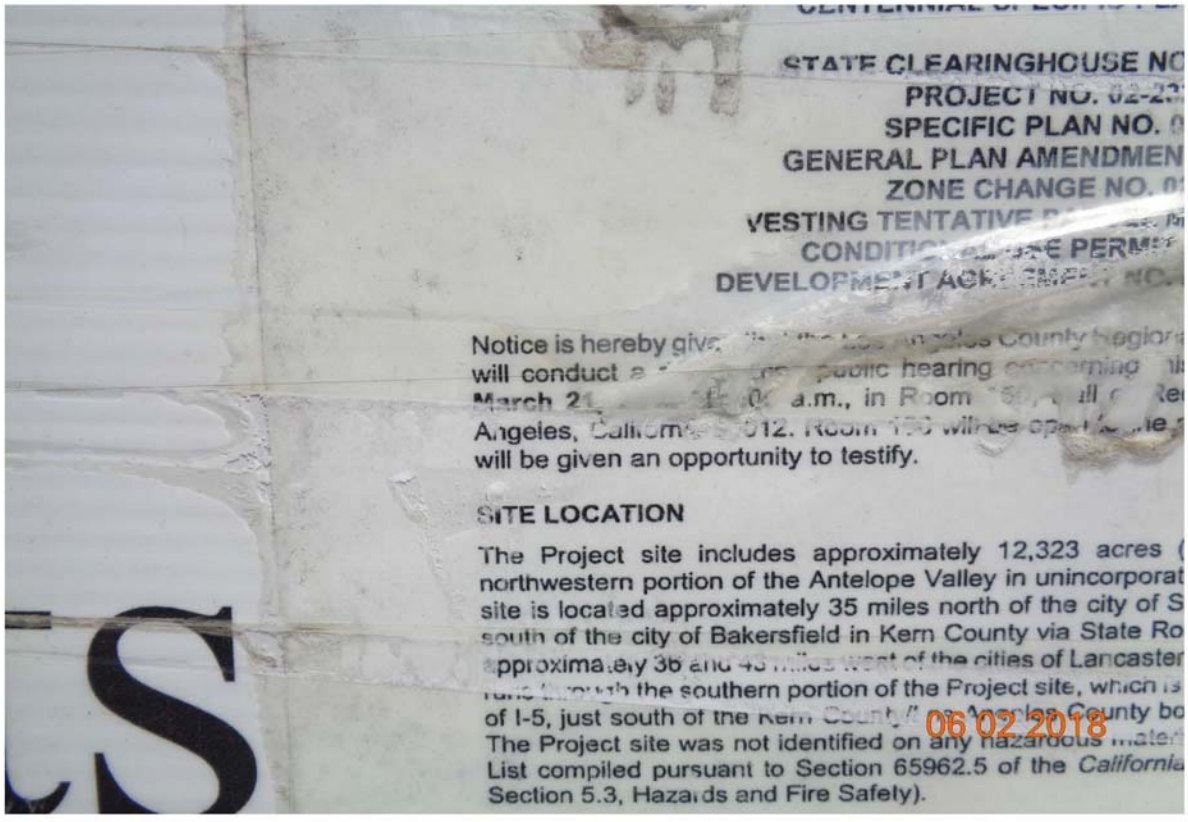


Difficult access to Sign 3, looking east, from dead end of Gorman Post Road. MM. 2.0. Also, eastbound drivers would need to cross four lanes of Hwy. 138 if they passed Gorman Post Road access turn, Which is well east of the sign. Below, looking NE from eastbound 138 and approximately 1/8 mile east of Gorman Post Road access. No U-turns or turn around until Quail Lake.





Sign 3, facing west, vicinity of Gorman Post Road, 8.5x11 meeting date, March 21st hearing notice only; no revised hearing dates noticed on the sign or paper. NO JUNE 6TH HEARING noticed on sign or 8.5x11.



Response to Comment Letter ADD-F.3
Three Points-Liebre Mountain Town Council
June 5, 2018

Response to Comment ADD-F.3-1:

Thank you for your comment and for your participation in this public process. All required public notices regarding the Project have been provided in accordance with applicable legal requirements. Nevertheless, this comment's concerns regarding signage placed at and near the Project site regarding Project hearing date are noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

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Association of Rural Town Councils
C/O Three Points-Liebre Mountain Town Council
P. O. Box 76
Lake Hughes, CA 93532
ourartc@gmail.com

5 June 2018

SENT VIA EMAIL

Mr. Jodie Sackett
Los Angeles County
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov
213.974.6443

Dear Mr. Sackett,

Subject: Project Number 02-232; Centennial Project, Final Environmental Impact Review

The Association of Rural Town Councils (ARTC) recently voted to provide comments on the Project and its Final Environmental Impact Review (FEIR). At this point in time, we are inclined to oppose the Project based on several factors. There are numerous "unavoidable significant impacts" with regard to air quality, traffic, biological resources, special hazards, water quality, emergency services, public health, and further impacts to several town council communities facing direct and indirect impacts resulting from this Project as well as cumulative impacts from proposed major infrastructure projects. ADD-F.4-1

We find ten days an inadequate amount of time to review the FEIR, evaluate its mitigations, determine their adequacy, and form an appropriate response. The ARTC requested additional time for reading and evaluating, (ARTC Letter dated 25 March 2018); however, no additional time was allotted for review, and we were informed ten days were allowed by law. Because the ARTC meets monthly, and most town councils meet monthly, it takes a minimum of forty-five to sixty days to be sure their input is considered in decisions the ARTC makes, and in order to gather properly thought out information and decide a course of action. We ask that you consider our request for extended time to evaluate the FEIR, but please bear in mind we reserve our decision until we have made adequate review. Please also remember, the ARTC is comprised of councils whose members volunteer their time, many of whom hold full time jobs and devote many hours to representing their communities. The 2,200 page FEIR document, should anyone choose to read carefully, would require reading 220 pages per day over the 10 day review period, not counting any effort at formulating written comments. ADD-F.4-2

Be apprised the Oso Town Council has excluded itself from the ARTC efforts described in this letter. In fact, their charter indicates their desire to be autonomous and separate from the ARTC. ADD-F.4-3

Sincerely,

Susan Zahnter

Susan Zahnter
Director

CC: Fifth District Senior Field Deputy Donna Termeer

Response to Comment Letter ADD-F.4
Association of Rural Town Councils
June 5, 2018

Response to Comment ADD-F.4-1:

Thank you for your comment and for your participation in this public process. This comment's general opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

Response to Comment ADD-F.4-2:

Regarding this comment's request for additional time to review the Final EIR it is noted that the Regional Planning Commission hearing on the Project has been continued from June 6, 2018 to July 11, 2018, thus allowing additional time for public review of the Final EIR documentation.

Response to Comment ADD-F.4-3:

This comment's clarification regarding the Oso Town Council's relationship to the Association of Rural Town Councils is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

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SOUTHERN CALIFORNIA LEADERSHIP COUNCIL

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P: 213.622.4300
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David Wolf
Robert Wolf

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Mike Roos
President

Richard Lambros
Managing Director

June 5, 2018

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH – SUPPORT

Dear Mr. Sackett:

It's no secret that the County of Los Angeles is in a housing crisis. In fact, housing affordability is one of the top concerns of our organization, the Southern California Leadership Council (SCLC), because of its impact to our region's economy and quality of life.

In case you are not familiar with SCLC, it is a non-partisan, non-profit, business-led public policy partnership that exerts strong leadership on issues of regional significance, providing a common voice on major public policies critical to economic vitality, job growth and quality of life in Southern California. SCLC is comprised of three dozen presidents and CEO's of top Southern California companies and agencies and SCLC is privileged to be led in its work by two of California's former governors (Governor Gray Davis and Governor Pete Wilson).

SCLC is concerned that Los Angeles County has some of the highest housing costs in the nation. Currently, only 28% of households are now able to afford a median-priced home in Los Angeles County, and this number will continue to shrink if we don't alleviate our housing shortage. With over 19,000 residential units being developed, Centennial is a step in the right direction for the County of Los Angeles to lessen our region's housing crisis.

In addition, according to LA County's Affordable Housing Action Plan, we have a shortage of 551,807 affordable homes. Even though the County doesn't yet have an official plan for affordable housing, Centennial has made a commitment to providing 10% of our units as Affordable Housing. That's 1,900 affordable homes. When you put Centennial into perspective, Centennial becomes an important part of LA County's affordable housing solution.

ADD-F.5-1

What's more, Centennial is able to provide affordable housing while also preserving one of the largest and most biological diverse areas in California through a historical conservation agreement. Ten years ago, Tejon Ranch reached an agreement with five environmental resource organizations (NRDC, Audubon California, Sierra Club, Endangered Habitats League and Planning Conservation League) to announce a ranch wide agreement, which resulted in the permanent conservation of up to 90%, 240,000 acres, of the Ranch's land. This also led to the creation of the Tejon Ranch Conservancy.

Tejon Ranch has always put an emphasis on the protection of open spaces and has taken significant steps to ensure protection of the biodiversity of the surrounding area. The extensive amount of open space that the Centennial project will provide is consistent with the Los Angeles County Antelope Valley Area Plan (AVAP) and the LA County General Plan. It implements the AVAP by creating an environmentally and economically sustainable master-planned community. Centennial will maximize efficient utilization of regional infrastructure while preserving thousands of acres of contiguous natural open space and biological resources.

SCLC believes that the Centennial project is doing it right ... providing both needed housing and environmental benefits. Because of this, we would like to encourage the Regional Planning Commission to approve the Centennial project. The time has come to move forward with this much-needed development.

ADD-F.5-1 cont.

Sincerely,

Mike Roos
President

Response to Comment Letter ADD-F.5
Southern California Leadership Council
June 5, 2018

Response to Comment ADD-F.5-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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June 7, 2018

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization



Ms. Jodie Sackett
County of Los Angeles Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

Via U.S. Mail and email to JSackett@planning.lacounty.gov

re: Centennial Project, Project Number 02-232

Dear Ms. Sackett:

I write on behalf of Advocates for the Environment, a non-profit public-interest law firm and environmental advocacy organization. Our mission involves protecting the environment, with a specific focus on Los Angeles County.

We oppose the Centennial Project because it will have a variety of significant, avoidable environmental impacts, including destruction of a large area of native California grasslands. The project is pure urban sprawl, and the County should deny its entitlements and support, instead, infill projects that don't add to sprawl in Los Angeles County.

ADD-F.6-1

Sincerely,

Dean Wallraff

Dean Wallraff, Attorney at Law
Executive Director

P.O. Box 4242, Sunland, CA 91041 (818) 353-4268 info@aenv.org

Response to Comment Letter ADD-F.6
Advocates for the Environment
June 5, 2018

Response to Comment ADD-F.6-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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G. Individuals

CENTENNIAL

at TEJON RANCH

ANTELOPE VALLEY DISTRICT OFFICE
848 W. LANCASTER BLVD., SUITE 101
LANCASTER, CA 93534
TEL (661) 729-6232
FAX (661) 729-1683

VICTOR VALLEY DISTRICT OFFICE
14343 CIVIC DRIVE, FIRST FLOOR
VICTORVILLE, CA 92392
TEL (760) 843-8414
FAX (760) 843-8348

SANTA CLARITA DISTRICT OFFICE
23920 VALENCIA BLVD., SUITE 250
SANTA CLARITA, CA 91355
TEL (661) 286-1471
FAX (661) 286-2543

California State Senate

SENATOR
SCOTT WILK
TWENTY-FIRST SENATE DISTRICT

COMMITTEES
AGRICULTURE
VICE CHAIR
EDUCATION
VICE CHAIR
GOVERNMENTAL ORGANIZATION
VICE CHAIR
BUSINESS, PROFESSIONS & ECONOMIC DEVELOPMENT
VETERANS AFFAIRS
BUDGET SUBCOMMITTEE #4

June 6, 2018

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sackett:

As the State Senator representing the 21st Senate District, which encompasses the proposed Centennial development, I am pleased to write you to express my full support of the Centennial at Tejon Ranch project.

After more than a decade of planning, the Centennial at Tejon Ranch project is finally nearing fruition with thorough environmental reviews now completed. As you know, Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, commercial space, schools, parks, natural open space, and mixed public use facilities.

The community master plan is simply the implementation of the AVAP, a balanced plan of economic opportunity and conservation. Centennial has also been at the table with the Golden State Gateway Coalition in regards to fast tracking the I-5 improvements before this new community has been set.

Furthermore, Tejon Ranch has been proactive in saving water throughout the years to help supply the project and the subsequent community in to the future. Centennial's Green Development program requires reduced potable water and promotes environmental stewardship and sustainability.

ADD-G.1-1

Centennial is LA County's opportunity to take advantage of growth in Kern County through increased tax revenue for the general fund, additional public services to North LA County, and homeownership opportunities for diverse working-class and middle-income families.

It's important to recognize the geographically sound placement of this project in relation to neighboring communities and the ongoing cooperation with those groups to ensure optimal utilization and conservation of shared regional infrastructure and resources. This is a thoroughly planned development with mechanisms in place to promote partnership with the surrounding areas of North Los Angeles and Kern counties and existing population centers nearby will only benefit from the execution of the Centennial Plan.

CAPITOL OFFICE: STATE CAPITOL, ROOM 4090 • SACRAMENTO, CA 95814 • TEL (916) 651-4021 • FAX (916) 651-4921
SENATOR.WILK@SEN.CA.GOV

I urge the Regional Planning Commission to approve and allow Centennial to move forward. We need to finally begin development on this much-needed project.

ADD-G.1-1 (cont'd)

Sincerely,

Scott Wilk
State Senator, 21st Senate District

cc: Hon. Kathryn Barger, Supervisor 5th District

Response to Comment Letter ADD-G.1
Senator Scott Wilk, 21st Senate District
June 6, 2018

Response to Comment ADD-G.1-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012
June 5, 2018

Centennial Project County Project Number: 02-232

The Centennial Project, no matter how many revisions it goes through, is still a suburban sprawl of leapfrog development disguised as a "community".

The real estates' development suffers from a lack of imagination and a true sense of what a real affordable low or very low rental housing or ownership program would be. The apartments, condos, or affordable houses would be at low-level (elevation) and high density living quarters. All other "village" areas would have their different densities, amenities and housing types. It is unclear to me if this is to distinguish them from each other or create a class system by way of privilege or membership for using amenities.

Existing cities and communities have homeless population problems. Is this Project in any way able to prevent more of this or solve the situation, and if so, how?

The Centennial Project is wrong and it is unacceptable to me and to every one of my neighbors and friends who I talk to about it. I oppose it and the glorified FEIR that does everything for more density and development at all costs and does it backwards.

I object to the ten day review and comment period as a project of this size deserves an adequate review to assess the magnitude of final conditions.

ADD-G.2-1

Thank you,

Judith Fuentes
47458 92nd Street West
Antelope Acres, CA 93536

661-723-1882

Response to Comment Letter ADD-G.2
Judith Fuentes
June 5, 2018

Response to Comment ADD-G.2-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. Regarding this comment's request for additional time to review the Final EIR it is noted that the Regional Planning Commission hearing on the Project has been continued from June 6, 2018 to July 11, 2018, thus allowing additional time for public review of the Final EIR documentation. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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Dear Jodie Sackett,

Scientists warn that we're in the middle of a climate crisis. Because transportation is the single largest driver of carbon pollution in California, new development located far from existing cities has disproportionately large climate impacts. Centennial exemplifies poor, outdated land-use planning on an unprecedented scale. This isolated new city would lock in at least 75,000 new vehicle trips per day with an average trip length of over 45 miles.

If you're committed to a sustainable future for L.A., then you need to say no to Centennial.

L.A.'s wildlands are rapidly diminishing. Ninety-nine percent of California's native grasslands are already gone forever, paved over by similar sprawl development. The Centennial project site contains the last, largest and best native grassland and wildflower fields left in California. Rare wildlife such as California condors, bald eagles, kit foxes and pronghorn also will be harmed if Centennial is built.

It's your job to protect our communities and natural resources, not sell them out to developers.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, urban, affordable housing. Centennial is a poster child of 20th-century sprawl development that exacerbates threats to our population through increasing greenhouse gas production and climate change, air pollution and a deteriorating quality of life.

ADD-G.3-1

The proposed site is in "high" and "very high" fire hazard severity zones. And it's directly on top of California's two major earthquake faults. The area was rated by the U.S. Geological Survey as having the highest level of earthquake hazard.

The county and its taxpayers will be on the hook for millions to provide basic public and emergency services to this remote area.

Instead of allowing isolated sprawl development on irreplaceable grasslands in an area at extremely high risk for fires and earthquakes, L.A. should focus on creating safe housing and economic opportunities in or near existing cities.

Please say no to Centennial: It's the wrong vision for L.A.

Sincerely,

Response to Comment Letter ADD-G.3
Form Letter 3
Various Dates

Response to Comment ADD-G.3-1:

A form letter was prepared by an unknown source and was made available to the public for submittal via email. A total of 276 form letters were submitted via email. Of the 276 form letters submitted, 20 were duplicate form letter submissions. Within this form letter, commenters were encouraged to sign with their name and email address, as well as their city, state, and zip code. Based on this information, the geographic breakdown of the form letter commenters is as follows:

1. 1 commenter within the Antelope Valley;
2. 60 commenters outside of the Antelope Valley, but within Los Angeles County;
3. 4 commenters within Kern County;
4. 74 commenters outside of Los Angeles and Kern Counties, but within California; and
5. 111 commenters outside of California;
6. 4 commenters outside of the United States; and
7. 1 commenter with an unrecognized zip code.

The individual form letters can be found in Appendix A-3 of this document. The response to this form letter is as follows.

Thank you for your comment and for your participation in this public process. This comment's stated opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. Please also see responses to Comment A.3-3, A.3-4, A.3-5, A.3-7, B.4-20, B.4-21, B.4-22, B.4-23, F.8-20, F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3A-46, F.8-189, G.31-1, H.21-1, and J.1-6 of the Final EIR. Since this comment does not raise any specific concerns regarding the adequacy of the EIR, no further response is required.

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Name :
Email :
Address :
City :
Zip:

Dear Mr. Sacket:

I'm writing in support of Centennial at Tejon Ranch. The County of Los Angeles is facing a housing crisis and we need a variety of housing types in various locations throughout Los Angeles County. Centennial's master-plan will do just that; create more price-attainable housing and it will help accommodate the planned regional population and economic growth in our county.

As you know, Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, commercial, schools, parks, natural open space, cultural, and public uses.

The community masterplan is simply the implementation of the AVAP, a balanced plan of economic opportunity and conservation. Centennial has also been at the table with the Golden State Gateway Coalition in regards to fast tracking the I-5 improvements before this new community has been set.

It is important to define the project location in terms of synergy with the growing populations near the Centennial project. There is great synergy between other Tejon Ranch projects in Kern County, including Grapevine and Tejon Mountain Village, as well as the Antelope Valley and Santa Clarita.

Centennial is LA County's opportunity to take advantage of growth at Tejon Ranch in Kern County by increasing tax revenue for the general fund and providing increased public services to North LA County, but also providing diverse working-class and middle-income families an opportunity for homeownership.

In addition, Centennial includes plans to focus on water conservation through the use of recycled water and several other sustainable sources. The project's Green Development program requires reduced potable water consumption through the use of drought-tolerant plants, low-flow showerheads, faucets, and toilets. The Centennial master plan will also use recycled water for landscape irrigation in residential common areas.

I urge the Regional Planning Commission to approve and allow Centennial to move forward. We need to finally begin development on this much-needed community.

ADD-G.4-1

Response to Comment Letter ADD-G.4
Form Letter 4
Various Dates

Response to Comment ADD-G.4-1:

A form letter was prepared by an unknown source and was made available to the public for submittal via email. A total of 21 form letters were submitted via email. Within this form letter, commenters were encouraged to sign with their name and email address, as well as their physical mailing address. Based on this information, the geographic breakdown of the form letter commenters is as follows:

1. 16 commenters outside of the Antelope Valley, but within Los Angeles County;
2. 1 commenter within Kern County;
3. 3 commenters outside of Los Angeles and Kern Counties, but within California; and
4. 1 commenter outside of California.

The individual form letters can be found in Appendix A-4 of this document. The response to this form letter is as follows.

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft or Final EIRs and thus no further response is required.

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From: Sidney
To: Jodie Sackett; cserry@bos.lacounty.gov; Kathryn@bos.lacounty.gov
Subject: Support Centennial at Tejon Ranch
Date: Thursday, May 24, 2018 9:31:05 AM

Name : Sidney
Last-name: Stone
Email : sstone@chelseainvestco.com
Address : 6339 Paseo Del Lago
City : California
Zip:92602

Dear Mr. Sacket:

LA County needs a solution to housing affordability! Centennial at Tejon Ranch is what LA County needs now more than ever!

The Natural Resources Defense Council (NRDC), Sierra Club, Audubon California, Endangered Habitats League and the Planning and Conservation League have all agreed to save 90% of the highest value and most biological diverse portions of Tejon Ranch.

Now, Centennial at Tejon Ranch will match the value of this unprecedented conservation and become a national model of an environmentally sustainable community for working-class Angelenos. It will power the entire community with its own clean, renewable energy, including achieving all 2016 CALGreen Tier 1 measures, use state-of-the-art water conservation measures, and with over 95 miles of trails and clustered development, it will allow the future of residences to walk and bike to work, schools, and retail services.

Centennial is a net zero electricity and net zero water community that will provide 19,000 new homes, 1,900 affordable units, 23,000 new jobs, $21.5 million in surplus to the County, all while preserving 240,000 acres of the most pristine natural lands in California.

The County of Los Angeles has already identified Centennial as an Economic Opportunity Area and the new community is consistent with the County's General Plan. Further, it is included in the Sustainable Communities Strategy and Regional Transportation Plan for the Southern California Association of Governments.

The solution to our County's housing affordability crisis is here!

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in the County of Los Angeles.

We need to approve this project, begin development on this much-needed community and allow for our housing crisis to come to an end.

Thank you

ADD-G.5-1

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This e-mail was sent from a contact form on We Need Housing (https://secure-web.cisco.com/1OVsYZj_tZJTF925CytC5En5g29DGFT2rYmalgMjEnbDnXT-vEqJ2JsFXdISk8MaRu6jkp_1fydcGG52tl7x-qLT-oQmsEILBs_81w46MsQI-frqL44Bh4e3621Wq5DBq1tgfLbVomgKnEQ4DtH6yXhYdxj2g9YOwU0Z2xBUNimQwPqORUAvfO6ETU8Toj9xFNel5C1XtUo_YulskuJhAqR2SLR3nrhOWEWU68kBRcz48dHM8cq4UNnoWvRrpgkBHYip83am_1-PE-md1f1B2csycmiptrDaZE0zPDzsWBdU0Upauf80lOA1VpKMSCWXZz3TV7Q6bv2d6vKAWsrBCXj6tOalJPoU-h0wj4rlG6k5z23d_xbY-Yro2y77sQV5ltjwTvwKy0kON5Z9l1p9AtGth_Oz0UcX50RUaf6Rjek/https%3A%2F%2Fweneedhousing.org)

Response to Comment Letter ADD-G.5
Sidney Stone
May 24, 2018

Response to Comment ADD-G.5-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Christie
To: Jodie Sackett; cgerwig@bos.lacounty.gov; KAshworth@bos.lacounty.gov
Subject: Support Centennial at Tejon Ranch
Date: Thursday, May 24, 2018 12:24:30 PM

Name : Christie
Last-name : Brown
Email : christiedianebrown@gmail.com
Address : 2408 s grand ave
City : California
Zip:90007

Dear Mr. Sacket:

L A County needs a solution to housing affordability! Centennial at Tejon Ranch is what L A County needs now more than ever!

The Natural Resources Defense Council (NRDC), Sierra Club, Audubon California, Endangered Habitats League and the Planning and Conservation League have all agreed to save 90% of the highest value and most biological diverse portions of Tejon Ranch.

Now, Centennial at Tejon Ranch will match the value of this unprecedented conservation and become a national model of an environmentally sustainable community for working-class Angelenos. It will power the entire community with its own clean, renewable energy, including achieving all 2016 CALGreen Tier 1 measures, use state-of-the-art water conservation measures, and with over 95 miles of trails and clustered development, it will allow the future of residences to walk and bike to work, school, and retail services.

Centennial is a net zero electricity and net zero water community that will provide 19,000 new homes, 1,900 affordable units, 23,000 new jobs, $21.5 million in surplus to the County, all while preserving 240,000 acres of the most pristine natural lands in California.

The County of Los Angeles has already identified Centennial as an Economic Opportunity Area and the new community is consistent with the County's General Plan. Further, it is included in the Sustainable Communities Strategy and Regional Transportation Plan for the Southern California Association of Governments.

The solution to our County's housing affordability crisis is here!

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in the County of Los Angeles.

We need to approve this project, begin development on this much-needed community and allow for our housing crisis to come to an end.

Thank you.

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This e-mail was sent from a contact form on We Need Housing (https://secure-web.cisco.com/1Dxgo4vRmTETomYf4Q8PC5XMirkzWhTWhHCjg9s9XSgEDbsOs2bwVSmpajvZN0lnZVnQAh3KXQ_11z3bGuG5bDlH1c8ul18WAwXjtGNB6QKRbHJWZnpC5rmThHp0YMMW2zXOYHE_AaCkiHAzSdA54vsC1Wh_93iDrxUEd3DjXkIk6UjLZ1Yb56aFDMdBF0K98rnl8rilKWqPzD-2j1dnIT05Y101eLU50SR910aQuIlhJmfZ52Yor4z7a-F-HmsWDvnkeKyphPWqXm6qoF4HiRZa8kCikiEBmnUVHQs82cCeHnD0TirH6cF8Y6wiEUxTRqQB-Obg4b4hFl2O0WEkPh8NDGBC9Q6hRGtUytEM0Hz5gZdpLSSV3Hxnlp2GMilybN0w2aZ5cFw4tps%3A%2F%2Frenewedhousing.org)

ADD-G.6-1

Response to Comment Letter ADD-G.6
Christie Brown
May 24, 2018

Response to Comment ADD-G.6-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Mihai Craioveanu
To: Jodie Sackett
Cc: Mihai Craioveanu
Subject: City of Centennial project
Date: Thursday, May 24, 2018 12:32:58 PM

Mr. Jodie Sackett
Los Angeles County
Department of Regional Planning
Hall of Records, 13th
Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
JSackett@planning.lacounty.gov
213.974.6443

Dear Mr. Sackett,

As a Los Angeles county land owner about 3 miles from the proposed site of Centennial, I am very much in favor for this project. I am a person who cares for the environment, but also cares for people and their wellfare! Having said that I read with concern some of the emails submitted against this proposal that while well intended miss some realistic, common sense, and logical issues:

1. California is losing almost a million people annually (more people leaving than moving in) due primarily to very expensive housing in southern California (L.A. San Diego area). Centennial will provide affordable housing and new employment opportunity outside the already congested, and heavily populated Los Angeles,
San Diego, and San Francisco areas.
2. Centennial will also be built with many environmental concepts, solar homes, recycling water station, etc. something not available in the congested large and old metro areas of the southern California.
3. Centennial allows much of its land for natural and recreational use within and outside its borders, unlike the old urban concepts of congested and crowded real estate developments in the existing major urban areas.
4. One cannot expect the state of California to be equated for ever with Los Angeles, and San Francisco where most of the new population tends to move to. This is NOT sustainable and it is one of the major reasons behind California's dwindling population year after year as these areas are already

ADD-G.7-1

beyond most people's financial reach and affordability.
4. Some of the concerns I read in protest emails mention fault lines and their potential consequences. Yet they are not protesting building and constant expansion in San Francisco, and Los Angeles. If we are to worry about fault lines, then we should stop building in 40% of the United States since there are many fault lines crisscrossing the country some much bigger and potentially much more dangerous than San Andreas (i.e. New Madrid, and Yellowstone).
5. Much of the unincorporated parts of L.A. county is made up of vast amount of land that does not provide tax revenue needed for California to maintain its front status in the United States, and one of the top six largest economies in the world. The L.A. county and the state need to keep this very much at the forefront of its future strategic planning.
6. Tejon Ranch is one of the largest (if not the largest) privately own ranch and has done a fabulous job keeping its vast majority of land pristine and in its natural state of environmental preservation.

ADD-G.7-1 (cont'd)

Finally, I am a person who believes in moderation, common sense, and logic, as opposed to radical, one-sided, and extreme points of view. After reading, and documenting myself on this issue for the past 12 years I find that Centennial project while not perfect (what is perfect in today's world anyway?) has the potential to benefit everyone from the individual person, to the county, and the state.

Sincerely,

Mihai Craioveanu
Professor of Music
Music Department
Hope College
Phone: 616-395-7657
E-mail: craioveanu@hope.edu

Response to Comment Letter ADD-G.7
Mihai Craioveanu
May 24, 2018

Response to Comment ADD-G.7-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: James
To: Jodie Sackett; cperry@bos.lacounty.gov; Kathryn@bos.lacounty.gov
Subject: Support Centennial at Tejon Ranch
Date: Thursday, May 24, 2018 7:53:40 PM

Name : James
Last-name: Tresevant
Email : jamestresevant@gmail.com
Address : 4309 S. Normandie Ave. Los Angeles
City : Alabama
Zip:90037

Dear Mr. Sacket:

LA County needs a solution to housing affordability! Centennial at Tejon Ranch is what LA County needs now more than ever!

The Natural Resources Defense Council (NRDC), Sierra Club, Audubon California, Endangered Habitats League and the Planning and Conservation League have all agreed to save 90% of the highest value and most biological diverse portions of Tejon Ranch.

Now, Centennial at Tejon Ranch will match the value of this unprecedented conservation and become a national model of an environmentally sustainable community for working-class Angelenos. It will power the entire community with its own clean, renewable energy, including achieving all 2016 CALGreen Tier 1 measures, use state-of-the-art water conservation measures, and with over 95 miles of trails and clustered development, it will allow the future of residences to walk and bike to work, schools, and retail services.

Centennial is a net zero electricity and net zero water community that will provide 19,000 new homes, 1,900 affordable units, 23,000 new jobs, $21.5 million in surplus to the County, all while preserving 240,000 acres of the most pristine natural lands in California.

The County of Los Angeles has already identified Centennial as an Economic Opportunity Area and the new community is consistent with the County's General Plan. Further, it is included in the Sustainable Communities Strategy and Regional Transportation Plan for the Southern California Association of Governments.

The solution to our County's housing affordability crisis is here!

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in the County of Los Angeles.

We need to approve this project, begin development on this much-needed community and allow for our housing crisis to come to an end.

Thank you.

ADD-G.8-1

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This e-mail was sent from a contact form on We Need Housing (https://secure-web.cisco.com/1FKf9nZ1H7KviKIqFuxiig-PsnAxF-0xeoLdZ6hms45wdY0ZAWvp8q4vzr5Oty_1qxGllTu1FleyuLAyaFCt3tz1t6Zm8uIz0sLbRmCZh4SFhj08ov9_VuGr4ks2c9dwFXsqxoj_5GZJ7ZpQYsua-3Ozp85MgNhxUSfG49_1Y8jnakBH-vOtmLbGz1tHmtqKEJlUCR-K97dpKX_fs7rYi97vpC7kqhgWQQQ2rFYUEZiXFCdmsh7IRFqIpNEQA-tp5_tNsEtlDxLVpI35vb83M552liYO3Lv1aorbMfDy8S4caRTFdQsa52BnPZr6im9IL_Zk0x6uD8xKAat33aKqTUY-Nd0mHwjgUvFXN4bo3xpehBJbRE09hgC5m2RzoOX1AnqXriCfNJOiEZN4NPmqL1AQ/https%3A%2F%2Fweneedhousing.org)

Response to Comment Letter ADD-G.8
James Tresevant
May 24, 2018

Response to Comment ADD-G.8-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: DRP LDCC
To: Jodie Sackett; Steven Jones
Subject: FW: Oppose Centennial's development plan for Tejon Ranch
Date: Tuesday, May 29, 2018 3:15:51 PM

FYI

Thank you,

Alice Wong, AICP
Principal Planner
Land Development Coordinating Center Section (front counter)
Department of Regional Planning
320 W. Temple Street, Room 1360
Los Angeles, CA 90012
http://planning.lacounty.gov/

Department Front Counter Hours:
M, Tu, Th 7:30am-5:30pm & W 8:30am-5:30pm
Closed every Friday

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-----Original Message-----
From: Bruce G. BALDWIN [mailto:bbaldwin@berkeley.edu]
Sent: Wednesday, May 23, 2018 7:08 PM
To: DRP LDCC <zoningldcc@planning.lacounty.gov>
Subject: Oppose Centennial's development plan for Tejon Ranch

Dear LA County Planning:
I am writing to urge opposition to Centennial's development proposal for 30,000+ acres of Tejon Ranch. As a professional botanist and specialist on California's native flora, I believe the development plan is too destructive to natural biodiversity to be defensible, even with preservation of the rest of the ranch. The areas to be developed have irreplaceable botanical value, including some of the most spectacular wildflower stands in California, and the scope of development in Centennial's proposal is far too great to be able to effectively mitigate against impacts to surrounding wildlands that are supposed to be protected under current law. Please reject Centennial's development plan.

ADD-G.9-1

Sincerely,
Bruce Baldwin
2408 Parker St.
Berkeley, CA 94704

Response to Comment Letter ADD-G.9
Bruce G. Baldwin
May 29, 2018

Response to Comment ADD-G.9-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: DRP LDCC
To: Jodie Sackett; Steven Jones
Subject: FW: Please oppose all development in Tejon Ranch
Date: Tuesday, May 29, 2018 3:21:19 PM

Another comment for your case

Thank you,

Alice Wong, AICP
Principal Planner
Land Development Coordinating Center Section (front counter)
Department of Regional Planning
320 W. Temple Street, Room 1360
Los Angeles, CA 90012
http://planning.lacounty.gov/

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-----Original Message-----
From: Dan s [mailto:danucleus02@gmail.com]
Sent: Tuesday, May 29, 2018 2:13 PM
To: DRP LDCC <zoningldcc@planning.lacounty.gov>
Subject: Please oppose all development in Tejon Ranch

We need to save the native grasslands! They are all but gone!

ADD-G.10-1

Response to Comment Letter ADD-G.10
Dan S
May 29, 2018

Response to Comment ADD-G.10-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Steven Jones
To: Jodie Sackett
Subject: Fwd: Please STOP all development of Tejon Ranch!!
Date: Wednesday, May 30, 2018 9:48:20 AM

Steven D. Jones, MPA, AICP
Land Divisions Section
Department of Regional Planning
County of Los Angeles
http://planning.lacounty.gov/
Office: (213)974-6433

Begin forwarded message:

From: DRP LDCC <zoningldcc@planning.lacounty.gov>
Date: May 30, 2018 at 07:25:27 PDT
To: Steven Jones <sdjones@planning.lacounty.gov>
Subject: FW: Please STOP all development of Tejon Ranch!!

Regards,

Land Development Coordinating Center Section (DF)
Department of Regional Planning
320 W. Temple Street, Room 1360
Los Angeles, CA 90012
http://planning.lacounty.gov/

General inquiries: 213-974-6411
Hours: M, Tu, Th 7:30am-5:30pm & W 8:30am-5:30pm
Closed every Friday

From: Susan Sundberg <sundberg27@yahoo.com>
Sent: Wednesday, May 30, 2018 6:59 AM
To: DRP LDCC <zoningldcc@planning.lacounty.gov>
Subject: Please STOP all development of Tejon Ranch!!

Please STOP the Centennial development and stop ALL development of Tejon Ranch. It is CRITICAL wildlife habitat for Antelopes, Jack Rabbits, and wildflowers. There are very few antelope left in the US. We used to count 600 or more antelope on our road trips to Minnesota in the 70's. On my trip in 1996 across to MN I saw maybe 5 or 6. They are very threatened!

ADD-G.11-1

Please stop ALL development of this irreplaceable and beautiful habitat and wildlife corridor.

Thank you,

Susan Sundberg

Sent from Yahoo Mail on Android

ADD-G.11-1 cont.

Response to Comment Letter ADD-G.11
Susan Sundberg
May 30, 2018

Response to Comment ADD-G.11-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Steven Jones
To: Jodie Sackett
Subject: Fwd: Centennial Specific Plan
Date: Wednesday, May 30, 2018 10:23:14 AM

Steven D. Jones, MPA, AICP
Land Divisions Section
Department of Regional Planning
County of Los Angeles
http://planning.lacounty.gov/
Office: (213)974-6433

Begin forwarded message:

From: DRP LDCC <zoningldcc@planning.lacounty.gov>
Date: May 30, 2018 at 09:58:45 PDT
To: Steven Jones <sdjones@planning.lacounty.gov>
Subject: FW: Centennial Specific Plan

This is for you....

Regards,

Land Development Coordinating Center Section (DF)
Department of Regional Planning
320 W. Temple Street, Room 1360
Los Angeles, CA 90012
http://planning.lacounty.gov/

General inquiries: 213-974-6411
Hours: M, Tu, Th 7:30am-5:30pm & W 8:30am-5:30pm
Closed every Friday

From: Katherine Pakradouni <wildergardens@gmail.com>
Sent: Wednesday, May 30, 2018 9:48 AM
To: DRP LDCC <zoningldcc@planning.lacounty.gov>
Subject: Centennial Specific Plan

Hi,

I am emailing regarding my opposition to the Centennial Specific Plan at Tejon Ranch.

Developing 30,000 acres of this valuable natural space would be a devastating move for a number of reasons. Ecologically-speaking, California would lose even more of its valuable plants and animals, including iconic wildflower displays and rare plants.

ADD-G.12-1

California's natural heritage is so significant to our value as a state, and Tejon Ranch is one of our most diverse and botanically and biologically significant sites. It should be preserved as such, and not disturbed with the inevitably disruptive nature of human activity.

Furthermore, the introduction of housing for thousands will also bring a much higher likelihood of fires to the area. Records show that human activity is most often the cause of our state's horrific fires. The inevitable increase of fires would be costly and taxing to our already overburdened fire departments.

Lastly, I am very concerned about urban sprawl. I feel we have enough urban areas as it is, but that if development is necessary, it should be done in an area where it would create minimal disturbance of California's pristine, natural heritage. Development at Tejon Ranch would be doing the opposite of that. It would be the equivalent of bulldozing the Antelope Valley Poppy Reserve or other botanically significant site to make room for housing. Let us focus development on areas that are already degraded and leave Tejon Ranch alone.

ADD-G.12-1 cont.

Thank you,

Katherine Pakradouni
4416 Gainsborough Ave.
Los Angeles, CA 90027

Response to Comment Letter ADD-G.12
Katherine Pakradouni
May 30, 2018

Response to Comment ADD-G.12-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Amy Plesetz
To: Jodie Sackett
Subject: Centennial - not a good plan
Date: Thursday, May 31, 2018 10:34:37 AM

Dear Ms. Jodie Sackett,

The location of the proposed Centennial project is a very bad place to house and additional 55,000+ people.

This is why:

-The commute to Los Angeles will be completely ridiculous for the residents.

-It will jam-up California's main artery (5 freeway) with more horrendous traffic. How far does urban sprawl really have to go?

-In addition to these, Newhall Ranch in Santa Clarita, was approved for their extremely large 5-Village project (over 15,000 Acres). All of these residence will no doubt be using the 5 freeway for their commute. Is it wise to approve another development that will no doubt add to this already existing traffic problem?

-This project will also negatively impact California's natural resources. There are 6 CNPS-ranked plants. These plants are very rare and not found very many other places in the world!

-No fewer than 10 species of oaks are found on the project site! The wildlife that exists within the oak woodlands will be effected by this. Pronghorn antelope can be found in this region of California!

-Biological corridors is something that could help California's wildlife along with any wildlife that migrate out of State. There is undoubtedly a number of benefits to allowing wildlife to cross from one fragmented habitat to another in order to carry on with their existence. The proposed development is within an corridor, a transitional area between ecoregions. If we want to preserve biodiversity, the approving this housing project, is not the way.

Thank you very much for your time and hearing me.

Sincerely,

Amy Plesetz
Nature-lover, commuter, California native and lifer!
(626) 991-4190

ADD-G.13-1

Response to Comment Letter ADD-G.13
Amy Plesetz
May 31, 2018

Response to Comment ADD-G.13-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Brien Brennan
To: Jodie Sackett
Subject: Tejon Ranch / Centennial
Date: Thursday, May 31, 2018 1:15:39 PM

Dear Ms.Sackett and the rest of the Regional Planning Commission,

I am writing to voice a perspective on the difficult decision that faces you regarding the Centennial project. But I will be up front that I am also writing to ask that the Regional Planning Commission not recommend the this project for approval. For all the reasons submitted by the California Native Plant Society, Tejon Ranch should be viewed as a sanctuary for life and left to the natural processes of the beings who evolved there.

I trust that you all have the best long-term interest of the greater community in your hearts. I also accept that, to hold the positions you have, you likely operate within a fairly normal societal framework of beliefs. Consciously and subconsciously, we all participate in the way of living created by these beliefs, which at core are rooted in a story of separation, of individual primacy.

With this story as central to "progress," humans have repeated the process of making choices that convert vastly complex communities of life into seemingly more "useful" lands or places for our communities and economies, which are nowadays usually seen as inseparable. Yet we have forgotten what (and who) we are really inseparable from--the real, tangible, living world. One hundred years from now, Earth will be a lot hotter, and the consequences of over-taxing that living world of which we are a part will have caused humans to either create new ways of living or spiral into spiritual and material impoverishment. I think the time to make the transition to living *with* the rest of the world rather than dominating and monetizing it is **now**. If you leave those 12,323 acres of intact biological communities alone, many will still be there in a hundred years, doing all the good they do--carbon sequestration, building soil, improve local water cycles, providing food and habitat to thousands of species (humans included!), cleaning the air, cooling the land. People of that era will be grateful for the for the wisdom of the Commission members who made that tough choice back in 2018.

The world is in the most serious crisis humans have ever encountered, as

ADD-G.14-1

our activities have destroyed so much habitat that a Sixth Mass Extinction of life on Earth has been declared, which 7 of 10 biologists feel is more dangerous to our own survival than is climate change. But when you add climate change to this first crisis, the unprecedented rates of extinction only accelerate. We don't need more cities or shopping malls or retail stores. Or jobs based on creating and maintaining these. We need jobs rooted in repairing the damage we've done to our one and only home. Rather than caving to the economic pressure, I wonder what a solution that addressed the sanctity of life would look like.

My hope for you all is a lively and heartfelt discussion (or many) that digs into that question.

ADD-G.14-1 cont.

Brien Brennan
Tehama County, CA

Response to Comment Letter ADD-G.14
Brien Brennan
May 31, 2018

Response to Comment ADD-G.14-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Tish Brown
To: Jodie Sackett
Subject: Response to the Centennial Specific Plans
Date: Thursday, May 31, 2018 10:41:18 PM

I oppose the development of the area under question. Hope it is possible to find other areas for all those houses but think it would be tragic if any more of the Tejon Ranch were destroyed, and especially that the area under question is more important as wildlife corridor and grassland.

ADD-G.15-1

Tish Brown
Bolinas, CA 94924

Response to Comment Letter ADD-G.15
Tish Brown
May 31, 2018

Response to Comment ADD-G.15-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Linda Curry
To: Jodie Sackett
Subject: Just say NO to Centennial
Date: Friday, June 01, 2018 1:54:14 PM

For Jodie Sackett to share with Los Angeles County Planning Commission in regards to proposed development for Tejon Ranch.

As native Californian with 7 generations of my family having lived here since before the Gold Rush, I can tell you the 'rush' never ended. It doesn't matter whether you look as far back as Bodie or as recently as Trona to see the effects of boom and bust as California resources are extracted and the lands abandonned to the detriment of local community. Salton Sea hucksters or East Coast money still trying to turn a buck have seriously compromised the natural heritage of this state.

I am old enough to remember the oak savannah that used to run from Mendocino to Mexico. The only new thing about the ghost towns in the desert is the age of the buildings. People commuting ever longer distances to work degrade air quality as well as their own quality of life. Not to mention that settling in areas as arid as the Mojave is just plain crazy. The boom and bust cycle just keeps prospering while the environment takes a beating and average taxpayers get the bill for the cleanup and impacts of rampant development.

It used to be that every California child had access to their natural heritage. These days it's hard to find kids that know anything different than play equipment at a concrete and grass park, much less nature trails through California native flora or an opportunity to spy what's left of our fauna.

ADD-G.16-1

Tejon Ranch property due to its geographic intersection and large, continguous parcel presents one of the last remaining native grasslands in California and a wildlife corridor that will probably see even more use after the devastating fires in Los Padres National Forest.

Plans for Centennial are the wrong place, the wrong size, and just plain wrong headed. If housing in LA county is so in demand, build up. Forget about paving the grasslands and allow what little rain that does fall to have a chance to recharge local aquifers. Not to mention the value of the land as a recreational spot for county to have vistas of the state and some small imagination of what it must have looked like to early settlers whether native Americans or imports.

Please reject the Centennial development proposed for Tejon Ranch.

Linda Curry
1015 Bush St.
Santa Rosa, CA 95404

Response to Comment Letter ADD-G.16
Linda Curry
June 1, 2018

Response to Comment ADD-G.16-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: elnura maine
To: Jodie Sackett
Subject: #stopcentennial please dont build a city in tejon
Date: Saturday, June 02, 2018 9:35:19 PM

Please do not develop in Tejon Ranch. I am a biologist and understand that the Tejon Ranch area is a very sensitive biome which houses a unique and sensitive ecosystem. Building there will just exacerbate the 200+ species that go extinct everyday.

ADD-G.17-1

Sincerely

Elnura Maine

Response to Comment Letter ADD-G.17
Elnura Maine
June 2, 2018

Response to Comment ADD-G.17-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Jacob Lemus
To: Jodie Sackett
Subject: tejon development
Date: Saturday, June 02, 2018 9:54:18 PM

Dear james sackett,

I am Jacob Lemus representing U.S. Fish & Wildlife service fire management, and I am asking you to please stop the proposed new development its a beautiful ecosystem that I have enjoyed almost my entire life. I think there are enough homes in southern california and we need to focus on preserving whats left of California's naturual beauty.

ADD-G.18-1

Sent from Yahoo Mail on Android

Response to Comment Letter ADD-G.18
Jacob Lemus
June 2, 2018

Response to Comment ADD-G.18-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Michelle MacKenzie
To: Jodie Sackett
Subject: Opposition to Centennial Development
Date: Sunday, June 03, 2018 12:29:32 PM

Dear Ms. Sackett

I write to submit public comment in opposition to the Tejon Ranch development planned for Centennial. I write as a lifelong resident of California. I grew up in Los Angeles County, hiking through the hills, wondering over the wildflowers, hoping to see wildlife and birds. We are so fortunate to enjoy the biodiversity of California.

As California faces climate change and the need to build closer to jobs and transportation corridors, I cannot fathom why a planned city away from all of these is being considered. Centennial is 60 miles from Los Angeles and 40 miles from Lancaster. Its location would require residents to endure long commutes and generate more greenhouse gas emissions which the state is working to reduce. Moreover, this location is vulnerable to high fire danger and is located on top of the San Andreas Fault -making Centennial risky and expensive to protect in the case of natural disasters. Wildfires, in particular, are more likely as climate change continues to impact our state.

Centennial's proposed site is actually an important habitat - some of the finest native perennial grassland and wildflower habitat that remains in California. 6 rare native plant species of plans and no fewer than 10 native oaks are present on the site. Unfortunately, proposed mitigation measures conflict with the conservation of these important native species.

Further, this site would disrupt important biological corridors. In light of climate change, transitional areas between ecoregions - such as this site - are extremely important to preserve. It is critically important that we preserve these types of areas.

The future home of Centennial is also habitat for California condors and the last place where pronghorn "antelope" still exist in Antelope Valley. As a result, this site is important wildlife habitat for these animals and several other wildlife species. It is an important wildlife corridor that needs to be preserved.

Centennial proposes a mitigation ratio of only 1.8:1 (conserved to developed ratio) for habitats impacted. Sensitive and unique habitats of Tejon Ranch should be mitigated for a much higher rate, at a minimum 3:1.

Finally, I urge you, as a native California, to please preserve this magical place. There are so few places left where California looks like native California. Let's build closer to the cities. Let's reduce greenhouse gas emissions. Let's fight climate change. Let's preserve wildlife corridors and oak woodlands and hills that sprawl with wildflowers and manzanita. We can do betters. We are California, after all. Close the door on this misguided project. Let California condors soar over open fields - not urban sprawl!

Sincerely,
Michelle MacKenzie
Menlo Park, California

ADD-G.19-1

Response to Comment Letter ADD-G.19
Michelle MacKenzie
June 3, 2018

Response to Comment ADD-G.19-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Tim Moore
To: Jodie Sackett
Subject: Specific Plan No. 02-232 / Centennial Specific Plan
Date: Sunday, June 03, 2018 2:23:47 PM

Dear Jodie Sackett,

I am writing to urge the LA County Regional Planning Commission to favor sensible and courageously far sighted planning in existing urban areas, not creating whole new towns in the last of California's pristine habitats that will such resources from the urban core. The Centennial project will put thousands of citizens in danger from fires, flooding and earthquakes, and this will strain already cash strapped emergency services. This project will also contaminate the groundwater table with urban runoff from autos and landscaping chemicals. It will disrupt wildlife migration patterns and rend the natural infrastructure even more than it has been until now.

Sprawl type development will eventually run out of room here in this great but not boundless state. We have to make a hard decision at some point, and better we do it now, before the earth warms another degree and we have more urban areas designed around the automobile, that will have to eventually be re-engineered for a sustainable future at a much greater cost in the future. Do we want to cover the last available areas with gas guzzling suburbs or create the best livable cities and preserve the best of California's world famous native landscapes and in the process save the worldwide climate? As a forty five year long resident of Southern California, I have seen enough so called well planned specific plans and no matter how pretty they make them look, in the big regional picture, it all ends up as more of the same, more leapfrog sprawl. Please say no to the Centennial Specific Plan.

ADD-G.20-1

Thank you for your time. Sincerely,

Timothy Moore

Ramona, California 92065

Response to Comment Letter ADD-G.20
Timothy Moore
June 3, 2018

Response to Comment ADD-G.20-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Dom ...
To: Jodie Sackett
Subject: Please don"t develop on tejon ranch
Date: Sunday, June 03, 2018 4:32:33 PM

I urge you do not develop on tejon ranch. It is a delicate ecosystem that we as a people can not afford to have the developed on. Too much of our natural, prestigious and more important irreplaceable lands have been overdeveloped and are no longer safe habitats for our ecosystem to thrive.
As a nature enthusiasts I plan on visiting this place many times in my future and implore you to please do not develop on this land. Please preserve this land for posterity and our current generation...

ADD-G.21-1

Sincerely, Dominique Ferguson

Response to Comment Letter ADD-G.21
Dominique Ferguson
June 3, 2018

Response to Comment ADD-G.21-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Francisco Villa
To: Jodie Sackett
Subject: Tejon Development
Date: Sunday, June 03, 2018 6:19:48 PM

Dear James Sackett,

The World deserves to see Tejon Ranch as a natural experience. Please consider NOT destroying the beautiful sacred landscape and habitat. Developing on this land

will only pollute the environment and endanger wildlife.

We have been blessed with its majestic landscape to enjoy peacefully and preserved. Turning it into a shopping mall would only devalue and degrade the natural features.

We know you recognize Tejon Ranch for its beauty and hope you value it naturally rather than commercially.

ADD-G.22-1

Response to Comment Letter ADD-G.22
Francisco Villa
June 3, 2018

Response to Comment ADD-G.22-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Rosie Beers
To: jsackett@planning.LAcounty
Subject: Centennial
Date: Sunday, June 03, 2018 9:29:17 PM

I am writing to encourage you to set aside all the land for the public, and have no development. Please, please. We need more nature preserved. ADD-G.23-1

Thank you.

May peace be with you,

Rosie

Response to Comment Letter ADD-G.23
Rosie Beers
June 3, 2018

Response to Comment ADD-G.23-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Rosie Ruiz
To: Ann Dorsey
Cc: Jodie Sackett; Steven Jones
Subject: RE: Oppose the Centennial Specific Plan
Date: Monday, June 04, 2018 6:07:44 AM
Attachments: image001.png

Your message has been received and will be forward to the Regional Planning Commission, thank you.

From: Ann Dorsey [mailto:aedorsey@hotmail.com]

ROSIE O. RUIZ | Commission Services
Los Angeles County Department of Regional Planning
213.974.6409 | http://planning.lacounty.gov | rruiz@planning.lacounty.gov
Department office hours are Monday through Thursday
From 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays

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Sent: Sunday, June 03, 2018 4:27 PM
To: Rosie Ruiz <rruiz@planning.lacounty.gov>
Subject: Oppose the Centennial Specific Plan

Ms. Ruiz,

Please forward the message below to the Los Angeles County Regional Planning Commission members.

Thank you,

Ann Dorsey

Los Angeles County Regional Planning Commission,

I ask that you oppose the Centennial Specific Plan which would create of a new city with

ADD-G.24-1

19,323 residences, approximately 55,000 people and 10.2 million square feet of commercial development, in an unpopulated ecologically unique area of northwest Los Angeles County for the following reasons:

-- The project would be located on top of the San Andreas Fault and subject to high fire danger.

-- It is located far away from other developed areas (40 miles from Lancaster and 60 miles from Los Angeles) which would require long commute times and degrade a large area of wilderness, well beyond the the city's boundaries, to develop the infrastructure (roads, water supply, electricity, etc.) necessary to support the community.

-- It is a site of ecoregional transitions at the junction of the Antelope Valley, Tehachapi Mountains, and the Liebre Mountains where ecological and evolutionary processes of statewide importance take place.

-- It is home to at risk wildlife and plants including California condors, pronghorn "antelopes", 10 oak species, and 6 other plants, is the site of some of the finest native perennial grassland and wildflower habitats that remain in California and is a critical biological corridor necessary for preserving biodiversity.

-- The proposed mitigation ratio of 1.8:1 (conserved to developed ratio) is too low. At a minimum the area should be mitigated at a rate of 3:1 because of the incredible biodiversity of the area. Tejon Ranch is just 0.25 % of California's acreage, but it includes 14% (911 plants) of the state's native flora.

We need to be thoughtful about where future development takes place. Starting a community in an area where residents would be subject to strong earthquakes and frequent wildfires, that is far away from other developed areas (increasing greenhouse gas emissions and exacerbating the effects of climate change) and would destroy habitat critical to maintaining the biodiversity of the state is not a good place to do so. It is just the opposite. Please do what is best for Californians and the future and oppose this project.

ADD-G.24.1 (cont'd)

Sincerely,

Ann Dorsey
Northridge, CA 91325

Response to Comment Letter ADD-G.24
Ann Dorsey
June 4, 2018

Response to Comment ADD-G.24-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. With regard to the Commenter's note that a 1.8:1 ratio of conserved to developed lands is inappropriate, the Commenter is incorrect about the amount of land conserved. Total open space mitigation land is approximately 27,000 acres, which is an approximate 3:1 open space to developed ratio. See Final EIR, response to Comment F.8-115. This comment does not otherwise raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: mary shabbott
To: Jodie Sackett
Subject: No to Centennial
Date: Monday, June 04, 2018 7:13:01 AM

Please vote NO to this massive development at Tejon Ranch. What little natural environment left has to be protected. We have enough concrete.
Please vote no.
Thank you,
Mary Shabbott

ADD-G.25-1

Response to Comment Letter ADD-G.25
Mary Shabbott
June 4, 2018

Response to Comment ADD-G.25-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Andrew Hemphill
To: Jodie Sackett
Subject: STOP CENTENNIAL
Date: Monday, June 04, 2018 11:48:25 AM

Dear James Sackett,

I am a wildland firefighter with the U.S. Forest Service, and I am writing to you asking that you oppose the development at Tejon Ranch. As a federal employee and "steward of the land", I urge you to think about the impact this would have. It would be devastating to the land, the natural wildlife, and to the people of Southern California.

This development will undoubtedly disturb the precious ecosystems at Tejon Ranch, and will unnecessarily pollute Southern California. We do not need to keep digging up our natural lands to make housing for people.

Let's work on protecting our beautiful and precious lands.

Please, stop this development.

-Andrew Hemphill

ADD-G.26-1

Response to Comment Letter ADD-G.26
Andrew Hemphill
June 4, 2018

Response to Comment ADD-G.26-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Kirkland West
To: Jodie Sackett
Subject: Please Reject the Centennial Project
Date: Monday, June 04, 2018 4:08:29 PM

Mr. Jodie Sackett

We would like to announce our full opposition to this project and encourage the Department of Regional Planning to reject this project proposal. The California Floristic Province has been identified as one of the few biological diversity hotspots of the world and it our privilege and duty as residents of California to ensure that we preserve this richness for the trillions of people that will exist on this planet after we are gone.

ADD-G.27-1

Aaron Echols
Alliance President
Habitat Defense Council

Response to Comment Letter ADD-G.27
Aaron Echols
June 4, 2018

Response to Comment ADD-G.27-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: ddcrumley@everyactioncustom.com
To: Jodie Sackett
Subject: Centennial is Unsustainable for Los Angeles
Date: Monday, June 04, 2018 3:38:07 PM

Dear Jodie Sackett,

In many ways California and Lis Angeles are leading the way toward climate-wise policies. However, the Centennial Project exemplifies poor, outdated land-use planning on an unprecedented scale. This isolated new city would lock in at least 75,000 new vehicle trips per day with an average trip length of over 45 miles.

If you're committed to a sustainable future for L.A., then you need to say no to Centennial.

L.A.'s wildlands are rapidly diminishing. Ninety-nine percent of California's native grasslands are already gone forever, paved over by similar sprawl development. The Centennial project site contains the last, largest and best native grassland and wildflower fields left in California. Rare wildlife such as California condors, bald eagles, kit foxes and pronghorn also will be harmed if Centennial is built.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, urban, affordable housing. Centennial is a poster child of 20th-century sprawl development that exacerbates threats to our population through increasing greenhouse gas production and climate change, air pollution and a deteriorating quality.

Instead of allowing isolated sprawl development on irreplaceable grasslands in an area at extremely high risk for fires and earthquakes, L.A. should focus on creating safe housing and economic opportunities in or near existing cities.

Please say no to Centennial: It's the wrong vision for L.A.

ADD-G.28-1

Sincerely,
Dawn Crumley
Burbank, CA 91505
ddcrumley@sbcglobal.net

Response to Comment Letter ADD-G.28
Dawn Crumley
June 4, 2018

Response to Comment ADD-G.28-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: Kristine Karnos
To: Jodie Sackett
Subject: Tejon Ranch
Date: Monday, June 04, 2018 7:07:54 PM

Hello

I'm writing to ask that the LA County Regional Planning Commission please reject the Centennial Specific Plan proposal.

Development in LA county should be sited close to where jobs and transportation infrastructure are located. Urban sprawl is a challenge everywhere in California, and siting development here would guarantee long commutes and the pollution and traffic that creates. It's also an area prone to wildfires, so the cost of protecting it (especially as we see high temperatures and intense wildfires on the increase in California) will be high.

In particular, siting this development in Tejon Ranch, which is a local hotspot of biodiversity, seems very shortsighted. The area of Tejon Ranch provides wildlife habitat and corridors, transitional areas between ecoregions - irreplaceable once impacted by development. Build where the impact isn't so great. California is a treasure not only for its climate, but for its natural beauty and open spaces... the area of Tejon Ranch is one that ought to be preserved not just for the enjoyment of people but for the SURVIVAL of the pronghorn and condors and other special status wildlife that make their home there. Limit development in areas of human/wildlife interface - we have fewer of these left.

And besides these concerns, there's a high earthquake risk for any development here. The 7.9 magnitude Tejon Earthquake (with an intensity of perhaps 8.25), which struck on the morning of Jan. 9, 1857 is considered by many to be the largest historic earthquake that California has witnessed (challenging even the 1906 San Francisco quake). Situating a large development in area with a history of major earthquake *and* high fire danger seems disastrous.

Please take a long range view. Please don't recommend the project for approval.

ADD-G.29-1

Thank you for your consideration,
K Karnos
(lifetime Californian, both in southern and northern CA)

Response to Comment Letter ADD-G.29
Kristine Karnos
June 4, 2018

Response to Comment ADD-G.29-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: martilindsey@everyactioncustom.com
To: Jodie Sackett
Subject: Vote NO on Centennial--Too Many issues
Date: Tuesday, June 05, 2018 8:25:24 AM

Dear Jodie Sackett,

I am writing to express several concerns about the planned Centennial project.

As a resident of the West Antelope Valley, just a few miles from the proposed mega-city, my major concerns are as follows:

1. Water. We are currently experiencing a record drought. Los Angeles County does not have nearly enough water to meet the needs of their current residents. A city the size of Centennial will severely affect our water out here in the Western part of the Mojave Desert.

2. Traffic. I feel that Tejon Ranch needs to address the traffic needs of the proposed population for this end of the valley BEFORE you begin to build. With the 2017mud slides and closure of Highway 58, traffic on Highway 138 has increased dramatically. There are significantly more trucks and autos on this two lane highway. This causes unsafe passing and potential accidents. This is a preview of what is to come if a city the size of Centennial is added to a rural area such as Neenach.

3. Light Pollution. The Western end of the Antelope Valley is one of the few places in Los Angeles County where stars are still visible. We need plans to preserve this.

4. Dust. The few solar facilities in the area have dramatically increased the amount of dust and spores in the air.

5. Wildlife/Open Space. Again, what are your plans to address this? L.A.'s wildlands are rapidly diminishing. Ninety-nine percent of California's native grasslands are already gone forever, paved over by similar sprawl development. The Centennial project site contains the last, largest and best native grassland and wildflower fields left in California. Rare wildlife such as California condors, bald eagles, kit foxes and pronghorn also will be harmed if Centennial is built.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, urban, affordable housing. Centennial is a poster child of 20th-century sprawl development that exacerbates threats to our population through increasing greenhouse gas production and climate change, air pollution and a deteriorating quality of life.

Instead of allowing isolated sprawl development on irreplaceable grasslands in an area at extremely high risk for fires and earthquakes, L.A. should focus on creating safe housing and economic opportunities in or near existing cities.

Please say no to Centennial: It's the wrong vision for L.A.

Sincerely,
Martha Lindsey
Lancaster, CA 93536
martilindsey@hotmail.com

ADD-G.30-1

Response to Comment Letter ADD-G.30
Martha Lindsey
June 5, 2018

Response to Comment ADD-G.30-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: avcprvc@everyactioncustom.com
To: Jodie Sackett
Subject: Centennial is the Right Vision for North Los Angeles County
Date: Tuesday, June 05, 2018 12:34:23 PM

Dear Jodie Sackett,

If you're committed to a sustainable future for North Los Angeles County, then you need to say YES to Centennial.

The Centennial project site all on Private Property and as such the owners should be allowed to Develop their land for the good of the citizens of California. Wildlife such as California condors, bald eagles, kit foxes and pronghorn will not be harmed if Centennial is built as they have the natural and un-disturbed habitat of the remaining mountain land of the Tejon Ranch.

It's your job to project the future of our communities see that affordable housing is available in the North Los Angeles County, not submit to self serving special interest groups whose only goal is to stop progress and kill California's growing economy.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, Suburb and Rural, affordable housing. Centennial is a poster child of 21st-century Planned Community Development that will deliver to our population affordable housing and new and improved schools and local shopping facilities and improve the quality of life quality of life.

ADD-G.31-1

Los Angeles County should not be dictating to private land owners and developers of private lands within the county and should not be subscribing to the precepts of Agenda 21 and the Wildlands Project.

Instead of isolating citizens of free will to the hazards, crime, and disease of urban sprawl, allow the development of the Centennial Project to proceeded on the already approved parcels of land in the North West part of Los Angeles County. Los Angeles should focus on improving safe housing and economic opportunities in our inner city and urban areas rather than stopping the progress of the Centennial Project for Free Thinking American and California Citizens..

Please say YES to Centennial: It's the Right Vision for sustainable development in Los Angeles County.

Sincerely,
John Martin
Lancaster, CA 93536
avcprvc@amlands.org

Response to Comment Letter ADD-G.31
John Martin
June 5, 2018

Response to Comment ADD-G.31-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: burenjargal anir
To: Jodie Sackett
Subject: Stop Centennial
Date: Tuesday, June 05, 2018 1:54:07 PM

Dear James Sackett,

I am a resident of Virginia, and I came across the disturbing news regarding a development at Tejon Ranch. As an advocate of the environment and nature, I strongly encourage you to re-think and protect Southern California's precious lands and its wildlife safety.
Please hear our words and protect our mother nature.

ADD-G.32-1

Sincerely,

Anir Burenjargal

Response to Comment Letter ADD-G.32
Anir Burenjargal
June 5, 2018

Response to Comment ADD-G.32-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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Jodie Sackett

From: Ksenya Gurshtein <ksenya@gmail.com>
Sent: Tuesday, June 05, 2018 2:58 PM
To: Jodie Sackett
Subject: Concern about the Centennial Specific Plan

Dear Ms. Sackett,
I am an LA (city and county) resident and voter, and I'm writing to you to express my concern about the Centennial Specific Plan for development ahead of a vote on it tomorrow. I am keenly aware of the housing shortage in Southern California, and I think that environmental concerns should be balanced with the need for affordable housing, but based on information I've been able to find on the Centennial Specific Plan, I do NOT think that such developments are the answer. Rather than encouraging housing density and connectedness through public transit, this development will take important wildlife habitat and turn it into more sprawl, traffic, and ergo pollution. As I said, I support development as a need, but urge the planning commission to reject this particular development because of the environmental degradation it would bring, the pressure it would put on existing infrastructure, and the wrong message it would send about the future of California's development.
Sincerely,
Ksenya Gurshtein

ADD-G.33-1

--
Ksenya Gurshtein

"Art is what makes life more interesting than art."
--- Robert Filliou

"What is true for writing and for a love relationship is true also for life. The game is worthwhile insofar as we don't know what will be the end."
--- Michel Foucault

Response to Comment Letter ADD-G.33
Ksenya Gurshtein
June 5, 2018

Response to Comment ADD-G.33-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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Jodie Sackett

From: Carolyn Longstreth <cklongstreth@gmail.com>
Sent: Wednesday, June 06, 2018 8:39 AM
To: Jodie Sackett
Subject: Opposing Centennial approval

Hello Ms. Sackett:
As a former officer of the statewide California Native Plant Society, I'm writing to urge the Planning Commission to reject the Centennial project.

The Antelope Valley is part of a critical eco region for California's Native flora— indeed, it produces one of the most spectacular wildflower displays in the entire world.

Los Angeles County needs to recognize this and act to prevent its destruction by rejecting this ill-conceived development. The project proponent should be instructed to significantly scale back the plan, protect the listed species, preserve migration corridors and greatly increase the ratio of lands to be set aside as mitigation vs acreage to be developed.

ADD-G.34-1

Such action would be more consistent with principles of sustainable development which must guide our responses to increasing population and climate change.

Thank you for the opportunity to comment.

— Carolyn Longstreth
Inverness CA
--
Carolyn Longstreth
PO Box 657
10 Balmoral Way
Inverness CA 94937
415-669-7514

Response to Comment Letter ADD-G.34
Carolyn Longstreth
June 6, 2018

Response to Comment ADD-G.34-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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Jodie Sackett

From: George A Paulikas <george.a.paulikas@aero.org>
Sent: Wednesday, June 06, 2018 5:40 PM
To: Jodie Sackett
Subject: Centennial Project

Dear Los Angeles County Planning Commission-
Please do not approve the Centennial Project. Our home in Bear Valley Springs/Tehachapi would border on this project if it is brought to completion We value our quiet rural environment as do the bears, elk, bobcats ,condors and mountain lions who are our neighbors. Our oaks and pines cherish the smog-free environment. Our brilliant starry skies do not need the glow of neon, sodium and mercury lamps.
Enough!

ADD-G.35-1

George and Joan Paulikas
301380 Starland Drive
Tehachapi, 93561 CA

Response to Comment Letter ADD-G.35
George and Joan Paulikas
June 6, 2018

Response to Comment ADD-G.35-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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Jodie Sackett

From: Steven Jones
Sent: Thursday, June 07, 2018 4:38 PM
To: Jodie Sackett
Subject: Fwd: Centennial Development

Sent from my iPhone

Begin forwarded message:

From: DRP LDCC <zoningldcc@planning.lacounty.gov>
Date: June 7, 2018 at 12:32:39 PDT
To: Steven Jones <sdjones@planning.lacounty.gov>
Cc: Rosie Ruiz <rruiz@planning.lacounty.gov>
Subject: FW: Centennial Development

-----Original Message-----
From: David Shluker <davidshluker@yahoo.com>
Sent: Thursday, June 7, 2018 12:31 PM
To: DRP LDCC <zoningldcc@planning.lacounty.gov>
Subject: Centennial Development

I am very strongly opposed to the Centennial Development. It is a 12,000 acre community that would include 20,000 homes. The project will ruin the habitats of protected species and contribute to urban sprawl that increases the region's car dependence, worsening air quality and generating more green house gases. The area is home to many endangered species including the California condor, San Joaquin kit fox and bald eagle. 99% of California native grasslands are already gone forever, you must not allow this project to be built and destroy what little remains.

ADD-G.36-1

Sent from my iPhone

Response to Comment Letter ADD-G.36
David Shluker
June 7, 2018

Response to Comment ADD-G.36-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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Jodie Sackett

From: Jack T. <jacktca@gmail.com>
Sent: Friday, June 08, 2018 1:42 AM
To: jholt@signalscv.com; Jodie Sackett
Subject: what the Tejon Centennial plan is missing

risk

Tejon is under no pressure to build

First off, TRC (tejon stock symbol) is a tax shelter. It enables the top 1% club members to avoid short term capital gains tax if they made a bundle on risky investments on the stock market and want to get out and invest in more stable real estate. If they cash out and buy real estate they get hit with a big tax. If they buy TRC stock and wait around for a while before cashing out they avoid the tax.

Secondly, TRC is not a regular guy off the street who is forced to pay property tax for better or for worse. A regular guy buys a lot today. If the market goes south he still has to pay property taxes. If he fails to pay he loses his land. That's the risk. TRC has no such risk. TRC pays property tax on cow dung pastures. This is a gift from Los Angeles county to the 1% club investors in New York. They now de-facto own 20,000 building lots and continue to pay property tax as if it were farm land. They do not have to pay premium property tax until the market is fantastic and they find a buyer for their land. That's what's missing from the Centennial plan. There is no risk on the part of TRC. The bottom line is that if TRC paid property taxes on 20,000 house building lots they would be out of business with the first payment to LA County.

Thirdly, if one looks at the market cap (how much a company is worth if someone were to buy all the stock today) it is directly related to the value of lots in Grapevine, TMV, and Centennial as if they were building lots. So in effect what is happening is that the investors in New York all the positive benefits of owning California real estate without the negative benefit of risk involved with holding onto lots during the ups and downs of the market.

My question to you as a reporter is how does a company get away with such a sweet deal? I have sent comment after comment in to regional planning that complain about the lack of pressure on Tejon to build. They are ignored.

Here is what I would love to see. A few examples of middle class investors who lost their land or were forced to sell in the local vicinity because they could not afford the property tax on their building lots in bad years like 2008-2011. Then I would like to see a comparison of how much property tax Tejon pays for cow dung pastures to how much property tax they would be paying for building lots.

ADD-G.37-1

Response to Comment Letter ADD-G.37
Jack T.
June 8, 2018

Response to Comment ADD-G.37-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: staceyflowerdew@everyactioncustom.com
To: Jodie Sackett
Subject: Centennial is the Wrong Vision for Los Angeles
Date: Monday, June 04, 2018 2:27:06 PM

Dear Jodie Sackett,

The grasslands, oak woodlands, wildflowers, and animals of Tejon Ranch belongs to all Californians. This is the last place on earth many of these species will ever be able to flourish. It would be a travesty to plant an entire city, and all the infrastructure needed for it, in the middle of one of the last vestiges of natural California that still exists.

The answer to L.A.'s congestion and traffic is not more sprawl. Building a city that decimates this Californian jewel only adds to the problems you are trying to alleviate while removing permanently a landscape and system of habitats that can never be replicated.

L.A. County has other choices than to build a city 45 miles away from L.A. Don't do it here. It is a bad plan, through and through.

ADD-G.38-1

Sincerely,
Stacey Flowerdew
Sacramento, CA 95818
staceyflowerdew@gmail.com

Response to Comment Letter ADD-G.38
Stacey Flowerdew
June 4, 2018

Response to Comment ADD-G.38-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: m.rhyne@everyactioncustom.com
To: Jodie Sackett
Subject: Centennial is the Wrong Vision for a treasured open space in LA County
Date: Monday, June 04, 2018 4:15:17 PM

Dear Jodie Sackett,

This development is proposed for an area of the last remaining expansive native grasslands in Southern California. So important is the habitat, that it is the home of the only park set aside to protect the state flower, the California Poppy. The Antelope Valley California Poppy Reserve is perilously close to this proposed mega development. The proposed development would destroy remaining native grasslands in the West Antelope Valley that are known for springtime displays of native wildflowers. This decrease in adjacent habitat would have unknown but potentially devastating negative effects on the world famous Poppy Reserve.

The area would also destroy habitat in a Globally Important Bird Area as designated by the Audubon Society. It currently provides habitat for endangered wildlife including Swainson's hawks, tricolored blackbirds, desert kitfox and more. It would destroy remaining biological connectivity for the Angeles Forest and coastal ranges to the Tehachapi and Sierra Nevada mountains.

The community formed as a result of Centennial would be another area where families are stressed by long commutes and suffer from inadequate infrastructure and support from social services.

Centennial is wrong for birds, wrong for wildflowers and wrong for families

ADD-G.39-1

Sincerely,
Margaret Rhyne
Palmdale, CA 93551
m.rhyne@verizon.net

Response to Comment Letter ADD-G.39
Margaret Rhyne
June 4, 2018

Response to Comment ADD-G.39-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Antelope Valley California Poppy Reserve is located approximately 22 miles southeast of the Project site. The Project site and the Poppy Reserve are separated by the towns of Neenach, Three Points, and Fairmont. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: anotherjessica@everyactioncustom.com
To: Jodie Sackett
Subject: Centennial is the Wrong Vision for Los Angeles
Date: Monday, June 04, 2018 10:34:10 PM

Dear Jodie Sackett,

U are incredibly dumb if u think paving over tejon ranch is even remotely acceptable. NO ONE WANTS THIS. Its bad on every front. Do u not care about nature at all? Do you not care that there are almost no untouched wildnerness left in california. Do u like being in your car all damnnn day. (Mispelled on purpose to avoid rejection)

ADD-G.40-1

Sincerely,
jessica t
Vacaville, CA 95688
anotherjessica@outlook.com

Response to Comment Letter ADD-G.40
Jessica T
June 4, 2018

Response to Comment ADD-G.40-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: gtn5586@everyactioncustom.com
To: Jodie Sackett
Subject: Centennial is the Wrong Vision for Los Angeles
Date: Tuesday, June 05, 2018 4:17:41 PM

Dear Jodie Sackett,

Please preserve that which is irreplaceable. It took Nature millions of years to produce the wildness threatened with this development. Endure. Let your decision allow the natural world to endure. Be remembered for what you protected, not what you destroyed. Thank you for your time and consideration.

ADD-G.41-1

Sincerely,
George Nanoski
Long Beach, CA 90804
gtn5586@lausd.net

Response to Comment Letter ADD-G.41
George Nanoski
June 5, 2018

Response to Comment ADD-G.41-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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From: 3pointsliebremountain@everyactioncustom.com
To: Jodie Sackett
Subject: Centennial is the Wrong Vision for Los Angeles
Date: Tuesday, June 05, 2018 4:47:33 PM

Dear Jodie Sackett,

Centennial should not be approved. This project, taking years to "build out," will require its residents to make long commutes. Eventually, building large industrial spaces will attract commuters from other areas of the Antelope Valley, Castaic, Bakersfield, Rosamond, Mojave, Santa Clarita, Frazier Mountain Communities, and Lancaster/ Palmdale. "Smart Growth" should not attract large volumes of commuter car travel, contributing unhealthy increases in air pollution for Antelope Valley. Combined with the proposed NW Hwy 138 Truck Route, and High Desert Corridor inland Truck Port contributing to increases in fine particulates in our air, including spores of the fungus causing Valley Fever in fugitive dust, we have components of a perfect storm related to public health from polluted air.

The project's Economic Opportunity Areas are exempt from other policies restricting density that protect other County residents from "Special Hazards," like flood, high fire hazard areas, earthquakes; and also exempt them from protecting riparian areas, groundwater recharge basins, significant ridgelines,
Hillside Management Areas, and the project can increase densities in the EOAs in the future.

Such development within and adjacent to sensitive habitats with such high biological value is unwise and does not protect these resources from the devastating effects of this massive development.

ADD-G.42-1

Sincerely,
Susan Zahnter
Lake Hughes, CA 93532
3pointsliebremountain@gmail.com

Response to Comment Letter ADD-G.42
Susan Zahnter
June 5, 2018

Response to Comment ADD-G.42-1:

Thank you for your comment and for your participation in this public process. The Commenter's statement of opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise specific concerns regarding the adequacy of the EIR and therefore no further response is required.

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3.2 RESPONSES TO PUBLIC TESTIMONY GIVEN AT JUNE 6, 2018 REGIONAL PLANNING COMMISSION HEARING

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Kathleen Trinity			
RPC-1	Introduction	Good morning, Chairman Louie and Board. I'm Kathleen Trinity from Acton, California, and I oppose the development.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
RPC-2	Biology	The proposed site for the Centennial development is the convergence of five ecological reg- -- regions. It is an extraordinary treasure, pristine in many parts. Most importantly, it nourishes and protects innumerable species of plants and animals, vast arrays of wildflowers and native grasses, two species of oak, reptiles, amphibians, small and large mammals, some of them rare and endangered or in decline. This is an extraordinary California treasure.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-3	Biology	Opening it up for urban development is a betrayal of vast proportions of the land, our wildlife and our grandchildren. The construction of 23,000 units, including ancillary buildings, concrete foundations, paved roads, traffic, will decimate or push out most of the native habitat and wildlife in the immediate area.	The Commenter's opposition to the Project is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This testimony does not specifically address the adequacy of the EIR, and no further response is required. The EIR thoroughly and appropriately analyzes Project impacts with regard to biological resources (see Draft EIR, Section 5.7) and traffic (see Draft EIR, Section 5.10) consistent with CEQA requirements, and mitigates impacts to the greatest extent feasible.
RPC-4	Biology	Beyond the immediate area it will discourage, degrade and limit wildlife linkages, preventing genetic diversity, especially for large animals.	The EIR appropriately analyzes potential impacts to habitat connectivity and wildlife movement, and the Project design and mitigation would ensure less than significant impacts. In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains was considered in detail (Draft EIR, pages 5.7-50 to -64, -164 to -170). The thorough assessment concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions (*Id.,* page 5.7-166). The wildlife movement impact analysis beginning on page Draft

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			EIR page 5.7-164 does conclude that development of the Project site will result in some losses of areas that may be used for foraging and/or breeding for species; pathways to or from foraging or breeding grounds on the Project site, such as along ridge-lines or canyon bottoms, may become "dead ends" to through dispersal. However, these losses are not expected to significantly impact wildlife movement, and sufficient habitat connectivity would be retained in the region for these species, especially given the substantial amount of similar terrain in the northwestern Antelope Valley area. Further, two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement and the TUMSHCP, although not providing mitigation for Centennial, would act in concert with the Centennial mitigation preserves to help sustain the functionality of the regional landscape linkage for future wildlife populations. Multi-generational gene flow (a series of connected wildlife movement events over time, allowing for genes to pass within and between populations) among wildlife populations in the region is expected to be sustained in the open spaces on and off the site that will remain following Project implementation. These open spaces provide sufficient habitat connectivity to allow for such gene flow. Implementation of MM 7-14, which designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) where the current intersection with National Cement Plant Road exists, will also allow for local wildlife movement to pass through the Project area down to SEA 17. The direct impacts of Project development on wildlife movement, therefore, are considered less than significant after mitigation for local wildlife movement impacts. Nonetheless, the Draft EIR (page 7-17) discloses that the Project when combined with other projects in the region would result in a cumulatively significant impact on wildlife movement. Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP) including with regard to open space designations, SEA protection, and preservation of habitat linkages. For further discussion of wildlife movement and habitat connectivity, please see Final EIR, responses to Comments B.2-3, B.4-34 to B.4-37, B.4-56, B.4-57, B.4-75, F.3-23 to F.3-25, F.3A-32 to F.3A-34, F.5-2, F.7-22, F.8-109, F.8-110, and F.8-165 through F.8-169.

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RPC-5	Biology	The DEIR admits that urban development discourages native species in and around its footprint and will attract non-native urban adapted species like Norway rats and Argentine ants. The thousands of humans and domesticated pets will introduce noise, trash, pollutants and pathogens.	While the Draft EIR does acknowledge that urban development such as the Project tends to attract wildlife that is better adapted to urban settings, it does not conclude that Norway rats are invasive. See Draft EIR, Section 5.7, Biological Resources, page 5.7-168. With regard to non-native species, as noted by the Commenter, development of the Project would cause impacts to native species, and the Project has the potential to attract non-native species including Argentine ants. However, with MMs 7-16 through 7-18, impacts would be reduced to less than significant. (*Ibid.*) The EIR thoroughly and appropriate analyzes all potential impacts to biological resources associated with urban development. See Draft EIR, Section 5.7, Biological Resources. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-6	Biology	The DEIR mitigation measures of environmental education by pamphlet and signage are totally inadequate. The fact is that once you have invaded these wildlands, no so-called mitigation will lessen its impact in any significant way.	The Commenter's opinion with regard to the adequacy of the mitigation is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The County disagrees with the Commenter's assertion, and notes that the EIR and Mitigation Monitoring and Reporting Program propose a comprehensive suite of mitigation measures to reduce impacts on biological resources, and education is merely a component of such measures.
RPC-7	Biology	The brief mention of medium and large mammals, such as badgers, prong-horned antelope, black bears, mountain lions, mule deer and gray foxes is grossly inadequate and vague in the discussion of these animals and their needs.	The EIR appropriately addresses potential impacts to all special status species or if Project impacts would reduce regional populations to below self-sustaining levels. Mammals mentioned by the Commenter do not qualify in either regard. In addition, the primary areas of regional movement are identified in the EIR, consistent with independent studies, as occurring outside the Project site. Wildlife movement impacts have been reduced to less than significant with the incorporation of mitigation measures. Regional movement for these species is not expected to be significantly impacted. With regard to human intervention with large mammals including bear and mountain lions, the Final EIR updated MM 7-17 to require educational materials be distributed that address these large native mammals, indicating they could prey on pets, indicating that no action shall be taken against such native animals, and indicating that pets must be leashed while using designated trail system and/or in any areas within or adjacent to open space, to reduce interaction. Control of stray and feral cats and dogs will be conducted in open space areas on an as-needed basis. See Appendix 2.0-C.Rev to the Final EIR, page C-81. For further discussion regarding these mammals, please see Draft EIR, Section 5.7, Biological Resources, pages 5.7-50 to -54, -63 to -65, -161, -166, and Final EIR, responses to Comments B.4-53 and F.5-8.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-8	Miscellaneous	It does not take sufficient account of factors such as fire hazard, expansion of Highway 138, increasing traffic and loss of habitat, nor climate change's full impact.	The Commenter's opinion with regard to the adequacy of EIR analysis is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration. However, the County disagrees, noting that the EIR thoroughly and appropriately analyzes fire hazard (see Draft EIR Section 5.3), traffic-related impacts including with regard to SR-138 (see Draft EIR Section 5.10), loss of habitat (see Draft EIR Section 5.7), and climate change (see Draft EIR Section 5.21, consistent with CEQA requirements). This general testimony does not provide specific criticism of EIR analysis, and no further response is required.
RPC-9	Climate Change	Joseph Stewart of the University of San- -- UC Santa Cruz states "Climate is changing faster than species can adapt."	The Commenter appears to be quoting from an article by Kate Stone called Climate Change Threatens California Pikas, posted online for GotScience Magazine on February 4, 2015. Stone quotes Joseph Stewart saying: "The problem is that the climate is changing faster than species can adapt or disperse to new sites." See https://www.gotscience.org/2015/02/climate-change-threatens-california-pikas/. The County notes that climate change is a global phenomenon and an existing condition affecting the environment, including wildlife species. The Project EIR thoroughly analyzes potential Project-related climate change impacts, and appropriately concludes that despite the incorporation of all feasible mitigation, impacts would remain significant and unavoidable. See Draft EIR, Section 5.21, Climate Change; Final EIR, responses to Comments F.3A-71, F.8-79 to F.8-97, F.8-204, and F.8-235. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-10	Conclusion	When you consider your vote, please put yourself in the shoes of your grandchildren. Will they remember that you let this treasure be devastated, that we abandoned and betrayed this precious place for profit or tax base, or will they remember that it was saved and protected for them and their grandchildren? This is not the place for a new city. Thank you very much.	The Commenter's opposition to the Project and its location is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the County disagrees with the Commenter's characterization of the Project, noting that the Project was sited and designed to promote regional “smart growth” planning principles established by the Southern California Association of Governments’ (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County’s Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. For a more detailed discussion, please see Final EIR, response to Comment F.8-20.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Margaret Ryan			
RPC-11	Introduction	I'm Margaret Ryan, a retired teacher and resident of the Antelope Valley for more than four decades.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-12	Biology	This development is proposed for an area of the last remaining expansive native grasslands in Southern California. Implementation would destroy these remaining large expanses known for springtime displays of native wildflowers.	The Commenter's assertion that all grassland will have been lost if the Project is approved is incorrect. Draft EIR Section 5.7, Biological Resources, discloses the Project's potential impact to grasslands and determines that direct and indirect impacts would be mitigated to a less than significant level, but cumulative impacts to native grasslands would be a cumulative significant impact. (Draft EIR, pages 5.7-158, -162.) Project implementation would include mitigation at a ratio of at least 2:1 for grasslands, resulting in improved functions and values of grasslands on the Project site, in addition to preservation in perpetuity within the Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Intensive, multi-year grassland studies have revealed that grasslands of equal or greater value occur in vast quantities in the Mitigation Preserve. Please see Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 for further discussion of grasslands.
RPC-13	Biology	So important is the surrounding area that it is home of the only park set aside to protect the state flower. The Antelope Valley California Poppy Reserve is perilously close to this proposed mega development. During the 2017 poppy season, from March through mid May, more than 150,000 visited Poppy Reserve. The park was swamped, proving that its 1,800 acres are not adequate for the many people passionate about viewing native wildflowers. Mitigation for Centennial must provide provisions to expand the poppy reserve to increase easy access for the public who want to hike and picnic in a public park devoted to protecting wildflowers. The poppy reserve is already being impacted on its eastern borders by industrial solar development.	The Antelope Valley California Poppy Reserve is located approximately 22 miles southeast of the Project site. The Project site and the Poppy Reserve are separated by the towns of Neenach and Fairmont. Therefore, the Project is not anticipated to have a significant impact on the preserve, and, therefore, there is no mitigation required to address the preserve.

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		Development of Centennial will cause the same kind of stresses on the west.	
RPC-14	Biology	Centennial would destroy habitat in the Antelope Valley globally important bird area.	The Commenter's opinion has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. With regard to Project impacts on important habitat for migratory and nesting birds, features which attract such birds have been avoided by the Project and/or are being preserved. This includes Quail Lake, which is entirely avoided by and protected by Project mitigation measures, and features such as grass, scrub, and woodlands, which are retained in large quantities in the Mitigation Preserve and for which the Project identifies further mitigation measures to reduce impacts to the greatest extent feasible. Therefore, there would be no notable interruption in use of the Project site and surrounding areas such as Quail Lake by migratory and special status birds.
RPC-15	Biology	It currently provides habitat for endangered wildlife, including Swainson's hawk, tricolor blackbirds, desert kit fox and more.	With regard to Swainson's hawk, the EIR notes that potentially suitable foraging and nesting habitat for these species occurs on the site and is expected to occur for foraging but not for nesting. (Draft EIR, page 5.7-116.) Project-related impacts to this species would be less than significant with no mitigation; nonetheless, MM 7-2 would further ensure avoidance of impacts. (*Id.,* page 5.7-149.) The Project site provides suitable foraging and small amounts of suitable nesting habitat for tricolored blackbird, and there are nesting colonies on the Project site. (*Id.,* pages 5.7-113, -114.) To avoid all direct impacts and minimize indirect impacts to the nesting colonies on the Project site, MM 7-7 is included. With regard to kit fox, this species in not present on the Project site and the EIR therefore appropriately concludes that the Project site would have no impact on this species. See Draft EIR, Section 5.7, Biological Resources, for further information.
RPC-16	Biology	It would destroy not only habitat for native wildlife, but also the remaining connectivity from the Angeles Forest coastal ranges to the Tehachapi Mountains and the Sierra Nevada.	With regard to habitat connectivity and wildlife movement, please see Response to Testimony RPC-4. With regard to habitat loss, the EIR conclusion that habitat loss is not an adverse impact on wildlife resources at a project or cumulative level is consistent with the independent judgment of the scientists and representatives of the six leading environmental groups that signed the Tejon Ranch Land Use and Conservation Plan, as described in Final EIR, response to Comment F.3-12. The AVAP concentrates development within designated EOAs (including the West EOA location of the Project site), which the AVAP EIR concludes is environmentally superior to the development pattern allowed under the former Town & Country Area Plan in relation to multiple environmental resource considerations, including reduced impacts to biological resources. For further discussion regarding

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			habitat loss, please see Draft EIR, Section 5.7, Biological Resources, pages 5.7-145 to -153, and Section 7.0, Cumulative Impacts, page 7-6; Final EIR, responses to Comments F.8-107 and F.8-108.
RPC-17	Affordable Housing	The community formed as a result of Centennial would be another area where families are stressed by long commutes and suffer from inadequate infrastructure and thinly-spread support for social services. If it was easy to place affordable housing adjacent to guaranteed employment centers, that would have already happened in the Santa Clarita and Antelope Valleys, and it most certainly has not.	The Commenter's opinion has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. However, the County disagrees, and notes that the Project is designed to create a complete and balanced community, with appropriate infrastructure and services to be provided, and a mix of housing types affordable at different price points. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-18	Conclusion	Centennial -- Centennial is wrong for wildlife, wrong for wildflowers and certainly wrong for families. Thank you.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
Johnny Zamorza			
RPC-19	Support	Good morning, Commissioners, staff. Yes. My name is Johnny Zamorza. I've lived in the valley, Antelope Valley, since October of 1970. Prior to that, I raised livestock and alfalfa, loved it here, so I moved here to raise my family and have been here ever since. I still have a lot of family, including grandkids, that love the area as well. I own and operate a roofing and sheet metal business. We have five locations, and our headquarters are here in the Antelope Valley, so we've made a commitment to be a part of the community and the valley. I'd like to say I was lucky enough to be a member of the blue ribbon committee that was designated by Supervisor Mike Antonovich, but "lucky" is	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		probably not the right terminology, it was a long-term affair, but what I did learn working with the Department of Regional Planning and the development discussions of the old Town & Country Plan, now called the "Antelope Valley Area Plan," I learned a lot about Centennial and Tejon Ranch that I didn't know before. So as I said, I'm here to be -- to speak in favor of the Centennial project, no questions about it. Centennial's approval is important to the Antelope Valley and to the north area of L.A. County. As Los Angeles County continues to grow, we need to be good stewards of preserving the land and promoting growth in the right locations. Tejon, over the years, has been a great steward of the land, and I know that with the Centennial project, they would continue to be good stewards. This is what Centennial and Tejon Ranch has done. The land set aside as open space, you heard Greg Medeiros say 240,000 acres, that's a lot of land for a company to set aside for open space, but the part I want to refer to is the part that's with Centennial. That's 14,000 acres plus that goes with the Centennial project in L.A. County, so there's lots of room for habitat of all types, be it growing or living. The development is clustered within villages and town centers, and it's adjacent, as we know, to Interstate 5 and also 138. The spec- -- specific plan is the right kind of new development, and it's consistent with the goals and planning of L.A. County and the Antelope Valley Area Plan. If you look at the approved Antelope Valley Ar- -- Area Plan, there was balance between conservation	

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		of our natural open space and the Antelope Valley economic growth. We need both. L.A. County Planning saw this importance, the blue ribbon committee saw it, and it's important that the board of supervisors see it as well. Thank you very kindly.	
Susan Zahnter			
RPC-20	Introduction	My name is Susan Zahnter. I am the director of the Association of Rural Town Councils and also the vice president of Three Points-Liebre Mountain Town Council. And I have a request at this time for an extra minute or two since I'm representing both entities. They may or may not completely agree, but I'd like to be able to say something on behalf of our town council as well. So that's my request, and I hope you can consider that for me.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-21	Introduction	Thank you so much. First of all, thank you for the venue here in Lancaster. Our -- the ARTC requested the venue, and we appreciate your consideration in providing it. The association recently voted to provide comments on the project and its final environmental impact review. At this point in time, we're inclined -- inclined to oppose the project based on several factors.	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-22	Miscellaneous	There are numerous unavoidable signif- -- significant impacts with regard to air quality, traffic, biological resources, special hazards, water quality, emergency services, public health and further impacts to several town council communities facing direct and indirect impacts resulting from the project as well as cumulative impacts from proposed major infrastructure projects.	The Commenter's testimony has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. The EIR thoroughly analyzes the Project's potential direct, indirect and cumulative impacts on the environment, identifies fully enforceable mitigation measures that reduce impacts to the greatest extent feasible, and identifies impacts for which despite the identification of all feasible mitigation, impacts would be significant and unavoidable. Per CEQA, the Board of Supervisors may determine that the Final EIR has considered the identified means of lessening or avoiding the Project's significant effects and that to the extent any significant direct or indirect environmental effects, including cumulative project impacts, remain unavoidable, such impacts are acceptable in light of the social, legal, economic, environmental, technological and other Project benefits, that override them. See Draft CEQA Findings Regarding the Centennial Specific Plan Project and EIR, and Draft Statement of Overriding Considerations, for more details.
RPC-23	Miscellaneous	We have found that 10 days an inadequate amount of time to review the final impact -- final environmental im- -- impact review, evaluate its mitigations and determine their adequacy and form an appropriate response. The ARTC requested additional time on March 25th via written communication. However, no additional time was allotted for review, and we were informed 10 days were allowed by law. If the EIR had been made available on March 21st, we would have had more than 60 days to review it at this point in time, and this -- this hearing, I wouldn't be asking for more time.	The County has complied with CEQA requirements for consideration of the Final EIR. Following testimony at the June 6, 2018 Regional Planning Commission hearing, the Commission continued public hearing to July 11, 2018, and again to August 29, 2018 to allow further time for consideration.
RPC-24	Miscellaneous	On behalf of the Three Points Council, I would like to say we submitted a letter regarding the signage that was posted on the Highway 138 and the difficulties in accessing that sign and the fact that the dates that were visible to the passing public indicated "March 21st."	All required public notices regarding the Project have been provided in accordance with applicable legal requirements. Nevertheless, this comment's concerns regarding signage placed at and near the Project site regarding Project hearing date are noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

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		We visited the site on June 2nd and found the site never updated. So I believe the signage has perhaps misdirected the public's idea of when the public hearing was supposed to take place on March 21st and never adequately updated, so I believe that's another point for extending the review period for people to respond and know that they can attend a public hearing.	
RPC-25	Miscellaneous	For our town council, the Antelope Valley Area Plan identified our community, which is right -- the end of our council boundary is at the edge of Quail Lake, so we face the Centennial project in -- in several areas. The plan describes our community as a very remote environment. The Centennial project is in a similar very remote environment, and we wonder how this project can be considered anything other than specific plan sprawl and sustainable or smart growth.	The Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
RPC-26	Miscellaneous	We are -- we're extremely concerned about all of the -- all of the significant impacts that I spoke of earlier, so in order that we have adequate time to review the mitigations, and that was previously -- previously mentioned by the Commission board member, that we request additional time and hope that we'll be able to get that. Thank you so much.	The County has complied with CEQA requirements for consideration of the Final EIR. Following testimony at the June 6, 2018 Regional Planning Commission hearing, the Commission continued public hearing to July 11, 2018, and again to August 29, 2018 to allow further time for consideration.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Merrylou Nelson			
RPC-27	Introduction	Good morning. My name is Merrylou Nelson, and I am commenting today in opposition of this project. At this point in time, I oppose the project based on several factors.	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
RPC-28	Miscellaneous	There are many unavoidable significant factors with regard to air quality, traffic, biological resources, special hazards, water quality, emergency services, public health and many additional impacts to our community.	The Commenter's testimony has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. The EIR thoroughly analyzes the Project's potential direct, indirect and cumulative impacts on the environment, identifies fully enforceable mitigation measures that reduce impacts to the greatest extent feasible, and identifies impacts for which despite the identification of all feasible mitigation, impacts would be significant and unavoidable. Per CEQA, the Board of Supervisors may determine that the Final EIR has considered the identified means of lessening or avoiding the Project's significant effects and that to the extent any significant direct or indirect environmental effects, including cumulative project impacts, remain unavoidable, such impacts are acceptable in light of the social, legal, economic, environmental, technological and other Project benefits, that override them. See Draft CEQA Findings Regarding the Centennial Specific Plan Project and EIR, and Draft Statement of Overriding Considerations, for more details.
RPC-29	Miscellaneous	Additionally, there are cumulative impacts as yet undefined or not yet adequately reviewed as the final documents have not had a substantial final review given the 10-day comment period.	The Commenter's opinion has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. However, the EIR thoroughly analyzes cumulative impacts. See Draft EIR, Chapter 7.0, Cumulative Impacts. This testimony does not provide specific support for this assertion, and no further response is required. The County has complied with CEQA requirements for consideration of the Final EIR. Following testimony at the June 6, 2018 Regional Planning Commission hearing, the commission continued public hearing to July 11, 2018, and again to August 29, 2018 to allow further time for consideration.
RPC-30	Miscellaneous	I strenuously object to planning allowing only 10 days to review such a far-reaching project given its permanent and inevitable far-reaching effects on surrounding rural communities.	The County has complied with CEQA requirements for consideration of the Final EIR. Following testimony at the June 6, 2018 Regional Planning Commission hearing, the commission continued public hearing to July 11, 2018, and again to August 29, 2018 to allow further time for consideration.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-31	Miscellaneous	Antelope Acres will see unavoidable effects such as permanent traffic, noise, air quality and health impacts due to the project itself. Over time, it will drive projected revisions to Highway 138, which, when implemented, will change the face of my community forever and sacrifice at least 16 properties, which mean the loss of 16 family homes to our community, and that is the current projection, not necessarily the final plan.	The Commenter's opinion has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. The EIR thoroughly analyzes and mitigates potential impacts on surrounding areas to the greatest extent feasible. With regard to the Project's relationship to the Northwest 138 Improvement Project, the Northwest 138 Improvement Project addresses significant existing and reasonably anticipated future needs irrespective of Centennial approval and development. Please see response to Comment ADD-F.10-5 for further discussion[3281].
RPC-32	Miscellaneous	Our community has already been invaded by solar projects, and the entities given the responsibility to protect us have not created a plan to assure that our health and safety are protected. Lancaster City officials and Los Angeles County Regional Planning have allowed all planned solar projects to be completed with no regard to their cumulative effects. There is no oversight to create sane growth in the renewable energy industry.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment about separate solar projects does not address the adequacy of the EIR, and no further response is required.
RPC-33	Miscellaneous	Jurisdictional boundaries are adding to this dilemma, as there are no coordinated efforts between the responsible entities to change those conditions.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-34	Public Health	Emphysema, COPD, asthma and valley fever statistics show a dramatic increase in the Antelope Valley with no change in sight.	The Commenter's testimony is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR thoroughly analyzes potential air quality and related health impacts of the Project and identifies appropriate mitigation to ensure impacts are reduced to a less than significant level to the greatest extent feasible. Specifically, with regard to Valley Fever, the EIR appropriately analyzes and discloses potential Project impacts related to Valley Fever, including with regard to the condition, potential for Valley Fever spores to be found in soils in the Antelope Valley, the effects of contracting Valley Fever, and risks from possible exposure to both construction workers and Project residents. See Draft EIR, Section 5.3, Hazards and Fire Safety, pages 5.3-13 to -14 and -17 to-19, Section 5.11, Air Resources, pages 5.11-28 and -29, and -

[3281] For responses to comments in letters ADD-C.2, ADD-F.8 through ADD-F.14, and ADD-G.49 through ADD-G.58, please see Responses to Additional Correspondence Received Through August 13, 2018.

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			64 through -67; Final EIR, responses to Comment F.3-29 through F.3-32, F.3A-5, F.3A-38 through F.3A-45, F.3A-68, F.3A-69, and G.13-1. Implementation of fugitive dust control measures required by AVAQMD and SCAQMD and MMs 3-2 and 3-3 would mitigate impacts related to Valley Fever to be less than significant. See also see response to Comment ADD-F.13-10, which further revises valley fever mitigation. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-35	Air Quality	The AVAQMD, which is the lead agency, had no comment when the DEIR was released.	The Commenter's concern regarding lack of AVAQMD comments on the Draft EIR is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, AVAQMD does have an important role in the CEQA process for this Project. As described in Draft EIR Section 4.8, Intended Use of the EIR, the County is lead agency for the Project, and AVAQMD is a responsible agency. (Draft EIR, pages 4-102, -110.) Approximately 85 percent of the Project site lies within the Mojave Desert Air Basin, over which AVAQMD has jurisdiction for air quality. Developers and businesses who plan to install equipment with the potential to emit air pollutants, including toxic and hazardous air pollutants, must obtain permits from the applicable Air Quality Management District prior to construction or operation. Examples of businesses and equipment that require permits are gas stations, dry cleaners, emergency generators, boilers for heating and hot water in large buildings, restaurant cooking equipment, and manufacturing facilities. Accordingly, AVAQMD was provided with an opportunity to review the EIR and is expected to use the information in the EIR for consideration of approvals related to and involved in the implementation of the Project. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required.
RPC-36	Air Quality	The South Coast Air Quality Management District's emissions exceeded the air quality impacts would exceed the CEQA and significant threshold for volatile organic compounds PM 2.5 and PM 10.	The air quality analysis in Section 5.11, Air Resources, of the Draft EIR was conducted based on the methods recommended by the SCAQMD for criteria pollutants and TACs, as discussed on pages 5.11-18 through 5.11-22. Project related air pollutant emissions were evaluated both in terms of contributions to regional air quality and localized impacts to uses proximate to the Project site. As this comment correctly notes, the Draft EIR disclosed that there would be significant and unavoidable air quality impacts related to construction emissions in the jurisdiction of the AVAQMD as well as the SCAQMD. Long-term operational emissions were also found to exceed the AVAQMD and SCAQMD thresholds of significance for regional emissions. However, it should be noted that the South Coast Air Quality Management District (SCAQMD) has reviewed the Centennial EIR and determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce

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			emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Final EIR, Comment D.4-2).
Larry Grooms			
RPC-37	Support	Oh, hi. I'm Larry Grooms. I'm a resident of Lancaster, and I'm speaking in support of the Centennial project both for myself as an individual and on behalf of associates in the central valley part of biz-fed. The master-planned Centennial community will be a key asset in the economic, social and environmental future of the entire Antelope Valley region, which includes technology job hubs in both northern Los Angeles and southeastern Kern Counties. Centennial's location puts it within easy reach of growing job markets, 50 miles to Bakersfield, 35 miles to Santa Clarita, 36 miles to Lancaster, 42 to Palmdale, 52 to Mojave Air and Space Port and 57 miles to the main base of Edwards. By virtue of its location alone, the future community of Centennial already has immediate proximity to the Interstate 5 freeway north and south, and State Route 138, already in planning for expansion, will provide a long-needed and economically beneficial east-west connectivity for the entire southern and central California regions. The 19,000-plus homes to be built in Centennial over 20 years or more will assure high quality of life housing remains available and affordable in our area. Centennial is already a carefully crafted component of the Los Angeles County Antelope Valley Area Plan adopted in 2015. That plan provides a balance	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		for economic opportunity and conservation, and it designates Centennial and the westerly economic opportunity area, including its land use for residential, commercial, light industrial development as well as significant conserved open space. That said, Centennial does not exist in a vacuum. It will interact with the entire region and have effects, and most of those, on balance, will be in a very positive manner. In the long term, this sustainable, environmentally friendly and largely self-sufficient community will transform what was once a place considered to be in the middle of nowhere into a crossroads in the middle of everything north, south and east. Thank you.	
Diane Carlton			
RPC-38	Support	Good morning. My name is Diane Carlton, and I am a lifelong resident of the Antelope Valley. I was born here, I have raised my family here, and all of that has been spent in the western portion of the Antelope Valley near where Centennial will be located. I am here to speak in support of the project. I believe it to be an outstanding project based on the fact that I have worked with regional planning for many years on different county ordinances and zoning, particularly in areas that pertain to the Antelope Valley. I am committed to keep doing so to make sure the Antelope Valley continues to reach its potential, its goals of economic growth and affordable housing,	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		which will allow families to continue to live and play in the Antelope Valley. I applaud the Regional Planning Commission for the work that they have done, for the staff who has worked diligently these many years on -- with Centennial in preparing this EIR and the draft before you today. Centennial has done this to make sure that the project is something that everyone in the Antelope Valley can be proud of. I'm very excited for the new services that this project will bring. It will bring new fire stations, sheriff's substation, schools, a library, parks, things that are much needed in the western part of the Antelope Valley and currently are lacking. In fact, some schools have closed, so students are bused long distances. Centennial will also provide jobs for the future. This is something that every area needs, and ours is no exception. When I review the specific plan and see that -- the standards for village centers, open space parks and transportation mixed in with housing and community living and inclusion of the bike paths, I am happy the county has listened to what the residents of the Antelope Valley want, as evidenced in the plan. I hope you will approve the Centennial Specific Plan and take the recommendations of staff to heart and know that this project is what -- something that is truly needed in the Antelope Valley. Thank you.	

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Sarah Tyndall			
RPC-39	Support	Good morning. My name is Sarah Tyndall, and I have been a resident of the Antelope Valley all of my life. I am here speaking on behalf of the Palmdale Chamber of Commerce, and we are here in full support of the Centennial project. As you know, Centennial lies within the west economic opportunity area. In the Antelope Valley Area Plan, an op- -- economic opportunity area is defined as a location that has significant opportunities for growth and economic development. Centennial will take full advantage to ensure the necessary growth and economic development is brought to the area. 19,000 new homes will bring a significant boost to our local economy. 23,000 permanent jobs will be brought to the Antelope Valley, which will contribute $21.5 million in surplus for the County of Los Angeles. Centennial is the growth that our working and middle class families need to be able to own their first home. Centennial is the sustainable community that residents will be able to live and work at. The economic viability of our region depends on smart community planning, and that is exactly what the Centennial project will bring to the Antelope Valley. The Palmdale Chamber requests your approval today. Thank you.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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Richard Skaggs			
RPC-40	Support	Good morning, Commissioners. I'm Richard Skaggs. I represent the Oso Town Council and the Neenach area, and we are adjacent to the project itself, and we're in fully support of the project. Tejon Ranch has been a very good neighbor forever. I've been there since '03, and we enjoy the help they've been giving to the community. The project itself, I'm not going to repeat everyone because I think that Linda said it all, I think the most important thing to our community is the safety. Our Highway 138, we have several people in our community that were killed on this highway, and with the new highway coming in once they start this project, I think it's going to be much better, safer for our community. I think it's a shame when you lose human beings in our community like this. Also, the other thing is the sheriff substation. We've been trying to get a substation in our community for the last 20 years. The sheriff works out of his car. So again, all these things, with outsiders, they don't understand that we're in a community with no services. We have to drive to Lancaster. We have to drive to Palmdale. So with this project, it's going to be a great project for our community of 840 people, and we're the closest to the project, and we've been working very closely with the Centennial -- Centennial people for many years, and we're in fully support. Thank you very much.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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Brett Tremaine			
RPC-41	Support	Yes. Good morning, Mr. Chairman, and members of the Commission. My name is Brett Tremaine. I am partners with Ed Roski with Majestic Realty. And so I appreciate all of you taking the time to hear public comment today. We -- as many of you may know, we authored a letter back in March in -- in support of the project, and we believe in the growth of northern Los Angeles County. I think many of you may know, we've -- we're a long-time, family-owned-and-operated business in Los Angeles County, we've been here since 1948, and we own and operate approximately 80 million square feet of industrial, manufacturing and warehouse space in this community. We -- we believe in Tejon Ranch, and I will share with you that we are investors in that project, we have built a facility up in Tejon Ranch, and we've also purchased an existing asset there, so we're committed. I'm not just here speaking on behalf of Tejon Ranch, but we're actually in that community and -- and are invested in it already. When we go into communities, we look at a lot of different aspects. We look at transportation, we look at labor, and the aspects along that are also housing, and we're very, very confident in that marketplace in Tejon Ranch, we think it's a great growth spot for L.A. County, but we do see a need for affordable housing and housing that will complement the growth of job creation in that area.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		So as we sit here today, we look at the affordable housing aspect as a balance to the community. These are live-work environments. We see it as a place where first-time buyers can come in and that they can actually live in an environment where they work, where they're not sitting an hour and a half on the freeways driving in, but they can be employed in a community and work in a community and shop and have kids in schools and -- and make it a -- kind of a thriving not only a commerce, but a residential place. And so I will tell you that we -- we see it, frankly, as, in effect, the missing link up there to see this residential growth occur and to see the affordable side of that. If you look at the demographics of the people that are within our properties and our tenants, there's a nice balance of entry-level jobs and higher-level executive jobs in -- in multiple disciplines, both technical, and we see more and more high-skilled jobs within these facilities because there's so much technology involved, and we see that a community like this will really support that. So I would -- maybe just in a brief closing comment, we have been involved with the executive team at Tejon Ranch for many, many years now, we're formerly partners with them, and they're good people. They are such that they stand up and do what they say they're going to do, and they're very good stewards of the ranch, and there's been a lot of decisions when we've been involved with them where they've made long-term decisions. And so I think that this is a project that will complement the ranch long term and the growth of L.A. County.	

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		So on behalf of myself and of course Ed Roski and Majestic, we are in favor of the project, and we would ask for your support and your vote. I thank you.	
Justin Rockey			
RPC-42	Support	Thank you. And good morning. My name is Justin Rockey, and I'm the Vice President of Operations for Progression Drywall Corporation, a larger union drywall contractor. We are actually based out of Lancaster. I've been a resident of the Antelope Valley since 1978, two days after my birth date, so I'm nowhere near retirement, but I'm here today to express my positive im- -- impact and flow on this project. I've sat in meetings on this project since the beginning, in 2002 in the Antelope Valley when this first came about, so I'm happy to be here today and support it. One of the things that is crucial, as some people have said in support today, is that this will create local jobs for employees that are spending a tremendous amount of time away from their families. You know, I have 385 employees on payroll this week, and most of them live in Lancaster and spend most of their life on the freeway. Even myself today, I'm upset that I couldn't be on the Skype from Lancaster. I was up at 4:00 in the morning to get down here for a 9:00 o'clock meeting. It's 69 miles from my house to here, and it takes more than two and a half hours to make sure you're on time for something of this importance.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		So along the lines of that, you know, they're talking about creating 25,000-plus construction jobs in this area with this project. I think that it -- it is not -- it is very well thought out. I think that there's obviously much work to be done, you know, there is a cre- -- a huge body of work done, but a huge body of work to do, but their plan will provide an opportunity to boost our local economy and the surrounding business because the expenditures are going to be kept internal and local. I think that we're looking at a possibility of keeping local work force up there off the freeway, which lessens car accidents, gives people time to just be at home and give their kids help with their homework, and I think you'll see divorce rates go down, and I'm speaking -- I'm speaking of this from -- I manage hundreds of people that are -- their lives are very much affected by having to be on the freeway, and if anybody in this room can be familiar with that, they know. Centennial is designated in the west economic opportunity area in L.A. County's Antelope Valley Area Plan, which was approved by the board of supervisors in 2015. It's consistent with the AVAP and intent of the economic opportunity of area, Centennial would accommodate sustainable growth in the Antelope Valley. The fact of the matter is it is a beautiful place. I happen to be a resident of the Antelope Acres in Lancaster with a full operating horse ranch with cattle and horses and dogs that bark and all of that, so I see that side of things, but I also see the side of things of the people, and I think that this is a huge opportunity to take care of many, many people. I do believe that the senior housing thing was a very good point brought up. My drywall company, we do a tremendous amount of affordable housing, low income, veterans, senior, that's kind of the	

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		nature of my business, very much prevailing wage, so I do see that side of things. But all in all, I think that this will connect the Antelope Valley to the Central Valley and create huge, huge economy in that area and huge growth, and -- and I think all in all, it will help the human kind in that area as well. So thanks for having me, and please consider it.	
RPC-43	Miscellaneous	COMMISSIONER MODUGNO: And -- and I appreciate the fact in terms of since I live along the I-5 corridor, in fact a mile away from it and have to get -- fight with the traffic with the trucks, appreciate that the labor, if you were successful in winning the job of doing some of the work on this project, will be coming from -- mostly from Lancaster across the 138 in, where would materials come from? Where do you bring your drywall in from? Would it be coming from Los Angeles north or be coming south, or would it be coming east, sort of east? JUSTIN ROCKEY: The -- the major- -- the majority of our drywall materials come from Las Vegas, so you're talking about coming right through that freeway right there. COMMISSIONER MODUGNO: So potentially across the 15 and then up through 138, 14 across – JUSTIN ROCKEY: Right down the 14, get off on Avenue D, the 138 out there. And the one gentleman that spoke from Lancaster talking about the 138 freeway, anybody that's driven it knows it needs work. It has -- there has been numerous people killed on that corridor. It is -	The Commenter is thanked for their participation in this public process, and their response to Commissioner Modugno's question. The County notes that the Commenter has not been selected as a provider for Project construction materials. Further, MM 21-21 requires contractors to use locally available and recycled building materials, provided such materials meet all applicable Building Code and other requirements, and are readily available and comparably priced to assure such materials do not increase the cost and decrease the affordability of housing or community infrastructure. See Final EIR, Appendix 2.0-C.Rev, page C-164.

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		- I live on Avenue I, and that's Avenue D, so if anybody checks the map, not very far at all. And I -- I'm telling you there is very, very much need for this work. It's going to create a tremendous amount of infrastructure. It's going to create a tremendous amount of work in the area. I -- I enjoy the Tejon Ranch. I actually have a horse that -- te- -- Tejon is in the horse's name. It came from that ranch. We go there. We ride horses there. This side of the project is not even really going to be affecting the ranch side of the project, I mean -- okay. COMMISSIONER MODUGNO: I -- I didn't want to get – JUSTIN ROCKEY: Yeah. Don't get me wrong. I – COMMISSIONER MODUGNO: We have a lot of people here. I just want to get answers to – JUSTIN ROCKEY: But -- there's a lot of people to speak, but anyways – COMMISSIONER MODUGNO: Okay. JUSTIN ROCKEY: -- the materials will be -- most of my materials will be coming from Vegas, and a lot of materials do come through the Vegas route that way.	

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Melissa Lippencott			
RPC-44	Introduction	My name is Melissa Lippencott. And I oppose the Centennial specific plan.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
RPC-45	Biology	Creation of a new city in a currently undeveloped remote portion of northwest L.A. County far from jobs and situated in a unique ecological area with remarkable wildlife habitat and plant diversity will have severe environmental impact despite the less than significant environmental impact finding in the south county plan, impacts to sensitive habitat, including vast amounts of native grassland, wildflower fields and their associated pollinators, rare plants, oak woodlands, in addition to mult- -- abundant wildlife in the area. This project would result in loss of wildlife habitat, loss of wildlife corridor -- corridors. It's surrounded by significant ecological areas and -- I get so nervous. It -- it's surrounded by significant ecological areas, and it's in a unique transition zone.	The Commenter's disagreement with EIR impact significance conclusions with regard to biological resource impacts is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the County notes that Section 5.7, Biological Resources, and Section 7.0, Cumulative Impacts, of the Draft EIR thoroughly and appropriately analyzed impacts to biological resources consistent with CEQA requirements, relying on extensive expert study. For further discussion with regard to habitat loss, please see Final EIR, responses to Comments F.8-108 and F.8-109. With regard to grasslands and wildflowers, please see Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131. With regard to rare plants, please see Final EIR, responses to Comments F.8-128 through F.8-131. With regard to oaks and oak woodlands, please see Draft EIR, responses to Comments A.2-7, B.4-50, B.4-41, and F.8-132 through F.8-125. With regard to wildlife movement and connectivity, please see Final EIR responses to Comments B.2-3, B.4-34 to B.4-37, B.4-56, B.4-57, B.4-75, F.3-23 to F.3-25, F.3A-32 to F.3A-34, F.5-2, F.7-22, F.8-109, F.8-110, and F.8-165 through F.8-169.
RPC-46	Traffic Greenhouse Gas	This project and the cumulative impacts of the Grapevine and Tejon Mountain Village Project would result in increased traffic, long commutes to L.A., a freeway already clogged with traffic, increased greenhouse gas emissions and resulting in climate change, air pollution, edge effects. Edge effects.	This testimony was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The EIR thoroughly and appropriately analyzes and discloses potential impacts on surrounding areas consistent with CEQA requirements and identifies all feasible mitigation to reduce such impacts. That includes cumulative impacts, discussion of which can be found in Draft EIR Section 7.0, Cumulative Impacts. This testimony does not address the adequacy of the EIR, and no further response is required. With regard to edge effects, please see Response to Testimony RPC-47.
RPC-47	Biology	So these -- these projects are surrounded by significant ecological areas. You have Angeles National Forest, we have the Los Padres National Forest, we have Tejon Ranch.	This testimony was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The EIR thoroughly and appropriately analyzes and discloses potential edge and/or indirect impacts on surrounding areas consistent with CEQA requirements and identifies all feasible mitigation to reduce such impacts. The Project site's

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		All of these areas are significant because of their wildlife habitat and rare plants and rare and sensitive wildlife species, so the edge effects include things like increased fire intervals, trash, pets, well, just increased human use on these sensitive areas.	development areas and preserved areas have been specifically chosen with the intent to minimize edge effects so that the biological resources within them are not jeopardized by the Project or potential future development in the region. For further discussion of edge effects, please see Draft EIR, Section 5.7, pages 5.7-54, PDF 7-1 at pages 5.7-136 and 5.7-160, This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-48	Hazards Biology	I mean Valencia and Santa Clarita, great examples. Every -- every open space area around those cities has burned in the last five years, and so we have this wildlife habitat surrounding these -- these new developments, and they burn down, and where are the wildlife going?	With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. Specifically, with regard to protection from fire for surrounding open space areas and wildlife residing there, MM 3-9 requires implementation of a Fuel Modification Plan, whose major components will ensure a minimum 20-foot setback from the edge of any structures; an irrigation and transition zone from 20-100 feet away, and native brush thinning zone between 100 and 200 feet away from structures. For further details of fuel modification requirements, please see Draft EIR, Section 5.3, and Final EIR, responses to Comments A.2-6, F.8-63, and F.8-64.

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RPC-49	Biology	We need -- we need a buffer between these residential areas and these wilderness areas, and -- and that -- that isn't included in any -- any of the plan. Despite the fact that they're, you know, protecting these areas, it's still going to be directly impacted by these projects.	The Commenter's requested buffer between development and open space is included in the Project. The Project requires implementation of a Fuel Modification Plan per MM 3-9, whose major components will ensure a minimum 20-foot setback from the edge of any structures; an irrigation and transition zone from 20 to 100 feet away, and native brush thinning zone between 100 and 200 feet away from structures, to reduce fire events and protect open space areas. For further details of fuel modification requirements, please see Draft EIR, Section 5.3, and Final EIR, responses to Comments A.2-6, F.8-63, and F.8-64.
RPC-50	Conclusion	So anyway, by approving the Centennial project, you would increase sprawl, increase traffic, increase fire frequency, increase use of water in an already -- in an area that's already -- has very little water, increase air pollution, increase climate change, destroy beautiful, natural open space and our beautiful state, decrease wilderness, decrease wildflowers, decrease pollinators, decrease wildlife, destroy habitat, remove wildlife corridors, increase roadkill. Oh, I'm finished? Okay. Thir- -- 30 seconds or -- okay. Oh, no. That's it. That's it. I think I've made my point. Thank you.	The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The Commenter's opposition to the Project is noted. The EIR thoroughly analyzes and discloses potential impacts with regard to all topics raised by the Commenter. Further, the County disagrees with the Commenter's characterization of the Project. The Project does not constitute sprawl. Rather, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
Mike McMillen			
RPC-51	Support	Thank you, Mr. Chair, other members of the Planning Commission. Good morning. My name is Mike McMillen. I'm Vice President of the TRI Pointe Group.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		We are a land development and home building company. I am here today to speak in favor of the Centennial project as well as to share some of the economic benefits of the project. As mentioned a couple of times today, we are in the midst of a housing crisis. We're seeing both high demand as well as an imbalance of the housing shortage that's going on today in the market, but more importantly, we're seeing a need for more price-attainable housing to serve the families throughout L.A. County. Both the -- both the working class and middle class families have a desire to get into home ownership, and we believe the cen- -- Centennial project will take a significant step to resolve this issue. In addition, Centennial provides substantial economic benefits. Some of these will include new jobs, income for local community as well as a -- an opportunity for residents and to generate tax revenue for local governments. Interesting to note, a local study was conducted recently by the National Association of Home Builders. They took a look at the one-year impact related to just 100 single-family homes, and the results are pretty astonishing. The results show that the 100 units on an annual basis generate about $30 million in local income as well as almost $4 million in tax revenue, but equally as important will create almost 400 jobs in the local community. If you extrapolate this data to the over 19,000 homes that are projected to be built at the Centennial project, the project itself will generate over $30 million in tax revenue on an annual basis in surplus to the county as well as also generate	

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		over 20,000 permanent jobs on a long-term basis. That's pretty significant. As I sit here today, we all know we have this housing crisis. We must alleviate this. More importantly, we think there's a real opportunity here to provide housing and home ownership to the residents throughout L.A. County. We believe Centennial will accomplish this goal. To conclude, I just want to make note that this project is consistent with the Antelope Valley Area Plan. And so with that said, today I ask for your support and recommend your approval of this project today. Thank you.	
Anne Burnaugh			
RPC-52	Support	Thank you very much. My name's Anne Burnaugh. I've been a resident of the Frazier Park mountain communities for over 30 years, and for the past 20 I've been the director of the Mountain Communities Family Resource Center in Frazier Park, so when I say that I have a sense of the communities that I've lived in and that -- the people I've served, I think I have credit to do that. We are providing services from local resources and from county -- Kern County and Los Angeles resources for our communities. We are enriching our families, enhancing our community and empowering our youth. We are an unincorporated area, and very little planning or vision ever took place for these areas.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		Because of that, and what started out as some hunting cabins, some second homes for families to get out of the city, we now have dirt trails that our fire department can't even get up to to be able to put a fire out on a house. They weren't built for that. There was no vision and no planning. Medical services, there's nothing there 24 hours. There's an ambulance service that will take you off the hill, but that's quite a -- quite a trek. Minimal jobs. Our youth don't really have opportunities. What I've found is when you give people opportunities, they really prosper. Well, our youth don't have opportunities in the areas, so if you want to work at a fast food place, rock on, you got it, plenty of those. But Centennial -- Centennial is a planned, you've heard that many times, we are at the planning department, it's a planned and has vision of what it's going to look like and what it's going to do. For me, I'm very excited for our youth and our young families who want that opportunity to have more jobs and more services medical-wise. So what I say to you: It's going to change lives in our area, and it's going to save lives, not only this generation, but the generations to come. So I love the fact that I live there, I can look up at night, and I can see the stars, and I choose to live there, but there's going to be a time in my life that I'm not going to be able to live there, that I'm going to need a location that's in a city that has the facilities that you and I will all need some day. I hope we all make it that far; right? So thank you very much for your time. I really appreciate it.	

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		I hope I've hit all the points that I want to, and I'm going to let somebody else go next. Thank you.	
Frank Williams			
RPC-53	Support	Well, thank you. And good morning, Chair, and Regional Planning Commission. My name is Frank Williams, and I'm in support to show my support for the Centennial project. I'm a volunteer. I'm glad you brought that up because I'm an advocate of housing and creating wealth through home ownership. And to add Mr. Modugno's credit -- credit, there was a question regarding the seniors, and I just want to let you know that I'm so proud to be a resident of Los Angeles County that we exercise Propositions 60 and 90 that elderly members over 55 can take their property tax base, trended base with them to this new project choo- -- so they choose to move into this project, which is a tremendous asset to a lot of families. And those families that are trying to become home ownership, I'm also proud that you have the unique privilege of changing the path of many generations. By creating wealth through home ownership, you offer -- you offer families the opportunity to provide for other things like education, maybe investing in their own retirement, also maybe investing in a small business. The people that you're helping today are small business owners. They're Angelenos that are looking right now for a house.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		There are hundreds of families right now that have the ability by today's standards, by today's underwriting standards, the most stringent in my career, and I have more than 28 years of experience in finance, and I could tell you they're looking for a home that they can qualify for by today's underwriting standards, and they cannot find it, and we're talking about just regular families that have regular jobs, regular self-employed people that get up every day that are paying more than 50 percent of their gross income to rent, they're paying rent to corporations that are moving into neighborhoods. And I'm proud that the Centennial project has actually reached out to our organization, The 200, which is a statewide advocacy of creating wealth through home ownership on their concerns over making sure that owner-occupied home ownership is a priority for them and at every level. Many times when projects are designed, they look to try to see what the big picture is, and really what it is is I see this project that was really designed with one family at a time, one family at a time that has an opportunity to buy their own home, that a child can go to their own school, that over the course of their generation know one home and have ability for that family to transfer that wealth from one generation to another. And the fact that this project has sustainable housing and other parks, I mean we cannot even build a park in Los Angeles County right now. I'm going to tell you the fact that they're so generous with the amount of open space and concern for bike path, and as a fellow cyclist, I appreciate the paths that they're doing out there because it also adds to our health and the things that I put on there with regards to health and	

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		improving our environment, of course it's less commuting. Again, thank you. And I just leave with this. If not now, when, and if not here, where? Thank you.	
Candace Huskey			
RPC-54	Support	Good morning. My name is Candace Huskey, and I'm a neighbor of Tejon Ranch. I'm also a registered nurse, and I'm president of a non-profit animal shelter called "Shelter on the Hill." Tejon Ranch has been a great neighbor and supporter of our local mountain communities. Ms. Burnaugh outlined for you the difficulties that our mountain communities Frazier Park, Lebec, Gorman and others have -- have had over the years in trying to provide jobs and job opportunities. For 25 years, I've watched Tejon Ranch invest in our local communities to fund local youth programs and to support animal care and adoption. I first learned of the ten -- Centennial project about 15 years ago, and I have been eagerly awaiting the benefits that it is bound to bring to our mountain communities. The job creation, the health care facilities, retail opportunities, housing and other public benefits are very much needed in our area, and Tejon Ranch has a record of doing things the right way. A personal passion of mine is the rescue of lost and abandoned animals from the streets and finding new homes for them.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		Many years, there was no place in our area to house lost and abandoned animals. Tejon Ranch was eager to partner with the community and with us to achieve the goal of rescuing local strays. I'm happy to say that because of many people's efforts, and that certainly includes the ranch, we opened a shelter in 2014, and since then, we've adopted out over 700 dogs and cats into new homes. I know Centennial will be a huge benefit to our community, and it will be done with excellence because excellence is what Tejon Ranch does in all its endeavors. I encourage you to recommend approval for the Centennial project and allow us local residents to experience the benefits of this much needed community. Thank you.	
Troy Hooper			
RPC-55	Support	Good morning. My name is Troy Hooper. As Chairman of the Board of the Santa Clarita Valley Chamber of Commerce, I'm here to speak in favor of the Centennial project. The chamber recognizes the need for responsible growth. Centennial will bring 23,000 permanent jobs to the area and a 21 and a half million dollar surplus to the County of Los Angeles.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		The Los Angeles Economic Development Corporation has studied the Centennial project, and I would like to review a few of the findings. The LAEDC reports that Centennial will generate $3.1 billion in annual total output in -- into L.A. County, 22,470 permanent jobs in L.A. County, $1.4 billion in annual labor income in L.A. County and 471.7 million in annual federal, state and local taxes. These numbers are an astounding boost to L.A. County. In addition, Centennial -- Centennial has been designed in such a way that its residents can live and work in a sustainable, self-contained community, which is desperately needed across L.A. County. Lastly, for Centennial to provide housing and commercial in one area allows for a boost in the local economy because expenditures will be kept internal. Centennial will accommodate sustainable growth throughout the Antelope Valley and L.A. County as a whole. The county's general plan includes Centennial as an appropriate location for growth. We urge you and your department to expedite as quickly -- expedite and quickly move this project through the final stages of approval. Approval for this plan is crucial. Thank you.	

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Wendy Heffernan			
RPC-56	Support	My name is Wendy Heffernan, and I am a native Californian. I have lived in L.A. County for over 60 years. My family grew up starting in the metro L.A. area, and my dad decided to move out to the San Fernando Valley to Granada Hills where he could afford a home. As I got married and decided to start my family, I moved to the master-planned community of Santa Clarita where I've lived for over 20 years, not as long as the Commissioner here, but still enough to be called a long-term resident. I'm here in support of the Centennial project. I have three adult sons. I took the day off work today so I could come talk to you about where are they going to live. They can't afford to live in Santa Clarita. I don't want them to move out of the state and move somewhere else. I'd love them to have a place like Centennial where they can live, they could raise their children, they have access to recreation and access to me so I could be close to them. Important; right? In addition, I work at an over 55 community in Santa Clarita, and I understand the importance of senior housing, and I hope, as this project moves forward to the tentative maps, there is an opportunity to revisit the fact of need for that kind of housing in that community. Conversely, I would look at a -- a community like Centennial, as I downsized from my house now that I have an empty nest, and look at it as a place to live close to my children who may hopefully still stay in	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		California, and as a senior, I won't have to leave California to go find somewhere else to retire, as many of my friends and many retirees are leaving the state to go somewhere else. The importance of a place like Centennial, close to the city, Santa Clarita, and also as part of L.A. County is vital, and I'm here to please ask you to support the project. Growth is important, and it's actually necessary, but well-planned communities with business, recreation and varying kinds of housing are critical going forward. You can't open the paper or listen to the news without hearing about the housing shortage, and Centennial is an option that I think we need to consider, and I hope that you vote to approve the project. Thank you.	
Lisa Ballentine			
RPC-57	Support	Good morning. My name is Lisa Ballentine, and I've lived in the Antelope Valley for over 40 years, I've been a resident of Neenach for over 27 years, so I'm very vested in this project. I was one of the original cabinet -- community cabinet members when Greg came out with his team asking for volunteers in the community for their input, and I figured better to be on the side to give our information on what we would like to see than to oppose it and not have any input at all. So for the past 10 -- over 10 years, I've had big stakes in this because I want to see it prosper. My husband works for L.A. County Fire Department, he's been there for over 30 years, and	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		because of that, we have, at times, been the only medical out there for our neighbors. They knew that, I've gone through a lot of the training to be a call man for the fire department, and so we have gotten the phone call after they've called 911 because the response time for our area is a minimum of 30 minutes. That's if they're not on another call. That's medical. For sheriff's department, it's 40 minutes or longer. So that was most important to me in seeing this project come. You know, to -- to have somebody die in your arms because we don't have anybody coming in enough time, we don't have the emergency services that everybody else has, it is extremely difficult when you know they're your neighbors and your friends. We pay taxes just like everybody else, and we don't have access to the parks, to the library to the schools the way everybody else does. Yes, we choose to -- to live out there. I love it. I raised four girls. I didn't have to worry about the gangs, and they could play in the road, they could -- you know, we hiked, we did all kinds of things, and we didn't have to worry about the problems that the city people did, and to us, that was the advantage of moving out there. You take the good with the bad. This project will bring in so many jobs, not only -- from beginning to end, from the -- the beginning, once -- the building, construction to the shopping centers to the community centers, the -- just the different things. And to see a school close because they can't afford to keep it open any longer, you know, now kids are being bused, and my girls had to get up at 5:00	

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		o'clock in the morning to get on the bus at 5:30 to sit on the bus for an hour and a half. Okay. Well, that's something that we had to do, they understood that, but if we can give that -- a better opportunity to the other families that are moving into this area, housing, I would much rather see that. So Tejon Ranch has always been, you know, very good to us, been an awesome neighbor and been supportive of our community, and I am fully in support of this project, and I appreciate you giving us the time to speak here today. Thank you.	
Tim Piasky			
RPC-58	Support	Good morning. My name's Tim Piasky, and I'm the CEO of the Building and Industry Association Los Angeles/Ventura Chapter. We are home to over 1,000 member companies employing over 100,000 workers. We're the voice of building and development in Los Angeles County. I'm here today to show support for Centennial. It's no secret that our county is in a housing crisis. We need more housing. According to the state and the Southern California Association of Governments, the county housing need for the 2013 to 2021 cycle is 30,199 housing units. Since 2013, the county has permitted a total of 3,149 housing units. This leaves the county more than halfway through their housing need cycle having only permitted 10 percent of their housing need, leaving them 27,050 units short.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		With over 19,000 price attainable units, and 10 percent of them affordable, Centennial is not only L.A. County's overall housing solution, but its affordable housing solution as well. We also need to do more for the missing middle, those that make too much to qualify for government subsidized affordable housing, but not enough to afford expensive market rate housing. Due to high land and development costs, developers aren't usually able to make this type of housing financially feasible, which is why there have been zero moderate income units permitted in L.A. County since 2013. Centennial would help solve this problem as well since it is designed to bring in young buyers just starting out as well as middle income families who are desperately looking for price attainable housing. It will offer small lot single-family detached residences, single-family and multi-family attached residences, including townhomes, condominiums and apartments. With their multi-modal transportation system encouraging public transportation and walking, Centennial will allow for a family to not only afford their homes, but be able to save on extra expenditures such as multiple vehicles and gas because there will be endless transportation alternatives for them to get from home to work. The BIALAV Chapter urges you to recommend approval and allow Centennial to move forward. We need to finally begin development on this much-needed project. Thank you.	

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Michael Josselyn			
RPC-59	Support	Good morning. My name is Michael Josselyn. I am a principal with environmental consulting firm WRA and also was a professor at San Francisco State University for 20 years as a conservation biologist. I'm here speaking in favor of the specific plan. It's been mentioned about 10 years ago when a ranchwide agreement was signed. It was a great day. Arnold Schwarzenegger was there with Tom -- Bob Stine, and they signed that agreement. But my role in that started five years earlier than that, and that's when the Trust for Public Land engaged me to get involved in trying to find the best conservation lands on Tejon Ranch that could be acquired by the state and also by private foundations. So in that process, I put together a scientific committee. We began looking at the data that's -- exists on the ranch. We spent numerous days out camping on the ranch, looking at it, examining the data that was available and also putting that into a -- really a massive database that we're able to look at a number of scenarios in order to see what lands would be best protected to provide for the future of wildlife and plants that are existing on the ranch and habitats there. So that effort resulted in that 240,000 acres of land to be protected. Much of that did include native grasslands. In fact, 30,000 acres were within those areas, and they were high quality native grasslands. We looked at a lot of places on the ranch and particularly at this Centennial site, and we involved both the scientists on the independent science	Thank you for your participation in this public process. The Commenter's summary of his work done to identify areas of the Project site most suitable for conservation and most suitable for development is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration.

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		panel as well as agencies, we walked that portion of the ranch, and we walked other areas too as well that we felt had much more limited resources and really didn't meet the grade, if you will, in terms of the kinds of qualities of habitats that could be protected and should be protected on the ranch, so some of those areas that didn't make the grade then were excluded. You know, given my experience on the ranch, I was asked to then lead a three-year scientific study on the grassland resources at Centennial. I put together another team with Dr. Bruce Pavlik and Dennis Murphy. We went out and looked at the Centennial in a three-year study. We found two important results. First, that the native grasslands on Centennial do vary considerably based on a lot of ecological factors, but not all of those grasslands were valuable areas, and so what we did was to design and propose areas that could be protected, and those areas were included in the preserve areas on Centennial. So I believe that the approach that is being used for the Centennial specific plan represents the best science available for this area. Thank you for your time.	
Armando Flores			
RPC-60	Support	All right. Good morning, Commissioners. My name is Armando Flores, Legislative Affairs Manager with the Valley Industry & Commerce Association, VICA. We represent over 400 businesses and non-profits all across L.A. County.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		I am here today to urge you to support and to move forward with the Centennial project, an important investment that will alleviate the housing crisis that our county and state continue to face. California has a housing deficit of over 2 million homes, and that number grows every year as production of homes continuously fails to meet demand. This shortage is driving up the cost of homes and apartments, pushing out working and middle class families from our communities and making it difficult for businesses to attract and retain talent. The only way we are going to solve and get out of the housing crisis is by building more, and Tejon Ranch is taking critical steps to address this present issue with the proposed project before you today. It will help accommodate the plan regional population and economic growth in our county. Centennial is a forward-thinking project that will provide over 19,000 homes and generate 23,000 jobs for the County of Los Angeles. As you've heard today, this project is consistent with the Antelope Valley Area Plan. It will transform an underutilized region into a vibrant community and commercial hub while protecting the open space that is unique to the Tejon Ranch area. Centennial will generate 21.5 million in public revenue for the County of Los Angeles and has committed to contributing major infrastructure investments in northern L.A. County, continuing its great synergy with the surrounding counties and communities.	

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		We cannot continue to ignore the need to build more housing. We strongly urge you to support and move forward with this project today. Thank you.	
Victor Lindenheim			
RPC-61	Support	My name is Victor Lindenheim. I'm the executive director of the Golden State Gateway Coalition. We're a non-profit organization based in Santa Clarita focused on improving roadway transportation in north Los Angeles County. Our current priorities including Interstate 5 corridor and the State Route 138, which I'll be talking about. I'm here today to express the coalition's support for a recommendation for approval of the Centennial specific plan project. In 2002, Centennial was a founding member of the Golden State Gateway Coalition. They later helped advance Interstate 5 improvements by voluntarily making a substantial contribution to the cost of environmental studies for the I-5 capacity enhancement project, currently about to go -- or actually underway. Completed and planned improvements to the freeway include truck climbing lanes through the Newhall Pass, 14 miles of carpool lanes, auxiliary lanes, sound walls and widened bridges. It is this type of forward thinking and commitment by the private sector, Centennial and others, in partnership with county and state and local officials, that will result in reduced traffic	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		congestion, safer roads, cleaner air and more efficient freight movement. Current status. Final design on the carpool lanes will be completed this year. Passage of L.A. County Measure M included 200 -- $240 million for construction of I-5 improvement. Just last month, the California Transportation Commission unanimously approved $247 million additional for that project. And just yesterday, a federal grant of $47 million was awarded for chokepoint relief in the I-5 corridor, so these things will be happening. This is a si- -- a significant project that will create thousands of good jobs and improve our quality of life in north county. This is an environmentally cleared, ready-to-go project, and Centennial made it happen -- helped make it happen. Construction's scheduled to begin next year. The Gateway Coalition and Centennial also support the State Route 130 -- 138 corridor improvement project. The planned SR 138 improvements will not only accommodate an anticipated economic growth, but also improve safety and goods movement for critical north county roadway system consisting of Interstate 5, State Route 14 and the planned high desert corridor. Environmental documents for SR 138 have already been approved, and Metro and Caltrans are exploring safety improvements that can be made to this critical route connecting Interstate 5 and the proposed high desert corridor.	

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		Because of its commitment from Centennial to improve transportation for north L.A. County, I can firmly stand in support of this project. I urge that the Regional Planning Commission recommend approval to the board of supervisors for the Centennial project. Thank you.	
Joshua Ginsberg			
RPC-62	Support	Good morning. My name is Joshua Ginsberg, and I am the Director of Economic Development for the Antelope Valley Hispanic Chamber of Commerce, which represents over 20,000 employees of our members' businesses. I come not -- come before you not only on behalf of the chamber, but also as a business owner in the Antelope Valley. I've been a business owner for over a decade, we -- and I represent Digi-VUE Advertising, which is one of the largest advertising firms in the Antelope Valley. As a business owner, the Centennial project is a cru- -- it is crucial to us because we are lacking on the number of rooftops throughout the Antelope Valley. The Antelope Valley, in my opinion, was developed in a very similar scope as the Centennial project. Palmdale-Lancaster started as an agri- -- agricultural community and grew into a full-fledged residential community. As a child, we moved from the L.A. Basin area to Palmdale, and we -- and we grew up in the Antelope Valley, I grew up in the Antelope Valley,	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		went to school in the Antelope Valley, I started a successful business in this community, we also provide jobs in this community and started a family. In light of all the positive things in the Antelope Valley, we have our challenges in our community, which is -- basically comes down to affordable housing and available housing. Over a short period of time, I've seen numerous of the businesses and families that we work with, they've moved either out of L.A. County or into different states because of the housing. It's very important. So we need price attainable homes for our working class families, and we must support our local economy, and I believe Centennial is an answer to -- to make that happen. In conclusion, I would like to say it's important that the County of Los Angeles recognize the needs of a growing economy, and we need to give its residents a fair opportunity, a -- a place to raise a family and also a place to enjoy a better quality of life, and I think, based off the points of what Centennial is offering to us, it -- it definitely would be a good opportunity. So I ask -- I ask for you to recommend approval to the board of supervisors and allow Centennial to begin developing. Thank you.	

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Mark Hemstreet			
RPC-63	Support	It's still morning, so good morning. Thank you all for allowing us to speak today. My name is Mark Hemstreet. I'm the CEO for the Lancaster Chamber of Commerce, so we're not too far from the Centennial project out there. And -- and I am speaking in support of the Centennial project. One of the things that the chamber looks at is -- is building a better community. That's both in -- in making sure that we have affordable housing and employment and resources for our residents. One of my -- we talked -- a lot of people have talked about 19,000-plus houses coming in, 25,000 new jobs for construction, 23,000 permanent jobs. We've talked about that. What we haven't talked about is -- is -- is what I call "smart planning," and that's the ability to come in and build a -- a -- a stand-alone, sustainable community. Now, that community bringing those -- those families into -- into Centennial will definitely impact my area. It will impact my members, my businesses, my community, and I think in a positive way. But one thing that I do really, really support in this project is the concept of building a -- a fully built-out community versus where -- where in Lancaster and many communities throughout California you have a builder, a developer that comes in and builds 50 houses, then you have another developer that builds 50 houses and another developer that builds 50 houses and -- and so on through your	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		community as kind of a patchwork. No one takes responsibility for the whole community. They take responsibility for their 50 houses and their tract, but when it comes to building a school, "I didn't" -- "I don't need to build a school 'cause I'm only building 50 houses," but you put 10 of them together, now you have 500 houses. Now you need schools, but we don't have the -- the resources always to put it together and build it together fast enough. We had one out in our area called "Anaverde," which was a master-planned community which supposed to have a school and -- and facilities built and never -- and it took years for that to happen after the -- after the houses were built, and that's one thing I think that Tejon Ranch can bring to the table is a fully built-out community to start with that I can really appreciate. The Antelope Valley has approximately 70,000 people that commute down the 14 freeway and the 5 freeway and the 405 down to Los Angeles every day. We have a lot of jobs, and we have a lot of -- I mean there -- we -- we could use more jobs up in our area, and this would definitely help us. We also see that we have Northrop, and we have Lockheed, and we have Edwards, but also huge players in our -- in our backyard that people drive to, so I see commuting people from Centennial even to these places too because it's a less -- much less time than they are driving currently. So the chamber's in support of it. I hope you can support it too. Thank you.	

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Sandra Hernandez			
RPC-64	Support	Well, just for the record, Thomas Gonzalez was called. I'm with Thomas Gonzalez. My name is Sandra Hernandez. (Unintelligible). I greeted you in our Kitanemuk language saying "Hello. Good morning. Thank you for having me here today. My name is Sandra Hernandez. I'm from Bakersfield. I'm a member of the Tejon Indian Tribe." I'm here today with Vice Chairman Thomas Gonzalez on behalf of the Tejon Indian Tribe to show our full support of Centennial. We have 904 tribal members indigenous to Kern County, specifically Bakersfield. Tejon Ranch is working with the tribe to continue to assist in advancing the local knowledge and appreciation of our ancestors' contributions, ensuring that the history behind the ranch is not lost. We appreciate Tejon Ranch's openness and cooperative nature. It is through this working relationship that we can say confidently that Tejon Ranch sets their standards high in the projects that they are involved in. From establishing conservation areas to using environmentally sus- -- excuse me, environmentally sensitive practices in ranching, farming and real estate, Tejon Ranch is committed to conservation and preservation of this land. Centennial has been designed to be a sustain -- a sustainable, self-sustained community where	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. For information regarding appropriate AB 52 consultation with Native American tribes, please see Draft EIR, Section 5.6, Cultural and Tribal Resources. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		people can live and work without having to commute long distances. Centennial has placed emphasis historically and contemporarily on the protection of open spaces and taken the necessary and significant steps to ensure protection of the biodiversity of the surrounding space. The Tejon Indian tribe, a sovereign Indian nation, is the only federally recognized tribe in Kern County boundaries. Tejon Ranch rests on our tribe's traditional and historical areas, the land our creation story states that we were placed on, the lands our ancestors worked on, lived on and loved, lands that we still love today. The tribe's inclusion to this discussion is integral as our ties to the land is from a time immemorial. The tribe supports Centennial and asks for your recommendation of Centennial and to allow it to move to the next stage. (Unintelligible). Thank you very much for your time.	
RPC-65	Cultural	COMMISSIONER MODUGNO: In looking at your ancestors' usage of the land, and the ranch is huge – SANDRA HERNANDEZ: Huge. COMMISSIONER MODUGNO: -- to the extent to which -- have there been documented -- in terms of ceremonial activities on any of the site that's being impacted, is there a way in which you've worked with -- the tribe has worked with -- with Centennial or Tejon Ranch to not only sort of honor and respect the history, but also in terms of being able to integrate future activities on the site or if any sort of cultural museums are ever built that they	The Commenter is thanked for their participation in this public process, and their response to Commissioners Modugno's and Louie's questions. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. For information regarding appropriate AB 52 consultation with Native American tribes, please see Draft EIR, Section 5.6, Cultural and Tribal Resources. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		can be used, again, to both honor and -- for future generations to learn the history of the peoples and the land? SANDRA HERNANDEZ: We have had lengthy discussions, informative discussions including all of the items of which you're speaking. The ranch's goal that we are able to continue to educate our community by the land usage and making provisions around the areas that are culturally sensitive as well as bringing the education to the community that's necessary has been ongoing dialogue that we've been, again, just very welcome in the openness that Tejon Ranch has provided with this project specifically. And I would just say anywhere you're digging, building or moving things in California is culturally sensitive regard (unintelligible) – COMMISSIONER MODUGNO: Oh, I understand that – SANDRA HERNANDEZ: Yeah. COMMISSIONER MODUGNO: -- but -- but the extent to which, again, the importance to the tribe and -- and to your people, in terms of that, they're -- they're working closely with you, and you're satisfied with your relationship. SANDRA HERNANDEZ: Yes, we are very satisfied – COMMISSIONER MODUGNO: Great. Thank you. SANDRA HERNANDEZ: -- with that, and they are culturally sensitive areas. COMMISSIONER MODUGNO: Thank you. CHAIR LOUIE: And -- and just for clarity, so beyond talking with you, recognizing, has there been any	

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		effort to capture the -- the history, the cultural importance of your tribe? Is there something that is going to be constructed, a memorial? SANDRA HERNANDEZ: So maybe just for a little bit of historical reference, our tribe was federally reaffirmed in January of 2012. We are considered a very new tribe. We were reaffirmed by the federal government and are in essentially the very beginning stages of developing our very new nation and what that looks like for us internally as tribal people and externally in our community what that means, that knowledge piece that Tejon Ranch and ourselves as a tribe have begun dialogue in is definitely moving towards these markers of knowledge for the space that's occupied by the community and Tejon Ranch right now.	
Ron Bruns			
RPC-66	Support	Good morning, Commissioners. My name is Ron Bruns. And I'm in support of the Centennial project. My ranch is located next to the Tejon Ranch in the Antelope Valley. And I first became exposed to the Antelope Valley as a teenager, which was a long time ago, and my -- on my uncle's ranch in the Antelope Valley, and I have watched the increase in traffic and the unmitigated growth, both legal and illegal, in the Antelope Valley for years. My term for it is "rural sprawl." We all know the term "urban sprawl," but in the Antelope Valley, what I've seen in my life is nothing but rural sprawl. And I'm here to talk about water and to support a project that's going to help to mitigate that rural sprawl.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		Centennial has developed a water plan that fully exceeds the requirements of the state and provides a sustainable supply of water under normal, dry and multiple dry year conditions. This will be done without the impact of existing water supplies to others as well as myself 'cause like I said, my fence and their fence are the same fence. The water controlled by Tejon was previously used for agriculture, but will now be used for Centennial. Centennial will be a wi- -- is -- is -- also will be wise in its water use, focusing on conservation, use of recycled water primarily for landscape and irrigation, storm water capture. Their plan also includes water banks so -- so that the supply of water during rainy times can be stored for -- for use during drier times. And lastly, Centennial will be responsible for building water systems, including water and -- potable water and sewage treatment plants to storage tanks, distribution lines and at no cost to the county residents in the Antelope Valley. I'm happy to say that I'm a supporter of the Centennial project, and I urge approval of this project and -- and -- because it does help to mitigate urb- -- or rural sprawl, and that's my biggest concern 'cause I just see it going on continuously unmitigated, and that includes traffic as well as housing, and it is, in many situations, inappropriate. Thank you very much.	

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Tony Mize			
RPC-67	Support	Mr. Chairman, Mr. Vice Chairman, members of the Commission, staff, my name is Tony Mize, M-i-z-e, and I'm a vice president with National Community Renaissance. We're a 25-year-old national non-profit organization based in Southern California. We currently own and operate about 9,000 units of affordable housing and within that portfolio about 85 properties with mixed income, affordable to extremely low, moderate income, some market rate, much seniors, much special needs populations, so we have our arms around what the affordable housing aspect of Tejon Ranch is all about, and we're here to speak in favor of the specific plan and moving it forward. National CORE has -- has worked with dozens of communities throughout Southern California, and we -- we work on the -- the nuances that were described earlier about what happens when and, you know, how do we move forward on the affordability components, those sorts of things. We work with cities, we have our own internal planning department, and we have done specific plans ourselves, so we're well versed in how this is all supposed to work and -- so we're in -- we're someone out there who -- who knows about those sorts of things, but what we mostly do is house well over 25- to 30,000 people typically in a better quality of life than they have ever experienced to date in their lives. And the crisis that we're facing now, you all know about it, you all read about it, but more than reading about it, you see it in every community you go into, no matter where it is, we are -- we are so horribly short of housing in Southern California that the kinds of things that are happening that	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		aren't really being surfaced and discussed as much as they should be when you can't move up, down or sideways, when you are anything but the most advantaged people in the population, it's a disaster. It's a disaster for the health care and education of our children. It's a disaster for so many reasons. And one of the other things it's doing, and I understand the -- the gentleman's comment about urban sprawl -- or rural sprawl versus what this is. This is incredibly well planned. This is -- I'll -- I'll mention a word, I hope it's okay, this is what Irvine was doing decades ago. You're planning way out in the future, and I think it's -- I think it's fabulous. The -- the thing that's happening everywhere else is the housing stock is deteriorating dramatically, and unless and until we really start producing housing, we're in for a catastrophe if you think the homelessness issues are bad now. The red light is on. I'll stop. Thank you.	
RPC-68	Miscellaneous	CHAIR LOUIE: Thank you very much. You -- you know, in the spectrum of your practice, do you do any work with homeless emergency housing? TONY MIZE: I have to say, Mr. Chairman, I am up here to do this, but today, right now, starting last night and through tomorrow at the Bonaventure is 1,200 professionals and practitioners of permanent supported housing and from all over the country, about half of them from California, the rest from the rest of the country. I'm supposed to be there, but this is so critical, so I am here.	The Commenter is thanked for their participation in this public process, and their response to Commissioner Modugno's question. The County notes that the Commenter has not been selected as a provider of services to the Project. This testimony does not address the adequacy of the EIR, and no further response is required.

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		Yes, we -- we do -- we do it from the mansion on the hill to the tiny homes community for the formerly homeless. CHAIR LOUIE: So how do you approach emergency homeless housing? TONY MIZE: The -- you know, it is one component of the homelessness issues, and there are, quote, "federal definitions" that require certain handling of how that's done, but there are a lot of non-federal where we -- we have rapid rehousing, we have lots of local jurisdiction-type solutions that can help someone transitionally, that -- that money, for the most part, has gone away federally, but whether -- you know, we're all working towards being able to help someone right off of the street right into a home, that is happening in some places to some levels, and we're working on ways to make that happen sooner, but the -- from the street to the transition -- or to the shelter to some transitional housing to permanent supportive housing, whether the federal definition or other definitions, it's all a collaborative effort, and it involves the government, the non-profit organizations and the communities most of all. CHAIR LOUIE: So for emergency homeless housing, are you placing those folks into apartments, or are you placing them into trailers? Are you placing them into – TONY MIZE: As I say, we – CHAIR LOUIE: -- tents? Modules? TONY MIZE: -- we work in five Southern California counties and about 30 cities, and it's -- everybody's approaching it many different ways. That is one of the ways, but it depends on what the jurisdiction has the appetite and resources for.	

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		CHAIR LOUIE: Okay. Thank you. COMMISSIONER SMITH: Mr. Chair, if I could ask a -- a quick follow-up question, if that's okay? And I know we have many other folks to -- that we want to hear from, so I'll try to be quick. But I am curious. Your portfolio of units across the region, would you say -- are most of them subject to a covenant term and, you know, are you looking at typically a 55-year term, do you do in perpetuity, and what happens when units that are covered by a term come up upon that expiration date, what kind of processes do you have in place? TONY MIZE: When affordable housing started out when I got into it 30 years ago or so, it was 15 years – COMMISSIONER SMITH: Right. TONY MIZE: -- and it was a HUD 15-year deal. State law now requires rental housing to be restricted 55 years and for sale housing 45 years, and there's lots of latitude on how you do what you do in that regard, and thus, those are the relationships between the providers and the jurisdictions to document all that. But we -- the -- the tax credit program, for example, is designed to turn over rental units about every 15 to 17 years with, you know, full rehabs and kind of start them over. We view them as a integral piece of infrastructure. The truly affordable, deeply affordable units are no different than our roads or schools or hospitals. You've got to have them. You've got to have them for the people that serve us.	

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		So you know, it -- it's -- it's a -- there's no one solution. There are 1,000 solutions, and we've got to do them all. We'll never dig our way out of this unless we – COMMISSIONER SMITH: Right. TONY MIZE: -- start viewing it that way. And this is a perfect example of making a dent rather than a scratch.	
Charlie Weiss			
RPC-69	Support	Mr. Chair, Mr. Vice Chair, Commissioners, I'm Charlie Weiss, and I'm Executive Vice President of California Resources Corporation. And I'm very pleased to be here today in support of the cen- -- Centennial project. Our company's proudly headquartered in Los Angeles County, and we employ over 1,000 employees and contractors here, so the availability and affordability of housing is critical to all of us and our families. And like some of the other speakers, I really want my daughters to be able to afford to live in Los Angeles County, and that requires a balance of both jobs and housing. My company has partnered with Tejon Ranch on other projects. We're not involved in this project, but we've seen firsthand their commitment to responsible development. We've also worked closely with Tejon Ranch to promote regional solutions with the Southern California Leadership Council and with Biz Feds,	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		both Los Angeles and Central Valley chapters, as well as in specific conservation projects and numerous charitable activities. And in -- in my view, the Centennial project is going to bring, as we've heard today and as reflected in the reports that you have, much needed, really urgently needed housing, 23,000 local jobs, millions of dollars in tax revenues for the county and -- and our public services and -- and a sustained push to economic growth for the Antelope Valley and for northern Los Angeles County. So we urge that the -- the Planning Commission recommend approval of this project without delay. Thank you so much for your time and consideration.	
Katherine King			
RPC-70	Introduction	My name is Katherine King. I am the secretary of the TriCounty Watchdogs. We're an environmental group located in the mountain communities where the three counties meet, Ventura, Kern and Los Angeles, and we have members in Gorman, Lebec, and I have a -- one foot in Los Angeles and one foot in Kern County myself. I'm going to basically pay attention here to the FEIR. Even though we didn't have time to read it very carefully, in fact, not all of it, and I don't -- but just certain parts, especially our letter and the comments to our comments, but before I address the responses to our comments, I want to start with the six alternatives described in the CEQA findings.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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RPC-71	Alternatives	Now, since in addition to displacing and disrupting precious plant and an- -- animal habitat, all the alternatives, except A, which is no project, insist on plunking 57,000 thirsty people into 19,000 houses with soil disturbed, spore-releasing yards, we would prefer none of these, but if this committee is determined to choose one, despite the significant and unavoidable impacts, we urge alternative E, for alternative E has a lesser, even if still significant, impact on air, water, grading, open space, visual resources and importantly biological resources, especially the Quail Lake tricolor black bird foraging habitat west of the aqueduct. This is something that's very important to us. We visit Quail Lake all the time. Now, the arguments in the FEIR that are used to dismiss this environment -- environmentally superior alternative are not persuasive.	This comment's general opposition to the Project, and its preference for Alternative E over the other Project alternatives, are noted, have been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration. With respect to this comment's concerns regarding Alternative E and its relationship to the Quail Lake and the tricolored blackbird, please see responses to Comments ADD-F.13-2 and ADD-F.13-4.
RPC-72	Alternatives	First, an eight-foot-wide regional trail north of Quail Lake is not necessary. Instead, a trail could easily connect from the northwestern tip of the project to the maintenance road around Quail Lake.	With regard to this comment's concerns regarding the proposed regional trail connection, please see response to Comment ADD-F.13-6.
RPC-73	Alternatives	Second, higher infrastructure costs for parks that are more highly used, that seems an excellent tradeoff. No problem.	With regard to this comment's concerns regarding Alternative E's potential impacts related to park maintenance costs, please see response to Comment ADD-F.13-6.
RPC-74	Alternatives	Finally, if an additional evacuation route is necessary, why not build one somewhere else? The CEQA findings do not seem to address this.	This comment's reference to "an additional evacuation route" is understood to be a reference to Alternative E, which would eliminate the Project's Village Nine, including a proposed bridge crossing the California Aqueduct. An EIR is not required to consider alternatives to a component of a project but should instead focus on alternatives as a whole. (*California Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993.) The Project, as well as Alternatives B, C, and D all assume the construction of a second access bridge over the aqueduct and the EIR thus provides a range of alternatives sufficient for informed decision making. Regarding the adequacy of the range of alternatives analyzed in the EIR, please see Final EIR, responses to Comments F.8-65 and F.8-72.

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RPC-75	Miscellaneous	Now, the responses to our comments, which are inadequate and fail to engage with the environmental crisis – I'm going to run out of time, so I can't give you exactly what the comments were. I'm just going to have to respond.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. With regard to the Commenter's specific assertions regarding impacts, see Responses to Testimony RPC-76 to RPC-78.
RPC-76	Water Supply	First, water, which is the biggest issue in Southern California, Tejon Ranch Corps has cobbled to- -- cobbled together enough water on paper to last until 2035, but in fact, they don't take into account a 10-year drought. They take into account three-year and five-year, but not 10-year, and that could become the norm, and of course it already is significant and unavoidable.	The Commenter's opinion regarding the reliability of water supply is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the County disagrees and concludes that Project EIR analysis demonstrates reliable and sustainable water supplies, including with regard to the Project's Water Supply Assessment. See Draft EIR, Appendix 5.18-A. As shown on EIR Tables 5.18-10 through 5.18-12, multiple-dry year projections are presented in five-year increments with the first two years shown as normal years and the last three years as a dry period or drought. This data was derived from the peer-reviewed *Centennial Specific Plan Water Supply Assessment* (WSA), which was prepared in accordance with Senate Bill 610 (Water Code § 10910 et seq.) and the California Department of Water Resources' *Guidebook for Implementation of Senate Bill 610 and Senate Bill 221* (DWR Guidebook).[3282] The DWR Guidebook was designed to provide step-by-step instructions for preparing an SB 610 water supply assessment and specifically provides that each water supply assessment should evaluate a multiple-dry year scenario over a five year period with the first two years shown as normal years and the last three years as a dry period.[3283] Thus, the EIR's water supply impact analysis was prepared in accordance with state law and expert agency recommendations and presents a reasonable, good faith disclosure and analysis of the Project's potential impacts on water resources that is appropriately based on an industry-standard analytical approach. That is all that CEQA requires. (*Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal*. (1988) 47 Cal3d 376, 392; *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App. 357, 372.) Despite this comment's implication to the contrary, the EIR's water resources impact analysis is not required to address all variations of the issues or permutations of the data, and a lead agency is not required to conduct every

[3282] Draft EIR Appendix 5.18-A, p. 1-14.
[3283] California Department of Water Resources, Guidebook for Implementation of Senate Bill 610 and Senate Bill 221, pp. iv, 33

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			recommended test and perform all recommended research in evaluating a project's environmental impacts. (*San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal. App.4th 645, 680; *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1125.) After thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts. With regard to the reliability of imported water supplies for the Project, the potential delivery reliability and variability of Project State Water Project supplies is discussed in Draft EIR Section 5.18, Water Resources, pages 5.18-20 to -28, and -54 to -64. The analysis of Project imported water supplies uses the Early Long Term scenario also used in the California Department of Water Resources' State Water Project Delivery Capability Report, and incorporates the effects of the most severe droughts during the 82-year historical record, plus additional adjustments to account for potential climate change effects and the 5 percent single dry year delivery level used by the Antelope Valley-East Kern Water in the Agency's 2015 Urban Water Management Plan. Consequently, the Draft EIR includes a discussion of State Water Project delivery reliability that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. Commenter provides no evidence for its assertion that the Draft EIR analysis is inadequate, and no further response is required. For further discussion of Project water supply analysis, including with regard to drought and climate change, see Final EIR, responses to Comments E.1-5, F.3-4 through F.3-9, F.3A-6, F.3A-9, F.8-213, F.8-214, and F.8-220.
RPC-77	Hazards	And last, I just want to respond specifically, if I may have a couple more seconds, to the valley fever mitigations, so -- we asked for, some of which were accepted or -- in modified way. Number one, hazmat suits for workers should be required, not optional. Spores can be carried home	Please see response to Comment ADD-F.13-10, which proposes revisions to MM 3-2 to further mitigate Project impacts related to Valley Fever and address this comment's concerns regarding Tyvek suits.

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		into other communities, as the research we cited in our comments proves. Second, we disagree that posting signs throughout the -- throughout and adjacent to the project saying "Close windows, valley fever area" would create unreasonable fear. We think it would create reasonable fear. Third, test the soil before you sell a house so that the buyer knows exactly what is in that soil. It can be done.	
RPC-78	Miscellaneous	Fourth, the area needs a hospital, and the comments to our comment -- the responses to our comment said it wasn't needed, and we think it is. Thank you.	The Commenter incorrectly summarizes the County's response to its comments on the Draft EIR. The Commenter appears to be referring to Final EIR, Comment F.3A-67, in which it states that a Level 1 Trauma Hospital is needed near the Project site. In response to this comment, the County explained that the need for a Level I Trauma hospital is dependent on the numbers and types of emergency service needs in the area, and that the Institutional/Civic land use designation of the Project allows for the future development of a hospital/medical center and other public institutional uses of 110 acres of the Project site. Further, Health services (doctor, dentist, and clinics), medical facilities and centers, and medical/dental offices are permitted in areas designated as Commercial, Business Park, Mixed Use, and Institutional/Civic. Urgent care centers are conditionally permitted in these same land use designations. See Final EIR, response to Comment F.3A-67.
Rose Bryan			
RPC-79	Introduction	I am Rose Bryan. I was going to give some of my time to my friend here. But I'm here in regards to the Golden Valley -- Valley Municipal Water District. I am the president of the district and – Okay. The Centennial project will -- will significantly impact the small town and the Golden Valley Municipal Water District because we only have 20 providers.	Thank you for your participation in this public process. Since testifying at this June 6, 2018 hearing, the Commenter has submitted a letter dated July 10, 2018 to the County on behalf of the Golden Valley Municipal Water District (GVMWD), clarifying this testimony. In that letter, the Commenter confirms that the GVMWD Board of Directors (1) approved the Project's Water Supply Assessment on May 18, 2011, and (2) on May 12, 2011, entered into a contractual agreement with the Project applicant to provide the water supply needed to serve the Project. The Commenter's letter clarifies that the GVMWD District Engineer has reviewed the January 4, 2017 Final Memorandum prepared by Kennedy/Jenks Consultants for the "Peer Review of the Water Supply and Demand Assessment for the Proposed Centennial Specific Development" (Draft EIR Appendix 5.18-G), and the February 2017 report by Psomas titled "Potable Water, Wastewater and

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		Now, we've been a very small organization, our district, for a long time, and now I think that it was private for a while, and then it became a -- a non-profit, and now we are all volunteers.	Recycled Water Demand and System Plan" for the Centennial Project and did not identify any concerns for the GVMWD as it relates to the Project's water, wastewater and recycled water infrastructure. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report (Draft EIR, Appendix 5.18-C). As discussed in Draft EIR Sections 5.18 and 7.0 the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs also concluded that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable. Neither the Antelope Valley Area Plan and General Plan EIRs nor the Draft EIR found that there would not be enough

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			water to serve future regional demand. The analyses found that impacts would be significant and unavoidable because of the lack of pertinent information and uncertainty regarding such supplies. Please see response to Comment ADD-D.1-1, which provides a response to the Commenter's July 10, 2018 letter clarifying this testimony.
RPC-80	Miscellaneous	One of the things that was told that I had to pre- -- present to you was the fact that when you've put out the Centennial project, we were never told and we were never given any information on any of the projects or the DEIR or the I - EIR until recently until I told them that I was working with it, so they got very, very upset that they were left out, and yet they are the primary people on the Golden Valley Municipal Water Di- -- District in your documents. So if -- if you're letting the district out of your -- of the loop here, I don't think that's a very good idea because if you're going to annex the project into the Golden Valley Municipal Water District, you're going to have our approval or our, you know, in- -- and information from us as to how we are going to proceed.	Thank you for your participation in this public process. Since testifying at this June 6, 2018 hearing, the Commenter has submitted a letter to the County on behalf of the Golden Valley Municipal Water District (GVMWD), clarifying this testimony. Please see Response to Testimony RPC-79 and response to Comment ADD-D.1-1. As discussed in Response to Testimony RPC-79, on July 10, 2018, the Commenter confirmed that the GVMWD Board of Directors (1) approved the Project's Water Supply Assessment on May 18, 2011, and (2) on May 12, 2011, entered into a contractual agreement with the Project applicant to provide the water supply needed to serve the Project.
RPC-81	Miscellaneous	Now, one of the things that I was told is that -- and -- and they wanted it documented, that the project, if we are going to be -- if you're going to annex the -- the Golden Val- -- the Centennial project into the Golden Valley Municipal Water District, you have to understand that our board needs to be involved in it from the very first. The -- Mr. Springer, which is frankspringer at associates.com, needs to be reached, and he wants to be involved from the very first from the development and also the building and the maps of everything you have if you are going to do that. If they are going to establish their own district, and -- then we're out of the whole thing entirely, but if you are, then you need to know that that is what we're concerned about and what you need to do.	Thank you for your participation in this public process. Since testifying at this June 6, 2018 hearing, the Commenter has submitted a letter to the County on behalf of the Golden Valley Municipal Water District (GVMWD), clarifying this testimony. In that letter, commenter clarified that both the County, and the Local Agency Formation Commission of Los Angeles, must approved the Project and approve expansion of GVMWD's service area boundary before GVMWD can serve as the water purveyor for the Project. Commenter's letter also clarifies that (1) once the Project is included within its service area, GVMWD will provide water supply verifications for future tentative tract maps in compliance with applicable State law, and (2) that GVMWD's District Engineer, and its consultant, Frank Springer, will provide GVMWD standards to the Project, and participate in the development of the Project water, wastewater, and recycled water plans and technical specifications for each phase of the Project, and oversee on behalf of GVMWD the construction of these improvements. Please see Response to Testimony RPC-79 and response to Comment ADD-D.1-1.

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RPC-82	Water Supply	Also, one of the other questions that came up was the project is -- is not following through on the amount of water that you have for 2035. You are now on 2018. This project started in 2002 or '3, and so it's going to run out before the project really is setting up for 2035, so you're going to -- we ask that you maybe possibly add another 20 years to the project, to 2055, because you're going to go at least till that time before it's all done, at least that's from our perspective, so that is something that you need to address and see if that is something you can work out.	Thank you for your participation in this public process. Since testifying at this June 6, 2018 hearing, the Commenter has submitted a letter to the County on behalf of the Golden Valley Municipal Water District, clarifying this testimony. Regarding the Project's long-term impacts on water resources beyond 2035, please see Response to Testimony RPC-79. Please also see response to Comment ADD-D.1-1.
RPC-83	Miscellaneous	Also -- and that -- and you -- and Mr. Springer asked if you would -- had any questions to please contact him at -- at frankspringerand -- andassociates.com. So if you have that information, or if you want more information, I can give you something on it.	Thank you for your participation in this public process. Since testifying at this June 6, 2018 hearing, the Commenter has submitted a letter to the County on behalf of the Golden Valley Municipal Water District, clarifying this testimony. Regarding Mr. Springer's future involvement in the Project, please see Response to Testimony RPC-79. Please also see response to Comment ADD-D.1-1.
RPC-84	Miscellaneous	I said it all -- I just wanted to -- I live in -- I wanted to say one more question. I live in Gorman, and I've been there for 40 years, and I've seen developments come and go, and main -- one of the main things is because of the remoteness of the area, not enough tra- -- roads and peo- -- and animals get killed by the year about all -- by trucks, by cars because there -- there are so many animals that are there that people don't realize are there, and they run down Gorman Post Road, and they get killed, and we then have to deal with that as residents living in Gorman, and that's just one issue. The other issues are water and of course the environment and so forth and so on, but anyway.	Thank you for your participation in this public process. This comment's concerns regarding animal/traffic conflicts in Gorman is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for its consideration. This comment does not raise any concerns regarding the adequacy of the EIR and no further response is required. Please see Response to Testimony RPC-79 and response to Comment ADD-D.1-1.
RPC-85	Water Supply	COMMISSIONER SHELL: Thank you.	Thank you for your participation in this public process. Please see Response to Testimony RPC-79 and response to Comment ADD-D.1-1.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		I -- I'm sorry. What -- did you say you were with the Golden Valley Municipal Water District? ROSE BRYAN: That's right. I run -- I'm the president at this point. COMMISSIONER SHELL: You're the president. So your district is -- would be supplying the majority of the water for the project? ROSE BRYAN: Well, I'm not sure. See, that's the whole point. They had made a -- a document in 2011 saying that they weren't going to provide the water, but somehow, I don't know all the whole -- the whole document or the whole information, they had lawyers doing all of this, and Centennial signed documents as stating -- you might ask Centennial, they have the documents to be able to tell you what exactly they signed, and they were supposed to be part of the Golden Valley Municipal Water District, as I understand, but it's been so many years now that we've got a new board, there's -- everybody is different on there except Mr. Springer, who was the civil engineer during that time, and one other board member. COMMISSIONER SHELL: Okay. So our staff report says the water supply assessment was approved by your water district – ROSE BRYAN: That's right. COMMISSIONER SHELL: -- in May 2011. ROSE BRYAN: That's right. COMMISSIONER SHELL: But you're dis- -- disputing that?	

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		ROSE BRYAN: I'm disputing it because that's what I've heard during the -- the meetings that we have had is that they don't -- not going to provide the water, but if they are, then I think somebody needs to tell the Golden Valley Municipal Water District or contact Mr. Springer to verify all this information because I don't know all the particulars on the contract that they signed in 2011.	
J.P. Rose			
RPC-86	Introduction	Good afternoon, Commissioners. My name is J.P. Rose, and I'm an attorney with the Center for Biological Diversity. I would request one additional minute as I'm representing the organization. Would that be okay? Thank you, Chair. So the center, as you may know, is an environmental group with approximately 1 million members and online activists who I represent today. And today, we are asking you to say "no" to Centennial. Centennial is the wrong vision for Los Angeles County.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. This comment does not address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-87	Miscellaneous	It will decimate some of California's last native grasslands and wildflower fields while generating -- generating unprecedented traffic and air pollution.	The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR thoroughly analyzes and discloses potential impacts with regard to traffic (Draft EIR Section 5.10), air pollution (Draft EIR Section 5.11), and wildlife (Draft EIR Section 5.7), and has identified all feasible mitigation measures to reduce impacts. Specifically, with regard to grasslands and wildflower fields, please see further discussion in Responses to Testimony RPC-12 and RPC-286.
RPC-88	Traffic	At 35 miles from Santa Clarita and 65 miles from downtown L.A., the vast majority of residents will end up having to have multi-hour commutes to Los Angeles just to get to work, and even by the EIR's optimistic standards, over -- the project would generate over 75,000 external vehicle trips per day with an average trip length of 45 miles, and even these figures are probably lower than they actually are because the EIR assumes that most of the residents will, in fact, find jobs on site, but given the flexibility built into the specific plan and the EIR, the project might be phased as primarily housing first with the commercial development phased or delayed many years later, depending upon market conditions. This will obviously significantly increase the already enormous traffic, air pollution and climate impacts of the project.	The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the EIR trip analysis is appropriate under CEQA. As discussed in more detail in Final EIR, response to Comment F.8-23, Draft EIR page 5.10-91 explains that the traffic analysis assumes that a portion of the Project workforce and resident population will live or work outside the Project area and will commute to jobs outside or within the Centennial Specific Plan area. The analysis also assumes that on-site residents and workers will travel for services and amenities outside of the Project. The proportion of internal and external Project area trips was derived from the North County Sub-Area Traffic Model updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The North County Sub-Area Traffic Model used for the Project analysis is the same model used by the County and other public agencies for transportation planning studies in the region, including the 2015 Antelope Valley Area Plan (AVAP) and County General Plan update EIRs. The model was also used by Caltrans in the preparation of the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS. With regard to Project trip length, as discussed on Draft EIR page 5.10-51, the North County Sub-Area Model results show that 40 percent of the trips made on site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. As shown on Table 3.8 of the traffic study (Draft EIR Appendix 5.10-A), the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. The model estimates that an average external trip will be 45.9 miles in length. Finally, the North County Sub-Area Model estimates that 48 percent of all trips will be internal and 52 percent of all trips till be external to the Project. Consequently, the average Project trip is estimated to be 25.5 miles in length. As discussed on page 3-9 of Draft EIR Appendix 5.10-A, these estimated trip lengths are conservative because they do not reflect the trip reduction measures being implemented by the Project that will encourage trips by walking, biking, and transit.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			With regard to Project phasing, although the phasing program may be revised by the Project Applicant/Developer, any such revision is subject to County approval during the tentative tract map (TTM) process required by the Los Angeles County Subdivision Ordinance and the development requirements in the Centennial Specific Plan. (Final EIR Appendix 4.0-A.Rev.) The conceptual phasing program is appropriate under CEQA and provides sufficient detail for impact analysis, as is further discussed in Final EIR, response to Comment F.8-11.
RPC-89	Greenhouse Gas	I'd also like to just quickly address something that I heard from the developers, consultants and attorneys earlier, that the project would be net zero energy. I have reviewed the -- the EIR, and I did not see anything to that effect. In fact, it said impacts to the climate would be significant. So that just simply is not true here.	As part of the Project's proposed development agreement with the County, the Project has committed to achieving a "net zero carbon for the electric sector" standard on all public and private facilities constructed within the Project, which means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions as documented over time as part of each application for a tentative tract map.
RPC-90	Traffic	Centennial, instead, will require the expansion of a sleepy two-lane highway into a full-fledged highway.	The Northwest 138 Improvement Project addresses significant existing and reasonably anticipated future needs irrespective of Centennial approval and development. Please see response to Comment ADD-F.10-5 for further discussion.
RPC-91	Biology Sprawl Traffic	This highway development would occur in habitat linkage next to the Angeles National Forest. We are still working here in L.A. County to undo the ecological damage of past freeway and sprawl development that has nearly driven our local mountain lion population to extinction, yet here we are considering whether to prove -- approve a sprawl city that will act as a catalyst for another wildlife-killing freeway in a remote corner of the county. Taxpayers deserve real solutions to the housing shortage, not more sprawl and freeways that only serve the interests of Tejon and its Wall Street investors.	As noted in Response to Testimony RPC-90, the Project is not the catalyst for the Northwest 138 Improvement Project. The County disagrees with Commenter's characterization of the Project, and notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-92	Biology	Centennial would also destroy thousands of acres of irreplaceable wildlands. 99 percent of California's native grasslands are already gone forever. I ask you not to put the final nail in the cos- -- coffin for these quintessential California landscapes.	The Commenter's opinion is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR thoroughly and appropriately documents the grassland study done on the Project site. Draft EIR Section 5.7, Biological Resources, discloses the Project's potential impact to grasslands and determines that direct and indirect impacts would be mitigated to a less than significant level, but cumulative impacts to native grasslands would be a cumulative significant impact. (Draft EIR, pages 5.7-158, -162.) Project implementation would include mitigation at a ratio of at least 2:1 for grasslands, resulting in improved functions and values of grasslands on the Project site, in addition to preservation in perpetuity within the Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Intensive, multi-year grassland studies have revealed that grasslands of equal or greater value occur in vast quantities in the Mitigation Preserve. Please see Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 for further discussion of grasslands.
RPC-93	Hazards	There are many other reasons you should say "no" to Centennial. It is in the high and very high fire hazard area. We just experienced one of the worst fire seasons in U.S. history -- in California history. These fires are going to grow more intense in climate change. We shouldn't be putting people in harm's way and extending county services to that area.	The Commenter's opinion is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.
RPC-94	Conclusion	I grew up in California, and I fell in love with the beautiful landscapes and rugged mountains that we have here. In my fairly short life, I have watched pieces of that landscape slip away and disappear forever. We ask you to do the right thing and protect these landscapes for the next generation of Californians. Thank you.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
Aaron Echols			
RPC-95	Introduction	My name is Aaron Echols, and I'm a professional biologist and photographer, and I've lived in Southern California my entire life. And I'm opposed to this project. I'm opposed, not for it. Most of my sentiments are shared with the Center for Biological Diversity, so I'll -- I'll be brief and -- and save you the -- the redundancy. You're welcome. I -- I will say we are currently sitting right here, although it may not look like it, in one of the original 25 biodiv- -- biodiversity hotspots of the world. Lucky us.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-96	Sprawl Biology	This project proposes massive textbook sprawl development into one of the most biodiverse subregions of the California Floristic Province.	The County disagrees with the Commenter's characterization of the Project, and notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion. The Commenter is correct that the Project site is located in the California Floristic Province, which has a Mediterranean-type climate located on the Pacific Coast of North America, with a distinctive flora similar to other regions with a winter rainfall and summer drought climate like the Mediterranean Basin. The Project EIR documents specific and exhaustive study of the Project site and the presence of plant species, analyzed potential adverse impacts, and identified all feasible mitigation to reduce such impacts to the greatest extent feasible. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-97	Biology	The Tejon Ranch should be left fully intact as natural habitat and for an enjoyment and peace of mind of the trillions of people that will exist on this planet after we are gone. It is our privilege and our duty to protect and preserve what little is left of Southern California natural habitat, especially that of such pristine quality.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition to the Project as proposed is noted. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-98	Conclusion	I'm hearing a lot of appeals on the proponents' side out of selfishness, "I want a house," "I want a contract," "I want business," "I want more convenient shopping," "I want money." I think we should make considerations beyond ourselves and our species and think about the planet and what we would like to leave behind. Thank you.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Steve Hartman			
RPC-99	Introduction	Good morning, Commissioners. My name is Steve Hartman. I'm a volunteer president of the board of the California Native Plant Society. Thank you. A people that values its privileges above its principles soon loses both. Let's see which principles will be valued less than the privilege of land ownership. The Regional Planning Commission will make an historic decision influencing how growth will occur in Los Angeles County for decades to come. Will our future include affordable urban housing that is close to employment, mass transportation and other public services? Or will the Commission take the side of a profit-driven corporation to create a new city on functioning and very valuable native California plant habitat?	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-100	Affordable Housing	The Centennial Specific Plan fails to create the affordable, appropriately cited, environmentally sustainable housing that our county desperately needs. Centennial is a lose-lose project.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted, but the County disagrees with the Commenter's characterization of the Project. See Final EIR, response to Comment F.8-20 for further discussion. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-101	Biology	It will replace critical functioning habitat for rare plants and animals with a leapfrog development. It will trade one of the last remaining native grassland habitats in California for commutes that average 45 miles one way.	The Commenter's opinion is noted for the record, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. However, the County disagrees. For an in-depth refutation of the assertion that the Project constitutes "leap-frog" or sprawl development, see Final EIR, response to Comment F.8-20. With regard to appropriate EIR analysis of habitat loss, please see Response to Testimony RPC-14. With regard to appropriate EIR analysis of grassland impacts, please see Response to Testimony RPC-12.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-102	Greenhouse Gas	It will eliminate habitat that sequesters carbon for greenhouse gas emissions.	As this comment correctly notes, the Project would result in the conversion of some vegetative cover that current sequesters carbon, as disclosed and analyzed in Draft EIR Section 5.21, Climate Change (pages 5.21-5 and -50). It should be noted, however, that the Project would plant an estimated 35,123 new trees, as required by the County Tree Planting Ordinance, which would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent, as discussed on Draft EIR page 5.21-83.
RPC-103	Hazards Geology	It will swap essential wildlife corridors for housing directly on the San Andreas Fault and in the face of wind-driven fires, endangering future residents.	The Commenter's opinion was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. The County disagrees with Commenter's characterization of the Project. As disclosed in Draft EIR Section 5.1, Geotechnical, the San Andreas Fault Earthquake Fault Zone and fault line cross the southwestern edge and southernmost point of the Project site, as shown on Draft EIR Exhibit 5.1-2, Geologic Hazards. However, with implementation of PDF 1-1 and compliance with State and County requirements for construction and setbacks, impacts would be less than significant. With regard to fire hazards, please see Response to Testimony RPC-93. With regard to wildlife connectivity and movement, please see Response to Testimony RPC-4. This testimony does not specifically address the adequacy of the EIR, and no further response is required.
RPC-104	Biology	It will trade one of the best remaining seasonal wildflower habitats for a leapfrog development.	The Commenter's opinion was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. The County disagrees with the Commenter's characterization of the Project. After thorough and appropriate analysis, the EIR concludes that Project mitigation measures and the preservation of 14,908 acres of grasslands coupled with long-term management through implementation of the Ranch-wide Management Plan will sufficiently offset and fully mitigate for impacts on wildflower fields associated with the Project. See Draft EIR, Section 5.7, Biological Resources, and Final EIR, responses to Comments B.4-17, B.4-43, F.3A-19, F.8-119, F.8-123 to F.8-125, and H.21-1 for further discussion of potential impacts to and mitigation to address such impacts to wildflower fields. For an in-depth refutation of the assertion that the Project constitutes "leap-frog" or sprawl development, see Final EIR, response to Comment F.8-20.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-105	Conclusion	We, the California Native Plant Society, recognize the need for additional affordable housing that benefits all residents of Los Angeles County. We also assert that despite this need, you must take each and every proposed development at face value. We need not trade functioning, intact, indeed precious habitat for leapfrog development that will endanger future residents. We urge you to make the right choice for the people of Los Angeles County like you have done dozens of times in the past. Tejon Ranch Corporation and their Wall Street investors will -- will be fine when you vote no on the Centennial Specific Plan. Thank you.	The Commenter's opposition is noted for the record, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. With regard to this comment's concerns regarding "leap-frog" or sprawl development, see Final EIR, response to Comment F.8-20.
Orchid Black			
RPC-106	Introduction	My name is Orchid Black. I -- I'm a volunteer today. I am missing -- I -- I have my own business, and I am missing work, and I care what I eat, so I don't eat when I'm not working. Chairman Louie, Vice Chair Mr. Moon and the Board, I'm -- I'm speaking in opposition to the plan today.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
RPC-107	Miscellaneous	I would like to mention that there's been 16 years of planning, and then I understand that this is statutorily okay, but 10 days to review an EIR after 16 years seems unnecessarily fast, and -- and it creates the appearance of a rush to judgment.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. Following testimony on June 6, 2018, the Regional Planning Commission continued the hearing until July 11, 2018, on which date the Regional Planning Commission continued the hearing again until August 29, 2018, allowing more time for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-108	Miscellaneous	Earthquake, wind and fire.	With regard to earthquake, wind, and fire, see Responses to Testimony RPC-110 to -115.
RPC-109	Public Services	This project is a beautiful, well-designed project in the wrong place. It is -- it is not even sprawl. It is le-- leapfrog development where we put development far from where the services are.	The Project does not constitute sprawl. Rather, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
RPC-110	Geology	And it -- it sits at the junction of two faults? I have heard nothing to say that -- that more rigorous building standards will be used to accommodate the fact of the faults. The county will be responsible when the earthquake comes to clean it up, so we should consider not siting it here.	The Commenter's preference for an alternative location due to fault placement is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR thoroughly and appropriately analyzes potential Project-related impacts due to fault location. First, it should be noted that the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State, so the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area. With regard to the Project site specifically, due to the proximity of both the San Andreas Fault and Garlock Fault to the Project site, a fault research company called Earth Consultants International (ECI) conducted a detailed fault investigation on the Project site and evaluated potential hazards as a result of fault locations in relation to the Project site and planned development areas. See Draft EIR, Appendix 5.1-A. While earthquakes that may occur along the San Andreas Fault Rift Zone are potential generators of significant ground accelerations at the site, foundation systems must be designed to withstand these accelerations, and secondary impacts such as liquefaction may be mitigated by remedial grazing, structural design and foundations or ground improvement techniques; active fault zones can also be mitigated against by implementing setback zones from Alquist-Priolo Earthquake Fault Zones. Accordingly, as shown on Draft EIR Exhibit 5.1-2, the Project has been designed to avoid development in areas near this zone. (Draft EIR, Section 5.1, Geotechnical, page 5.1-16.) The Project shall incorporate all applicable geotechnical recommendations identified in the geotechnical documents previously prepared for the Project, and implementation of these requirements would ensure impacts would be less than significant. For further discussion

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			regarding seismic impacts and faults, see Final EIR, responses to Comments F.8-206 to F.8-210.
RPC-111	Hazards	It's -- we also have wind and fire. Most of our big fires are wind-driven events. If you look at them from space, there's just these huge trails during the Santa Ana winds from all the fires in Southern California. I recommend that you look for that.	The EIR recognizes that the Project site sometimes experiences high wind events. (Draft EIR, pages 5.11-23, 5.3-17.) This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-112	Miscellaneous	This site is always windy. I've been to it several times, and any time pressure changes in either the San Joaquin or the Antelope Valley, this is where the wind goes through.	The EIR recognizes that the Project site sometimes experiences high wind events. (Draft EIR, pages 5.11-23, 5.3-17.) This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-113	Hazards	And we haven't had fires there why? Because no ignitions. We're going to put 57,000 people there, we're going to have ignitions, and those fires are going to be wind driven, and the county is going to be responsible to deal with that catastrophe.	With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.
RPC-114	Miscellaneous	So that's catastrophe one, earthquake. Catastrophe two, the wind and fire.	With regard to wind, see Response to Testimony RPC-112, and with regard to fire, see Response to Testimony RPC-113.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-115	Miscellaneous	Wind is also something that just makes people irritable, so you'll have people who have their dream home, but they're irritable all the time. Yeah. So earthquake, wind and fire.	As noted in Response to Testimony RPC-112, the EIR recognizes that the Project site sometimes experiences high wind events. The Commenter's opinion that this will have a widespread effect on residents' behavior, and the Commenter's overall opposition to the Project, has been heard by the Regional Planning Commission and Board of Supervisors. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-116	Traffic	We have our 75,000 vehicle trips, and we're going to have trips both ways. Everybody who lives there isn't going to work there and take their bicycle. It's a great vision. It belongs closer to Los Angeles. That vision, that great transportation vision, this -- this vision is going to be -- even people who live in the urban areas, somebody talked about his 382 workers, are always driving, and we're going to put in a small town over there, and those people are going to be always driving. His workers are going to have temporary work, and then 23,000 -- let's say 3,000 people get jobs there that work -- that live there. 20,000 trips up the 5 and the 138, and 75,000 down and back? That's, you know, almost 100,000 car trips per day. That's too many. That's too much greenhouse gas for us. That's not appropriate for here. The lands are sensitive --	This comment's opposition to the Project's location is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration. For a detailed discussion regarding the Project's consistency with long-term regional planning documents designed to achieve regional greenhouse gas reductions in the land use sector, please see Final EIR, response to Comment F.8-20. Indeed, the South Coast Air Quality Management District (SCAQMD) has reviewed the Centennial EIR and determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Final EIR, Comment D.4-2). With regards to the number of average daily trips generated by the Project, the North County Sub-Area Model provides an estimate of the Projects average daily trips. As shown on Draft EIR Table 5.10-19, the model projects that about 48 percent of the Project's average daily trips (i.e., 70,246 trips) will be internal to the Project site, while about 52 percent (i.e., 75,908 trips) will be external to the Project site. Thus, as this comment correctly notes, not everybody who lives on the Project site will work on the Project site, and not all Project residents will commute to work by bicycle.
RPC-117	Biology	It's -- it's in the wrong place. The landscape is a sensitive landscape. It has many rare, fragile plants, it has rare birds, it has rare mammals, and they only can exist there because of the -- the immense area of this space, and when we reduce that area and put 100,000 people out there, they won't exist anymore. Thank you.	The Commenter's opposition to the Project and opinion regarding impacts on biological resources is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR appropriately analyzes and mitigates potential Project-related impacts to biological resources to the greatest extent feasible, and the Project Applicant has committed to preserving much of Tejon Ranch for the benefit of species and habitat conservation. This comment does not specifically address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Christopher Hanson			
RPC-118	Introduction	Hi. I'm Christopher Hanson. I come to you as a retired 911 EMT from Santa Monica as well as an outdoor trip leader from University of California at Riverside, and I studied sociology. I understand that this will bring economic growth, but I ask the question: At what cost? The lady from Lancaster who we heard from this morning, her environmental opposition to the project doesn't really get at why it's such a big deal.	Thank you for your participation in this public process. These comments will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-119	Biology	People forget why biological diversity is so important, and I'd like to remind you that it's nature that acts as the lungs for our planet and helps clean the air and helps give us good breathing air.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-120	Air Quality Public Health	And something that just came out in 2017, which is quite relevant to me, is the impact on air quality for our brains. Alzheimer's is becoming a very big deal now, and our older generation is suffering, and sciencemag.org, as well as the L.A. Times, published an article saying that they're now realizing that the air quality is affecting our brains, and our neuroge-- neurodegenerative diseases are becoming more and more prevalent. So I would propose that as research is just beginning to come out to show the effects of air quality on our aging population that we at least let these studies kind of gain a little bit more traction before we decide that "Yes, let's do this thing" that I've seen to be irreplaceable as I've led outdoor trips for lots of different international people. Like,	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. With regard to this comment's concerns regarding the Project's potential air quality impacts and their effects on human health, this potential impact was analyzed in the EIR. As explained on Draft EIR pages 5.11-9 and 5.11-10, toxic air contaminants (TACs) are those air pollutants that are known or suspected to cause cancer or other serious health effects (e.g., reproductive effects or birth defects). With respect to the Project's potential to expose sensitive receptors (e.g., residences, schools, day care facilities, hospitals) to substantial pollution concentrations, the Draft EIR determined that this impact would be less than significant with implementation of MM 11-2. With respect to TAC emissions associated with the Project's proposed on-site stationary sources, the Draft EIR determined that impacts from these sources would be less than the incremental cancer risk of and non-cancer health index thresholds with implementation of MMs 11-1, 11-7, 11-8, and 11-9 and, therefore, this impact would be less than significant.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		they come to California for the nature. They don't come for residential areas. They come to, like, explore Yosemite and Santa Monica beach, like, the -- that's why they are driven here.	
RPC-121	Biology	And so I would offer that we don't be so quick to make a decision to develop on a land that won't be able to be replaced. It takes so long to build these kind of grasslands just from, like, an environmental standpoint. The soil does not replenish itself in matters of tens of years.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition to the Project is noted. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-122	Conclusion	And so at least give yourself some time and perhaps push this out a little bit to really consider all the ramifications, especially those health and -- ramifications such as Alzheimer's and the connection to air quality that will get worse if we take away natural habitat and replace it with emissions. Thank you.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. Following testimony on June 6, 2018, the Regional Planning Commission continued the hearing until July 11, 2018, on which date the Regional Planning Commission continued the hearing again until August 29, 2018, allowing more time for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
Bryn Lindblad			
RPC-123	Introduction	Hi. Good afternoon. I'm Bryn Lindblad, Associate Director of Climate Resolve. We're a local organization focused on solutions to climate change. I head up our transportation and land use work, and I would just like to express my strong opposition to this type of -- of sprawl development. I'd urge you to -- to put the brakes on this ill-conceived idea and encourage you to -- must have the courage to really pull the plug on it altogether. But it's -- it's -- it's exactly the wrong sort of development for our region.	Thank you for your participation in this public process. The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. However, the Project does not constitute sprawl, and provides development on a site planned to accommodate projected growth in a manner consistent with regional strategies for achieving mandatory reductions in greenhouse gas (GHG) emissions attributable to the land use sector. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and GHG emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-124	Sprawl Traffic	It's -- it's this sort of sprawl development that -- that perpetuates car dependence and is sure to worsen congestion on our already traffic-filled roads and not to mention the climate pollution that comes from that.	The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. Please see Response to Testimony RPC-123.
RPC-125	Pop/Housing	This -- this project claims to have a jobs-housing balance, but I call serious doubt to that feasibility of it really playing out that way. The reality now in north L.A. County is that it's experienced significantly more growth in housing than it has in jobs, almost twice as much, and there's a real -- a real jobs deficit -- deficit -- deficit, and I have -- I have every reason to believe that that pattern would hold true for this sprawl development as well. Employers don't want to be located 45 miles away from other businesses, and -- and if approved, this -- this massive housing development would not be one where everyone is able -- is ever -- is working there on site, and there would be significant out commuting, and with that, massive amounts of new, long car trips.	This comment's opinion regarding the Project's projected job/housing ratio is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration. The Project's land use plan would provide an estimated jobs/housing ratio of 1.22 through the development of commercial and business park uses on the site, thus positively contributing to the attainment of the Antelope Valley Area Plan's targeted 1.3 jobs-to-housing ratio. With regard to this comment's concerns regarding the EIR's job growth assumptions, as explained in Draft EIR Section 5.9.3 (pages 5.9-18 through 5.9-22, 5.9-29, and 5.9-30), such assumptions are based on regional employment growth projections published by the Southern California Association of Governments (SCAG), which SCAG adopted as part of its 2012 and 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) planning documents. As shown on Draft EIR Table 5.10-19, it is projected that about 48 percent of the Project's average daily trips will be internal to the Project site, while about 52 percent will be external to the Project site. Thus, as this comment correctly notes, not everybody who lives on the Project site will work on the Project site. With regard to this comment's concerns regarding the length of Project trips, as discussed on Draft EIR page 5.10-51, the North County Sub-Area Model project's that 40 percent of the trips made on site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. The model estimates that an average external trip will be 45.9 miles in length, and that the average Project trip is estimated to be 25.5 miles in length.
RPC-126	Traffic	This -- this part of our region is also -- north L.A. County is -- is where the longest commutes are already happening, and our congested roads just really cannot accommodate that sort of car dependence, long commutes. Not to mention, this project doesn't include any transit access whatsoever, and there's really -- there's just something -- something missing there connecting people in a way that's sustainable.	The Commenter's opinion has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to transit, among other requirements, the MMRP and Specific Plan require the Project Master Developer to establish a Transportation Management Association (TMA) to develop linkages with other Antelope Valley/Santa Clara Valley TMAs or like organizations in order to maximize transit efficiencies and services. Please see Final EIR, Appendix 4.0-A.Rev for further details. Please see also Responses to Testimony RPC-127 and -128 with regard to smart growth.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-127	Affordable Housing	I think we can't be giving up on -- on smart growth, by which I mean trying to preserve and create affordable housing near where people can work. They can get around without a car.	The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.
RPC-128	Miscellaneous	And -- and I -- I don't think you guys can be fooled into -- into thinking that we can call this project infill.	The Project site is not an infill site. However, it provides development on a site planned to accommodate projected growth in a manner consistent with regional strategies for achieving mandatory reductions in GHG emissions attributable to the land use sector. See Response to Testimony RPC-127 for further details.
RPC-129	Greenhouse Gas Traffic	So as you -- as you probably know, transportation is our largest source of greenhouse gases. What you may not know is that our regional transportation plan, sustainable community strategy and the collection of statewide regional plans doesn't set us upon a path to meet our state climate goals. The reason why is that -- that rich, powerful greenfield developers hire lobbyists to infiltrate those regional planning processes and make sure that their sprawl development project is in those plans.	As discussed in detail in Final EIR, response to Comment F.8-20, SB 375 tasks CARB with calculating per capita GHG emissions reduction targets for each of the regional MPOs.[3284] Each MPO must then adopt an SCS that describes a regional development pattern and transportation network that, if implemented, will feasibly reduce VMT in an amount sufficient to achieve the regional GHG reduction target.[3285] The SCS is adopted as a component of each MPO's federally mandated Regional Transportation Plan (RTP). By law, every SCS must accommodate the region's projected population growth over a 20-year period, as well as an 8-year projection of the regional housing need, as determined through the RHNA process.[3286] In 2010, CARB set the current GHG reduction target for the SCAG region at 8 percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035.[3287] Shortly thereafter, SCAG, its member agencies, and regional stakeholders engaged in a public process to prepare the region's first SCS. In order to weigh relative costs and benefits, the 2012 RTP/SCS working group evaluated four regional development patterns that would be capable of achieving the region's GHG reduction target while also accommodating future growth projections and housing

[3284] Government Code § 65080
[3285] Ibid.
[3286] Ibid.
[3287] Southern California Association of Governments (SCAG). 2016a (April 7). The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life. Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			needs.[3288] The land use scenarios varied with respect to the mix of location (e.g., greenfield development vs. infill development), housing type (e.g., single-family versus multifamily), and transportation investments (e.g., roadway versus transit improvements).[3289] These different land use scenarios were developed to explore their relative merits and they informed the project alternatives evaluated in the environmental impact report that SCAG prepared for the 2012 RTP/SCS (2012 RTP/SCS EIR).[3290] In June 2012, CARB certified that implementation of the 2012 RTP/SCS would achieve and exceed the 2020 and 2035 GHG reduction targets applicable to the SCAG region.[3291,3292] That same month, the Federal Highway Administration and the Federal Transit Administration, in consultation with the U.S. Environmental Protection Agency (USEPA), CARB and the regional air quality management districts, determined that the 2012 RTP/SCS was in conformance with the applicable State Implementation Plan (SIP) prepared in accordance with the Clean Air Act to establish control measures necessary to achieve attainment of National Ambient Air Quality Standards (NAAQS) in the SCAG region.[3293,3294] Accordingly, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG region have determined that, if implemented, the 2012 RTP/SCS would achieve targeted per capita GHG emissions reductions from passenger vehicles and will not impede or conflict with regional efforts to reduce criteria air pollutants to acceptable levels. As required by SB 375, in April 2016, SCAG updated 2012 RTP/SCS with its adoption of the 2016-2040 Regional Transportation Plan/Sustainable

[3288] Southern California Association of Governments (SCAG). 2012a. (April). 2012-2035 Regional Transportation Plan (p. 114). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf.

[3289] *Id.*, p. 117

[3290] Ibid.

[3291] California, State of, California Air Resources Board (CARB). 2012. Executive Order G-12-039 Southern California Association of Governments (SCAG) Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/exec_order_scag_scs.pdf.

[3292] California, State of, California Air Resources Board (CARB). 2012b (May). Technical Evaluation of the Greenhouse Gas Emission Reduction Quantification for the Southern California Association of Governments' SB 375 Sustainable Communities Strategy. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/scag_scs_tech_eval0512.pdf.

[3293] United States Department of Transportation, Federal Highway Administration (USDOT). 2012. Conformity Determination for SCAG's 2012 RTP/SCS and 2010/11 FTIP through Amendment No. 11-24. Sacramento, CA: USDOT. http://rtpscs.scag.ca.gov/Documents/2012/final/SCAGFF24_060412.pdf.

[3294] United States Department of Transportation, Federal Highway Administration (USDOT). 2013. Conformity Determination for SCAG's 2012 RTP/SCS through Amendment 1 and the 2013 FTIP through Amendment No. 13-04. Sacramento, CA: USDOT. http://rtpscs.scag.ca.gov/Documents/2012/final/SCAGFF04_071513.pdf.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			Communities Strategy (2016 RTP/SCS).[3295] The 2016 RTP/SCS sets forth the same balanced land use plan described in the 2012 RTP/SCS, including its land use and transportation strategies, investments, and policies.[3296] The 2016 RTP/SCS also identifies new transportation investments to improve regional mobility, including new rail transit facilities, vehicle replacement programs, new funding for active transportation, bus system improvements, network maintenance projects, and highway and arterial improvement projects.[3297] Like its predecessor, the 2016 RTP/SCS anticipates development of the Project site at densities consistent with the *Centennial Specific Plan.*.[3298,3299,3300] In addition, the 2016 RTP/SCS identifies the Northwest SR-138 Improvement Project (which is partially located within the Project's boundary and was recently approved by Caltrans) as a major regional highway project needed to improve regional access to opportunities such as jobs, education, recreation and healthcare.[3301,3302,3303] In June 2016, CARB determined that implementation of the 2016 RTP/SCS would achieve SCAG's per capita GHG reduction target of 8 percent by 2020 and would achieve an 18 percent per capita GHG reductions by 2035 (exceeding the SCAG 2035 target of 13 percent by five percentage points).[3304,3305] State and federal regulators also determined that the 2016 RTP/SCS conforms to the

3295 SCAG 2016a
3296 *Id.,* p. 69
3297 *Id.,* pp. 89, 94, 101
3298 Southern California Association of Governments (SCAG). 2015b (December). *2016-2040 Sustainable Communities Strategy (SCS) Background Documentation Appendix* (pp. 6, 7, 10, 11). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf.
3299 Southern California Association of Governments (SCAG). 2016e (April). *2016-2040 RTP/SCS Public Participation and Consultation Sub Appendix Part 1 of 5 Comments and Responses Adopted April 2016* (p. 115). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/subAppendix01_2016fRTPSCS.pdf.
3300 DRP 2017, p. 6-8
3301 SCAG 2016a, p. 100
3302 Southern California Association of Governments (SCAG). 2017a (April). The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Amendment #1 (p. 35). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_amend01.pdf.
3303 Southern California Association of Governments (SCAG). 2017b (July). The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Amendment #2 (p. 2). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_amend02.pdf.
3304 CARB 2016
3305 California, State of, California Air Resources Board (CARB). 2016a (June). Technical Evaluation of the Greenhouse Gas Emission Reduction Quantification for the Southern California Association of Governments' SB 375 Sustainable Communities Strategy. Sacramento, C7777A: CARB. https://www.arb.ca.gov/cc/sb375/scag_final_staff_report_06_29_16.pdf.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			SIP and its control measures to reduce regional criteria pollutant emissions consistent with NAAQS.[3306,3307] In light of the procedural history associated with SCAG's RTP/SCS approval, this comment's suggestion – without evidence - that SCAG, CARB, USEPA, the Federal Highway Administration, and the Federal Transit Administration were all somehow "infiltrated" by the development community to "erode [SB 375's] accountability mechanisms" is without factual foundation. Please also note that many state and local measures in addition to RTP/SCS will be needed to meet the State's climate goals. For example, ARB in its 2017 Scoping Plan[3308] (p. 76) notes that, for the transportation sector, there is a gap between what SB 375 can provide and what is needed to meet the State's 2030 and 2050 GHG reduction goals.
RPC-130	Greenhouse Gas	It -- it really limits the amount of greenhouse gas reductions we can achieve as a region, and I think – It's not -- you know, we're not in a place where we -- we look around and say "What else can we do?" Stopping a project like this is -- is what we can do to make good on our climate goals. At the state level, our scoping plan aggregates all the greenhouse gas reductions from these regional plans as well as other sectors. Right now, we're not -- we're not set to achieve reductions of the scoping plan as soon as we need to do. Unfortunately, the lawyer before you today also has a lawsuit filed against that scoping plan trying to erode the accountability mechanisms and a viable path to being -- making good on our climate goals.	As discussed in Final EIR, response to Comment F.8-20, CARB has determined that implementation of the 2016 RTP/SCS would achieve SCAG's per capita GHG reduction target of 8 percent by 2020 and would achieve an 18 percent per capita GHG reductions by 2035 (exceeding the SCAG 2035 target of 13 percent by five percentage points). This comment's general opposition to the Project is noted and will be provided to County decision makers for their consideration. Also see Response to Testimony RPC-129.

3306 United States Department of Transportation, Federal Highway Administration (USDOT). 2016. Conformity Determination for SCAG's 2016 RTP/SCS. Sacramento, CA: USDOT. http://scagrtpscs.net/Documents/2016/notices/FHMW-FTA_2016RTPSCSConformityDetermination_2016-0601.pdf.

3307 United States Department of Transportation, Federal Highway Administration (USDOT). 2017. Conformity Determination for SCAG's 2016 RTP/SCS Amendment No. 1 and 2017 FTIP Consistency Amendment No. 17-03. Sacramento, CA: USDOT. http://www.scag.ca.gov/programs/Documents/16RTP_A1.pdf.

3308 California Air Resources Board (CARB). 2017. California's 2017 (November). Climate Change Scoping Plan, the Strategy for achieving California's 2030 greenhouse gas target. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-131	Conclusion	So transportation and gridlock, automobile dependence and climate change, the massive amount of the GHGs that we're putting into our climate I would argue are the largest challenges facing our region, and a project like this – -- does not help us address that.	The Commenter's opinion is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the County disagrees with Commenter's characterization, and notes that the Project will help to address regional climate goals, as further addressed in Response to Testimony RPC-130.

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3.3 RESPONSES TO CORRESPONDENCE RECEIVED PRIOR TO JUNE 11, 2018 REGIONAL PLANNING COMMISSION HEARING

All comment letters received by the County through July 10, 2018 have been included and responded to herein. Comments that raise environmental issues pertinent to the analysis presented in the EIR have been thoroughly addressed in these responses.

With respect to the new comments letters received, individual comments within the body of each letter have been identified and numbered. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. Responses to each bracketed comment are included on the page(s) following each comment letter, and the electronic PDF file includes hyperlinks between the comment and the associated response to facilitate ease of review.

Table 1 below presents a summary listing of the additional comment letters received, including the commenting agency/individual; the assigned numbering for each comment letter; the date of the correspondence; and the page number where the comment letter can be found herein.

TABLE 3.3-1
ADDITIONAL LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
A. Federal Agencies			
-	-	-	-
B. State Agencies			
-	-	-	-
C. County Agencies			
-	-	-	-
D. Regional Agencies			
ADD-D.1	Golden Valley Municipal Water District	July 10, 2018	3-228
E. Local Agencies			
-	-	-	-
F. Organizations			
ADD-F.7	Pacific Crest Trail Association	June 28, 2018	3-230
G. Individuals			
ADD-G.43	Candace Huskey	June 28, 2018	3-232
ADD-G.44	Form Letter 5 – Various Commenters	June 12, 2018	3-234
ADD-G.45	Stephanie Pincetl	June 26, 2018	3-236
ADD-G.46	Chris Van Hook	June 5, 2018	3-248
ADD-G.47	Arthur Winer, PhD	June 26, 2018	3-250
ADD-G.48	David E. Boufford	June 28, 2018	3-252

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D. Regional Agencies

CENTENNIAL

at TEJON RANCH

GOLDEN VALLEY MUNICIPAL WATER DISTRICT

49744-3 Gorman Post Road
Gorman, California 93243
Phone: (661) 248-8501 – Fax: (661) 248-5563

July 10, 2018

Los Angeles County Regional Planning Commission
David W. Louie, District 2, Chair
Doug Smith, District 1
Laura Shell, District 3
Elvin W. Moon, District 4
Pat Modugno, District 5
320 West Temple Street
Los Angeles, CA 90012

RE: 2017 Centennial Water, Wastewater and Recycled Water Infrastructure Project

Dear Chairman Louie and Board Members:

Thank you for the opportunity to address the Planning Commission about the Centennial Project on June 6, 2018. As President of the Golden Valley Municipal Water District (District) I wanted to take this opportunity to briefly clarify my comments. The Golden Valley Municipal Water District Board of Directors voted to approve the Water Supply Assessment (WSA) on May 18, 2011 based on the proposed Centennial project at that time. On May 12, 2011, our Board entered into an agreement with Centennial to serve as the water purveyor for the Centennial project at that time, with Centennial providing the water supply needed to serve the project, as well as consulting with the District during the planning, design and construction of the water, wastewater and recycled water elements of the Centennial project. In addition, the 2011 agreement also called for Centennial to pay all the District's costs during this process, and payment for the entire project construction for the water, wastewater and recycled water infrastructure. A copy of that agreement is attached to this letter.

Our District Engineer and technical consultant, Frank Springer has reviewed the January 4, 2017 Final Memorandum prepared by Kennedy/Jenks Consultants for the "Peer Review of the Water Supply and Demand Assessment for the Proposed Centennial Specific Plan Development", and the February 2017 report by Psomas "Potable Water, Wastewater and Recycled Water Demand and System Plan" for the Centennial Project. Mr. Springer's review of these two documents provided by Centennial has not identified any concerns at this time for our District as it relates to the proposed 2017 Centennial project water, wastewater and recycled water infrastructure.

I also want to clarify my remarks and make clear that both the County, and the Local Agency Formation Commission (LAFCo) of Los Angeles, must approve the project and approve expansion of our Agency's service area boundary before we can serve as the water purveyor for the project. Once the project is included within our adjacent service area, the District will also provide water supply verifications for future tentative tract maps in compliance with applicable State law. Additionally, our Board's District Engineer and technical consultant, Frank Springer,

ADD-D.1-1

will provide District standards to Centennial, and participate in the development of the project water, wastewater and recycled water plans and technical specifications for each phase of the project, and oversee on behalf of the District the construction of these improvements for each phase of the project.

We continue to expect our District Engineer and technical consultant, Frank Springer, to work with Centennial and the County during the planning, design and construction of the water, wastewater and recycled water improvements for each phase of the project.

ADD-D.1-1 (cont'd)

Sincerely,

Rose Bryan

Rose Bryan, President
Golden Valley Municipal Water District

cc: Amy Bodek, Director of Los Angeles County Department of Regional Planning
Jan Bircumshaw, Office Manager, Golden Valley Municipal Water District
Frank Springer, District Engineer, Golden Valley Municipal Water District

Response to Comment Letter ADD-D.1
Golden Valley Municipal Water District
July 10, 2018

Response to Comment ADD-D.1-1:

Thank you for your comment and for your participation in this public process. The County acknowledges this comment's confirmation of an existing agreement between the Project Applicant/Developer and Golden Valley Municipal Water District (GVMWD), whereby the Commenter has agreed to serve as the Project's water purveyor and the Project Applicant/Developer has agreed to provide the needed water supply and to consult with GVMWD during planning, design and construction of the water, wastewater and recycled water components of the Project.

As this comment accurately notes, and as discussed in the EIR on pages 5.18-2 through 5.18-3, in May 2011, the GVMWD approved a water supply assessment for the Project in accordance with Sections 10910 et seq. of the California Water Code (WSA). As discussed in EIR Section 8.3, Project History (page 8-9), the Project was modified after the WSA was approved to reduce residential development by 3,665 dwelling units, and to reduce commercial and business park development by 4.12 million square feet. Accordingly, the water supply required to serve the Project has been reduced and is expected to fall well within the water supply and demand assumptions considered in the WSA.

This comment confirms that the GVMWD's District Engineer and technical consultant have reviewed the January 2017 Final Memorandum prepared by Kennedy/Jenks Consultants for the "Peer Review of the Water Supply and Demand Assessment for the Proposed Centennial Specific Plan Development," and the February 2017 report by Psomas entitled "Potable Water, Wastewater and Recycled Water Demand and System Plan" for the Project. This comment further confirms that, based on such review, GVMWD has not identified any concerns as it relates to the Project's proposed water, wastewater and recycled water infrastructure.

Finally, this comment clarifies the Commenter's previous statements concerning the Project to explain that the County must first approve the Project, and the Los Angeles Local Area Formation Commission must first approve expansion of GVMWD's service area boundary to include the Project site, before GVMWD could serve as the Project's water purveyor. As this comment correctly explains, once the Project is included within GVMWD's service area, the GVMWD would provide water supply verifications for future tentative tracts maps in compliance with State law. The GVMWD's expectation that its District Engineer and technical consultant will continue to work with the Project and the County during the planning, design and construction of water, wastewater and recycled water infrastructure for each Project phase is noted with appreciation.

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F. Organizations

CENTENNIAL

at TEJON RANCH

Pacific Crest Trail Association

ADD-F.7

June 28, 2018

Mr. Jodie Sackett
County of Los Angeles Dept. of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012

Re: Final Environmental Impact Report (FEIR) for the Centennial Project, State Clearinghouse No. 2004031072

Dear Mr. Sackett:

The Pacific Crest Trail Association (PCTA) appreciates and thanks County staff for considering comments on the Draft Environmental Impact Report for the Centennial Project (DEIR) set forth in our July 13, 2017 transmittal designated as comment letter "F.4" in the FEIR. The PCTA is the primary private partner with the USDA Forest Service in the management of the 2,650 mile Pacific Crest National Scenic Trail (PCT) through California, Oregon and Washington. The PCTA would also like to thank Tejon Ranch Company (TRC) staff for inclusion of our comments in the FEIR. Especially, comments regarding the visual analysis as seen by trail users of the PCT as it traverses the Centennial Project. ADD-F.7-1

Overall, upon review of the FEIR, we are pleased that our comments on the DEIR have been addressed satisfactorily. However, we would encourage County staff and Board of Supervisors to consider an alternative location (as listed in the DEIR, 4-59) of the wastewater reclamation facility (WRF East) along the northwest end of 300th Street West. The PCT does pass alongside the proposed WRF East location. Also, a school and park are proposed directly across the street from the WRF East location. Facilitating a different location of the Waste Water Treatment Plant would reduce potential visual, noise and smell impacts to the PCT, park and school at the northern gateway area to the Centennial Project along 300th Street West. The alternative 23 acre WRF East site located east of 300th Street West along the northern edge of the project would environmentally remain unchanged, even reduce a pumping station, but would need a change of zoning. ADD-F.7-2

Thus we write to express that, with the exception of the wastewater treatment plant location, our concerns regarding the Centennial Specific Plan are satisfied and we believe that with the changes in trail location and the conservation plans underway surrounding a new PCT location on TRC lands, the overall impact of large scale plans regarding Tejon Ranch will result in a dramatic net benefit to the public as it utilizes the Pacific Crest National Scenic Trail in future years. ADD-F.7-3

We look forward to continuing our work with TRC, the Tejon Ranch Conservancy, and our agency partners in Los Angeles County to provide a world class experience to the public along the Pacific Crest National Scenic Trail. ADD-F.7-4

Respectfully Submitted,

Liz Bergeron

Liz Bergeron
Executive Director and CEO

1331 Garden Highway
Sacramento, CA 95833
916-285-1846 (Main Office)
www.pcta.org

Celebrating 50 years of the PCT as a National Scenic Trail.

PACIFIC CREST TRAIL 1968 50 YEARS 2018

Response to Comment Letter ADD-F.7
Pacific Crest Trail Association
June 28, 2018

Response to Comment ADD-F.7-1:

Thank you for your participation in this public process. These comments will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The lead agency notes the Commenter's thanks with appreciation. This is an introductory comment, and no further response is required.

Response to Comment ADD-F.7-2:

This comment confirms that the Final EIR adequately responds to all comments on the Draft EIR previously submitted by the Commenter. As noted by the Commenter, one of the two permanent wastewater reclamation facilities (WRFs) proposed for the Project is planned for a location east of the aqueduct and is referred to as "WRF East". The treated effluent from the two WRFs would be supplied to the recycled water distribution system to meet irrigation demands throughout the Project site, as well as some indoor uses such as wastewater and cooling uses in the business park. (Draft EIR, Section 4.0, Project Description, page 4-59) Construction of WRF East would occur first and would be operational upon site occupancy – it would be expanded in phases, as required to treat the wastewater flows generated by occupied land uses. (*Ibid*.) This facility is proposed for development on a site near the northeastern corner of the Project site, just west of 300th Street West, as shown on Draft EIR Exhibit 4-14. The Draft EIR identifies a potential alternative location for WRF East, on property located to the east of 300th Street West at the northern edge of the Project boundary, which is currently designated as Low-Density Residential. (*Ibid.*) The Commenter's preference for this alternative location is noted for the record and will be provided to the Regional Planning Commission and the Board of Supervisors for consideration. This comment does not address the sufficiency of the EIR, and no further response is required.

Response to Comment ADD-F.7-3:

With regard to the location of WRF East, please see response to Comment ADD-F.7-2. The Commenter's opinion regarding Project benefits are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. This comment does not specifically address the EIR, and no further response is required.

Response to Comment ADD-F.7-4:

This concluding comment will be passed along to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the EIR, and no further response is required.

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G. Individuals

CENTENNIAL

at TEJON RANCH

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348 320 West Temple Street
Los Angeles, CA 90012 jsackett@planning.lacounty.gov

May 20, 2018

Dear Mr. Sackett

I am writing again to show my support for the Centennial project by Tejon Ranch (Specific Plan No. 02-232 / Centennial Specific Plan).

This project has been in the planning stages and thus under continuous refinement and improvement for a dozen or more years. In it's current form it is a a carefully thought-out and a much needed addition to the growing Antelope Valley but also to the residents of the more distant communities such as Frazier Park.

The project will be a mix of villages and neighborhood centers encouraging walking and biking with extensive parks, greenbelts and hiking trails, preserving almost half of the entire project site as designated Open Space.

In addition to the estimated 25,00 construction jobs created during build out, the included commercial and institutional land use areas will produce on-site employment and decrease work-related commuting. The additional employment opportunities will be provided by the planned 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and the land set aside for medical facilities, and estimated 20,000 permanent jobs.

Centennial will create an environmentally and economically sustainable community by including a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public, all of which will be a welcome neighbor to the Frazier Mountain area.

I am asking the Regional Planning Commission to approve Centennial and allow the developers to move expeditiously to the next stage.

ADD-G.43-1

Candace Huskey

Candace Huskey
500 East End
Frazier Park, CA 93225

(661)333-3383

hskybrwn@frazmtn.com

RECEIVED
2018 JUN 28 PM 3:37
DEPT OF REGIONAL PLANNING

Response to Comment Letter ADD-G.43
Candace Huskey
Received June 28, 2018

Response to Comment ADD-G.43-1:

Thank you for your participation in this public process. The Commenter's words in support of the Project will be passed along to the Regional Planning Commission and the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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Dear Regional Planning Commission,

I am very strongly opposed to the Centennial Development. It is a 12,000 acre community that would include 20,000 homes. The project will ruin the habitats of protected species and contribute to urban sprawl that increases the region's car dependence, worsening air quality and generating more green house gases. The area is home to many endangered species including the California condor, San Joaquin kit fox and bald eagle. 99% of California native grasslands are already gone forever, you must not allow this project to be built and destroy what little remains.

ADD-G.44-1

Respectfully,

Response to Comment Letter ADD-G.44
Form Letter 5
Various Dates
Received June 12, 2018

Response to Comment ADD-G.44-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County. This form letter was received from a total of five commenters, with no variations in content. These form letters appear as Appendix A-5 to this document. The response to this form letter is as follows.

Thank you for your comment and for your participation in this public process. The Commenters' expression of general opposition to the Project will be provided to the Regional Planning Commission and the Board of Supervisors for their consideration. However, the lead agency disagrees with the Commenters' characterization of the Project. With regard to habitat and species conservation generally, please see Draft EIR, Section 5.7, Biological Resources, and Final EIR, responses to Comments F.8-107, F.8-108, and F.8-110. With regard to specific species, please see Final EIR, responses to Comments A.3-3 and B.4-21 through B.4-23, F.8-138 through F.8-143 (California condor), F.8-163 and F.8-172 (San Joaquin kit fox – this species is not present on the site and will not be affected by the Project), and F.8-146 through F.8-148 (bald eagle). For an in-depth refutation of the assertion that the Project is "urban sprawl", please see Final EIR, response to Comment F.8-20. With regard to grasslands conservation, please see Final EIR, responses to Comments B.4-43, B.4-63, F.8-113 and F.8-119 through F.8-128. This comment does not make specific assertions regarding the adequacy of the EIR, and no further response is required.

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Stephanie Pincetl
130 S. Sycamore Ave
Los Angeles CA 90036
spincetl@gmail.com
310-245-2339

June 26 2018

Dear Members of the Regional Planning Commission,

I am writing to provide some comments on the proposed Centennial development. I will go over the following key points:

1. Centennial and Energy demand
2. Centennial and transportation impacts and needs
3. Centennial and water use
4. Centennial and resource needs
5. Centennial and fire risk
6. Centennial Externalities including County budgets
7. Centennial Sustainability and future generations

ADD-G.45-1

Energy

The first phase of the development, 19,000 homes, places residents in the northern part of Los Angeles County projected for the highest numbers of extreme heat as the region warms up over the next few decades due to climate change. This has significant ramifications for energy needs – whether conventional or renewable – grid resilience and thermal comfort of residents. Building in this part of the county will require more energy per capita, and more energy infrastructure than in other areas. It is at most risk of service interruptions from increasing demand. Building in this area will expose people to high cooling bills, especially as *Time of Use* rates get deployed, as well as high out of doors thermal discomfort (see Burillo et al 2018, just submitted to the California Energy Commission). Burillo et al 2018– among other studies – show that common wall buildings, densely agglomerated, reduce energy needs considerably, a land use form more likely in the already urbanized regions of the county.

ADD-G.45-2

Transportation

Transportation impacts are likely to be significant in their cumulative effect – something difficult to measure, but experienced by those involved in utilizing the 5 corridor. Even if there is vehicle electrification (adding to the grid load just discussed above), these additional electric vehicles are still vehicles that impact circulation and increase congestion. In addition, there will be many more service vehicles due to the development that may or may not be electric. Air pollution impacts are likely to increase due to this ex urban development.

ADD-G.45-3

Water

Water will be needed. No doubt the developers have pointed to ample water resources, but the Commission would be well served to understand whether this is traded paper water or wet water, and what long term availability looks like, especially with a changing climate. The Commissioners might investigate, if it is wet water, where exactly it is coming from, at what promised price, and which other entity will be foregoing it. If it is ground water, please ask whether the groundwater resource is to be managed and by whom, and what provisions are being made for groundwater recharge. Water neutrality, at a minimum, should be required as well preservation of existing vegetation and ecosystems throughout that are adapted to the existing water regime.

ADD-G.45-4

Resources

There is little to be done about the resource needs for such a development, materials for roads, sidewalks, housing construction, commercial buildings and more. Already northern Los Angeles County will be shortly experiencing sand-for-concrete limitations (Clinkenbeard 2012), and expansive new infrastructure will require expansive use of materials. Each type of material has embedded energy costs for processing and manufacturing, as well as the GHGs expended in the transportation to the site all of which contribute to GHG emissions; our state accounting is weak in this area, but lifecycle costs should be counted as part of the GHG emissions of any new development (what are the GHG emissions embedded in new sewage infrastructure, like cast iron pipes, for example, or PVC drains?). Resource impacts on places of origin are not taken into account either but are not insignificant, as the abandoned gravel mines in the county can show. The Commission might ask of the developer whether they are going to be purchasing GHG emissions offsets, and if so, how many and what those offsets entail. This will provide the Commission an opportunity to weigh whether it finds them credible and appropriate. Often offsets simply mean other places are responsible for our consumption.

ADD-G.45-5

Fire

The Commission might inquire whether Centennial might also increase fire risk in this part of the region by either further fragmenting the landscape and thus creating more human ignition potential (more miles of suburbs adjacent to wildlands) and/or expose the proposed residents to more fire risk than infill development. Will the development offset any additional fire fighting costs that will be incurred? The Fourth Climate Assessment of the state, which will be published later this summer, concludes that human ignition accounts for most of the wildfire incidents. Adding more people and more roads will inevitably increase fire incidents.

ADD-G.45-6

Fiscal impacts and Externalities

Approving far flung development such as Centennial, continues a long standing California pattern of existing urban areas fiscally subsidizing far off developments. Such an approach to providing housing undermines state policy direction to concentrate urbanization in the already built areas to reduce impacts (SB 375, for example), exercise fiscal discipline, and to build walkable healthy communities. The Commission would be well advised to inquire whether the

ADD-G.45-7

development will contribute sufficiently to the county's revenues to offset its costs to the region: policing, sanitation, road maintenance over time, social services and more. Developments such as Centennial increase the difficulty and cost of providing public transportation and reducing vehicle miles traveled. In contrast, concentrating development in the already developed county core accomplishes a number of things: it increases the efficiencies of infrastructure, including transportation, and generally will be less water intensive. It takes advantage of already built infrastructure, like schools that are seeing declining enrolments, sewage treatment plants (that are now utilized at under capacity), leverages and utilizes our investments in public transportation, and jobs. According to Zev Yaroslovsky, there are 400,000 underutilized parcels in the county that can accommodate multiple family dwellings. Continuing to neglect the potential of the already built area to house more people in a livable, walkable urban environment perpetuates the carbon intensive, land intensive and extensive patterns of the twentieth century. If we wish to move to a livable future, together, it makes more sense to develop where we already have available infrastructure and services, and to reduce environmental and ecological impacts on our disappearing California landscapes. There is no question this development will fragment habitat and cause further environmental degradation.

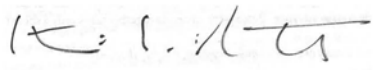
ADD-G.45-7 (cont'd)

Centennial represents the past. The county, especially with its commitment to sustainability must forge a new approach to land use that is compatible with a sustainable future for all and no longer subsidizes land development that creates expensive externalities borne by County residents and its lands. While Centennial's developers may end up meeting the letter of the law for GHG emissions (as the laws stand today), habitat protection, water provision and more, the development as a whole violates the spirit of sustainability, transport accessibility and the deep decarbonization path the state is embarking on. It perpetuates flight from our urban cores to mythical suburban enclaves that often end up breeding alienation and depression and costing all residents more for their exclusive maintenance. Centennial's approval will be a mistake to be borne by all, differently.

ADD-G.45-8

Thank you for your serious consideration

Best regards



Stephanie Pincetl

Climate Change in Los Angeles County: Grid Vulnerability to Extreme Heat
By Daniel Burillo, Mikhail Chester, Stephanie Pincetl, Eric Fournier, Daniel Walton, Fengpeng Sun, Marla Schwartz, Katharine Reich, Alex Hall a report for California's Fourth Climate Change Assessment, prepared for the State Energy Commission.

CALIFORNIA NON-FUEL MINERALS 2012

By John Clinkenbeard, Supervising Engineering Geologist (PG #4731) and Joshua Smith, Engineering Geologist (GIT # 379), California Geological Survey

Response to Comment Letter ADD-G.45
Stephanie Pincetl
June 26, 2018

Response to Comment ADD-G.45-1:

Thank you for your participation in this public process. The Commenter's concerns are noted for the record and will be provided to the Regional Planning Commission and the Board of Supervisors for consideration. This introductory comment provides a list of the topic areas addressed in this letter. Responses to specific comments on each topic are provided below. No further response is required to this introductory comment, which does not raise specific concerns regarding the EIR.

Response to Comment ADD-G.45-2:

Energy

With regard to the assertion that the Project will require more infrastructure and energy per capita, and residents will experience more energy service interruptions than is typical, the Commenter's opinion is noted for the record. However, the lead agency has appropriately analyzed energy demand and infrastructure requirements specific to the Project and location, and consulted with utility providers to ensure that sufficient energy and infrastructure will be provided for the Project. Electrical service to the Project site is provided by Southern California Edison (SCE), which has transmission and distribution facilities located within and near the Project site as described on Draft EIR, page 5.20-7. The Draft EIR acknowledges that the Project would place new demands on electrical service and create the need for new utility infrastructure. (*Id.*, page 5.20-8) During operations, SCE estimates that all proposed land uses in the Project over a 20-year horizon would generate a peak increase in electricity demand of approximately 165 MW at buildout – this is a conservative assumption that does not take proposed energy efficiency measures into account. (Id., pages 5.20-8, -9.) SCE would serve the Project's demand for electrical service through the existing distribution facilities on the Project site and the utility improvements that are proposed as part of the Project, which are described on Draft EIR pages 5.20-10 through 5.20-12. SCE has indicated that with proposed infrastructure improvements, there would be adequate electrical supplies to serve the Project under peak demand conditions. (*Id.*, page 5.20-9) Further, per MM 20.2-1, the Project Applicant/Developer will coordinate with SCE to ensure that there are no prolonged disruptions to existing transmission lines that extend through the study area, and coordinate in the design and implementation of future services and facilities, to ensure that service and infrastructure is adequate to serve proposed land uses and are available for the first occupied uses. (Final EIR, page 3-82) The study cited by the Commenter indicates that the Los Angeles region will see an increase in the number of "extreme heat days" by mid-century, adding strain to the energy grid. However, as noted by the California Natural Resources Agency, a resulting project funded by the Electric Program Investment Charge (EPIC) program is developing data that will help local and regional agencies and utilities identify where the grid is most vulnerable, which neighborhoods are served by these problem spots, and what types of adaptation measures

should be taken to improve reliability and minimize risks to public health and safety.[3309] The Commenter has provided no specific evidence to refute that proposed energy service and infrastructure will meet Project demand, or that the Project's electricity and energy impacts would be less than significant with mitigation, and no further response is required.

With regard to the concern that cooling bills will be high for Project residents and that residents will experience "high out of doors thermal discomfort", this comment will be passed on to the Regional Planning Commission and the Board of Supervisors for consideration. However, the economic cost of living in a warm climate is a social impact, not a physical impact on the environment that must be considered under CEQA. Moreover, the "high out of doors" temperatures described by the Commenter is a characteristic of the existing environment that is common to the planning area and is not expected to be exacerbated by the Project in any meaningful way. With regard to the note that common wall buildings reduce energy use, the lead agency notes that the Project has been designed to maximize energy efficiency. The Project incorporates multi-unit and townhome residential buildings in appropriate locations but provides a wide range of housing types to address the state's shortfall of about 3.5 million units needed by 2025 in both affordable and market rate housing.[3310] Given that this comment does not address a concern specific to CEQA or the EIR, no further response is required.

Response to Comment ADD-G.45-3:

Transportation

With regard to the comment that cumulative transportation impacts will be significant, the Commenter is correct that the lead agency has conservatively concluded the Project would have significant and unavoidable cumulative impacts because it cannot require Caltrans to implement improvements identified in mitigation measures. However, the lead agency has appropriately analyzed cumulative transportation-related impacts consistent with CEQA requirements in Draft EIR Section 7.0, Cumulative Impacts, and concluded that if implemented, mitigation measures for impacts to the I-5 and off-site intersections involving fair share contributions to identified improvements would reduce all cumulative impacts to a less than significant level. (Draft EIR, Section 7.0, page 7-19) The Traffic Mitigation Agreement proposed by MM 10-3 provides a mechanism for the needed transportation improvements to be implemented by providing advance funding for planning, design, and construction of certain improvements to Caltrans facilities and establishing a funding program to collect fair shares for other improvements. (Ibid.) Nevertheless, the Draft EIR recognizes that the lead agency does not have jurisdiction over Caltrans and thus cannot require Caltrans to implement planned and needed improvements – if Caltrans does not implement them, the Project would contribute to significant and unavoidable impacts, as

[3309] California Natural Resources Agency, Press Release: Natural Resources Agency Releases Updated Report on Climate Adaptation, Resiliency Strategies. January 29, 2018. Available at: http://resources.ca.gov/wp-content/uploads/2018/01/CNRA-releases-2018-upate-to-Safeguarding-Report.pdf. Last accessed July 3, 2018.

[3310] McKinsey Global Institute, A Tool Kit to Close California's Housing Gap: 3.5 million Homes by 2025, October 2016. Available at: https://www.mckinsey.com/featured-insights/urbanization/closing-californias-housing-gap. Last accessed July 3, 2018.

conservatively concluded in the Draft EIR. (*Id.,* pages 7-19, 7-20) The Commenter has not provided specific assertions regarding Project-related cumulative transportation impacts or inadequacies of the EIR analysis, and no further response is required.

With regard to the statement that even electric vehicles will add to potential transportation impacts related to circulation and congestion, the lead agency acknowledges this fact and notes that the EIR does not fail to include trips made by electric vehicles in its transportation impact analysis. Rather, the impact analysis is based on the total number of estimated vehicle trips generated by the Project, regardless of the type of vehicle. See Draft EIR, Section 5.10, Traffic Access and Circulation, pages 5.10-48 to 5.10-134 for further discussion of potential transportation impacts related to circulation.

With regard to the assertion that air pollution impacts will increase from additional vehicles, the lead agency notes that the EIR thoroughly and appropriately analyzes potential vehicle-related air quality impacts from Project implementation, and incorporates all feasible mitigation to reduce impacts, both for temporary impacts from construction vehicles and from long-time operational vehicle use. At Project buildout, in 2035, long-term operational emissions of VOC, NOx, CO, PM10, and PM2.5 would exceed AVAQMD and SCAQMD CEQA significance thresholds, and the primary source of emissions would be from vehicle operations. MM 11-4, MM 11-5, and MM 11-6 would be implemented to reduce operational emissions; however, the impact would remain significant and unavoidable. It should be noted that the Project's proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trip making. The Project requires establishment of a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations, to maximize transit efficiencies and services. The TMA would reduce dependence on automobiles and provide for a more efficient use of transportation resources among Project occupants, reducing pollutant emissions. MM 11-10 requires implementation of PDF 11-6, which specifies that residences or other sensitive land uses shall not be built within 150 feet of SR-138. The analysis demonstrates that the incremental cancer risk and chronic non-cancer health risk to sensitive receptors beyond the 150-foot buffer would be less than significant. The analysis also indicates that health risks to existing residents adjacent to SR-138 in the Project vicinity would be less than significant with incorporation of MM 11-10. Further, the Project would not conflict with AVAQMD and SCAQMD air quality management plans (AQMP) because the land uses, population, and vehicle travel elements of the Project are anticipated in the SCAG 2012–2035 RTP/SCS and the SCAG 2016–2040 RTP/SCS, which is the basis for AQMP development. In fact, the SCAQMD has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin". (See Final EIR, Comment D.4-2.) Finally, the Project is subject to a plethora of regulatory requirements that reduce air pollution impacts from vehicular/mobile sources, as discussed in the Final EIR. (See Final EIR, pages 2-351 to 2-354.)

Response to Comment ADD-G.45-4:

Water

With regard to the Commenter's concerns about source and long-term sustainability of Project water supplies, the EIR has thoroughly analyzed demand and supply for the Project. As discussed on Draft EIR pages 5.18-2 to 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011. (Draft EIR, Appendix 5.18-A) The Draft EIR found the Project's water supplies will sustainably meet buildout potable and recycled water demand and maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout, or more than 11 years of full-buildout potable water demand. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts. The analysis of the Project's water supplies is consistent with and based on the most current projections prepared by state and regional public agencies with expertise and responsibility for analyzing water supplies, including imported and ground water, under applicable laws, regulations and policies. The Project's recycled water use is consistent with state and regional policies, rules and regulations encouraging use of recycled water to reduce demand for potable supplies. In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. The Project's water supply analysis is consistent with CEQA requirements, and the Commenter provides no evidence to the contrary. See Draft EIR, Section 5.18, and Final EIR, response to Comment F.8-212 for further discussion of this topic. With regard to the price of water supplies, please note that the fiscal impact of the Project is purely a socioeconomic impact not related to adequacy of the EIR, per CEQA Guidelines Section 15064(e). For an informational discussion of the price of water supplies, see Draft EIR, Appendix 5.18-A.

With regard to regional long-term water supply availability, long-term and cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The County's AVAP and General Plan EIRs concluded that current water supplies in the Antelope Valley are sufficient to meet demand up to 2035 during average water years. The EIRs also noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated current supplies will meet dry and multiple-dry year demand by 2035. However, because potential buildout of the AVAP and General Plan in the region after 2035 could further increase regional water demand, and there are no water supply projections extending after 2035, the EIRs found cumulative impacts to regional water supplies significant and unavoidable. The Draft EIR determined that the Project would help reduce cumulative water supply impacts identified in the AVAP and General Plan EIRs, because it would achieve water use efficiencies above average regional rates and would ensure that the Project-related increment of anticipated future regional growth would occur with a high level of water conservation, including state-of-the art household and irrigation installations and enhanced recycled water use. Nevertheless, consistent with the AVAP and General Plan EIRs, the Draft EIR determined that long-term cumulative water supply impacts would be

significant and unavoidable. See Final EIR, response to Comment F.8-212 for further discussion.

With regard to climate change impacts on Project water supply, an extensive and sophisticated analysis of potential climate change impacts was incorporated into the projections used in the Antelope Valley-East Kern Water Agency (AVEK) Urban Water Management Plan (UWMP) and the Project's water supply analysis. The UWMP was approved by AVEK in 2016 and was determined to meet all California Water Code requirements by the California Department of Water Resources (DWR) in March 2017. The Project water supply analysis is based on the UWMP analysis, including with regard to climate change impacts. The UWMP analyzed DWR's current Delivery Capability Report (DCR) and determined that of the scenarios presented in the DCR, the conservative Early Long Term (ELT) scenario was most appropriate for long-term estimates of future supply availability, because it is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for expected climate change impacts. (Draft EIR Appendix 5.18-F, p. 6-1) The Draft EIR explains that the ELT scenario was chosen because of its substantial climate change analysis. (Draft EIR, pages 5.18-27, -28; Draft EIR Appendix 5.19-A, page 7-7). See Final EIR, responses to Comments F.8-212 and F.8-213 for further discussion of this topic, including more about climate change analysis in the ELT scenario. The Project's water supply analysis appropriately takes potential climate change impacts into account, and the Commenter provides no contrary evidence. No further response is required.

The Commenter asks whether the Project will use groundwater, and how it will be managed. The Project will use groundwater, and use is subject to strict management. Project groundwater use must comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution ("Adjudication"). (Draft EIR, Appendix 5.18-D) The Adjudication was approved to sustainably manage Antelope Valley groundwater resources over time. Groundwater use consistent with the Adjudication takes account of and avoids potential long-term, cumulative impacts to the Antelope Valley Basin. Per Section 1.5 of the Adjudication, the basin's safe yield is 110,000 acre-feet per year. Per Section 3.5.43 of the Adjudication, safe yield is the amount of annual extractions of water from the basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Per Section 3.4 of the Adjudication, the physical solution governs groundwater, imported water and basin storage space to ensure that the basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication allocates overlying production rights in amounts consistent with sustainable yield and provides that, after a seven-year rampdown period applicable to all users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The Project's groundwater use will be limited to this allocation. For further discussion of Project groundwater use and the Adjudication, see Final EIR, response to Comment J.1-10. With regard to groundwater recharge, the Project has been designed to maximize recharge opportunities, with low impact development stormwater management techniques to promote recharge, as required by MM 4-1. (Final EIR, pages 3-6, 3-108)

With regard to the Commenter's suggestion that the Project be required to demonstrate "water neutrality", this suggestion is noted and will be provided to the Regional Planning Commission and the Board of Supervisors for their consideration. Centennial has proposed a "Net Zero Water" program, which is also required by the project features included in the Specific Plan and the mitigation measures included in the Environmental Impact Report (EIR). There are several elements in this program, which collectively result in the project creating its own water supply rather than using water supplies owned or controlled by other water agencies in the region. Centennial's water supplies include imported water, an adjudicated amount of groundwater based on the project site, historic agricultural water use, a comprehensive advanced wastewater treatment program to ensure reclaimed recycled water for outdoor irrigation and other authorized uses, and a water banking program to store ample amounts of water to meet project needs during multi-year drought conditions." With regard to the request that vegetation and ecosystems adapted to the existing water regime be preserved as part of the Project, the Landscape Plan included in the Centennial Specific Plan requires a water-wise, regionally appropriate landscape to enhance and/or complement native habitat, with the use of native, drought-tolerant plants identified in a plant palette specifically tailored to the unique high desert environmental conditions. (See Final EIR, Appendix 4.0-A.Rev, Centennial Specific Plan [Revised], pages 3-29 to 3-50.) The Commenter does not provide a more specific request for water-related revisions to the Project or the EIR, and no further response is required.

Response to Comment ADD-G.45-5:

Resources

With regard to the Commenter's general concern about resource use for Project construction, this comment will be provided to the Regional Planning Commission and the Board of Supervisors, but the lead agency notes that resource demand is common to all development projects, and is a common attribute of residing, working, or producing goods or services in California. Further, the Project is subject to a myriad of energy efficiency and green development regulations and requirements incorporated into Project design and mitigation measures. For example, the Centennial Green Development Program's Green Building component requires all Project development to comply with CALGreen Code Mandatory Measures and voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances. Additional measures are also included to further improve energy, water, and material management conservation and efficiency, and to assure healthy building materials and designs. Please see Final EIR, response to Comment F.8-204 for further discussion of this topic. With regard to potential limits on the availability of sand as a construction material, the Commenter's statement is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The lead agency acknowledges that all new development, including the Project, is subject to the availability of construction materials. To the extent the Commenter's concern is the source of sand and other materials, per MM 21-21, the Project Applicant/Developer shall require contractors to use locally available and recycled materials, provided such materials meet all applicable Building Code and other requirements, and are readily available and comparably priced to assure that such materials do not increase the cost and decrease the

affordability of housing or community infrastructure. (Final EIR, Appendix 2.0-C.Rev, page C-164) The Commenter does not raise a specific concern about the sufficiency of the EIR, and no further response is required.

With regard to the assertion that impacts for the full lifecycle of Project materials should be incorporated into analysis of the Project's GHG emissions, the lead agency responds that the full lifecycle of Project materials falls outside the scope of Project impacts as defined by CEQA, and therefore has determined that such study is not appropriate. What CEQA requires is analysis and mitigation of "either a direct physical change in the environment, or a *reasonably foreseeable indirect physical change* in the environment." (Pub. Res. Code § 21065, emphasis added). The entire "lifecycle" of a product is not a well-defined concept, and there is no common methodology for the analysis of lifecycle impacts – such analysis would therefore be unduly speculative and is outside the scope of what is considered "reasonably foreseeable". For this very reason, the Office of Planning and Research removed the term "life cycle" from proposed CEQA Guidelines on GHG analysis in 2009.[3311] Moreover, the California Supreme Court has expressly found that CEQA does not require EIRs to include a life cycle analysis of a project's potential environmental effects [*Save the Plastic Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 173 (CEQA does not require an agency "to conduct an exhaustive analysis of all conceivable impacts a project may have in areas outside its geographical boundaries")]. For further discussion of life cycle analysis, see Final EIR, response to Comment F.8-191. With regard to the foreseeable GHG emission impacts associated with construction-related transportation, such impacts have appropriately been incorporated into the Project's GHG emission analysis. (Draft EIR, Section 5.21, Climate Change, pages 5.21-50, -51, and Draft EIR Appendix 5.11-A)

With regard to potential impacts occurring at the locations from which Project materials are sourced, this comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, CEQA does not require the consideration of every remote, potential Project-related impact that could arise in other locations. Rather, as required by CEQA, the EIR limits its analysis to the scope of the Project and its impacts on the environment as defined by CEQA. CEQA defines the "project" as any activity which may cause either a direct physical change in the environment, or a *reasonably foreseeable indirect physical change* in the environment; the "environment" is defined as the physical conditions that exist *within the area which will be affected by the proposed project*. (Pub. Res. Code §§ 21060.5, 21065, emphasis added) Therefore, the EIR appropriately limits its analysis to direct physical changes and reasonably foreseeable indirect changes on the Project site and the surrounding area. Analysis of potential impacts at the source of Project materials would be unduly speculative and outside the scope of the Project and its reasonably foreseeable impacts as defined by CEQA.

Addressing the Commenter's GHG emission offsets question, as explained in the EIR, the Project does not rely on GHG offsets to mitigate Project impacts related to GHG emissions not otherwise covered by California's cap-and-trade program. See Draft EIR, Section 5.21,

[3311] California Natural Resources Agency, Final Statement of Reasons for Regulatory Action Pursuant to SB97, December 2009.

Climate Change, and Final EIR, responses to Comments F.8-83, F.8-88, F.8-95, and F.8-204 for further discussion of the Project's aggressive means of reducing GHG emissions and the use of offsets.

Response to Comment ADD-G.45-6:

Fire

With regard to the Commenter's concerns about increased demand for firefighting services, the Commenter's concerns will be passed on to the Regional Planning Commission and Board of Supervisors. However, the Project EIR has adequately analyzed potential impacts and appropriately concludes that impacts will be less than significant after mitigation. First, Draft EIR Section 5.16, Fire and Law Enforcement Services, acknowledges that the Project would create demands for fire protection. MM 16-1 requires that response times to the Project site shall be 5 minutes or less for fire service responses. The Project would therefore include the construction of up to four on-site fire stations to meet increased demand in the established response times (MMs 16-1 through 16-3). As indicated by the Los Angeles County Fire Department, these fire stations would provide the necessary fire protection services to the Project and thus, impacts on fire protection services would be less than significant after mitigation. See also Final EIR, responses to Comments F.3A-64, F.7-18, and F.8-62 for further discussion of this topic.

With regard to increased fire risk, the EIR appropriately recognizes potential fire risks and adequately analyzes the impact of introducing urban development, specifically the Project as designed, into an area subject to wildfire, concluding that the Project would comply with regulatory requirements and incorporates mitigation measures that would reduce impacts to a less than significant level. (Draft EIR, Section 5.3, Hazards and Fire Safety, pages 5.3-35 to 5.3-39) As noted in the EIR, the Project site is located in an area designated as a Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection. (Draft EIR, Appendix 5.19-A, page 5.3-30) The majority of the Project site is either within a Very High Fire Hazard Severity Zone (VHFHSZ) or High Fire Hazard Severity Zone (HFHSZ), while the eastern edge of the Project site is within the Moderate Fire Hazard Severity Zone (MFHSZ). (Final EIR, page 3-103) The Draft EIR determines that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance. This determination, however, does not rely solely upon implementation of MM 3-9 or other mitigation measures. Rather, the Draft EIR concludes that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protections services, including but not limited to MM 3-9. For further discussion, see Draft EIR, pages 5.3-35 to -39; Final EIR, responses to Comments F.8-63 and F.8-64. With regard to the exact location of Fire Hazard Severity Zones on the Project site, an updated EIR Exhibit 5.3-2, Fire Hazard Severity Zones, was unintentionally omitted from the Final EIR, and is hereby incorporated

into the Final EIR, Section 3.0, Draft EIR Clarifications and Revisions, after page 3-103 – it appears in Appendix D to this document.

With regard to the concern about fire service costs, as stated on Draft EIR page 5.16-5, the County's Developer Fee Program was adopted specifically to fund the purchase of fire station sites; the construction of new stations and facility improvements; and the purchase of equipment. Prior to the construction of the first on-site fire station, the Project would pay developer fees, which may be used for the construction of facility improvements and the purchase of equipment needed at Fire Station 77. MM 16-2 on page Draft EIR page 5.16-16 allows the Applicant to enter into a program where the Applicant provides the land and constructs and equips the fire stations in exchange for credit towards the fee payments. MM 16-3 states that the Applicant would provide the land for, and construct and equip, up to four new fire stations to serve the Project. The fire station operating and staffing costs would be funded by property tax revenues from the Project. Impacts on fire protection services would be less than significant after mitigation. The Commenter provides no evidence to the contrary and does not specifically question the adequacy of the EIR with regard to fire risk and fire services. No further response is required.

Response to Comment ADD-G.45-7:

Fiscal Impacts and Externalities

With regard to the assertion that the Project will be fiscally subsidized by existing urban areas, the Commenter provides no evidence to support this unfounded assertion. The Project and the construction of related infrastructure will be appropriately funded, and it is specifically a Project objective to "Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers." (Draft EIR, Section 4.0, Project Description, page 4-4) To provide just two examples of how the Project will carry out this objective:

- The proposed Centennial Transportation Improvement Program Agreement provides a mechanism for transportation-related improvements to be implemented by providing advance funding for planning, design, and construction of certain improvements and establishing a funding program to collect fair shares for other improvements. (Draft EIR, Section 7.0 Cumulative Impacts, page 7-19)
- As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. (Final EIR, page 2-503; Final EIR, Appendix 2-C to Appendix 4.0-A)

The Commenter provides no evidence to support its assertion, and no further response is required. Further, please note that the fiscal impact of the Project is purely a socioeconomic impact not related to adequacy of the EIR. CEQA Guidelines Section 15064(e).

With regard to the related assertions that the Project constitutes sprawl, is not a healthy walkable community, undermines the goals of SB 375, and "violates the spirit of sustainability", the Commenter provides no evidence for these assertions, and the lead agency disagrees. With regard to the County's "underutilized parcels", construction of the Project is not incompatible with the use of those parcels for multi-family development. While the lead agency acknowledges the benefits of infill development listed by the Commenter, the EIR extensively documents the sustainable and walkable nature of the Project, and clearly explains that the Project represents the culmination of a long-term, comprehensive regional and local planning process designed to accommodate anticipated growth in the Antelope Valley while also protecting the Antelope Valley's valuable open space and agricultural resources. The Project has been situated and designed to promote regional "smart growth" planning principles established by the SCAG 2016-2040 RTP/SCS (per SB 375) and the AVAP for the purpose of sustainably accommodating regional growth projections in a manner that reduces pollutant and GHG emissions and promotes public health. (Draft EIR, pages 4-3 to -15; 5.8-1 to -11, -19 to -74; 5.9-1 to -21, -23 to -31; 8-4) Further, as part of the Project's overall transportation demand management (TDM) strategy to reduce the dependence on the private automobile, which would result in a consequential reduction in overall volume of Project-generated trips off site, the Project Applicant will be required to participate in or form a Transportation Management Association (TMA) to serve the residents and employees of businesses within the Project area or will be organized in conjunction with an existing organization in the Antelope Valley or Santa Clarita area. Regional and local agencies report successful implementation of the types of TDM measures that the TMA would consider to meet the standards set forth in MM 10-25, and which are listed in Table 2-C-2 of the Specific Plan's Mobility Plan (Appendix 2-C to Final EIR Appendix 4.0-A.Rev).[3312],[3313],[3314] For further discussion, please also see Final EIR, responses to Comments F.8-20 and F.8-72 (in-depth refutation of the assertion that the Project is "sprawl"), and F.8-204 (in-depth discussion of the Project's walkable and sustainable design and features).

With regard to whether the Project's economic benefits will offset its costs, the Commenter's concerns are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the cost of a Project is a socioeconomic impact and not a physical impact on the environment that must be considered under CEQA. Given that this comment does not address a concern specific to CEQA or the EIR, no further response is required. Nonetheless, the lead agency notes that the Project will provide significant net economic benefits to Los Angeles County, including expected annual revenues of $3,394,902.00, versus $21,827,596.00 of annual costs to the County's General Fund for re-occurring public services, representing an annual net benefit to the General Fund of about $21,567,306.00. The Project will also generate an estimated $22,328,502.00 of property tax revenues. Further, an estimated 23,675 permanent jobs would be created by Project uses,

[3312] Neil Peacock, District 3 Corridor Planning Manager, Caltrans. Sacramento-Area Regional VMT Mitigation Opportunities: Bike share and Microtransit First/Last Mile Accessibility Solutions.
[3313] Devon Deming, Los Angeles County Metropolitan Transportation Authority. Sponsorship of Specialized Pass Programs.
[3314] David Somers, Los Angeles Department of Transportation. Reducing vehicle miles in the region by investing in Transportation Management Organizations. Proposal for SCAG VMT Exchange Study. June 14, 2018.

with about 25,000 construction jobs. See the Draft Statement of Overriding Considerations, available at http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180711-attG4.pdf, for further discussion.

With regard to the assertion that the Project will fragment habitat, the Commenter's opinion is noted for the record, but based on extensive regional and Project-specific analysis documented in the EIR, the lead agency disagrees. Species expected to use the internal open space areas following Project buildout are expected to consist predominantly of common urban- and suburban-adapted species, which persist in these environments regardless of typical barriers by using streets and green space areas. The Project has been designed to include green space connections between undeveloped open space areas where feasible for increased species mobility. The Project only fragments the natural open space areas within the development footprint, and remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. Further, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is therefore considered less than significant. The Commenter provides no evidence to the contrary, and no further response is required. For further discussion, please see Draft EIR, Section 5.7, Biological Resources, pages 5.7-142 to -164, and Final EIR, responses to Comments F.8-108 and G.28-3.

Response to Comment ADD-G.45-8:

This comment reiterates many of the points made elsewhere in the Commenter's letter and expresses the opinion that the Project should not be approved. The Commenter's opinions regarding the Project are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. With regard to sustainability and Project design, the assertion that the Project will be "subsidized", and habitat protection, see response to Comment ADD-G.45-7; with regard to the provision of water, see response to Comment ADD-G.45-4; with regard to GHG emissions and the Project's consistency with the state's "deep decarbonization path" (specifically with regard to SB 375), see responses to Comments ADD-G.45-5 and ADD-G.45-7. This comment does not make specific assertions about the adequacy of the EIR, and no further response is required.

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ADD-G-46

June 5, 2018

Dear Supervisors,

Please oppose the Centennial Specific Plan!

This plan will destroy the habitat of many California native plants and animals and turn thousands of acres of beauty into urban sprawl. This cannot keep happening!

California and Los Angeles County must stop encroaching on these wild lands. We do not have the water or resources to support these developments. Our roads are clogged and traffic is a nightmare creating more and more pollution to these lands and plants and animals. They must have space too! You cannot over development all these wild areas. California does not need to accommodate more and more people which we cannot support, when our current standard of living is being threatened and undermined daily. California will be ruined if you do not do your jobs and protect it. The current residents, animals, plants must all be taken into account and protected. If you keep filling up the boat with all this development you will be instrumental in the destruction of California.

ADD-G.46-1

We cannot afford to lose more precious native habitat to development we don't need or want! We need natural lands not more building. There are lots of other states that need people to live there, with lots of resources. You cannot ruin California to accommodate every developer and person who wants to live and take from California. We are an important state and we must be protected. Please do so and vote no on the Centennial Specific Plan.

Thank you.

Chris Van Hook

337 Via de la Paz

Pacific Palisades, Ca. 90272.

Response to Comment Letter ADD-G.46
Chris Van Hook
June 5, 2018

Response to Comment ADD-G.46-1:

Thank you for your participation in this public process. The Commenter's general opposition to the Project is noted for the record and these comments will be provided to the Regional Planning Commission and Board of Supervisors for consideration. With regard to topics generally addressed in this comment, please see Draft EIR, Section 5.7, Biological Resources, pages 5.7-142 to -164; Final EIR, responses to Comments F.8-108 and G.28-3 (habitat), F.8-20 and F.8-72 (sprawl and accommodation of anticipated regional growth that will occur with or without the Project), and F.8-212; response to Comment ADD-G.45-4 in this document (water supply); and Draft EIR, Section 5.10, Traffic Access and Circulation (transportation impacts). This comment does not make specific assertions about the adequacy of the EIR, and no further response is required.

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ENVIRONMENTAL HEALTH SCIENCES DEPT.
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LOS ANGELES, CALIFORNIA 90095-1772

June 26, 2018

Via Electronic Mail

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Re: Centennial Project Final Environmental Impact Report

Dear Commissioners:

As an atmospheric chemist and air quality expert with 45 years of experience, who has extensively studied and described in more than 200 peer-reviewed journal articles the causes and impacts of poor air quality in Southern California communities, I am asking you to deny approval of the proposed Centennial project. Large-scale urban sprawl of this immense magnitude is not the way to meet the health-based ozone and fine particle air quality standards which continue to be routinely violated in this region, nor is it the way to reach the climate change mitigation goals of California. ADD-G.47-1

The proposed Centennial project is a massive 5,800-acre development more than 60 miles away from downtown areas. It will worsen air pollution by putting more cars on roads for long trips, which will intensify already-terrible traffic conditions while increasing emissions of air pollutants such as nitrogen oxides (NO_x), volatile organic compounds (VOCs), carbon monoxide, heavy metals, carbon dioxide and respirable particulate matter ($PM_{2.5}$). It will also lead to more ozone (O_3) production through the photochemical reactions of NOx and VOCs emitted by these vehicles. Short- and long-term exposure to several of these pollutants have been shown to have adverse health effects in humans and have been linked with premature mortality, compromised birth outcomes and a host of respiratory impacts. In addition, increased daily vehicle trips will result in more emissions of greenhouse gases (GHGs), including NO_x, carbon dioxide (CO_2), and methane (CH_4), which will, as noted above, counter California's climate change goals. ADD-G.47-2

The proposed project would be located at the boundary between the South Coast Air Basin (SoCAB) and the Mojave Desert Air Basin (MDAB). However, most vehicle trips ADD-G.47-3

associated with the project would occur within the SoCAB, as potential residents would likely commute between Centennial and either Santa Clarita (>30 miles away) or Los Angeles (>60 miles away). This is a major concern because the SoCAB already suffers from high levels of air pollution. Despite decades-long efforts to reduce air pollutant emissions, the SoCAB still fails to meet federal (or state) air quality standards, specifically the national ambient air quality standards for 8-hour O_3, 1-hour O_3, annual-averaged $PM_{2.5}$, or 24-hour $PM_{2.5}$.

ADD-G.47-3 (cont'd)

A combination of unique topography (the SoCAB is surrounded by high mountains and the coast), adverse meteorology that results in low mixing layers and limited dispersal, and the emissions from millions of vehicles on the road due to daily commuters and the goods movement industry make the SoCAB the worst area of O_3 pollution in the nation. According to the South Coast Air Quality Management District (SCAQMD), in 2012 mobile sources contributed almost 90% of the region's total NO_x emissions. Obviously, we cannot control the topography or meteorology of this area, but we can (and must) change our behavior to reduce vehicle emissions if we are serious about improving air quality in Los Angeles County.

ADD-G.47-4

Approving developments like Centennial will only exacerbate a wide range of health effects due to air pollution in this region. If LA County is truly committed to keeping its residents healthy, and to combatting climate change, then we need to redefine how we design and plan our cities and move away from the massive urban sprawl and resulting adverse air quality impacts inherent in this Centennial project.

ADD-G.47-5

Thank you for your consideration.

Cordially,



Arthur Winer, PhD
Distinguished Emeritus Professor, UCLA Fielding School of Public Health
Director Emeritus, UCLA Environmental Science and Engineering Program
Associate Director Emeritus, UCLA Institute of Environment and Sustainability

Response to Comment Letter ADD-G.47
Arthur Winer, PhD
June 26, 2018

Response to Comment ADD-G.47-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project and all comments provided in the Commenter's letter will be provided to the Regional Planning Commission and Board of Supervisors for consideration. For a discussion of climate change impacts and the Project's consistency with regional and state emission reduction goals, as well as a detailed refutation of the assertion that the Project constitutes sprawl, see Final EIR, responses to Comments F.8-20, F.8-72, F.8-79, F.8-80, and F.8-204. With regard to air quality, the lead agency disagrees with the Commenter's general assertion, and notes that the South Coast Air Quality Management District (SCAQMD) submitted a letter to the County, dated July 13, 2017, indicating that it reviewed the Draft EIR and determined that the Project "exemplifies the [County's] leadership in promoting sustainable communities" and that it "supports the goals" of SCAQMD's 2016 Air Quality Management Plan (AQMP) and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the Basin" (see Comment D.4-2). In addition, the Antelope Valley Air Quality Management District (AVAQMD) submitted a letter to the County, dated May 26, 2017, indicating that it reviewed and had no comments on the Draft EIR (see Comment Letter D.1). See also Final EIR, responses to Comments F.8-188 through F.8-205 for further discussion of air resource impacts. This comment does not make specific assertions about the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.47-2:

This comment's assertion regarding the potential health effects of air pollution is noted. The Draft EIR discloses and describes in detail the potential health effects of each criteria pollutant on pages 5.11-3 through 5.11-11 and analyzes the potential health impacts of criteria pollutant emissions on sensitive receptors in Draft EIR Section 5.11, Air Resources, at pages 5.11-21 through 5.11-22, 5.11-3 through 5.11-37, 5.11-63 through 5.11-64, 5.11-68 through 5.11-74, and 7-20. See also Final EIR, responses to Comments F.8-188 through F.8-205 for further discussion of air resource impacts. With regard to climate change, see also response to Comment ADD-G.47-1 in this document. This comment does not make specific assertions about the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.47-3:

As noted by the Commenter and discussed in the EIR, the Project site straddles the South Coast and Mojave Desert air basins and both basins are designated non-attainment for certain state and federal air quality standards, including for particulate matter and ozone. (Draft EIR, page 5.11-24 and -25) The EIR thoroughly and appropriately analyzes potential air resource impacts, including the South Coast Air Basin, and mitigates impacts to the greatest extent feasible. As discussed in Final EIR, Comment D.4-2, SCAQMD has reviewed

the Draft EIR and determined that the Project "supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin." As discussed in Comment D.1-1, the Antelope Valley Air Quality Management District has reviewed, and has no comments on, the Draft EIR. See also Final EIR, responses to Comments F.8-188 through F.8-205 for further discussion of air resource impacts. This comment does not make specific assertions about the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.47-4:

The Commenter's description of the South Coast Air Basin and opinion regarding the reduction of vehicle emissions is noted for the record. The Project has been designed using smart growth principles to reduce vehicle miles traveled and vehicle emissions. It is consistent with regional planning efforts as further discussed in Final EIR, response to Comment F.8-20, and as noted in responses to Comments G.47-1 and G.47-3, the SCAQMD has determined that the Project "exemplifies the [County's] leadership in promoting sustainable communities" and that it "supports the goals" of SCAQMD's 2016 Air Quality Management Plan (AQMP) and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the Basin" (see Comment D.4-2).

Response to Comment ADD-G.47-5:

This comment reiterates assertions made in the Commenter's letter. See responses to Comments ADD-G.47 through ADD-G.47-4. See also Final EIR, responses to Comments F.8-20, F.8-72, F.8-79, F.8-80, and F.8-204 for further discussion of these topics and refutation of the Commenter's opinion. This comment does not make specific assertions about the adequacy of the EIR, and no further response is required.

THE HARVARD UNIVERSITY HERBARIA
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28 June 2018

Department of Regional Planning for Los Angeles County
Room 150
320 West Temple Street
Los Angeles, California 90012

Dear Members of the Department of Regional Planning for Los Angeles County:

In February 2014, I saw something I never expected to see in my lifetime, California condors! They were soaring off in the distance along the southeast side of the Tehachapi Mountains. We saw them from a high point on Tejon Ranch on a day I was given a special tour of the property. Since it was still early in a season following many years of severe drought, I was unable to see the magnificent display of wildflowers on the ranch, but from photos of the area it was obvious that Tejon Ranch can exhibit one of the world's most spectacular floral displays following wet winters. ADD-G.48-1

I have been a botanist for 48 years and have participated in extensive field studies in China, Japan and other Asian countries and in eastern North America (and less so in western North America) and have visited temperate areas of high biodiversity in South Africa, Australia and Madagascar and can easily say that none of those areas exceeds California in the uniqueness and importance of its flora and fauna. In nearly all of Asia, particularly in China, there are no areas that have escaped the influence of humans. The biodiversity of Madagascar is seriously threatened by a growing population and extreme poverty, which results in the over-exploitation of natural resources. Large areas of western Australia and some areas in South Africa are fairly well protected, but on a worldwide scale, those areas of exceptional biodiversity represent only a tiny portion of the earth's surface, and none of them share any of the plants and animals that occur only in California, which is so unique that it has been given its own scientific designation as the California Floristic Province. ADD-G.48-2

The 270,000 acres of Tejon Ranch may seem like a huge area, but it is only fraction of the 100 million acres of the state of California. To keep Tejon Ranch free from development would not only further California's role as the leader for the environment in the United States, but it would preserve a unique, worldwide, biological treasure. ADD-G.48-3

Benefits of Keeping Tejon Ranch intact

Preserving some of the finest native grasslands in Southern California and one of the finest spring wildflower displays in the world.

Insuring the connection and uninterrupted transition between ecologically significant habitats. Habitat connections are necessary given the reality of global climate change.

Preserving habitats for rare and common plant and animal species

ADD-G.48-4

Problems to be expected from development

Urban sprawl ADD-G.48-5

Long commutes and more cars on California's highways
Pollution and additional greenhouse gas emissions
Severed habitat corridors
Local extirpation of plants and animals
Loss of ability for plants and animals to migrate uninterruptedly

ADD-G.48-5 (cont'd)

For those members of the Department of Regional Planning for Los Angeles County who have not visited Tejon Ranch, or who know little about its wildlife, I urge you to visit Tejon Ranch in a good wildflower year, or to search for photos of the area taken during the peak of wildflower bloom. This is not a special place for just California, but for the whole country and for the world. I hope you will do all you can to preserve intact this unique and one of the most beautiful and biologically significant parts of our country. Thank you for reading my message and for your consideration.

ADD-G.48-6

Respectfully,



David E. Boufford
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Response to Comment Letter ADD-G.48
David E. Boufford
June 28, 2018

Response to Comment ADD-G.48-1:

Thank you for your participation in this public process. These comments will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As noted by the Commenter and appropriately discussed in the EIR, California condor have the potential to occur in the Project region and have been observed on the Project site. The Draft EIR concludes that Project implementation is not expected to result in significant adverse impacts on this species. However, MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. For further discussion regarding the California condor, see Draft EIR, Section 5.7, Biological Resources, pages 5.7-118 to -120, -145, -148, and Final EIR, responses to Comments A.3-3, B.4-21 through B.4-23, and F.8-138 through F.8-143. With regard to wildflowers, the EIR appropriately discusses their presence on the Project site, and potentially significant impacts to wildflower fields and other special status vegetation types that would result from implementation of the Project would be reduced to less than significant levels with implementation of MM 7-10. For further discussion of wildflowers on the Project site and potential impacts, see Draft EIR, Section 5.7 Biological Resources, pages 5.7-1, -11, -24, -26, -31, -40 to -44, -66, -158 to -160, -162 to -164, and Final EIR, responses to Comments F.8-114, F.8-119, F.8-123 to F.8-125, F.8-127, and H.21-1, and Section 3.0, pages 3-32 and 3-33. This comment does not make specific assertions about the Project or adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.48-2:

This comment provides background on the Commenter, and information regarding the flora and fauna in other nations as compared to the State of California. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not specifically address the Project or adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.48-3:

The Commenter's opinion regarding the preservation of Tejon Ranch is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. The vast majority of Tejon Ranch is to be conserved in perpetuity, and the Project has been designed to maximize open space and habitat/species protection. As noted in the EIR, on June 17, 2008, Tejon Ranch Company (TRC) entered into a Conservation and Land Use Agreement (Ranchwide Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy), which allows TRC and its development partners to pursue approvals for development of agreed-upon portions of the Tejon Ranch, including the Project site, without opposition from the

Resource Groups, while providing for the designation of Project open spaces and the dedication or sale of conservation easements over approximately 240,000 acres, or approximately 90 percent, of the 270,000-acre ranch. Of the 12,323-acre Project site, approximately 5,624 acres (or 45.6 percent) are proposed for open space for natural resource protection and greenways. Further, preservation of the entire Project site would impede regional planning goals, including with regard to addressing the region's critical housing needs, and would undermine the implementation of the SCAG 2016-2040 RTP/SCS and compliance with SB 375. This comment does not specifically address the Project or adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.48-4:

The Commenter's opinions regarding benefits of conservation are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. As more fully discussed in Draft EIR, Section 5.7, Biological Resources, above in response to Comment ADD-G.48-3, and in Final EIR, response to Comment F.8-20, the Project has been designed to accommodate anticipated growth while maximizing conservation and ensuring that potential impacts to plants and wildlife species are mitigated to the maximum extent feasible. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.48-5:

The Commenter's opinions regarding potential development impacts are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. The EIR thoroughly and appropriately addresses all of the listed potential impacts in this comments, including with regard to Project siting and urban sprawl (Draft EIR, Section 5.8, Land Use, and Final EIR, response to Comment F.8-20 and F.8-72); greenhouse gas emissions (Draft EIR, Section 5.21, Climate Change, and Final EIR, responses to Comments F.8-79 through F.8-97 and F.8-204); habitat corridors and connectivity, and wildlife movement (Draft EIR, Section 5.7, Biological Resources, pages 5.7-164 to 5.7-170 and Final EIR, responses to Comments B.4-36, B.4-56, B.4-57, F.3-23, F.3-25, F.3A-32, F.5-2 through F.5-7, F.8-109, F.8-110, F.8-172, and J.1-12); and potential impacts to flora and fauna more generally (Draft EIR, Section 5.7, Biological Resources). This comment does not specifically address the Project or adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.48-6:

The Commenter's suggestion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. This comment does not address the Project or the adequacy of the EIR, and no further response is required.

3.4 RESPONSES TO PUBLIC TESTIMONY GIVEN AT JUNE 11, 2018 REGIONAL PLANNING COMMISSION HEARING

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Kathleen Trinity			
RPC-132	Introduction	Good morning, Chairman Louie and Commissioners. I'm Kathleen Trinity from Acton. And I'm opposed to the plan. I realize that a lot of time and effort has gone into the Centennial Plan, the DEIR and the FEIR. At the County level, the environment is neatly divided into planned sectors, and in CEQA habitat and wildlife are referred to as biological resources, that is, for human use.	Thank you for your participation in this public process. The Commenter's opposition to the Project is noted, has been heard in testimony by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR appropriately analyzes and mitigates potential Project-related impacts to biological resources to the greatest extent feasible, and the Project Applicant has committed to preserving much of Tejon Ranch for the benefit of species and habitat conservation. This comment does not specifically address the adequacy of the EIR and, therefore, no further response is required.
RPC-133	Biology	But as human beings, we also have an obligation and a desire, I would think, to preserve and protect our natural areas and wildlife. We need to stand back and be extremely cautious because this massive urban development will, first, forever change the nature of the area and, second, will compromise the area, not only unique in flora and fauna, but because it is located between the Tehachapi Mountains and the San Gabriels and the Antelope Valley. This location between mountain ranges is key to providing essential linkages for wildlife movements between ranges and roaming within them.	The Commenter's opinion regarding the nature of the Project is noted, was heard in testimony by the Regional Planning Commission, and will be provided to the Board of Supervisors. The EIR appropriately analyzes potential impacts to habitat connectivity, and the Project design and mitigation would ensure less than significant impacts. In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains was considered in detail (Draft EIR, pages 5.7-50 to -64, -164 to -170). The thorough assessment concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions (*Id.,* page 5.7-166). The wildlife movement impact analysis beginning on page Draft EIR page 5.7-164 does conclude that development of the Project site will result in some losses of areas that may be used for foraging and/or breeding for species; pathways to or from foraging or breeding grounds on the Project site, such as along ridge-lines or canyon bottoms, may become "dead ends" to through dispersal. However, these losses are not expected to significantly impact wildlife movement, and sufficient habitat connectivity would be retained in the region for these species, especially given the substantial amount of similar terrain in the northwestern Antelope Valley area. Further, two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement and the TUMSHCP, although not providing mitigation for Centennial, would act in concert with the Centennial mitigation preserves to help sustain the

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			functionality of the regional landscape linkage for future wildlife populations. Multi-generational gene flow (a series of connected wildlife movement events over time, allowing for genes to pass within and between populations) among wildlife populations in the region is expected to be sustained in the open spaces on and off the site that will remain following Project implementation. These open spaces provide sufficient habitat connectivity to allow for such gene flow. Implementation of MM 7-14, which designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) where the current intersection with National Cement Plant Road exists, will also allow for local wildlife movement to pass through the Project area down to SEA 17. The direct impacts of Project development on wildlife movement, therefore, are considered less than significant after mitigation for local wildlife movement impacts. Nonetheless, the Draft EIR (page 7-17) discloses that the Project when combined with other projects in the region would result in a cumulatively significant impact on wildlife movement. Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP) including with regard to open space designations, SEA protection, and preservation of habitat linkages. For further discussion of wildlife movement and habitat connectivity, please see Final EIR, responses to Comments B.2-3, B.4-34 to B.4-37, B.4-56, B.4-57, B.4-75, F.3-23 to F.3-25, F.3A-32 to F.3A-34, F.5-2, F.7-22, F.8-109, F.8-110, and F.8-165 through F.8-169.
RPC-134	Biology	An urban development of 57,000 persons, planned community or not, will deprive wildlife, such as mountain lions, pronghorn antelope, mule deer, and others of habitat and healthy movement. Large animals are already hemmed in by the I-5, the SR-138, and the California Aqueduct. An overpass at the aqueduct and an underpass at the SR-138, while helpful, are totally inadequate, incapable of mimicking nature.	With regard to wildlife movement, please see Response to Testimony RPC-133. With regard to habitat loss, the EIR acknowledges that Project development would result in loss of habitat. The EIR assesses impacts to habitat for all species at the Project and cumulative impact levels, including those mentioned by the Commenter. Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity are included in the EIR and the Project's MMRP to reduce impacts to habitat to a less than significant level. For further discussion regarding habitat loss, please see Draft EIR, Section 5.7, Biological Resources, pages 5.7-145 to -153, and Section 7.0, Cumulative Impacts, page 7-6; Final EIR, responses to Comments F.8-107, F.8-108. Specifically, with regard to mountain lions and other large mammals, please see Responses to Testimony RPC-7, -135, and -136, Draft EIR, Section 5.7, Biological Resources, pages 5.7-50 to -54, -63 to -65, -161, -166, and Final EIR, responses to Comments B.4-53 and F.5-8. With regard to pronghorn, please see Response to Testimony RPC-296.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-135	Biology	How many deer and bear do we need to see slaughtered on the highways and freeways. I see skimpy mention of the California mountain lion in the DEIR. Its need for roaming land and linkages are not addressed. This is a serious omission without which the project should not go forward. Mountain lions require vast roaming areas and do not always remain in the Foothills. Hundreds of mountain lions are killed in California each year. Many are forced out of the Foothills in search of food and water only to be deemed a threat and shot.	The EIR appropriately addresses potential impacts to all protected species or if Project impacts would reduce regional populations to below self-sustaining levels. Mammals mentioned by Commenter would not experience significant impacts in either regard. In addition, the primary areas of regional movement are identified in the EIR, consistent with independent studies, as occurring outside the Project site. Local wildlife movement impacts have been reduced to less than significant with the incorporation of mitigation measures. Regional movement for the species listed by the Commenter is not expected to be significantly impacted. With regard to human intervention with large mammals including bear and mountain lions, the Final EIR updated MM 7-17 to require educational materials be distributed that address these large native mammals, indicating they could prey on pets, indicating that no action shall be taken against such native animals, and indicating that pets must be leashed while using designated trail system and/or in any areas within or adjacent to open space, to reduce interaction. Control of stray and feral cats and dogs will be conducted in open space areas on an as-needed basis. See Appendix 2.0-C.Rev to the Final EIR, page C-81. For further discussion regarding these mammals, please see Draft EIR, Section 5.7, Biological Resources, pages 5.7-50 to -54, -63 to -65, -161, and -166, and Final EIR, responses to Comments B.4-53 and F.5-8.
RPC-136	Biology	In the February 2012 L.A. Times, it was reported that Tejon Ranch had illegally killed 11 to 20 mountain lions to keep them away from wealthy hunters' quarry. Even if Tejon has since reduced its hunting program, mountain lions should not end up on cramped islands like P35 to the south. And consider additional deaths on freeways and highways.	With regard to potential Project-related impacts to mountain lion and appropriate EIR analysis of same, see Response to Testimony RPC-135. With regard to illegal killing of mountain lions, it is not Tejon Ranch policy to do so. As indicated in the article referenced by the Commenter, the Applicant has publicly explained that it expresses "deep regret that such incidents took place on ranch property and the company is doing everything within its power to ensure that something like this never happens again." Further, the killings "occurred without the knowledge and/or consent of Tejon Ranch's senior officers." This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-137	Conclusion	A planned community has many advantages. But at this location, it will certainly not be advantageous to wildlife, nor is this acceptable. Thank you.	The Commenter's opinion regarding Project location has been heard in testimony by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
Jacqueline Ayre			
RPC-138	Introduction	Hello. My name is Jacqueline Ayre. I'm here on behalf of Save Our Rural Town.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The comment letter

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		Save Our Rural Town, or SORT, submitted a letter on Monday. I wanted to make sure it was received because it wasn't mentioned earlier by Mr. Sackett.	referenced has also been received and responded to. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-139	Traffic	SORT is concerned that the Staff Report finds traffic impacts are less than significant. Then it admits the traffic impact will be significant if Caltrans does not complete the Northwest Corridor Project. Then it says that the issue of traffic impact is out of the County's hands because it has no jurisdiction over Caltrans; so if significant impacts occur then, oh, well.	The Commenter's concern regarding EIR analysis and staff report discussion of traffic-related impacts is noted and will be provided to the Board of Supervisors for consideration. However, EIR analysis and staff report discussion is consistent with and appropriate per CEQA requirements. As explained in Draft EIR, Section 5.10, Traffic, Access, and Circulation, under Thresholds 10-1 and 10-2, in accordance with the MMRP, the Project must provide the required funding for the implementation of all identified roadway and highway improvements necessary to reduce Project-related impacts to a less than significant level, either through an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. If built, improvements identified in the MMRP would fully mitigate all potential Project-related significant impacts to SR-138 and other state highways. In each case, the MMRP specifically requires that Project funding be provided either in accordance with the agreement with Caltrans and in accordance with timing set forth in that agreement, or prior to final map recordation. Consequently, all of the Draft EIR and MMRP highway facility improvements required to address potential Project-related significant impacts are fully enforceable and must be completed before each phase of development may occur. However, as recognized in the EIR, Caltrans is legally responsible for implementing planned improvements of State facilities, and the Project Applicant and the County do not have the authority to require that Caltrans do so. For this reason, the EIR concludes that if improvements are not implemented, the Project would contribute to significant and unavoidable impacts. (Draft EIR, Section 5.10, pages 5.10-1, -2, -130.) The draft CEQA Findings, included in the most recent staff report, accurately reflect EIR analysis and conclusions that under Thresholds 10-1 and 10-2, impacts would be significant and unavoidable if Caltrans does not implement improvements. See Staff Report Attachment G, Draft CEQA Findings Regarding the Centennial Specific Plan Project and EIR.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-140	CEQA	But CEQA does not work that way. As lead agency, the County cannot wash its hands of significant impact by throwing the responsibility to mitigate such impact onto another agency. CEQA requires that the County impose conditions on the Project to eliminate significant impact if the conditions are feasible and if they achieve the Project objective.	The Commenter misstates CEQA and the County's responsibility. As explained further in Response to Testimony RPC-139, the County has evaluated potential Project-related impacts and required the implementation of enforceable mitigation that would fund identified necessary roadway and highway improvements. If implemented, these improvements would mitigate impacts to a less than significant level. However, the County does not have legal authority to carry out improvements to State facilities. This, rather, is the responsibility of Caltrans. Therefore, as is specifically permitted under CEQA, the County in its draft CEQA findings concludes that if improvements are not implemented, the Project would contribute to significant and unavoidable impacts because implementation of the improvements is within the responsibility of another public agency and not the agency making the finding. (CEQA Guidelines § 15091(a)(2); CEQA § 21081(a)(2).)
RPC-141	Project Description	In this case, the Project is slated for phase development in ten parts, with each development phase being fully contained and capable of supporting all new occupants.	The Commenter is correct that the Project's conceptual phasing plan proposes development in 10 phases, with appropriate infrastructure and services to serve occupants of each phase. See Draft EIR, Section 4.0, Project Description, for further details.
RPC-142	Traffic	The traffic studies in the EIR show that no traffic impact will occur on existing 138 facilities up to 10 percent of Centennial's development. And with the new corridor, the 138 improvement that Caltrans is proposing, it can accommodate up to 75 percent of the Centennial Development.	The Commenter correctly summarizes Project EIR discussion of impacts prior to and with implementation of the Northwest 138 Improvement Project. MM 10-21 requires funding of improvements to accommodate up to 10 percent of Project buildout and anticipated cumulative development, MM 10-22 requires funding improvements to accommodate up to 75 percent of Project buildout and anticipated cumulative development, and MM 10-23 requires funding improvements to accommodate up to 100 percent of Project buildout and anticipated cumulative development. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-143	Traffic	These facts set the table for conditioning the project to permit 10 percent development until the Northwest Corridor project is done, then limit it to 75 percent under further improvements after Caltrans has completed its improvements, then allow additional development up to a 100 percent after the Centennial Project has expanded its improvements that are required to accommodate full buildout.	The conditions suggested by the Commenter are not necessary, because mitigation requirements in the EIR, the Project's Mitigation Monitoring and Reporting Program ("MMRP"), and Specific Plan implementation requirements all ensure equivalent safeguards against the possibility of Project development occurring without mitigation of potential impacts through implementation of appropriate improvements. Because the EIR/EIS for SR-138 has been approved, and these improvements are included in the Regional Transportation Plan/Sustainable Communities Strategy, it is reasonably foreseeable that these improvements will be timely constructed to serve the region's transportation needs, which exist independent of the project as discussed in response to Comment ADD-F.10-5. SR-138 improvements that are specific to the Centennial projects, such as the access

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			points to the Project site, are required to be constructed by the Developer/Applicant. The Project is also required to monitor and report on traffic conditions. Mitigation Measure 10-2 specifically requires that the Applicant "submit a traffic study that addresses site access and local circulation in accordance with the County of Los Angeles Department of Public Works Traffic Impact Analysis Report Guidelines. The Project Applicant/Developer shall retain a Traffic Engineer or Civil Engineer licensed in the State of California to perform the traffic study to the satisfaction of the County." (Final EIR, Appendix 2.0-C.Rev, page C-87) This requirement applies, per the MMRP, "Prior to approval of Tentative Maps." (*Id.*) This monitoring and review process also allows for updated traffic counts, which are expected to continue to evolve based on a wide variety of evolving transportation technologies and services (e.g., app-based ride sharing) and workplace patterns (e.g., home-work and WeWork remote work options that reduce peak hour as well as overall commuter trips). In the unlikely scenario that the SR-138 improvements are delayed and unavailable to serve new project demand, approval of the next discretionary approval for the project (e.g., the tentative tract map) could be delayed until such time as adequate traffic capacity on SR-138 exists. Or, the County may condition the map approval on the construction of the needed improvements or deny the tentative tract map. Further, MM 10-21 requires funding of improvements to accommodate up to 10 percent of Project buildout and anticipated cumulative development, MM 10-22 requires funding improvements to accommodate up to 75 percent of Project buildout and anticipated cumulative development, and MM 10-23 requires funding improvements to accommodate up to 100 percent of Project buildout and anticipated cumulative development. While the County cannot require Caltrans to implement improvements (as explained in Responses to Testimony RPC-139 and RPC-140), the Specific Plan and subdivision mapping processes further ensure that Project development would not occur without all necessary infrastructure and improvements. Tentative Tract Map applications are discretionary actions subject to CEQA compliance requirements per Specific Plan Sections 4.5.3 and Specific Plan Appendix 3-B, and per CEQA § 21080(a) - this means development of each portion of the Project contemplated in each subdivision map will require further environmental review and approval from the County to ensure appropriate roadway and freeway infrastructure improvements are implemented prior to development and to ensure impacts are less than significant.

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RPC-144	Traffic	These conditions achieve all the Project's objectives, they eliminate all the significant traffic impacts, and they comply with CEQA. So the County has no method for avoiding imposing these conditions.	The Commenter's suggested conditions are not necessary, because the Project's Mitigation Monitoring Reporting Program and Specific Plan implementation requirements ensure equivalent safeguards against the possibility of Project development occurring without mitigation of potential impacts through implementation of appropriate improvements. Public Resources Code § 21100(b)(3) requires the EIR set forth feasible mitigation measures to minimize significant environmental effects of the Project. The EIR has done this and CEQA does not require the incorporation of conditions suggested by Commenter. See Response to Testimony RPC-143 for more details.
RPC-145	Traffic	So SORT respectfully asks that you add these three conditions -- that you limit development to 10 percent until the 138 Corridor improvements are completed, then you limit it to 75 percent until Centennial has completed its additional improvements of the 138. And then, at that point, they can go on to 100 percent development.	This testimony summarizes the requests made in the Commenter's previous testimony. For responses to these requests, please see Responses to Testimony RPC-142 through RPC-144.
RPC-146	Traffic	There's one other thing that SORT would request -- that you adopt the finding that states the Antelope Valley Area Plan only recognize 138 exits on 60th Street West, 110th Street West, 190th Street West, and 245th Street West. Those are the only exits that the AVAP identified as outside boundary of the Project. Limiting development to just those -- limiting access to just those points is essential for the preservation of rural communities including Green Valley, Three Points, and all lakes and mountain communities. Thank you very much.	The County is aware that the Caltrans' preferred alternative for the Northwest 138 Corridor Project includes recommendations for roadway access to SR-138 that differs from the AVAP. The Centennial EIR includes analysis consistent with the AVAP assumptions as well as the access points specified in the Caltrans preferred alternative. State Route 138 is under the jurisdiction of Caltrans, not the County, and the County does not have the legal authority to determine or limit access points along SR-138 in the vicinity of the Project site, as this comment recommends. For further discussion, please see responses to Comments ADD-F.11-7 and ADD-F.11-8.
Richard DeSpain			
RPC-147	Support	Good morning. My name is Richard DeSpain. I'm here to speak in favor of the Centennial Project. Southern California is and will continue to grow. L.A. County needs a controlled solution to its housing affordability. I believe the Centennial Project is the answer.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard in testimony by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		This unique self-sustaining project will bring endless benefits to this new community. The Proposal will bring over 19,000 new homes at buildout. All of these homes will be state of the art in construction techniques and in compliance with California and Los Angeles County's Green Building and Residential Codes. This is a -- this is positive in contrast to the surrounding areas' building progression of the past. This will be a community that embraces smart growth principles that are highly needed in housing areas around L.A. County. I believe it is designed to be a sustainable, self-contained planned community.	
RPC-148	Traffic	My recommendations would be that the County responds to the roads and traffic, the higher increases. On State Route 138 it's already in great need of upgrade. And new networks of fast lane road to all outlying areas must be considered in the High Desert from the I-5 to State Route 14 and I-15. This should be the County and State's responsibility.	The Commenter's recommendations for County consideration of separate improvement projects to address regional traffic is noted, was heard in public testimony by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This testimony does not specifically address the Project or the adequacy of the EIR, and no further response is required.
RPC-149	Airports Housing	Two, there should be a local regional airport in the future for commuter planes and fire and Sheriff's helicopters to operate from, and, three, this plan should include any veteran-honored housing.	With regard to the County's construction of a regional airport, this opinion was heard by the Regional Planning Commission in testimony and will be passed on to the Board of Supervisors for consideration. The Commenter's suggestion that the Project specifically include veteran-dedicated housing is noted, was heard in testimony by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This testimony does not specifically address the adequacy of the EIR, and no further response is required.
RPC-150	Support	The Centennial Project is a well thought out community for the region, offering parks, recreation, schools, medical, fire, police, infrastructure, along with open spaces. Commissioners, I urge you to approve this project	The Commenter's support for the Project has been heard in testimony by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		and allow this community to begin in Southern California. Thank you.	
Jim Boes			
RPC-151	Support	Good morning, Chairman Louie and members of the Regional Planning Commission. My name is Jim Boes. I'm here to speak in favor of the Centennial Project. As a resident of the Antelope Valley for over 50 years and a lifelong County resident, I care deeply about the future of our community and our region. In the past ten years, I've served as Chairman for the Planning Commission for the City of Lancaster. I also had the honor to serve as Co-Chairman of the Blue Ribbon Committee that worked with the County of Los Angeles to formulate the Antelope Valley Area Plan. We identified areas of future economic growth and areas of important environmental protection. The community plans for Centennial respect and honor the work we did with the County to create a framework of growth and preservation of our region. It's not often when you have the opportunity to see the hard work and thoughtful process come to fruition. But we can see that here today with Centennial. Centennial has worked hard to listen to the community input and the concerns of the environmental community. Ten years ago, Centennial came to an agreement with some of the largest environmental organizations in the state to preserve 240,000 acres of open space. To say Centennial is a well thought out plan is quite an understatement. What other landowner has dedicated 90 percent of their property for permanent open space, preserving one of California's most biologically diverse areas. It's	Thank you for your participation in this public process. The Commenter's support for the Project has been heard in testimony by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		an impressive undertaking, to say the least. And they balance that with one of the most environmentally sensitive new communities. I would urge the Regional Planning Commission to approve Centennial today. It's time to start implementing these plans. I appreciate your time and your consideration. Thank you.	
Louisa Stevens			
RPC-152	Introduction	Louisa Stevens, Secretary for the Lakes Town Council. The Lakes Town Council opposes the Centennial Specific Plan, which would create a new city at Tejon Ranch.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard in testimony by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
RPC-153	Land Use	The creation of the Tejon Ranch Conservancy actually does little to mitigate a planned city with nearly 20,000 new residences and additional industrial complexes.	The Commenter's opinion that the Tejon Ranch Conservancy does little to mitigate for Project impacts was heard in testimony by the Regional Planning Commission and will be passed on to the Board of Supervisors. The County notes that the Project EIR does not rely on creation of the Tejon Ranch Conservancy to mitigate potentially significant Project-related impacts, but rather imposes mandatory, Project-specific mitigation measure requirements to mitigate impacts to the extent feasible, as set forth in the EIR and the Mitigation Monitoring and Reporting Program, Final EIR Appendix 2.0-C.Rev.
RPC-154	Biology Hazards	In addition to obvious concerns about this biologically rich and diverse area being compromised or destroyed altogether, we have grave reservations about the impact of high density housing and commercial industrial developments with regard to fire. We have lived through mandatory fire evacuations during the Powerhouse Fire of 2012, and a number of people lost their homes. A planned city will only invite more fire events.	With regard to Project-related impacts on biological resources, the EIR has thoroughly and appropriately analyzed such impacts consistent with CEQA requirements and mitigated them to the extent feasible. For more information, please see Draft EIR, Section 5.7, Biological Resources, and Final EIR, Appendix 2.0-C.Rev, the Mitigation Monitoring and Reporting Program. With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire

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			hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.
RPC-155	Traffic	Traffic is another major concern. The communities of Three Points, Green Valley, Leona Valley, Lake Hughes, and Elizabeth Lake will suffer as a result of commuters and others using Pine Canyon Road, Elizabeth Lake Road, Lake Hughes Road, and other roads. The Highway 138 improvement project does not guarantee that traffic will not diverted through those areas to various communities due to various circumstances. As it stands, over the past ten years, a number of nonresident commuters using San Francisquito Canyon Road has increased dramatically, and there have been numerous fatalities. The same could happen along Elizabeth Lake Road.	The Centennial EIR traffic study is based on a travel demand forecasting model that assigns traffic volumes based on travel times. Analysis of SR-138 indicated that level of service (LOS) would generally be LOS B and C during peak travel times with full development of Centennial together with the SR-138 improvements identified as mitigation (Final EIR Appendix 5.10-C, Table 3-8). With LOS B and C conditions, travel times on SR-138 would experience minimal added delay with average speeds of 59 to 60 mph (Draft EIR Table 5.10-15). Based on these travel speeds, a trip from Centennial to Palmdale during the peak hour by way of a route that utilizes SR-138 and SR-14 is approximately 44 miles in length with a travel time of approximately 40 minutes on what will be a fully improved expressway and a freeway. In comparison, a route that utilizes Pine Canyon Road and Elizabeth Lake Road is approximately 39 miles in length with a travel time of approximately 52 minutes, which is 30 percent longer than the SR-138 and SR-14 route. Pine Canyon Road and Elizabeth Lake Road are each rural two-lane roadways subject to additional delay due to slower moving vehicles and the lack of passing areas. Since the SR-138/SR-14 route represents a substantial savings in travel time, and since the route utilizes what will be a fully improved expressway and a freeway with ample opportunities to pass other vehicles, the number of vehicle trips from Centennial to use Pine Canyon Road and Elizabeth Lake Road is expected to be minimal. Analysis that was done by the County when developing the AVAP determined that traffic on Elizabeth Lake Road with full development of the Centennial Project would remain at LOS A conditions with volume to capacity (V/C) ratios on the roadway segments ranging from 0.31 to 0.58.

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			Similarly, from Centennial to Castaic, a route that utilizes SR-138 and I-5 is approximately 32 miles in length with a travel time of approximately 30 minutes on what will be a fully improved expressway and a freeway. Analysis of I-5 indicated that LOS would generally be LOS C and D during peak travel times with full development of Centennial (Final EIR Appendix 5.10-C, Table 4-2). With LOS C and D conditions, travel times on I-5 would experience minimal added delay with average speeds of 58 to 68 mph (Draft EIR Table 5.10-9). In comparison, a route that utilizes Pine Canyon Road and Lake Hughes Road is approximately 41 miles in length with a travel time of approximately 58 minutes, which is almost double the travel time compared to the SR-138 and I-5 route. Pine Canyon Road and Lake Hughes Road are each rural two-lane roadways subject to additional delay due to slower moving vehicles and the lack of passing areas. Since the SR-138/I-5 route represents a substantial savings in travel time, and since the route utilizes what will be a fully improved expressway and a freeway with ample opportunities to pass other vehicles, the number of vehicle trips from Centennial to use Pine Canyon Road and Lake Hughes Road is expected to be minimal.
RPC-156	Water Supply	What about water in the future? Surely considerations regarding drought, climate change are cause for concern.	Project water supply analysis appropriately takes potential drought and climate change impacts into account. For further discussion of Project water supply analysis, including with regard to drought and climate change, see Draft EIR, Section 5.18 Water Supplies, and Final EIR, responses to Comments E.1-5, F.3-4 through F.3-9, F.3A-6, F.3A-9, F.8-213, F.8-214, and F.8-220.
RPC-157	Hazards	With so much construction we come to the very real possibility of Valley Fever.	The EIR appropriately analyzes and discloses potential Project impacts related to Valley Fever, including with regard to the condition, potential for Valley Fever spores to be found in soils in the Antelope Valley, the effects of contracting Valley Fever, and risks from possible exposure to both construction workers and Project residents. See Draft EIR, Section 5.3, Hazards and Fire Safety, pages 5.3-13 and -14 and 5.3-17 through -19, Section 5.11, Air Resources, pages 5.11-28 and -29, and -64 through -67; Final EIR, responses to Comment F.3-29 through F.3-32, F.3A-5, F.3A-38 through F.3A-45, F.3A-68, F.3A-69, and G.13-1. Implementation of fugitive dust control measures required by AVAQMD and SCAQMD and MMs 3-2 and 3-3 would mitigate impacts related to Valley Fever to be less than significant. See also see response to Comment ADD-F.13-10, which further revises valley fever mitigation.

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RPC-158	Miscellaneous	Air, light, noise pollution will all be new and most unwelcome. Why plan an entire new city instead of using smart growth principles that expand and improve upon existing infrastructures? Why plan an area with industrial complex and housing developments where wildlife and the people who enjoy a quiet, healthy, safe, rural lifestyle will be marginalized at best?	The Commenter's opposition to the Project and its siting was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County disagrees with the Commenter's characterization of the Project, and notes that the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy and the County's Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. For a more detailed discussion, please see Final EIR, response to Comment F.8-20.
RPC-159	Miscellaneous	Globally and regionally land is disappearing every day. It's not a good plan and terrible stewardship.	This testimony has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Commenter's opposition to the Project is noted. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-160	Miscellaneous	It is easy to imagine this area of scenic vistas with beautiful tawny rolling hills the color of mountain lions become congested with traffic, crime, and all manner of pollution that are characteristic of such developments. There will be broken bottles and industrial plastic and cardboard packaging. The ubiquitous greasy fast food wrappers will be blown about by the area's gusty winds and garishly festooning what remains of our native plants.	The Commenter's opinion is noted for the record, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. The County disagrees with the Commenter's characterization of the Project. The EIR appropriately analyzes potential Project-related impacts with regard to traffic, police services, and solid waste disposal, and includes binding mitigation to reduce impacts to the greatest extent feasible. For further information regard traffic analysis, see Draft EIR, Section 5.10, Traffic, Access, and Circulation. For further information with regard to police services, see Draft EIR, Section 5.16, Fire and Law Enforcement. For further discussion of solid waste disposal, please see Draft EIR, Section 5.17, Other Public Services.
RPC-161	Miscellaneous	Lastly, we have profound ethical concerns raised in the July 6th, 2018, Mountain Enterprise article titled, Black List, Tejon Ranch Wages War on Science and Public Comment. Thank you.	This testimony and the Mountain Enterprise article are noted, have been provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. However, for informational purposes the County notes that many scientists have been and continue to be allowed access to the ranch per the RWA and RWMP, and thorough, independent scientific review of Tejon Ranch, including the Project site, has been completed. The Project Applicant also addressed this article in its July 11, 2018 testimony to the Regional Planning Commission, explaining that the RWA does not provide unrestricted public access to Tejon Ranch, but rather provides the express right to withhold access permission. The Applicant further explained that its

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			intention has been to deny access to Center for Biological Diversity and their partner organization, the California Native Plant Society, who have active, ongoing litigation against Kern County, Los Angeles County, and Tejon Ranch regarding Tejon Ranch projects.
Cindy Borcher			
RPC-162	Introduction	My name is Cindy Borcher. I represent the Three Points-Liebre Mountain Town Council and the Association of Rural Town Councils today.	Thank you for your participation in this public process. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-163	Traffic	Traffic and winds were already brought up by our previous speaker. But I would like to stress that our community of Three Points has two access points that lead to five other access points that join -- that take route -- that connect Lancaster, Palmdale, and Santa Clarita.	The Project EIR adequately and appropriately analyzes and mitigates for impacts with regard to traffic and wind-related impacts to the greatest extent feasible. Commenter's description of access to the Three Points community is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. This testimony does not specifically address the Project or adequacy of the EIR, and no further response is required.
RPC-164	Traffic	It's reasonable for us to expect that traffic avoiding congestion that's predicted on Highway 138 will be diverted to our community, to the lakes and valley communities and through the canyon roads that are already highly impacted by commuter traffic from Lancaster and Palmdale areas avoiding the highway -- Highway 14 that people seek to avoid because of congestion, dangerous conditions, traffic closures, and truck traffic.	As noted in Response to Testimony RPC-155, the travel times to and from Centennial using two-lane rural roadways such as Pine Canyon Road, Elizabeth Lake Road, and Lake Hughes Road are substantially longer than when traveling using SR-138, which will be a fully improved expressway, and the I-5 and SR-14 freeways. Because of this, the number of vehicle trips from Centennial using the rural roadways is expected to be minimal.
RPC-165	Traffic	One of our concerns is that the Antelope Valley Area Plan and the Northwest Highway Improvement Project did not review the additional lane freeway that stopped virtually at our community for the -- the DEIR did not evaluate the additional lane in their project or the Antelope Valley Area Plan that would accommodate 100 percent buildout of this community of Centennial. So I have concerns about that. It wasn't -- the issue	The comment refers to a third lane in each direction that would be constructed from 300th Street West to just east of 250th Street West in order to accommodate 100 percent of the Centennial development, which is in addition to the two-lanes lanes in each direction included in Caltrans' preferred Northwest 138 Corridor Project. In the EIR prepared for the Northwest 138 Corridor Project, Caltrans evaluated a roadway cross-section that accommodates a third lane in each direction based on Caltrans standards.[3315] The Northwest 138 Corridor Project's EIR explains that the project study area along SR-138 extends out 300 feet on each side of the

[3315] Caltrans. 2017. Northwest State Route 138 Corridor Improvement Project Final Environmental Impact Report/Environmental Impact State and Section 4(f) Evaluation, pp. 11-22, 29, 166, 320-327

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		was never raised about 100 percent accommodation of traffic as a result of the project.	roadway.[3316] As such, the impacts of a third lane from 300th Street West to just east of 250th Street West in each direction are included within the project footprint analyzed by the Northwest 138 Corridor Project's EIR.[3317] The traffic forecasts utilized in the Caltrans' Northwest 138 Corridor Project EIR included traffic based on 100 percent of Centennial development together with estimates of regional traffic growth. The Centennial EIR includes higher estimates of regional traffic growth in comparison to the Caltrans EIR; therefore, the Centennial EIR is based on a higher volume of traffic forecast for SR-138 resulting in the recommendation for a third lane as noted.
RPC-166	Hazards	The words fire and urban wildland interface are horrifying to rural residents, especially those who have experienced wild fire destruction. Some of the worst fires in California during the last two years occurred at urban wildland interface. Thousands and thousands of homes have been destroyed. Live stock lost horses, pets, animals from all the fires that have happened in our area recently and the Southern California area. The Antelope Valley Area Plan does address fire hazards severity zones by implementing low density land use development in special management areas that are excluded from the economic opportunity areas of the Centennial Project, the project areas and the frequent high winds events area making fighting fires especially difficult and contribute to the spread of fire to the adjacent area.	The Commenter's opinion with regard to fire and choice of development density is noted. With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.

[3316] *Id.* at p. 29.
[3317] *Id.* at pp. 16, 29.

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RPC-167	Land Use	Low density housing would be reduce impacts to the currently rural and remote area. Planners have over-looked hazards and costs associated with high density residential, commercial, and industrial development in the EOA, whose costs due to catastrophic events would be transferred to all of the citizens who pay taxes in Los Angeles County.	The Commenter's opinion regard choice of development density is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to EIR fire impact analysis, please see Response to Testimony RPC-166. With regard to the Project's fiscal impacts, the Commenter's opinion is noted, but the County notes that as discussed in the Draft EIR, such as in Section 5.16 Fire and Law Enforcement and Section 5.17 Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities. The Project will provide significant net economic benefits to Los Angeles County, including expected annual revenues of $43,394,902.00, versus $21,827,596.00 of annual costs to the County's General Fund for re-occurring public services, representing an annual net benefit to the General Fund of about $21,567,306.00. The Project will also generate an estimated $22,328,502.00 of property tax revenues.
RPC-168	Biology	The DEIR explains that natural landscape feature of the region, such as Tehachapi Mountains, form a natural linkage of the corridor on a regional scale; yet they have not provided for adequate wildlife crossing north and south across the 138.	The Commenter's opinion with regard to adequacy of the Project's opportunities for wildlife movement is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. However, the County disagrees and notes that per the EIR, wildlife moving from north of the Project across the SR-138 are expected to use either the crossing at the west side of the Project where the Aqueduct intersects the SR-138, or to travel around the Project and cross to the east of the Project. Draft EIR, Section 5.7, Biological Resources, page 5.7-165. In addition, the aqueduct represents a substantial barrier for most species rendering the site less than suitable for substantial movement. (*Ibid*.) In addition, many green ways will be retained and created on the site, natural and unnatural, which will allow for common urbanized wildlife to move about the Project lands. Further, studies on wildlife movement in the Project region have generally shown the Project area as a whole to be largely outside important corridor linking the Sierra Nevada-Cascade Cordillera with the Sierra Madre-Transverse-Peninsular Range Cordillera, and SEA 17, which is considered an important corridor for wildlife, will not be impacted by the Project. (*Id.,* pages 5.7-8, -155, -194.)
RPC-169	Biology	I hope you all can see the letter I presented with mountain lion roadkill in the transition area of the 138 and the I-5.	Materials submitted to the Regional Planning Commission will all be considered and provided to the Board of Supervisors for consideration. This testimony does not specifically address the Project or adequacy of the EIR, and no further response is required. For discussion regarding mountain lion and other large mammals, please see Draft EIR, Section 5.7, Biological Resources, pages 5.7-50 to -54, -63 to -65, -161, and -166, and Final EIR, responses to Comments B.4-53 and F.5-8.

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RPC-170	Ranch-Wide Agreement	I also have concerns that the Ranch-Wide Agreement that oversees the Tejon Ranch Conservancy manages that area as a hunting reserve. It can remove animals that threaten the -- the animals that provide a great deal of income for the home ranch that they sell trophy hunting to private hunters. I'm concerned that the wildlife driven from the area due to the Project over time will be funneled into the conservancy area where they might end up losing their lives to hunting or wildlife management to provide more hunting opportunities for paying customers.	The Commenter's concern was heard in testimony by the Regional Planning Commission and will be provided to the Board of Supervisors. With regard to the Project's On-Site Mitigation Preserve, all recreational hunting is prohibited per MM 7-23. In the Off-Site Mitigation Preserve, hunting is restricted to Ranch authorized individuals within designated hunting areas only per MM 7-23. Hunting on the ranch as a whole is subject to restriction in the TUMSHCP, and hunting uses are considered compatible in the Off-Site Mitigation Preserve because no new disturbances or increases in hunting permit issuance is anticipated. Further, the Applicant coordinates regarding hunting activities with the California Department of Fish and Wildlife, is not entitled to remove or kill animals disrupting the hunting program and has no policy to do so.
RPC-171	Miscellaneous	Yes. I believe that the Tejon Ranch Conservancy should make public requirements -- make public the requirements for access and, if necessary, amend them to provide fair and equal treatment for the process. If they receive public funds, which they have in California, no member of the public should be excluded no matter what organization they belong to.	The Commenter appears to be referring to Tejon Ranch denying access to the ranch to certain individuals, as reported in the Mountain Enterprise. The Commenter's opinion is noted. This testimony and the Mountain Enterprise article are noted, have been provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. However, for informational purposes the County notes that many scientists have been and continue to be allowed access to the ranch per the RWA and RWMP, and thorough, independent scientific review of Tejon Ranch, including the Project site, has been completed. The Project Applicant also addressed this article in its July 11, 2018 testimony to the Regional Planning Commission, explaining that the RWA does not provide unrestricted public access to Tejon Ranch, but rather provides the express right to withhold access permission. The Applicant further explained that its intention has been to deny access to Center for Biological Diversity and their partner organization, the California Native Plant Society, who have active, ongoing litigation against Kern County, Los Angeles County, and Tejon Ranch regarding Tejon Ranch projects.
George Dickerson			
RPC-172	Support	Morning. My name is George Dickerson. I've been a resident of the Antelope Valley for 27 years, a former Marine, served 7 years, and now I own my own business in the Antelope Valley for 25 years. I want to express my full support of this Centennial Project. As I read on, you'll see I represent a broad	Thank you for your participation in this public process. The Commenter's support for the Project has been heard in testimony by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		cross-section of both residents and business of the A.V. As a small business owner, I'm involved in the local chambers. I'm a former board member of the "Cortsal" Chamber of two years. There are many chamber members who are very excited for this new town and services in West Antelope Valley. I support a couple nonprofit veteran organizations in the A.V. as well, with members in support of this project with better affordable housing for personnel getting out of the military and desiring to stay here to work as contractors at Plant 42 and such. My business allows me substantial face time with my customers. When I talk to other business owners in the A.V., one of our biggest challenges and concerns are the lack of affordable housing for employees, especially for the lower middle class. We need housing. And the Centennial Project would provide that for the West Antelope Valley. Not only will Centennial's housing be more affordable, but the Project has implemented all the future needs of the new community, including public services, parks, civic center, medical, and other amenities. This will not be a stress on the economy, but boost for the A.V. I've heard opposition say this is urban sprawl. But this project is the exact opposite. The Antelope Valley Area Plan that was adopted by the Board of Supervisors dedicated three locations for future growth to help preserve the rest of the A.V. from sprawl. Centennial is within one of those areas and is just implementing a decision that L.A. County has already approved. I hope that you approve Centennial and hear the importance of this project to the local residents of Antelope Valley.	

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		I have four grown children. In the last two years, three of them and their spouses moved out of state for reasonable housing. My fourth, which is working to be my business partner, would benefit from affordable housing that would be offered with this project, and maybe she would not leave the state as well. Lastly, I want to say that, when I have heard the studies and read the reports in consideration that Centennial has made for environmental issues, I'm very impressed and thankful that they care. We need this housing, and we need these services. Thank you.	
Virginia Stone			
RPC-173	Introduction	My name is Virginia Stone. And I represent the Antelope Acres Town Council. And we would like to request that this FEIR be not approved today, be extended for further comment and for further deliberation because there are so many cumulative effects that are yet undefined and yet -- and not adequately reviewed in the plan documents. This is a big project. It is imperative that L.A. County get it right. It's going to be an unincorporated city that people would expect urban services surrounded by people who want a rural lifestyle. And there's lots of financial questions that need to be way more specific. There are several unavoidable that -- according to the FEIR, that cannot be mitigated. And we feel that those need to be looked at further to see what can be done about that because they will have great effect on the other people.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard in testimony by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. The EIR thoroughly analyzes the Project's potential direct, indirect and cumulative impacts on the environment, identifies fully enforceable mitigation measures that reduce impacts to the greatest extent feasible, and identifies impacts for which despite the identification of all feasible mitigation, impacts would be significant and unavoidable. Per CEQA, the Board of Supervisors may determine that the Final EIR has considered the identified means of lessening or avoiding the Project's significant effects and that to the extent any significant direct or indirect environmental effects, including cumulative project impacts, remain unavoidable, such impacts are acceptable in light of the social, legal, economic, environmental, technological and other Project benefits, that override them. See Draft CEQA Findings Regarding the Centennial Specific Plan Project and EIR, and Draft Statement of Overriding Considerations, for more details.

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RPC-174	Population/ Housing	No. 1, the -- just for some of them, it talks about population and housing and employment impacts. The cumulative impact, which affects our town of Antelope Acres and all the surrounding areas in there, it says, they will contribute -- the project will contribute reasonably foreseeable additional development proposals, seeking AVAP Amendment -- and this Project has so many amendments -- that could be made outside the West EOA and would -- the people would reasonably expect that those also would be granted to them and would further exacerbate sprawl.	As noted by the Commenter, with regard to the proposed Project's impacts in comparison to existing Project site conditions, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments could be made outside the West EOA, which is considered a significant, adverse indirect growth-inducing impact. Draft EIR, Section 7.0, Cumulative Impacts, pages 7-19, and Section 6.0, Growth-Inducing Impacts, pages 6-6 to 6-9. However, the EIR does not indicate that the Project would exacerbate sprawl. See Final EIR, response to Comment F.8-20 for an in-depth refutation of the assertion that the Project constitutes or would contribute to sprawl. For further discussion of growth-inducing impacts, see Draft EIR, Section 6.0, Growth-Inducing Impacts, and Final EIR, responses to Comments F.8-47 through F.8-49.
RPC-175	Traffic	Traffic and circulation impact: It says that it will not physically divide any community. Well, Antelope Acres will see absolutely the cumulative traffic will divide the town of Antelope Acres in half, as specifically stated in the Caltrans Northwest 138 EIR. And they have tried looking at many different ways to try to lessen that. So we'd like that corrected.	The Project's potential to physically divide an established community is analyzed in Draft EIR Section 5.8, Land Use (pages 5.18-18 through 5.18-19). As explained in the EIR, the Project site is generally undeveloped and is not part of an established community that would be divided with implementation of the Project. Caltrans' Northwest State Route 138 Corridor Improvement Project (SR-138 Improvement Project) is a separate action being undertaken by a separate lead agency and is not a consequence of the Project, as discussed further in response to Comment ADD-F.10-5. In any case, the SR-138 Improvement Project's potential to physically divide an existing community were fully analyzed in Northwest State Route 138 Corridor Improvement Project Environmental Impact Report/Environmental Impact Statement prepared by Caltrans and was determined to be less than significant with implementation of mitigation.
RPC-176	Noise	The noise impact -- it says that those are -- you can't mitigate that because the sensitive receptors -- that would be people like me -- that live near there, will have noise levels. It doesn't specifically say what or exactly the noise level because they haven't -- I haven't seen in this FEIR an accumulative traffic for the 138 -- amount of traffic that they expect -- traffic trips that would be made every day. The noise would be like the noise on any freeway.	As explained in Draft EIR Section 5.12, Noise, pages 5.12-45 through 5.12-46, the Project would generate an estimated 75,908 external daily trips at buildout; these vehicles would primarily use State Route (SR) 138, Interstate (I) 5, SR-14, and SR-99. The addition of Project traffic to existing traffic would increase the traffic volumes on these roadways and, therefore, the traffic noise at adjacent receptors. Traffic noise increases would exceed the 3 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) threshold of significance at identified receptors on SR-138, between Gorman Post Road and Old Ridge Route Road, resulting in a significant impact. The impact would be considered significant and unavoidable because feasible mitigation to reduce these impacts is not within County jurisdiction. Noise-reduction measures would involve alterations to private property and/or within California Department of Transportation (Caltrans) right-of-way, which are not in the County's or the Project Applicant's control. It should be

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			noted that the forecasted noise increase is 3.3 dBA, and a noise increase of 3 dBA, when occurring instantaneously, is barely perceptible to most people. Project-generated traffic noise increases at Project buildout on other parts of SR-138 would not exceed 2.5 dBA CNEL. Project-generated traffic noise increases at Project buildout on I-5, SR-14, and SR-99 would be less than 1.0 dBA CNEL. Traffic noise increases due to the Project would occur gradually over the buildout period of approximately 20 years. "Existing Plus Project" noise levels along freeway segments are described on Draft EIR Table 5.12-11 (page 5.12-38), and Draft EIR Table 5.12-12 (page 5.12-42) shows the "2035 Without Project" and "2035 With Project" traffic volumes along freeway segments, the calculated noise levels at the nearest receptor, and the nose increase due to Project-generated traffic.
RPC-177	Solid Waste	The solid waste impact -- the contributions to the cumulative mass for land fill capacity, which are already a controversy in L.A. and L.A. County. How much -- they just say, well, parts that are not recyclable -- well, it's just very vague. And it says, we're going to take it to so many landfills. And it's just very dismissive and those kinds of things provide problems for the taxpayers and county residents in the future. And I don't believe that that is necessarily solid -- or good planning.	The Commenter's opinion that analysis of Project-related landfill use is vague was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees and notes that the EIR appropriately analyzes Project-related solid waste disposal impacts, based on available County information. The Los Angeles County Department of Public Works (LACDPW) has evaluated and planned the County's solid waste disposal needs over a 15-year time frame and included strategies for maintaining adequate disposal capacity from 2015 to 2030. While the County updates this report annually, at this time, they have only evaluated solid waste disposal to 2030 and determine adequacy of existing landfills. However, as annual updates are completed, it is expected that updated waste projections, facility capacities, diversion rates, and alternative technologies would be developed to meet the future waste disposal needs of the County. As stated on Draft EIR page 5.17-18, the Los Angeles County Countywide Siting Element establishes goals and policies for the siting of solid waste transformation and land disposal facilities to serve the solid waste generation and disposal needs of the County for the next 15 years. The County is in the process of updating the Countywide Siting Element, which will include goals and strategies through which current and future solid waste management infrastructure needs can be met; potential landfill expansion sites; and out-of-County disposal opportunities. Thus, evaluation and planning by the LACDPW is expected to be updated continuously to identify strategies for maintaining adequate disposal capacity into the future. However, permitted Class III landfill capacity cannot be guaranteed at the time of Project buildout and through the life of the Project, which are beyond the LACDPW's 15-year planning horizon for disposal. Therefore, while the County is committed to handling all solid wastes generated within the County now and into the future, to be

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			conservative, the Draft EIR concludes that the Project buildout would result in a significant impact on the County's anticipated Class III landfill capacity. Draft EIR, Section 5.17, Other Public Services, page 5.17-2. PDFs 17-2 and 17-3, and MMs 17-9 and 17-10, reflect all feasible measures to reduce and divert the Project's municipal solid waste generation. Therefore, the Draft EIR concludes that the Project would conservatively result in significant and unavoidable impacts related to municipal solid wastes during long-term operation of the Project. (*Ibid*.) With regard to the selection of landfills to serve the Project, Table 5.17-3 on Draft EIR page 5.17-23 lists the major landfills that serve the Project area. However, solid waste haulers and landfills operate in a free enterprise system in the Antelope Valley area that allows the use of any waste hauler and any landfill. Draft EIR page 5.17-29 states that construction wastes are likely to be disposed at the nearest landfills, the Antelope Valley Public Landfill and the Lancaster Landfill and Recycling Center, but may be disposed at any of the available facilities, as selected by the individual contractors. Draft EIR page 5.17-31 also states that long-term solid wastes from the Project after diversion may ultimately be disposed of at any in-County facility and out-of-County facilities.
RPC-178	Conclusion	These are just some of the concerns that we had in the FEIR. This is a very large project. So, again, we ask that you to require additional time to go over the FEIR to discuss these in much more detail. Thank you.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. With regard to time, the County has complied with CEQA requirements and provided appropriate time to review the EIR, with public hearings at the Regional Planning Commission on June 6, 2018, July 11, 2018, and August 29, 2018 This comment does not specifically address the adequacy of the EIR, and no further response is required.
Sharon Rooney			
RPC-179	Introduction	Good morning. My name is Sharon Rooney. I've been a resident in the West Antelope Valley living just east of this project for almost 40 years.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-180	Hazards	I moved here in 1979, then unaware that the soil in the Antelope Valley carries a fungal spore that, when breathed, causes Valley Fever. The prevailing winds are eastward, but they do blow in every direction. And anybody who lives here can testify that the winds really blow out here. These spores	The health of effects of air pollutants associated with the Project, including Coccidioides immitis spores that cause Valley Fever, are analyzed in Section 5.11, Air Resources (pages 5.11-5 through 5.11-10, and 5.11-28 through 5.11-29), and in Section 5.3, Hazards and Fire Safety (pages 5.3-13 through 5.3-19). This comment correctly notes that Valley Fever spores can be transported on the wind. Given the prevalence of Valley Fever spores in the Antelope Valley, the EIR conservatively presumes that Valley Fever spores affect the entire Project site and present a health risk to existing and future

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		become airborne when the soil is disturbed, and then they blow in the wind. Over the years, I remember hearing about people -- neighboring farmers and residents, who moved out to the country for rural living, who suffered months with these flu-like symptoms, who recovered eventually, but suffering lasting issues. Life was never the same. Three years ago I became very sick. And I was misdiagnosed for six weeks. Then I was informed I had Valley Fever and earlier treatment would have helped greatly. I suffered for six months with treatment that doesn't kill the fungus, rather only suppresses its growth. If untreated, it can cause spinal meningitis and lead to death. Within a year of the infection -- within a year, the infection disseminated and I became sick for another year and a half, the treatment having side-effects similar to chemotherapy -- chronic fatigue, joint pain, depression. And believe me, it is life-changing. If this project was to start disturbing this beast in the soil, it would endanger all the workers, all the existing population, their pets, their livestock, as well as future residents and businesses. Wildlife is also susceptible. This infection occurs in most animal species -- dogs, cats, horses and other livestock. Animals suffer terribly, and the costs are unbelievably expensive for testing and treatment. So having this life-changing illness that has slowed my life to a fraction of normal, I urge you to consider having more awareness of this. You will be responsible for allowing this possible epidemic to occur. There are no vaccines yet and no medication to completely get rid of the Valley Fever.	residents and workers in the Project area through ground-disturbing activities. In light of this presumption, the EIR imposes feasible mitigation measures to reduce the EIR's assumed Valley Fever risk to less than significant levels, as discussed on EIR page 5.3-19 and in response to Comment ADD-F.13-10. As this comment correctly notes, some animals are susceptible to Valley Fever. According to the Valley Fever Center for Excellence (VFCFE) at The University of Arizona, Tucson, "most mammals can be shown to be infected with the Valley Fever fungus, even if they do not get sick very often." University of Arizona, Tucson. Valley Fever In Other Animals. https://vfce.arizona.edu/valley-fever-dogs/valley-fever-other-animals (accessed July 27, 2018). According to the VFCFE, species in which Valley Fever has been found include: dogs; cats; cattle and other livestock; horses; llamas and alpacas; apes and monkeys; zoo mammals (i.e., kangaroos, wallabies, tigers, bears, badgers, otters); marine mammals (i.e., sea otters, dolphins, California sea lions); mammalian wildlife that lives in the endemic area (e.g., skunk, cougar). (*Ibid*.) In response to this comment, MM 3-11 is hereby proposed for revision as follows: **MM 3-11** The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information <u>in both English and Spanish</u> regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable interested parties both on- and off-site to easily access information relevant to potential Valley Fever risk, <u>including information relevant to potential Valley Fever risks to pets, horses, and other animals that may be present at or around the Project site during construction activities</u>. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebec, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.

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		Also, there is a cement plant to the northwest of this proposed community that is constantly disturbing soil and even blasts there, on a regular basis, the soil. And I imagine that will blow right toward the Project site. Thank you for listening. I hope you make a responsible decision with this information. Bye.	Regarding this comment's concerns regarding medical treatments for Valley Fever, the Mayo Clinic advises most people with acute Valley Fever don't require treatment, and the best therapy for otherwise healthy adults is often bed rest and fluids, even when symptoms are severe. Mayo Clinic. Valley Fever: Diagnosis & Treatment.[3318] The Mayo Clinic further advises that, if symptoms don't improve or become worse, a treating doctor may prescribe an antifungal medication (e.g., fluconazole, itraconazole), and more serious infections may be treated with an intravenous antifungal medication (e.g., amphotericin B) or with two newer antifungal medications – i.e., voriconazole and posaconazole. (*Ibid*.) This comment's concerns regarding the National Cement Plan located in Kern County north of the Project site are noted and will be provided to County decision makers for their consideration. In California Building *Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 269, the California Supreme Court held that CEQA generally does not require an EIR to analyze how existing environmental conditions (e.g., existing air pollutants generated by the offsite National Cement Plant) might impact the Project's future users or residents. However, it should be noted that the National Cement Plant operates under permits issued and enforced by the Eastern Kern Air Pollution Control District (EKAPCD) and must comply with EKAPCD Rule 419. EKAPCD Rule 419 prohibits the cement plant from discharging from any source whatsoever air contaminants or other materials which cause injury, detriment, nuisance or annoyance to the public, or which endanger the health or safety of the public.
Lydia Ponce			
RPC-181	Introduction	Lydia Ponce, Venice, California, So. Cal. 350. Master Plan Entitlements, Specific Plans -- these are colonial settler laws providing continued systemic capitalistic environmental desecration. The Antelope Valley is named Antelope. We have the bald eagle, kit foxes, badgers, mountain lions, bears, bobcats from their territory near and the California Condor knows no borders. And this migratory bird is my direct relative, as I am the Condor Tribe. I am "Myo" from Sinaloa, Mexico.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

[3318] Mayo Clinic. 2018 (July 27, accessed). Valley Fever. https://www.mayoclinic.org/diseases-conditions/valley-fever/diagnosis-treatment/drc-20378765.

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RPC-182	Biology	Our winged and four legged, finned and creepy crawlers are all of our relatives. The State of California Coastal Commission denied a permit at Banning Ranch because of our relative, the burrowing owls. They take residence there, and they take residence here at this proposed project area. It is a protected species, as is the bald eagle. This Project is not affordable for them.	The Commenter's testimony was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Project EIR discusses impacts to the burrowing owl on page 5.7-150, while impacts to individuals is considered potentially significant and MM 7-2 is provided to reduce impacts to less than significant, the loss of habitat is determined to be adverse but less than significant. The availability of potentially suitable habitat for this species in the region is extensive and includes the majority of the landscape within it. As such, the loss of habitat resulting from Project implementation is relatively minor and would not be expected to have a discernable effect on regional populations of the species. Furthermore, the Mitigation Preserve described in PDF 7-1 on page 5.7-135 sets aside over 27,000 acres of land composed of lands which are largely suitable for burrowing owl and burrowing owl have been detected within the Mitigation Preserve. For further discussion specific to burrowing owl, please see Draft EIR, pages 5.7-22, -92, -115, -150, and Final EIR, responses to Comments B.4-24, B.4-25, F.8-163, and F.8-164.
RPC-183	Affordable Housing	Affordable housing for whom? Extremely low and low-moderate incomes? How will the County acquire a list to draw names for a lottery for the housing? Is it like for like? Homes for upper income and lower income that will provide the same marble countertops, washers and dryers, parking? If it's not in writing, it does not exist. Please do not approve this Project, as it further diminishes people in poverty in our lives. I recommend that you deny this Project -- or deny this permit.	The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required. With regard to affordable housing details, please see the Affordable Housing Implementation Plan in the Specific Plan, at Final EIR, Appendix 3-C to Appendix 4.0-A.Rev.
RPC-184	Miscellaneous	And if it's the big tax revenue that you're all about, then continue the process with the developers and investors wiggling in their seats with anticipation. Order them to work with the community because jobs are temporary, and employees must drive great distances to these projects as such.	The Commenter's opinion has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Project does incorporate a local hire program. This testimony does not specifically address the adequacy of the EIR, and no further response is required.

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RPC-185	Miscellaneous	We need to take more time to reduce this project significantly in size, reduce its carbon footprint, as our winged and four-legged relatives require and are more than deserving to be honored, defended, and protected. When will the developers and investors learn they cannot control nature and redirect it no matter how well their plans are written?	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opinion regarding Project size and character is noted. This comment does not address the adequacy of the EIR, and no further response is required
RPC-186	Conclusion	I don't believe their phasing and their future plans typically made -- they are made of empty promises on paper. Our lives are now. Deny this project because our children are deserving of green spaces over green paper money profits.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opinion is noted. This comment does not address the adequacy of the EIR, and no further response is required
Sean Longmire			
RPC-187	Introduction	Good morning members of L.A. County Planning Commission. As a current resident, homeowner, and backyard naturalist – … Sean Longmire. As a current resident, homeowner, and backyard naturalist in the First District and a lifelong Angeleno who grew up in the Third District, I'm here to ask that the Planning Commission not recommend the approval of the Development Centennial Specific Plan as proposed by the Tejon Ranch Corporation.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
RPC-188	Miscellaneous	The Tejon Ranch Corporation and their individual stakeholders have every right to propose development on their land investment, just as I have the right to build and invest in my own property in Los Angeles. But this plan in its current form, as evidenced by its need for the various entitlements from the Los Angeles County is ill-conceived as it still remains.	The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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RPC-189	Biology	The project simply has too many negatives going against it -- among them, the destruction of unique habitats and its associated biodiversity. The proposed land, if it would be developed, approximately 70 miles north from where we now sit, would forever alter some of the finest native grassland that remains in California.	The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. With regard to Project impacts on habitat, the EIR concludes after thorough analysis that habitat loss is not an adverse impact on wildlife resources at a project or cumulative level. Draft EIR, Section 5.7, Biological Resources, page 5.7-145 to -153, Section 7.0, Cumulative Impacts, page 7-16. This is consistent with the independent judgment of scientists and representatives of the six leading environmental groups that signed the Tejon Ranch Land Use and Conservation Plan, as described in the Final EIR, responses to Comments F.3-12 and F.8-108. With regard to grassland, Draft EIR Section 5.7, Biological Resources, discloses the Project's potential impact to grasslands and determines that direct and indirect impacts would be mitigated to a less than significant level, but cumulative impacts to native grasslands would be a cumulative significant impact. (Draft EIR, pages 5.7-158, -162.) Project implementation would include mitigation at a ratio of at least 2:1 for grasslands, resulting in improved functions and values of grasslands on the Project site, in addition to preservation in perpetuity within the Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Intensive, multi-year grassland studies have revealed that grasslands of equal or greater value occur in vast quantities in the Mitigation Preserve. Please see Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 for further discussion of grasslands.
RPC-190	Traffic	Traffic: Future residents of this proposed city, when its fully expanded to 55,000 people, will endure long commutes with the nearest employers being 40 to 60 miles away, making regional traffic even worse.	As discussed on Draft EIR page 5.10-51, the North County Sub-Area Model results show that 40 percent of the trips made on site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. As shown on Table 3.8 of the traffic study (Draft EIR Appendix 5.10-A), the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. The model estimates that an average external trip will be 45.9 miles in length. Finally, the North County Sub-Area Model estimates that 48 percent of all trips will be internal and 52 percent of all trips till be external to the Project. Consequently, the average Project trip is estimated to be 25.5 miles in length. As discussed on page 3-9 of Draft EIR Appendix 5.10-A, these estimated trip lengths are conservative because they do not reflect the trip reduction measures being implemented by the Project that will encourage trips by walking, biking, and transit.

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RPC-191	Greenhouse Gas	Greenhouse gas emissions: The greenhouse gas emissions that will result from the vehicle pollution energy consumption, pumping of stored ground water, and loss of carbon sequestration mean intact habitats will be unmitigatable. The Antelope Valley already suffers some of the worst levels of PM 2.5 and PM 10 pollution. This project will make already poor air quality worse.	As discussed in Final EIR, response to Comment F.8-79, the Project's potential GHG impacts from these sources were fully disclosed and analyzed in Section 5.21 of the Draft EIR. Moreover, the Draft EIR includes mitigation measures which require compliance with a non-exclusive list of laws and regulations requiring GHG reductions in equipment, activities, facilities and services associated with the project (MM 21-20) The Draft EIR also includes 45 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and 21-1 through 21-19). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in Final EIR, response to Comment F.8-204, and mitigation measures have been revised in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures as set forth in Final EIR, responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3A-46, and F.8-189. However, climate change is a global phenomenon and the significance of greenhouse gas emissions is inherently cumulative in nature. Moreover, the County of Los Angeles has no jurisdictional control or responsibility for GHG reductions in other parts of California (and certainly not in the context of global action), which all contribute to climate change. Although many other agencies with the necessary jurisdiction are currently taking action to reduce GHG emissions, the County cannot assure that these measures would ultimately be implemented by such agencies or sufficient to address climate change given its jurisdictional limitations. Therefore, the Draft EIR conservatively determined that the Project's incremental contribution to the global GHG emissions inventory would be considered cumulatively considerable and that this cumulative impact would be significant and unavoidable, even though the Project satisfies several "pathways to compliance" identified by the *California Supreme Court in Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 2004. The air quality analyses in Section 5.11, Air Resources, of the Draft EIR was conducted based on the methods recommended by the SCAQMD for criteria pollutants and TACs, as discussed on pages 5.11-18 through 5.11-22. Descriptions of health effects for each of the analyzed air pollutants were provided to inform the public of potential health effects as required by the disclosure requirements under the CEQA. Project related air pollutant emissions were evaluated both in terms of contributions to regional air

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			quality and localized impacts to uses proximate to the Project site. As this comment correctly notes, the Draft EIR disclosed that there would be significant and unavoidable air quality impacts related to construction emissions in the jurisdiction of the AVAQMD as well as the SCAQMD. Long-term operational emissions were also found to exceed the AVAQMD and SCAQMD thresholds of significance for regional emissions. However, it should be noted that the South Coast Air Quality Management District (SCAQMD) has reviewed the Centennial EIR and determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2).
RPC-192	Hazards	Fire: The proposed site is notoriously windy, as other people have mentioned, making wind-driven fire highly likely. And adding a 55,000 person city will lead to increased fire frequency. In the face of fires in late 2017, have we learned nothing about allowing development in remote places of L.A. and adjacent counties. The cost of fighting fires on Tejon Ranch will become a burden to Los Angeles County and adjacent Kern County.	With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6. With regard to the Project's fiscal impacts on other communities, please see Response to Testimony RPC-167.

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RPC-193	Geology	Earthquakes: The site is located on the San Andreas fault and adjacent to the Garlock fault. These are the State's two largest fault systems. L.A. County should focus development efforts towards areas with less seismic risk. Thank you.	The Commenter's preference for an alternative location due to fault placement is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR thoroughly and appropriately analyzes potential Project-related impacts due to fault location. First, it should be noted that the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State, so the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area. With regard to the Project site specifically, due to the proximity of both the San Andreas Fault and Garlock Fault to the Project site, a fault research company called Earth Consultants International (ECI) conducted a detailed fault investigation on the Project site and evaluated potential hazards as a result of fault locations in relation to the Project site and planned development areas. See Draft EIR, Appendix 5.1-A. While earthquakes that may occur along the San Andreas Fault Rift Zone are potential generators of significant ground accelerations at the site, foundation systems must be designed to withstand these accelerations, and secondary impacts such as liquefaction may be mitigated by remedial grazing, structural design and foundations or ground improvement techniques; active fault zones can also be mitigated against by implementing setback zones from Alquist-Priolo Earthquake Fault Zones. Accordingly, as shown on Draft EIR Exhibit 5.1-2, the Project has been designed to avoid development in areas near this zone. Draft EIR, Section 5.1, Geotechnical, page 5.1-16. The Project shall incorporate all applicable geotechnical recommendations identified in the geotechnical documents previously prepared for the Project, and implementation of these requirements would ensure impacts would be less than significant. For further discussion regarding seismic impacts and faults, see Final EIR, responses to Comments F.8-206 to F.8-210.
Rachel Wing			
RPC-194	Introduction	Thank you, Mr. Chairman, Commissioners and Staff. My name is Rachel Wing from Pasadena. I'd like to just highlight everything that Dr. Longmire said with particular respect to how loss of some of the natural features, particularly the native grassland and the rare plants, are unmitigatable. So I am speaking as a private citizen in opposition to the project as a whole.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		I currently work in conservation in the control of the basic needs. I volunteer for the California Condor Recovery Project as a nest watcher and formerly worked for the City of Monrovia's Parks Department and their Fire Department on wildland urban interface issues.	
RPC-195	Hazards	I coordinated and co-wrote their Community Wildfire Protection Plan. And one of the things that became clear in that is that the amount of wild land urban interfaces that you create magnifies the hazards of wildfire, of wildlife interactions, and geologic hazards, and magnifies the costs to those things. And there could hardly be any way of increasing the amount of wild land urban interface greater than going from zero to plopping a new development within previously uninhabited or very sparsely inhabited areas.	With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.
RPC-196	Biology	And even to the extent that you can mitigate those hazards to people and the costs -- or are willing to bear the monetary costs, there is always a permanent loss to nature. You have to bulldoze buffer areas around our developments. Animals are simply killed because we can't coexist with them -- all the things we have to do.	The Commenter appears to be referring to fuel modification practices to reduce fire risk, and the Commenter's opinion regarding fuel modification and biological resources is noted. The Project is required to implement fuel modification to comply with State and County regulations. Per MM 3-9, the Project must prepare and implement a Fuel Modification Plan to be reviewed by the LACFD Forestry Division. Some Project development is proposed in areas that would be adjacent to large open spaces areas with moderate vegetative cover. Under existing conditions, the plant communities that make up this cover are highly combustible and would, therefore, present a high fire hazard and pose a potentially significant impact to development in these

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			areas. As development of the Project site proceeds, however, fire hazards associated with the natural vegetative cover would be eliminated through its replacement with urban landscape vegetation, which is irrigated and less combustible than the existing vegetation. (Draft EIR, page 5.3-36.) The impacts of fuel modification zones have been accounted for in the analysis of Project impacts on biological resources in Section 5.7, Biological Resources. MM 7-21 on Draft EIR page 5.7-194 prohibits fuel modification zones from encroaching on the adjacent SEA. MM 7-1 on Draft EIR pages 5.7-173 through 5.7-175 prohibits fuel modification in areas occupied by special status plant species (i.e., crownscale and spineflower). As such, fuel modification zones would be located away from open spaces where sensitive biological resources are present and would be confined to areas that are proposed for disturbance. For further discussion of fuel modification, please see Final EIR, responses to Comments F.8-63, F.8-64, G.28-4.
RPC-197	Biology	Regarding condors, they are mentioned in the EIR -- a few flyovers. But how many would you expect now that the population is just back from the brink of extinction. Anyone who has seen -- that has experienced a California condor in the wild dreams of the time when we really do recover the population. But that won't happen if we take away their habitat. So please refuse this -- this Project. Thank you very much.	The Commenter's concern regarding the California condor and conservation of their habitat is acknowledged. The Draft and Final EIR analyzed potential Project impacts on the condor in depth. Independent studies analyzing potential Project utilization by the condor were conducted by t experts on the species (Bloom 2009) and were included as attachments to the Draft EIR (Appendix 5.7-B, Birds-6). As noted on page 2-42 of the Final EIR, condors are extremely infrequent visitors to the Project site. The Project site is on the eastern edge of the historic condor range, and some fly-overs have occurred, although the core flight paths are located to the west of the Project site. Expert analyzation of the Project site concluded that thermal updraft is likely not sufficient over the site to propel the condor into flight. Due to the large size of the California condor, areas of at least moderate topographical relief seem to be required for both thermals and updrafts to facilitate take-off (Allen et al. 2016). For this reason, as well as the record of occurrence, the Project site is not considered important foraging grounds for the species. Observations of flying condors prior to 1987 indicate that, on the few instances that they were known to have flown over valley floor habitat (including the Centennial Project site), the birds were usually flying high over the landscape, probably at an altitude of over 1,000 feet (Bloom 2009). During these flights, the condors rarely, if ever, landed and their movements appeared transitory (Bloom 2009). To date, four GPS location points out of many thousands were in the vicinity of the Centennial Project site (Bloom 2009). As stated on page 5.7-94 of the Draft EIR, no suitable breeding habitat is present and potential foraging habitat is present, but lack of thermals appears to prohibit use of the site. Although there are many flyover records from the site (and 1 landing) and from the surrounding areas, this species is

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			expected to occur only as a relatively rare flyover compared with core habitat in the adjacent mountains to the north and west. The Draft EIR correctly concluded that impacts to condor are less than significant. The USFWS analysis supports this conclusion. However, MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. MM 7-6 includes mitigation measures to protect condors during design of the Project, during construction of the Project, post-Project construction, and includes a homeowner Condor Educational Curriculum. To address the Commenter's statement about the future of the species, historical grassland foraging habitat around the base of the San Joaquin Valley remains viable, and large swaths have been protected since about 1984, including the Bitter Creek National Wildlife Refuge (NWR) (5,867 ha), the private Wind Wolves Preserve (39,000 ha), and the Carrizo Plains National Monument (121,405 ha) (Walters et al. 2010).[3319] Additionally, large swaths of foraging and roosting habitat have been preserved on Tejon Ranch that is a critical gateway to historical foraging areas in the Sierra Nevadas.
Myles Lewis			
RPC-198	Introduction	So my name is Myles Lewis. I'm coming from the West Valley. So I come as a native of Los Angeles's legacy of sprawl in the West San Fernando Valley. And like everyone here, I'm sure, I have a deep and abiding relationship to nature, which has been consistently upset by the revelation of all of the ways in which any human development has unavoidably damaged what we all fear to lose through transit, infrastructure, waste management and all forms of resources.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

[3319] Walters J. R., et al. 2010. Status of California Condor (*Gymnogyps Californianus*) and Efforts to Achieve its Recover. The Auk, Vol. 127(4):969-1001. The American Ornithologists' Union.

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RPC-199	Miscellaneous	So I appreciate Centennial's care. I deeply appreciate their care in working with broad based environmental input. I would appreciate such care in the retrofitting of existing comparable developments across California and the Nation. But when our priorities have to be making our developed areas more affordable, efficient, and sustainable, I can't see any reasonable decision other than conservation.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-200	Miscellaneous	The City and the culture doesn't have the bandwidth to subsidize new concerns, especially in such a deeply important region as is covered by the Project site. And I'd like to end by saying that encouragement of best practices socially is great -- you know, bicycling, electric vehicles, et cetera -- which I know Centennial brought up -- but as a guy who was just hit on my bike by a completely insensitive motorist, you know, who doesn't see a bike because we don't have the culture, and living in an area in the West Valley where people are almost superstitiously suspicious of public transit, as if it is far more dangerous than driving a car. It's just what I experience every day from family and friends. We have to fix what we have rather than exporting this kind of limping good intention to new developments. Thank you very much.	The Commenter's opposition to the Project and preference for revitalizing existing communities has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
Richard Dickie			
RPC-201	Introduction	Hi. My name is Richard Dickie. I'm a professional photographer and have been photographing California landscapes well over 30 years and counting. I first became familiar with Tejon Ranch after meeting a ranch foreman named George Sanford in the late 1980's. During the spring wild flower seasons George allowed photographers from	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. Project design takes the surrounding environment into account, and the EIR analyzes impacts on the Project site and areas immediately surrounding it. This comment does not address the adequacy of the EIR, and no further response is required.

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		around the globe onto the ranch to drive around and document the spectacular wonders that are unique to Tejon -- unique to Tejon and nowhere else. I visited the ranch almost a hundred times over the years and documented landscapes from year to year. I've also traveled all over California and documented the few remaining wildflower spots that exist. And nothing compares to the jaw-dropping wonder of Tejon and the adjacent Gorman hills, which is an interconnected issue that needs to be considered if development is allowed on Tejon.	
RPC-202	Miscellaneous	Tejon and Gorman have been compared to Yosemite Valley for their world-class scenery not seen anywhere else on the planet. This area was designated as a sensitive environmental area for good reasons.	The existing visual resources associated with the Project site are disclosed in EIR Section 5.13.4 (pages 5.13-7 through 5.13-11). As discussed in the EIR, the vast majority of the Project consists of open grasslands that are used for cattle grazing. While aesthetically interesting, the Project site does not share the striking visual qualities of Yosemite Valley. Nevertheless, the EIR determined that the Project would result in significant and unavoidable impacts related to a change in visual character experienced from public vantage points (primarily transportation thoroughfares including SR-138, 300th Street West, 290th Street West, and Malinda Avenue). Visual character impacts related to grading and development of the Project would be reduced through implementation of PDFs 13-4 and 13-5, and MMs 7-13, 13-1, 13-2, and 13-3; however, the change of the Project site from a rural to urban condition and the varying degrees of obstruction of existing views of local foothills and the Tehachapi Mountains would be considered a significant unavoidable impact, for which no additional feasible mitigation exists. The Project site has not been identified a Significant Ecological Area under the AVAP. Rather, the Project site is within an area identified as the West EOA, and Project development entirely avoids nearby SEA 17. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This testimony does not address the adequacy of the EIR, and no further response is required.

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RPC-203	Miscellaneous	Once the infrastructure of roads, water, sewer, and electricity are in place for Centennial City, the adjacent Gorman hills would be developed using the newly installed utilities close by. Then come the off-road vehicles that will whiz across the landscape and the hikers and dog walkers that will want to go off path, invasive plants that will take hold in the new disturbed soil, and the illegal trash dumps that no entity seems to be able to control will be the result. If you build it, they will come along with the human nature and the inevitable urban impact.	The Commenter's opinion with regard to growth-inducing impacts was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to the proposed Project's impacts in comparison to existing Project site conditions, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments could be made outside the West EOA, which is considered a significant, adverse indirect growth-inducing impact. Draft EIR, Section 7.0, Cumulative Impacts, pages 7-19, and Section 6.0, Growth-Inducing Impacts, pages 6-6 to 6-9. To the extent this comment implies that the EIR is deficient unless it analyzes the cumulative impacts of future development that may be induced by the Project, the comment is mistaken. As provided in CEQA Guidelines § 15126.2(d), the EIR analysis of growth inducing impacts need only discuss "the ways in which the proposed project could foster economic and population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The Court of Appeal has confirmed that "[n]othing in the Guidelines, or in the cases, requires more than a general analysis of projected growth." See *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369. The EIR meets this analytical standard and CEQA does not require the EIR to analyze the cumulative environmental effects of such projected growth. In any case, such analysis would require the Lead Agency engage in pure speculation as to the type, size, location and timing of future growth, which is not permitted under CEQA Guideline § 15145. For further discussion of growth-inducing impacts, see Draft EIR, Section 6.0, Growth-Inducing Impacts, and Final EIR, responses to Comments F.8-47 through F.8-49.
RPC-204	Conclusion	Once you break it, you'll never be able to fixes it. This is a special place it's the last of an amazing legacy. I ask you to clearly consider the decision you're about to make. This area deserves to remain an intact sensitive environmental area as originally planned for. The investors bought the property with eyes wide open, knowing the risk of trying to develop it. This definitely does not fit an infill housing need as	The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.

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		proposed by one of the developers. We all know better than that. This is an extremely exquisite, remote, pristine habitat. I ask that you please leave it as is. And I would like to provide documentation to the commissioners. Thank you.	
Stephanie Pincetl			
RPC-205	Introduction	Stephanie Pincetl. Good morning, Staff and Commissioners. It's very nice to be here again. I have submitted some comments. And since the new documentation's come in, I will also submit more comments because in three minutes you really can't begin to scratch the surface. I would like to raise a couple of issues that have not been raised by either the EIR or the Staff or anyone else. And that -- these are -- they are the following:	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-206	Housing	One of the persuasive arguments is that the region needs more housing. Of course, we need more housing, but not at this location. And let's look at it a little more closely for some other reasons.	The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.
RPC-207	Climate Change	By mid-century, annual average maximum temperatures will exceed 100 degrees and, by the end of the century, may go up to nearly 130 degrees on hot days. By mid-century, there will be 20 to 40 additional extremely hot days and by the end of the century 60 to 90 extremely hot additional days. These will have serious impacts. Public health and any outdoor activity will be impaired. Think Phoenix. No walking, no biking even if you were able to go for coffee and out with friends, ride your bike to school, or go shopping. Impacts on the grid, despite the offset approach to Zero-Net electricity will be inevitable. And this I	The Commenter's suggestion that surface temperatures on the Centennial Project (Project) site will soon exceed "130 degrees" due to climate change are inaccurate. Global climate change is discussed in detail in Draft EIR Section 5.21, Climate Change. As discussed on page 5.21-39 of the EIR, according to California's 2012 Vulnerability and Adaptation Study, the State's third major assessment on climate change, modeling results from a high emissions scenario developed by researchers at UCLA indicate that mountain and inland areas of the Los Angeles region could warm up to or greater than 4.5 degrees Fahrenheit (°F) by mid-century. The high emissions modeling scenario also indicates that the number of heat days in unincorporated areas of the County may increase by nearly 12-fold. As discussed on page 3-2 of the EIR, data from the Western Regional Climate Center show that the average annual temperature on Tejon Ranch from 2012 to 2014 was 67 °F, and that temperatures of 100 °F or more were uncommon. If the potential high emissions scenario modeling results summarized in the EIR were to occur in

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		will write more detail for the Commission's interest. With this kind of heat, regardless of generation -- let's say it's being generated farther away -- there will be electricity, with solar -- there will be up to a 20 percent capacity loss, not to mention interruptions in service and component breakdown. Severe heat is severe heat. With current policy, people will be paying very high rates for time of use electricity when there is no solar generation. And that happens to be when they're coming home in the evening. So even if it's zero net electricity, that does not mean there will not be natural gas power plant generation for the evening needs.	the future, temperatures and the number of heat days at the Project site would increase, but not to the extent that average or maximum daily temperatures would regularly exceed, or even come close to, the 130 °F levels suggested by Commenter.
RPC-208	Miscellaneous	So I know my time is very short, but I will amplify those comments significantly in my written testimony.	This comment does not address the adequacy of the EIR, and no further response is required.
RPC-209	Water Supply	I just want to make one other point today. The Project points to the State Water Project essentially for water supply. That Project is currently five times over-allocated. Everybody's promising State Water Project. This means that the State Water Project isn't really available -- that water, particularly when there will be times of drought. And we know that there will be. Instead, you will be robbing Peter to pay Paul with water transactions. And lots of choices will have to be made there about priorities in water use.	The Commenter's opinion regarding the reliability of the State Water Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees and concludes that Project EIR analysis demonstrates reliable and sustainable water supplies, including with regard to water from the State Water Project. After thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts. With regard to the reliability of imported water supplies for the Project, the potential delivery reliability and variability of Project State Water Project supplies is discussed in Draft EIR Section 5.18, Water Resources, pages 5.18-20 to -28, and -54 to -64. The analysis of Project imported water supplies uses the Early Long Term scenario also used in the California Department of Water Resources' State Water Project Delivery Capability Report, and incorporates the effects of the most severe droughts during the 82-year historical record, plus additional adjustments to account for potential climate change effects and

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			the 5 percent single-dry year delivery level used by the Antelope Valley-East Kern Water in the Agency's 2015 Urban Water Management Plan. Consequently, the Draft EIR includes a discussion of State Water Project delivery reliability that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. Commenter provides no evidence to dispute EIR analysis, and no further response is required.
RPC-210	Conclusion	So I will follow up with more comments. But thank you very much for your time today. And I hope to be in further discussions with you all. Thank you.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
Jack Ite			
RPC-211	Introduction	Good day. My name is Jack Ite. I'm an Urban Planner with Wild Heritage Planners and a Co-Founder of So. Cal. 350 Climate Action. So I've worked on a lot of large-scale development projects. A few years back I did a totally rethinking of the Rancho Mission Viejo project, which was proposing 14,000 units down in Orange County. We were able to protect a good percentage of that land there. I worked on East Orange. I worked on Tejon Mountain Village. I put a suggestion out to the Kern County Board of Supervisors that they totally reduce that Project. They ignored what I put down for the project, which they approved, which was highly unfortunate. I also -- I am working on the Banning Ranch Project, which a protected 400 acre site there that the Coastal Commission protected basically because of the burrowing owl, which is very significant here.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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RPC-212	Greenhouse Gas	I think this is a totally inappropriate area for development, which has been stated. But I want to take on some issues with Net-Zero, SB 375 in terms of sustainable communities and the correlation with Cap and Trade.	This comment's general opposition to the Project location is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. With respect to the Project's consistency with the regional planning efforts being undertaken in compliance with SB 375, please see response to Comment F.8-20. With regard to this comment's reference to "net zero," the Project has made a commitment to achieve a "net zero carbon for the electric sector" standard on all public and private facilities constructed within the Project, which means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions as documented over time as part of each application for a tentative tract map.
RPC-213	Greenhouse Gas	I guess -- just first thing is the cap is massive, meaning it's our carbon budget. So if you have tons of money in your account and you can go out and spend it however you want, that's fine. But when you have a cap, you're very limited. So if we're going to expend our budget on building housing in an area where there's absolutely no infrastructure -- there's no roads. There's no electricity. There's no sewer. There's no water. It's totally hot as heck. And it's disconnected from everything -- we are wasting our carbon budget. So I would submit that Cap and Trade should be pushed aside.	This comment's opposition to the Project and to California's cap-and-trade program are noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. It should be noted, however, that the Project is not itself subject to the cap-and-trade program, though the producers of the fuel and electricity needed to construct the Project are generally subject to cap-and-trade. As this comment notes, under California's cap-and-trade program, the State sets an emissions cap and issues a quantity of emission allowances consistent with that cap. Regulated emitters (e.g., fuel and electricity producers) must hold allowances for every ton of greenhouse gas they emit. The regulated emitters may buy and sell allowances, thus establishing an emissions price. Moreover, regulated emitters that can reduce their greenhouse gas emissions at a lower cost may sell their any excess allowances to other covered entities facing higher compliance costs.
RPC-214	Land Use Population/ Housing	Now, in terms of 375 -- SB 375, Sustainable Communities -- yes, it's one thing to put housing next to walkable areas, put a school in there. But, unfortunately, if you're going to start talking jobs/housing balance, and you can say, well, they're going to balance it. No. It will never be balanced because people will be driving from far away to work in those offices, and people living there will be driving far away to go to other offices. There will be no balance. Whether you can show me something up on the screen that it's balanced -- it will never be balanced. So that is completely fallacious. And SB 375, again, is part of that. It's a	The Project's land use plan would provide an estimated jobs/housing ratio of 1.22 through the development of commercial and business park uses on the site, thus positively contributing to the attainment of the AVAP's targeted jobs-to-housing ratio. With regard to this comment's query regarding the EIR's job growth assumptions, as explained in EIR Section 5.9.3 (pages 5.9-18 through 5.9-22, and pages 5.9-29 through 5.9-30), such assumptions are based on regional employment growth projections published by the Southern California Association of Governments (SCAG), which SCAG adopted as part of its 2012 and 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) planning documents. With respect to the Project's consistency with the RTP/SCS, please see Final EIR, response to Comment F.8-20.

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		sustainable community, but it's not taking into account the regional issue that we're facing here.	
RPC-215	Miscellaneous	And this region makes no sense. I would be one to get up and say let's reduce the site of this project. Let's find the most important habitat and protect that, and maybe we can build on a bit of it. If you told me a community the size of Frazier Park, which has, I don't know, 5,000 -- if you told me they wanted to build that community here, maybe we could talk.	The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.
RPC-216	Biology	And even that would be a major impact because we're talking critical habitat for the California condor. We're talking major species that would be impacted.	The Commenter's opinion with regard to even a smaller project on the Condor was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. However, the EIR appropriately analyzes potential Project-related impacts to California condor and concludes that impacts would be less than significant. Requirements in MM 7-6 would further reduce impacts to California condor. For further discussion specific to California condor, see Draft EIR, Section 5.7, pages 5.7-94, -119, and -120 and Final EIR, responses to Comments B.4-20 to B.4-23, and F.8-138 to F.8-143.
RPC-217	Hazards	We're talking massive risk of wildfire. We're talking dangerous issues. I mean wildfire -- if you look at the burning that happened in December and October of last year, it was through historic wildfire areas. It didn't matter how much they reduced the brush. It didn't matter how much they changed the land. When that fire swept down into Santa Rosa, it was unstopable because the winds -- the Santa Ana winds now are much worse than they ever were and because of the droughts, which are coming -- droughts are going to be happening. Suddenly the dry season goes into the Santa Ana season. When those Santa Ana winds start blowing through that valley, this community will burn. I guarantee it.	With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities,

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			and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.
Dr. Sandra Namoff			
RPC-218	Introduction	Hello. Thank you for allowing me to speak today. My name is Dr. Sandra Namoff. And I'm a resident of L.A. County's First District. I'm here today to strongly oppose the Centennial Specific Plan. Everyone here has an interest in Tejon Ranch. My interest comes from the perspective of an evolutionary biologist. For my Doctoral research, I studied the processes that led to diversification of morning glory species in California.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.
RPC-219	Biology	My research indicates that over the last million years, the Southern Tehachapi Mountains, including Tejon, have been integral to the processes that have led to diversification of this group in Western North America. The region is exceptionally important to ecological speciation because it connects the cool coastal habitats to deserts land, mountains and beyond.	The Commenter's concern regarding the significance of the Project region as an important ecological region, specifically for speciation, is noted. It is generally agreed that the Project region is ecologically important for many reasons. The description of the primary resources within SEA 17, which occurs within the Project region and partially on the Project site, includes wildlife movement and the mosaic of habitats along the San Andreas Fault Zone. The area encompasses an important linkage between the San Gabriel Mountains and the Tehachapi Mountains, representing the only mountain linkage from the Transverse Ranges or the Pacific Coast Range to the Sierra Nevada Range (PCR et al. 2000). As noted on page 5.7-8 of the Draft EIR, SEA 17 is identified as significant due to position within a region where multiple diverse biomes (a community of plants and animals) and wildlife corridors come together. It contains a unique mosaic of vegetation types that represent a transitional area between the Mojave Desert, the Coast Ranges, and the Tehachapi Mountains. Much of this important land is included in the Project's proposed Mitigation Preserve. The proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas. While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land is preserved through the Project's mitigation process. Additionally,

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			there is no evidence to suggest that biological processes necessary for continued speciation would be negatively affected by Project implementation.
RPC-220	Biology	We can choose to continue to allow this habitat to play a role as a functional ecosystem for millenia to come, or we can choose to allow a development plan that will create outdated -- an outdated sprawl-type community. I strongly believe that it's imperative to maintain the area within the Centennial Specific Plan as a functional ecosystem where evolutionary processes can function in the absence of further human disturbances.	The Commenter's preference for preservation of the entire Project site is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The County notes that the Project is not sprawl development, as discussed in detail in Final EIR, response to Comment F.8-20. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-221	Miscellaneous	I'm also here to express my aversion to the tactics that the Tejon Ranch Company has taken to silence the scientific community. I was shocked and dismayed by the article published in the Mountain Enterprise less than a week ago that details a systematic effort to prevent anyone from visiting or studying Tejon Ranch who has expressed formal opposition to Centennial. And I realize this now includes me.	This testimony and the Mountain Enterprise article are noted, have been provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. However, for informational purposes the County notes that many scientists have been and continue to be allowed access to the ranch per the RWA and RWMP, and thorough, independent scientific review of Tejon Ranch, including the Project site, has been completed. The Project Applicant also addressed this article in its July 11, 2018 testimony to the Regional Planning Commission, explaining that the RWA does not provide unrestricted public access to Tejon Ranch, but rather provides the express right to withhold access permission. The Applicant further explained that its intention has been to deny access to Center for Biological Diversity and their partner organization, the California Native Plant Society, who have active, ongoing litigation against Kern County, Los Angeles County, and Tejon Ranch regarding Tejon Ranch projects.
RPC-222	Miscellaneous	The mere existences of a black list will cause scientists to hold back their opinions, as being banned from Tejon may damage their ability to do future research. This will have a chilling effect on the very community of scientific advisors that Tejon Ranch should need and want to help them effectively manage their land. The black list	This testimony has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Commenter's opinion is noted. With regard to ranch access, please see Response to Testimony RPC-221. This testimony does not specifically address the Project or adequacy of the EIR, and no further response is required.

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		amounts to an attack on free speech, and it should not be tolerated.	
RPC-223	Miscellaneous	While I recognize that Tejon Ranch is private land, it is true that tax payer dollars were used to purchase conservation easements on Tejon. And public access is a central tenet of the 2008 Conservation Agreement. And I agree with the article's assertion that the black list is against the spirit of the 2008 Agreement.	This testimony has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Commenter's opinion is noted. With regard to ranch access, please see Response to Testimony RPC-221. This testimony does not specifically address the Project or adequacy of the EIR, and no further response is required.
RPC-224	Conclusion	The Regional Planning Commission has a choice. It can promote development that puts the people of L.A. first, or it can cater to billionaire hedge fund investors of the Tejon Ranch Corporation. Please make the right choice and say no to the Centennial Specific Plan. Thank you very much.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.
Dr. Nicholas Jensen			
RPC-225	Introduction	Good morning. Thank you very much for hearing me this morning. I am Dr. Nicholas Jensen. I'm the Southern california Conservation Analyst for the California Native Plant Society. As part of my dissertation research I produced the first comprehensive catalog of the plants of Tejon Ranch. I'm a Los Angeles County resident in District 1. The California Native Plant Society opposes this project as both scientists and Californians. Not only is this project bad for nature, it is bad for people.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.
RPC-226	Housing	With the Centennial Project, the Tejon Ranch Company has initiated an impressive display of public deception. The company wants us to believe that developments like this will solve our very real housing crisis. But what we really need is affordable housing near centers of work. The reality is so distorted that Barry Zoeller, Vice President of Corporate Communication Investors	The Commenter's opinion with regard to Project location is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The Project site is not an infill site. However, it provides development on a site planned to accommodate projected growth in a manner consistent with regional strategies for achieving mandatory reductions in GHG emissions attributable to the land use sector. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of

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		Relations called Centennial "Infill Development" on KPCC just a couple weeks ago. The Tejon Ranch Company wants us to believe that developments like this will solve our very real housing crisis, but what we really need is affordable housing near centers of work.	Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and GHG emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.
RPC-227	Biology	At the RPC hearing on June 9th, Michael Jocelyn testified that the grassland habitats on Centennial were not valuable. This opinion -- and I place full emphasis on the word "opinion" here -- is counter to what I and many other scientists have observed on Tejon Ranch. I implore the Tejon Ranch Company to provide the public with the data that supports the assertion that the grasslands on Centennial are not of statewide conservation importance.	The Commenter's opinion regarding Michael Joselyn's testimony is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. The County notes that Michael Joselyn summarized his work studying Tejon Ranch to help identify portions of the ranch most suitable or conservation, and most suitable for development. The EIR thoroughly and appropriately documents the grassland study done on the Project site. Draft EIR Section 5.7, Biological Resources, discloses the Project's potential impact to grasslands and determines that direct and indirect impacts would be mitigated to a less than significant level, but cumulative impacts to native grasslands would be a cumulative significant impact. (Draft EIR, pages 5.7-158, -162.) Project implementation would include mitigation at a ratio of at least 2:1 for grasslands, resulting in improved functions and values of grasslands on the Project site, in addition to preservation in perpetuity within the Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Intensive, multi-year grassland studies have revealed that grasslands of equal or greater value occur in vast quantities in the Mitigation Preserve. Please see Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 for further discussion of grasslands.
RPC-228	Geology	Furthermore, Tejon Ranch continues to ignore the fact that Centennial is a proposed city in a dangerous location. We've heard a lot of people talking about wildfire risks so far this morning. The project is situated at the junction of the two largest faults in California -- the San Andreas and the Garlock. The San Andreas fault, in particular, poses a grave danger to Centennial. It is a matter of when, not if the San Andreas produces another large earthquake in this area.	The EIR thoroughly and appropriately analyzes potential Project-related impacts due to fault location and seismic risk, and both compliance with State and County requirements and Project-specific mitigation measures would ensure impacts are less than significant. Please see Response to Testimony RPC-193 for further discussion regarding seismic impacts and faults. With regard to wildfire risks, please see Response to Testimony RPC-195.

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RPC-229	Geology	For example, on January 9th, 1857, at 8:20 A.M. a magnitude 7.9 earthquake struck near Parkfield, California. Because Forte Tejon was the nearest inhabited location to the epicenter, this earthquake is known as the Forte Tejon earthquake. It is the largest earthquake in recorded history in California. Benjamin Star, the former mayor of Los Angeles, noted that not a single structure at Forte Tejon was left standing. A fissure, 30 to 40 miles long, was opened in the ground. Cattle were vaulted in the air and rolled down hillsides. Mature trees were broken off at the ground level. Tejon Pass was blocked for months by massive landslides. And this was from an earthquake that occurred that was 120 miles to the northwest of Centennial.	The EIR thoroughly and appropriately analyzes potential Project-related impacts due to fault location and seismic risk, and both compliance with State and County requirements and Project-specific mitigation measures would ensure impacts are less than significant. Please see Response to Testimony RPC-193 for further discussion.
RPC-230	Geology	Not if, when this happens again, Centennial will be in the bullseye. A proposed community of 60,000 people will be destroyed and survivors in this leap-frog -- not infill -- development will be cut off from help. This is clearly a proposed new city in a dangerous place. I urge you to reject the Centennial Specific Plan.	The EIR thoroughly and appropriately analyzes potential Project-related impacts due to fault location and seismic risk, and both compliance with State and County requirements and Project-specific mitigation measures would ensure impacts are less than significant. Please see Response to Testimony RPC-193 for further discussion. While the Project site is not an infill location, the Project has been situated and designed to promote "smart growth" planning principles established by SCAG's 2016 RTP/SCS and the County's AVAP for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas emissions and promotes public health. Please see Final EIR, responses to Comments F.8-20, F.8-191, and F.8-204 for further discussion.
RPC-231	Grazing	I don't think grazing should be seen as an evil thing in all cases. I think what should be proposed, if – Okay. If grazing is to be permitted in the mitigation lands, I think there should be science that backs up that management decision. And that would be by doing, you know, multi-year studies that showed that these exact habitats that are being used for mitigation can support cattle while promoting the diversity of native species. And so I don't know what has been done so far in that, necessarily. But I would propose that as a -- as a course of action	The grasslands on Tejon Ranch have been grazed by cattle for approximately 150 years continuously. (Draft EIR, Section 3.0 Environmental Setting, pages 3-1, 3-4) It is not possible to know the exact effects the cattle grazing has had on the pre-grazed habitat in this area due to lack of data on the pre-grazed plant and wildlife composition and habitat condition. It has been speculated that California's grassland invasion by non-native weedy plant species may have occurred whether cattle grazed in the region or not due largely to out-

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		going forward. So a detailed scientific study that ensures that that is the right management regime for those mitigation lands.	competition for resources and greater seed production.[3320,3321,3322] While it is not possible to know exactly how cattle grazing on Tejon Ranch affected the vegetation and species composition, it is reasonable to speculate that due to the length of time which grazing has occurred on these lands, and the consistent management regime, the species composition, cover, and species richness of the grassland is likely in a stable state, and the forces/pressures cattle exert on the land is not greatly fluctuating. The grazing management regime on the ranch has been season-long "continuous" grazing which is solely tied to the availability of plant material for forage on the site (not species specific). The intensity and duration of grazing in any particular area of the Centennial site or surrounding Tejon lands, including areas within the Project's Mitigation Preserve, has consistently fluctuated from year to year and month to month dependent on availability of forage. Forage availability, as expected, is closely correlated with weather conditions, particularly precipitation quantity and timing, which consistently fluctuates from year to year within a relatively predictable range which include periods of drought. As with all existing grasslands in California, the grasslands on the Ranch are comprised of a mosaic of non-native invasive species and natives. Exotic invasive species include wild oats (*Avena* spp.), annual grasses such as red brome (*Bromus madritensis* subsp. *rubens*) and ripgut brome (*Bromus diandrus*), and forbes such as round-leaved fillaree (*Erodium cicutarium*), and black mustard (*Brassica nigra*) (Draft EIR pages 5.7-40 and -41). Native species include perennial bunchgrasses such as needle grass (*Stipa* spp.) and one sided blue grass (*Poa secunda*) as well as native forbs such as lupine (*Lupinus* spp.) (Draft EIR pages 5.7-40 and -41). Some remnant patches contain high native cover and species diversity, while most areas are dominated by non-natives and contain very little native cover or species diversity (*Id.,* pages 5.7-25 through 5.7-28). There is great interest in California to restore grassland areas to a composition that more closely resembles a pre-European contact condition. The overall goal in grassland restoration is generally to reduce cover of non-native invasive annual grasses while increasing cover and species diversity of native species. Grazing is often proposed as a cost-effective option for weed control on rangelands. Grazing can be employed as a tool in restoration

[3320] Heady, H.F. 1977. Valley grassland. Pages 491–514 in M.G. Barbour and J. Major, eds., Terrestrial Vegetation of California. Wiley, New York.
[3321] Bartolome, J.W., and B. Gemmill. 1981. The ecological status of Stipa pulchra (Poace-ae) in California. Madroño 28(3):172–184
[3322] Murphy, D.D., and P.R. Ehrlich. 1989. Conservation biology of California's remnant native grasslands. Pages 201–211 in L.F. Huenneke and H.A. Mooney, eds., Grassland Structure and Function: California Annual Grassland. Kluwer Academic, Dordrecht.

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			activities by exerting pressure on invasive annuals while allowing native perennials to mature. Goats, sheep, or cattle are used to effectively "mow" select exotic annual species which are often more palatable to the animal than the native perennials early in the growing season (Stromberg et al. 2007). The foraging preference differs between animals, for instance sheep typically favor forbs, while cattle generally prefer grasses (Stromberg et al. 2007). Non-native annuals can produce a thick layer of "thatch" or mulch that eliminates growing space for native plants. One cow will consume approximately 27 pounds (dry weight) of forage per day, or almost 5 tons of forage per year.[3323] Most research on how grazing may affect California grasslands has been focused on the introduction of cattle to areas devastated by exotic invasive species, and how the native species composition changes over time. However, there is some mention in the literature on the effects of removal or exclusion of cattle from areas that have been grazed long-term, such as Tejon Ranch. One study, which looked at Bureau of Land Management (BLM) grazing allotment known as Bear Creek Unit of the Cache Creek Natural Area in Colusa County, California. The Bear Creek Unit includes 7,360 acres suitable for grazing and consists of a patch-mosaic of annual grasslands, blue oak woodlands, and serpentine chaparral plant communities. Until 2001 the land had been continuously grazed during the growing season. The BLM removed cattle when it purchased the land in 2001 in an effort to enhance native plant cover. In the four years following the cessation of grazing, BLM documented increased invasive weed cover and high accumulations and persistence of vegetative litter (Davy et al. 2015). Grazing was re-introduced to the Bear Creek Unit in 2006. A meta-analysis of existing research on cattle grazing effects on California grasslands concluded that exclusion of cattle from areas previously grazed does not return these areas to native dominant, and in fact exotic plants persist as a major element of the vegetation.[3324] The same meta-analysis concluded that the majority of evidence suggests that properly managed livestock grazing can increase native bunchgrass abundance in California grassland habitats in some situations.[3325] Much of the research suggests that "prescribed grazing" can lead to increased native

[3323] Barry S., Bush L., Larson S., Ford L. D. 2015. Understanding Working Rangelands, The Benefits of Grazing – Livestock Grazing: A Conservation Tool on California's Annual Grasslands. University of California Agriculture and Natural Resources. ANR Publication 8517. University of California: Richmond, CA.

[3324] D'Antonio, C.M., Bainbridge, S., Kennedy, C., Bartolome, J., and Reynolds, S. 2001. Ecology and restoration of California grasslands with special emphasis on the influence of fire and grazing on native grassland species. Unpublished report to David and Lucile Packard Foundation, Los Altos, Calif.

[3325] Ibid.

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			cover and diversity. Prescribed grazing refers to the controlled timing (season), frequency, and intensity (animals per acre) of grazing. This controlled management regime protects native plant ecology (of target species) while reducing non-native biomass. For example, a recent study showed that purple needlegrass responds positively to early spring time grazing coupled with reduced grazing during the flowering period.[3326] Additionally, a study on Tom Kat Ranch in Pescadero, California, found that switching from season long continuous grazing to planned or prescribed grazing appears to have facilitated the restoration of native perennial grasses.[3327] Grazing on Tom Kat Ranch went from season-long continuous grazing where cattle were often split into multiple herds and left out over large portions of the ranch for several months at a time (providing plants with little rest between grazing periods) to a planned approach where cattle density was increased by putting them in small blocks and moving them quickly through subdivided fields. Grazing lasted one day to one week, providing plants with 70-120 days of rest. Native grass cover remained small (<5 percent) but increased over time from 2011 to 2013 (See Figure 1).[3328]

[3326] Melvin R. George, Stephanie Larson-Praplan, Morgan Doran, Kenneth W. Tate, Grazing Nassella: Maintaining Purple Needlegrass in a Sea of Aggressive Annuals, Rangelands, Volume 35, Issue 2,2013, Pages 17-21, ISSN 0190-0528, https://doi.org/10.2111/RANGELANDS-D-12-00077.1.

[3327] Henneman C., Seavy N. E. 2014 (December). Restoring Native Perennial Grasses by Changing Grazing Practices in Central Coastal California. Ecological Restoration. 32:4.

[3328] Ibid.

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			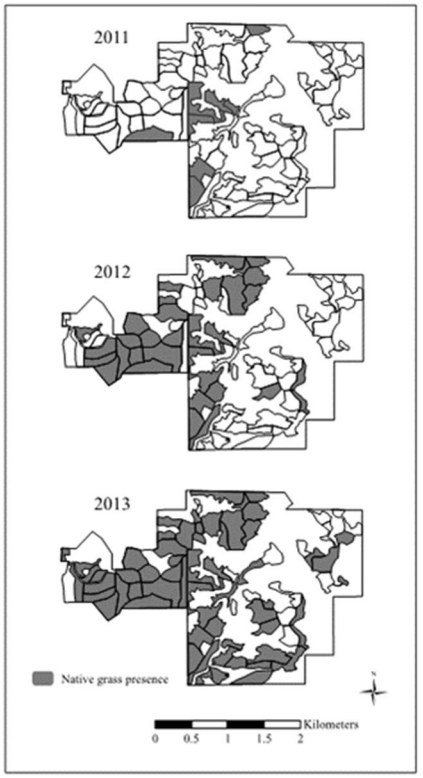 Figure 1. 74 vegetation survey units with native grasses detected (shaded areas) during vegetation surveys from 2011–2013 at TomKat Ranch, Pescadero, CA. Another study on the impacts of cattle grazing on a coastal California prairie found that native forb species richness and cover were higher in grazed sites. The study also recorded higher exotic annual grass and forb cover on grazed sites (native annual forbs: grazed=29, ungrazed=18; exotic annual forbs: grazed=60, ungrazed 52), and the number of native perennial forb species was higher in ungrazed sites (grazed=83, ungrazed=107). Native grass cover

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			and species richness did not differ in grazed and ungrazed sites.[3329] This research highlights the fact that grazing can be beneficial to some native guilds, but also may have negative consequences for others. It can be concluded that a site-specific, adaptive approach to grassland management is likely to result in a net benefit to native grasslands. It should be noted that the level of grazing, both intensity and duration, is expected to decrease as a result of the Project. Because all of the lands within the Mitigation Preserve are currently grazed, the continuation of grazing, as directed by results of long term biological monitoring, is expected to be approximately the same. As mentioned previously, the existing conditions of the grasslands on the Project site and the Mitigation Preserve is largely due to the effects of grazing and that condition is considered special and worthy of protection and mitigation for losses as described in the Draft EIR (pages 5.7-158 through 160). The proposed approach to grazing for the benefit of grassland values, therefore, is expected to be similar to the past grazing regime to ensure current conditions persist. Substantial changes in the grazing regime would be considered risky due to the unknown outcome and potential challenge of returning to current conditions in the event of a reduction in nativeness resulting from such changes. Adaptive management is instead expected to implement small changes over long periods of continued monitoring. The reduction in the level of grazing is strictly due to the removal of approximately 7,453 acres of grazing lands within the project development areas.
Elena Bowman			
RPC-232	Introduction	My name is Elena Bowman, and I am a botanist and part of CMPS, San Gabriel Valley. But I'm here also as a private citizen.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-233	Housing	I do understand the need of new housing very much. But it seems to me that this project is the most possible worse area considering the fire hazard, the Valley Fever, the earthquake fault zone, the air quality that was discussed.	The Commenter's opinion with regard to Project location is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR thoroughly analyzes potential Project-related impacts in areas identified by the Commenter and identifies mitigation measures to reduce impacts to the greatest extent feasible. See Draft EIR, Section 5.3 with regard to fire hazard, 5.11 with regard to Valley

[3329] Hayes G. F., and Holl. K. D. 2003 (December). Cattle Grazing Impacts on Annual Forbs and Vegetation Composition of Mesic Grasslands in California. Conservation Biology. Pages 1694-1702. No 6. University of California Santa Cruz: Santa Cruz, CA.

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			Fever and air quality more generally, and 5.1 with regard to earthquake fault zones. This testimony does not address the adequacy of the EIR, and no further analysis is required.
RPC-234	Miscellaneous	And, lastly, it seems to be much better to use this money to improve the communities we already have in the area. So that's my comment.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-235	Conclusion	I wish you could get the same excitement in improving what we have instead of putting the excitement in building something new and futuristic like this in this scale that we have.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-236	Greenhouse Gas	And also I think the Zero-Net idea is unattainable. Thank you.	The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to this comment's reference to "net zero ideas," in the proposed Project development agreement, the Project has made a commitment to achieve a "net zero carbon for the electric sector" standard on all public and private facilities constructed within the Project, which means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions as documented over time as part of each application for a tentative tract map. The Commenter provides no evidence to support its assertion that this commitment is unattainable, and this testimony does not specifically address the adequacy of the EIR. No further response is required.
Marta Segura			
RPC-237	Introduction	Good morning, everyone. My name is Marta Segura. And I'm currently with the -- I am the Southern California Engagement Director for the Center for Biologic Diversity. But I was the Planning Commissioner under Mayor Garcetti for about three years. I'm going to talk about how equity for L.A. County is incompatible with the financialization of our public resources and specifically the Centennial Development.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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RPC-238	Public Services	Scarce County resources should not fund a new city in L.A. County where there is no existing infrastructure -- for example, no schools, parks, fire department, law enforcement -- especially in an area prone to wildfires. Our limited public resources should instead go toward equitable revitalization of existing communities in L.A. County, like where I live in District 1 -- South Los Angeles. We should not undermine the fiduciary duty and commitment we have already made to those shouldering the cost of crumbling infrastructure and the loss of affordable housing.	The Commenter's preference for revitalization of existing communities is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to Project independence and fiscal impacts on other communities, please see Response to Testimony RPC-167.
RPC-239	Miscellaneous	Also a recent New York Times expose stated that America is facing a crisis over its crumbling water infrastructure and fixing it will be a monumental and expensive task. Two powerful industries -- plastic and iron -- are locked in a lobbying war over the estimated 300 billion that local governments will spend on water and sewer pipes over the next decade. And that's just for the broken system, not for any new systems.	This testimony was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to Project independence and fiscal impacts on other communities, please see Response to Testimony RPC-167. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-240	Miscellaneous	It is a battle of titans raging just inches beneath our feet. And somehow L.A., in its wisdom, is considering not fixing what's broken, but creating a profit for those Titans. Our funds should be about improving existing communities and building infrastructure; right? Squandering millions of our tax dollars in the creation and maintenance of a new city violates our public trust and possibly fiduciary duty, and it will create unintended consequences.	The Commenter's preference for revitalization of existing communities is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to Project independence and fiscal impacts on other communities, please see Response to Testimony RPC-167.

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RPC-241	Sprawl	Has California not learned its lesson about urban sprawl?	The Project does not constitute urban sprawl. Rather, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
RPC-242	Public Services Utilities	We respectfully ask you not to approve entitlements for hedge fund managers and banks while we have crumbling infrastructures, schools, and water pipes, especially in places like Compton, where the water is brown and there aren't funds enough to build new sewage or water distribution pipes to clean the mess that has been made from neglect of our public leaders in the past. We could put more folks to work in the urban core if we funded these projects -- like those that live in Compton, Maywood and other regions that lack resources and capacity to figure out how to resolve their water issues.	The Commenter's preference for revitalization of existing communities is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to Project independence and fiscal impacts on other communities, please see Response to Testimony RPC-167.
RPC-243	Miscellaneous	Tejon's investors are trying to get the County leaders to give them entitlements for Centennial to financialize and profiteer the land assets. Why? So that they can then sell off to the highest bidder. The profits from Centennial will go to Tejon's Wall Street investors, not to our community. That money will leave our county to line the pockets of billionaires, and it's like we are subsidizing the creation of more wealth of the all ready too rich at the expense of the L.A. County taxpayer and the California taxpayer.	The Commenter's opposition is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to Project independence and fiscal impacts on other communities, please see Response to Testimony RPC-167. This testimony does not address the adequacy of the EIR, and no further response is required.

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RPC-244	Traffic	Also, I don't want to be fooled or any of us to be fooled that highway 38 is an expansion and will exist regardless of whether this development is created. This development will create the demand for highway 138 at an expense of $830 million. This highway will only be in demand if this city is built. We already have over 60 crumbling roads and bridges that need repair in California to just waste on a new one we don't even need.	With regard to the relationship between the Project and the Northwest 138 Improvement Project, please see response to Comment ADD-F.10-5.
RPC-245	Conclusion	There is nothing sustainable about this Development. Tejon Centennial is not a solution for our regional housing shortage. Housing must be in close proximity to existing jobs and communities and under-utilized schools … -- and under-utilized schools, not something that's 65 miles north of our L.A. urban core. Thank you so much.	The Commenter's preference for an alternative location is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
Suni Dodson			
RPC-246	Introduction	I'm Suni Dodson. I'm here representing the California (unintelligible) Society of Los Angeles, Santa Monica Chapter. And I'm also here as a private citizen. I think we have had many distinguished scientific speakers already commenting against this project. So I won't try to beat that to death. I think you know the issues.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-247	Miscellaneous	I think, to me, there are many, many overriding considerations for you not to approve this project -- the lack of water, the harm to the ecology, the extremes of the environment where this development is proposed to be built. That's in the far western Mojave Desert. That is already not that	The EIR recognizes that the Project site sometimes experiences high wind events. (Draft EIR, pages 5.11-23, 5.3-17.) The Commenter's opinion that this will have a widespread effect on residents' behavior, and the Commenter's overall opposition to the Project, has been heard by the Regional Planning Commission and Board of Supervisors. This testimony does not address the adequacy of the EIR, and no further response is required.

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		bike-able, walkable community you're building there. Its hot and windy in the summer, cold and windy in the winter. So it's disingenuous to say you're building up a bike-able -- that everybody's going to be biking to school. That's just not possible.	
RPC-248	Miscellaneous	The lack of public transportation -- this is not the answer to Los Angeles County's housing shortage -- building a huge development out in the middle of nowhere. That -- who is going to pay for this to sustain this community? Yes. They'll build it. But then the taxpayer is going to be sit there with the bill to keep all of those -- all of that infrastructure running for the future.	With regard to transit connectivity, please see Response to Testimony RPC-126 With regard to the Project's independence and fiscal impact on other communities, please see Response to Testimony RPC-167.
RPC-249	Miscellaneous	Of course, it's going to destroy irreplaceable habitat. And the Greenhouse Zero -- Net-Zero thing, it's smoke and mirrors. You really have to closely examine all of that data -- re-examine it because you can say all you want that it's sustainable. It is not. Thank you very much.	The Commenter's opinion with regard to the Project's net zero commitments was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County has thoroughly examined all available Project-related data relevant to the Project's sustainability. This testimony does not address the adequacy of the EIR, and no further response is required.
Hester Bell			
RPC-250	Introduction	Hello. My name is Hester Bell. I live in District 5 of Los Angeles County. And I would like to focus on two words -- "Regional Planning." You have enormous responsibilities here. And I can tell from the two projects you're reviewing today that you take your responsibilities very seriously. I'd like to contrast those two projects.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-251	Miscellaneous	The West Carson Project is addressing and considering problems that exist in an existing community with providing transportation and housing near a major medical facility.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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RPC-252	Miscellaneous	The Centennial Project is not addressing problems. It's creating problems. It is a boondoggle. Centennial is a Boondoggle, and it is going to create problems in -- with water usage, with air pollution, with transportation and transport of people and goods and services. And it, most particularly, is a boondoggle in terms of utilization resources. It's an extraordinarily poor way for Los Angeles County to use its important resources in providing for its citizens. And it will be a burden on Los Angeles County, not a benefit to Los Angeles County. Thank you.	The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to water supplies, please see Draft EIR, Section 5.18, Water Resources. With regard to air quality, please see Draft EIR, Section 5.11, Air Resources. With regard to traffic, please see Draft EIR, Section 5.10, Traffic, Access, and Circulation. With regard to the Project's independence and fiscal impact on other communities, please see Response to Testimony RPC-167.
Cliff McQueen			
RPC-253	Biology	Good afternoon. I'm Cliff McQueen. I'm a resident of District 1, and I am the President of the San Gabriel Mountains Chapter of the California Native Plant Society. And we in CNPS are concerned about the impacts of Centennial on the unique flora and fauna at the Centennial site.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's concerns are noted. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-254	Biology	And you've heard all about the convergence of the ecosystems here. I won't go into that any further. But the corridors that are there for the wildlife are really important in Southern California. And we at CNPS want to preserve that as much as possible.	The Commenter's preference for preservation of the Project site is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR appropriately analyzes potential impacts to habitat connectivity, and the Project design and mitigation would ensure less than significant impacts. For further discussion, please see Response to Testimony RPC-133.
RPC-255	Housing	We know that the L.A. County population is growing and the additional people need housing somewhere. But we think that Centennial is the wrong place to build for all the reasons you've been hearing about.	The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The County notes that the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation

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			Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
RPC-256	Greenhouse Gas	In addition to the environmental damage it would do, it would be a major setback for the significant progress that L.A. County has made and continues to make towards its goals towards reducing greenhouse gases and smog creating particulate matter in the air. And this is because of the six hundred -- up to 600 million vehicle miles every year that would be driven by commuters to other L.A. County communities.	The Commenter vastly overstates the estimated annual Project vehicle miles traveled ("VMT"). The Centennial Specific Plan Traffic Study includes both a regional VMT and trip length comparison (in 2035, a 1,921,599-mile net increase in VMT with the project, as opposed to without), and a Project VMT and trip length summary (3,724,006 total Project VMT, with average external trip length of 45.9 miles). (Draft EIR, Appendix 5.10-A, page 3.9.) The County also disagrees with the Commenter's characterization of the Project, and note that the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
RPC-257	Land Use	We believe there are better places to accommodate population growth than the Centennial proposed site, such as the one we heard about this morning, which is true infill.	The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The County notes that the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
RPC-258	Water Supply	I have another question or concern. I've heard questions about the adequacy of the water for the Centennial users. And we've heard that the aqueduct goes through the Tejon property and they have heritage water rights enough for the community and that they've been selling these rights to other communities. But what happens	This testimony suggesting that the occasional, temporary, and time-limited provision of certain of the water supplies secured by the Tejon Ranch Company (TRC) the Centennial Project (Project) for agricultural purposes in the San Joaquin Valley could adversely affect the short-term water users is inaccurate. As discussed on page 5.18-62 of the Project Environmental Impact Report (EIR), in 2008, the TRC acquired the rights to approximately 1,451 acre-feet per year (afy) of State Water Project (SWP) Table A Amounts

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		when this water is no longer available to the other communities because it's being used in Centennial? What will those people do that had been buying the water? I'm concerned that the County will be setting up for a future water crisis if Centennial is permitted to be built. I'd like to hear an answer to the question about that and who that water is going to now and what happens to those people when that water is being used by Centennial.	held by the Tulare Lake Basin Water Storage District (Tulare Lake). In 2010, TRC also acquired the rights to approximately 1,993 afy of SWP Table A Amounts held by the Dudley Ridge Water District (Dudley Ridge). The transfer agreements are included in Appendices L and K of Draft EIR Appendix 5.18-A. In 2012, TRC and AVEK executed an assignment and import agreement under which the Tulare Lake and Dudley Ridge Table A Amounts were transferred to AVEK in accordance with SWP system rules and regulations. AVEK agreed to import the supplies for Project use, subject to cost reimbursement and the provision of five percent of the imported amounts for agency use. The AVEK-TRC agreement is included in Appendix 5.18-E of the Draft EIR. Until required for Project use, subject to SWP system rules and regulations and the AVEK-TRC agreement, TRC has the right to contract with and make these supplies available to other users prior to Project approval and Project demand for these supplies. Since the Dudley Ridge and Tulare Lake water supplies were acquired, TRC has contracted to sell certain of the supplies on a temporary basis for San Joaquin Valley agricultural uses. The provision of any such water has been made subject to specific contract termination provisions and without any express or implied expectation that the supplies would be available after the applicable termination date. Agricultural demand for short-term, finite and temporally-limited water supplies from TRC is variable over time. The temporary, short-term provision of Dudley Ridge or Tulare Lake supplies acquired for Project use prior to Project approval and demand has no long-term effect on the sustainability of any agricultural operations in California. The water supplies, if purchased at all, at most provide a short-term water source that is not intended to and cannot in fact support long-term agricultural activities in the state due to the extremely limited duration of each supply contract and the state overwhelmingly more substantial agricultural water supply problems due to new laws and regulations. In 2014, the state enacted the Sustainable Groundwater Management Act (SGMA), which requires that almost all of the San Joaquin Valley (and other locations within the state) be managed to ensure that groundwater extractions avoid groundwater overdraft and other adverse results as defined in the statute (see California Water Code Sections 10720 *et seq.*). Where applicable, sustainable groundwater management plans must be adopted in 2020 or 2022. Recent published reports indicate that the San Joaquin Valley groundwater extraction deficit that SGMA must address

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			ranges from approximately 2 million afy[3330] to 3 million afy.[3331] Based on a 3 million afy groundwater deficit, as much as 1.2 million acres of California agriculture in the San Joaquin Valley is at risk of retirement and fallowing.[3332] The California Irrigation Institute is the oldest independent forum on irrigation and water in California. The primary purpose of the institute is to host an annual conference on California water issues, water use efficiency, water quality and surface and groundwater management. The conferences feature leading water industry experts, government agency heads, water district managers, innovative farmers and vendors with leading water saving products. The sessions aim to discuss research results and practical field experience. The 2017 annual conference included a panel discussion of the potential for decreased agricultural irrigated acreage as a result of SGMA and the concurrent lack of replacement water, including surface supplies that have been adversely affected by drought, and regulatory requirements and potentially decreased winter snowpack depths. One of the panelists summarized the effects of SGMA as follows: SGMA will have a dramatic effect on future land use decisions. There will be significant fallowing of agricultural land to achieve [the legislation's requirement of] "sustainable yield". Economics will dictate what remains in production. It is anticipated that larger, highly capitalized farming operations will purchase and fallow water right lands and accept this as a cost of doing business. Water will become very expensive and scarce. Water application will become extremely efficient. Larger vertically integrated operations will fund environmental water banks, whose role will be the acquisition of lands with water rights and fallow to enable the water bank depositor to keep their land base in production. Most likely we will see the reduction/loss of field crops and forages such as corn and alfalfa. High return on investment crops

[3330] See E. Hanak et al., Replenishing Groundwater in the San Joaquin Valley, Public Policy Institute of California, April 2018, http://www.ppic.org/wp-content/uploads/r-0417ehr.pdf, accessed July 2018.

[3331] See California Irrigation Institute, 2017 Conference, Session II, Implications of Decreased Agricultural Irrigated Acres, presentation on SGMA and California Dairy Industry- Final, January 30, 2017, http://www.caii.org/wp-content/uploads/2017/02/SGMA-and-California-Dairy-Industry-Final.pdf, accessed July 2018.

[3332] See E. Hanak et al., Replenishing Groundwater in the San Joaquin Valley, Public Policy Institute of California, April 2018, http://www.ppic.org/wp-content/uploads/r-0417ehr.pdf, accessed July 2018; California Irrigation Institute, 2017 Conference, Session II, Implications of Decreased Agricultural Irrigated Acres, presentation on SGMA and California Dairy Industry- Final, January 30, 2017, http://www.caii.org/wp-content/uploads/2017/02/SGMA-and-California-Dairy-Industry-Final.pdf, accessed July 2018.

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			such as grapes, almonds, pistachios and citrus will replace other field crops and forages.[3333] Consequently, California agricultural operators are currently facing significant and unprecedented potential water supply issues related to SGMA compliance alone that will likely affect hundreds of thousands of acres of farmland in the near future. TRC's provision of temporary, short-term water supplies that were specifically acquired and transferred to AVEK for Project use has no effect on the long-term sustainability and operation of agriculture within the state. As described in more detail in Section 5.18 of the Draft EIR, all of these supplies will be utilized by to meet Centennial demand after the Project is approved.
RPC-259	Development Agreement	I have one other warning here for a problem that has happened in many long-term development projects with environmental promises made in writing with good intentions is that very often, after a few years, there's nobody around who is there to check and make sure that the developer has done all the things that they planned to do and continues to do the maintenance that is required by their agreements. And who is it that's going to be there to ensure that those agreements are continued to be followed? And that's a major responsibility the County will have. And it's difficult to do. Thank you.	The Commenter's concern is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. Mitigation requirements imposed on the Project are laid out in the EIR and the Project's Mitigation Monitoring and Reporting Program, as are the ongoing monitoring and implementation responsibilities for all parties. See Final EIR, Appendix 2.0-C.Rev for more details. The Development Agreement also contains binding requirements and enforcement provisions.
Gabby McQueen			
RPC-260	Introduction	I'm Gabby McQueen. And I'm a resident of Los Angeles County, unincorporated area. And I'm also a CNPS member. But I also care for, not just habitat and beautiful flowers and all the benefits that nature provides us, but I care about the people that need the housing. And your job is to make sure that people get adequate housing.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Project provides housing. This comment does not address the adequacy of the EIR, and no further response is required.

[3333] California Irrigation Institute, 2017 Conference, Session II, Implications of Decreased Agricultural Irrigated Acres, presentation on SGMA and California Dairy Industry-Final, pages 3-4, January 30, 2017, http://www.caii.org/wp-content/uploads/2017/02/SGMA-and-California-Dairy-Industry-Final.pdf, accessed July 2018.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-261	Geology Hazards	And what this project proposes is to put 60,000 people on top of earthquake faults in an area that has very high -- extremely high winds. And they will have fires because fires -- most fires come from human activity. And you put 60,000 people there, there are going to be fires, and they are going to be unstoppable. And like the other one -- other person mentioned -- the Valley Fever. So putting 60,000 people in those areas with those risks I don't think is a good idea. And for that alone, you -- I would advise you that you don't approve the project.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition to the Project is noted. With regard to fire hazard, please see Response to Testimony RPC-309. With regard to faults and seismic hazard, see Response to Testimony RPC-193. With regard to Valley Fever, please see Response to Testimony RPC-321.
RPC-262	Biology	On top of that, what you give up is just horrific. It's a beautiful environment that all Californians benefit from. To have open space, to have these wildflowers displayed, to have the biodiversity benefits all of the people, not just the investors.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-263	Population/ Housing Traffic	So please, I would really love to see that you reject the Project and put your attention to providing housing where it is needed -- near jobs where there is no -- where there is already transportation and we don't have to create more impacts with creating more gas emission with all that traffic.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. The County notes that the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20. This comment does not address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-264	Greenhouse Gas Traffic	That Zero-Gas emission to me does not make sense because I can't believe that they would have considered the traffic to and from jobs and housing that will ensue. If they make enough jobs for the housing in three years, what happens in those three years? People need to go to jobs and -- otherwise, they can't pay for the houses. And then you'll have a community that's dead. So – ... -- that's it.	Contrary to this comment's claim, the Project is not proposing a "Zero-Gas emissions" program. Rather, as part of the Project's proposed development agreement with the County, the Project has committed to achieving a "net zero carbon for the electric sector" standard on all public and private facilities constructed within the Project, which means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions as documented over time as part of each application for a tentative tract map. With respect to the Project's projected jobs-housing balance, the Project's land use plan is projected to provide an estimated jobs/housing ratio of 1.22 through the development of commercial and business park uses on the site, thus positively contributing to the attainment of the AVAP's targeted jobs-to-housing ratio. As explained in Draft EIR Section 5.9.3 (pages 5.9-18 through 5.9-22, and 5.9-29 through 5.9-30), such Project-specific projections are based on regional employment growth projections published by the Southern California Association of Governments (SCAG), which SCAG adopted as part of its 2012 and 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) planning documents. This comment's assertion that people need jobs in order to pay for housing is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration.
Kathy Metz			
RPC-265	General Opposition	Good afternoon. My name is Kathy Metz. I'll be short. I'm just here to say that I oppose the Centennial Project. And I really believe that we should protect this really vital and beautiful landscape and ecosystem. Thank you.	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.
Roselyn Helfant			
RPC-266	Introduction	Hi. My name is Roselyn Helfant. I'm a resident of the Third District of L.A. County. I have a degree in environmental studies with an emphasis in environmental assessment. And I grew up in Simi	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. This comment does not address the adequacy of the EIR, and no further response is required.

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		Valley, California, where I had the opportunity to really see firsthand the effects of sprawl. I believe that this development is -- is beyond its capacity to be sustainable even with the mitigations and concessions made by the developer.	
RPC-267	Miscellaneous	In the last decade things have changed considerably in California. Our capacity to sustain this type of sprawl has been reduced in terms of ecosystem sustainability. We've had permanent heatwaves set in, together with severely decreasing water resources. And the fire threat has increased, as well as traffic has increased considerably in Los Angeles County to the breaking point. I don't think we have the capacity to support this development as a County, given the other strains -- these other strains on our resources.	The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County notes that the Project does not constitute sprawl. Rather, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
RPC-268	Sprawl	Additionally, study after study has shown that the long-term costs of far-flung sprawl in these developments really take our public coffers to the breaking point as well. They become unmanageable for sewer systems, road systems, water systems, energy systems, fire suppression over the long term even with short-term concessions made by developers to help fund these costs.	The Project does not constitute sprawl. Rather, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20. With regard to the Project's fiscal impact on surrounding communities, please see Response to Testimony RPC-167.
RPC-269	Miscellaneous	And they say that these cities can become independent. In fact, a lot of studies have shown that these places that seek to become independent, instead, have huge financial issues and are at risk of financial decay.	With regard to the Project's independence and fiscal impact on surrounding communities, please see Response to Testimony RPC-167.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-270	Infrastructure	So I think that we really need to ensure that our developments are next to current resources, current infrastructure. Other cities have also shown that the costs of developments to counties and cities when they are next to current structure -- infrastructure is much, much less than developments such as this.	The Commenter's preference for infill development was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. The Project Applicant is responsible for infrastructure costs and construction, and the relative public cost of a Project is not an impact on the environment under CEQA. With regard to the Project's fiscal impact, please see Response to Testimony RPC-167. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-271	Climate Change	And also we're all concerned about climate change. And we want to make sure to reduce any increased impact on climate change. Thank you.	The Commenter's concerns with regard to climate change impacts were heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Project has been sited and designed to reduce GHG impacts, as further addressed in Response to Testimony RPC-268 and Final EIR, response to Comment F.8-20. Further, the EIR includes many mitigation measures which would reduce GHG emissions beyond those already inherent in the Project site and land use plans (e.g., balance mix of residential, employment, school, retail, parking and other uses; distributed village core areas with neighborhood serving uses and schools to encourage walking and biking; tertiary wastewater treatment and site-wide reuse of reclaimed water for outdoor irrigation, etc.), and project features included in the Specific Plan (e.g., comprehensive transportation management program to encourage multi-modal transportation and discourage single occupancy offsite automobile commute trips; Green Development Program). The list of mitigation measures in the EIR and the Mitigation Monitoring and Reporting Program (Final EIR, Appendix 2.0-C.Rev), go beyond the GHG reductions mandated by existing laws and regulations. See Final EIR, response to Comment F.8-204, for further details regarding GHG-reducing Project features, Specific Plan requirements, and mitigation measures.
Gavin Pierce			
RPC-272	Introduction	Hello. My name is Gavin Pierce. I'm a board member of the Highland Park Neighborhood Counsel and an Organizer with So. Cal. 350 Climate Action. I actually spent a month in the area on and surrounding Tejon Ranch one summer ago. And while I was there, I was amazed by the beauty of the land that could exist so close to such a massive urban center like our city. You forget that you're in	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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		L.A. County. You take a step back into the way that the ground here was before we built upon it. That is to say that it's one of the last glimpses we have of the natural ecosystem of the region Angelenos call home. And we should cherish it.	
RPC-273	Biology	But it's more than about protecting what's beautiful. If we willing destroy the last remaining wild grasslands in California, with 99 percent of these habitats already erased, we will be forced to take a hard look at who we are as humans by eradicating this refuge -- 5,800 acres for plant and animal species such as bald eagles, mountain lions, and California condors.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Project does not eliminate the last remaining grasslands. For further discussion regarding grasslands preservation and mitigation, please see Response to Testimony RPC-323. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-274	Traffic	Further, the proposed development would result in an additional 75,000 long distance drives per day on our already crowded freeways, jeopardizing city and state emission reduction goals.	Per the Centennial Specific Plan Traffic Study, the Project would result in approximately 75,908 external trips with an average trip length of 45.9 miles. (Draft EIR, Appendix 5.10-A, page 3.9.) However, this is based on traffic model output that does not reflect the many trip reduction measures to be implemented by the Project. (*Ibid*.) The Commenter's opinion that this jeopardizes Los Angeles and state emission reduction goals has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees with this assertion, noting that the Project has been sited and designed to meeting regional and state goals, including with regard to pollutant emissions and greenhouse gas emissions reductions. Please see Final EIR, response to Comment F.8-20 for more information.
RPC-275	Public Services Infrastructure	And, lastly, my opposition to Centennial is about more than the value of the life on the land there. It's also about the value of the lives of residents in L.A. County right here. The costs associated with this Project to fund new public services -- such as schools, fire departments, transit rails -- cannot be justified when there's an urgent need for funding elsewhere. We have a homeless crisis, we have drastically under-funded schools and we have infrastructure that needs support. There is work to do here in L.A. and surrounding cities -- very urgent work that needs to be resolved before we even	The Commenter's preference for revitalization of existing communities is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to Project independence and fiscal impacts on other communities, please see Response to Testimony RPC-167.

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		consider putting mounds of funding into new ventures.	
RPC-276	Conclusion	In closing, I would just like to thank the Board for hearing me, and I'd also like to urge you to reject this Project. Please think about the people. Please think about the climate goals of the city and state. And please think about the dire need to address current crises before we consider new and unnecessary expansions. Thank you.	The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.
Ankur Patel			
RPC-277	Introduction	My name is Ankur Patel. Who owns the world? Who owns the earth? No person, no Planning Commission. But you have an important say in how this important piece of land is used into the future. I apologize for my earlier editorial comments with respect to the Board. It is hot -- right? -- economically, politically, the atmosphere -- what is going on.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-278	Population	And, again, what you decide here with these 20,000 units -- right? -- 60,000 people -- maybe more, maybe less, depending on if they're five bedroom or three bedroom -- $500,000 units or $1.5 million units. There's a whole range that hasn't been detailed out.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-279	Miscellaneous	The 20-year building plan, as Staff said, it's on their hypothesis. Right now they don't have the details on what CDEV, a Wall Street traded company, is going to design.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-280	Miscellaneous	I appreciate my Commissioner, Mr. Modugno on behalf of Supervisor Kathryn Barger, clearly stating that this is going to be postponed because these details have not been discussed. The exhibits in process of preparation. There are so many details that my colleagues, my friends, other people have brought up. You cannot ignore -- you cannot ignore the range of testimony. And you cannot ignore their campaign contributions on this other side. I understand that. There's a political atmosphere that we're looking at. As appointed Commissioners, we represent voters. We represent people. We represent citizens who are here in good faith with public consciousness to preserve our land, our planet, and the species, and all these other things that are going on. That's why there are so many people in this room today. And you have the ability to charter a city -- a city; right? This is so dramatic -- potentially beautiful. But where is it -- why is it there?	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-281	Public Services Traffic	We touched on education. And I'll give you one paramount example of Porter Ranch. The way that the phase developed and when schools are going to be lined in there -- again, the developer hasn't laid out three bedroom, four bedroom, five bedroom. How did that affect the population of the students. How many schools need to be built -- k through 12 -- over what period of time? Transportation is evolving. There's so many different details there. But this deserves more hearing.	With regard to the provision of school sites as part of the Project, the Project Applicant has consulted with applicable school districts concerning the numbers and location of school sites required for the expected Project residents. Draft EIR Section 4.0, Project Description, includes multiple school sites based on current student generation rates for residential households when the Draft EIR was prepared. The ultimate sizing of school sites would depend on further consultation with the school districts with regard to necessary inter-district transfers, the grade breakdown for students attending the schools, the implementation of school size reduction efforts, building layout and configuration needs, and the outdoor facility needs for each school. (Draft EIR, Section 5.15, Education, pages 5.15-17, -19.) The final designation of school sites for the Project will be completed with each future tract map, ensuring appropriate size and availability of schools to serve Project residents. (*Id*., page 5.15-18.)

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RPC-282	Miscellaneous	And, again, your -- I feel that you're listening to us. I appreciate it. I could spend my remaining 40 seconds addressing just the Commission, the audience, the few people who may be listening on public broadcast or however that is. But I know building houses is part of the solution. You have un-housed people; right? There's a homeless crisis. The framing of the conversation is so important. How does this development play in the broader aspects of humanity? We're voters. We're here to help bring the voice of the rational citizen. You know you can't approve this as it is. You're at the fulcrum of power and how this vote goes down and what that means for the future. My name is Ankur Patel. Thank you.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
J.P. Rose			
RPC-283	Introduction	Good afternoon, Commissioners. My name IS J.P. Rose. And I am an attorney with the Center for Biological Diversity and resident of the Third District. Approving Centennial would be a boon for Tejon's Wall Street investors, but it would be a bad deal for L.A. County. Tejon's mountain of studies, an army of consultants can't change the fact that Centennial would destroy thousands of acres of irreplaceable wildlands, nor can it change the reality that Centennial would add huge amounts of traffic to our already clogged freeways.	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard in testimony by the Regional Planning Commission and considered and will be provided to the Board of Supervisors for consideration. The EIR thoroughly analyzes and discloses potential Project-related impacts with regard to biological resources (see Draft EIR, Section 5.7), land use (see Draft EIR, Section 5.8), and traffic (see Draft EIR, 5.10), and all feasible mitigation has been incorporated in each impact area, to ensure impacts are reduced to a less than significant level to the greatest extent feasible. This testimony does not specifically address the adequacy of the EIR, and no further response is required.
RPC-284	Housing	Tejon has spun Centennial as a solution to L.A.'s housing shortage. But building 60 miles from L.A. to solve L.A.'s housing shortage is like a doctor trying to cure a person with the flu by amputating her leg. The proposed solution does nothing to fix the problem and will actually make things worse.	The Commenter's opinion was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. However, the County disagrees with the Commenter's characterization of the Project. The Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive

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			Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20.
RPC-285	Public Health	Studies show that long commutes increase the risk of diabetes, obesity, asthma, and depression. The truth is we need housing close to jobs here in the existing communities, not 60 miles from downtown L.A.	The Commenter's opinion was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. However, the County disagrees with the Commenter's characterization of the Project. The Project has been situated and designed to promote regional smart growth principles and promote public health, as discussed further in Response to Testimony RPC-284. With regard to this comment's concerns regarding the health effects purportedly associated with driving, please see responses to Comments ADD-G.50-3 and ADD-G.50-4. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-286	Biology	Tejon will not pay for the damage caused by Centennial. No amount of money can bring back the wildflower fields, and no amount of money will bring back the San Joaquin kit fox and condor and other rare species that we evicted from their habitat.	The Commenter's opinion was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. The County disagrees with the Commenter's characterization of the Project. After thorough and appropriate analysis, the EIR concludes that Project mitigation measures and the preservation of 14,908 acres of grasslands coupled with long-term management through implementation of the Ranchwide Management Plan will sufficiently offset and fully mitigate for impacts on wildflower fields associated with the Project. See Draft EIR, Section 5.7, Biological Resources, and Final EIR, responses to Comments B.4-17, B.4-43, F.3A-19, F.8-119, F.8-123 to F.8-125, and H.21-1 for further discussion of potential impacts to and mitigation to address such impacts to wildflower fields. With regard to San Joaquin kit fox, this species in not present on the Project site and the EIR therefore appropriately concludes that the Project site would have no impact on this species. See Draft EIR, Section 5.7, Biological Resources, for further information. With regard to California condor, the EIR appropriately concludes after thorough analysis that Project impacts would be less than significant, and mitigation requirements would further avoid impacts. For further discussion specific to California condor, see Draft EIR, Section 5.7, pages 5.7-94, -119, and -120 and Final EIR, responses to Comments B.4-20 to B.4-23, and F.8-138 to F.8-143.
RPC-287	Traffic	Nor is Tejon going to pay for the $830 million freeway that is necessary for it to go forward. Tejon's attorneys told you at the last hearing that the 138 is proceeding with or without Centennial. But Caltrans, in the MTA's own website, indicates that that is inaccurate. Instead, the six-lane freeway	The County acknowledges that per Caltrans, the Northwest 138 Improvement Project will be built in phases as needed or as demand requires, with short-term and mid-term improvements intended primarily to correct existing and potential safety conditions, including operational and safety improvements, such as intersection improvements, shoulder widening, and curve corrections. The corridor currently experiences accident rates double the statewide average, which alone necessitates significant

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		will only be built if demand requires. And the only demand up there next to the Angeles National Forest would be Centennial. We already have a $59 billion backlog of deferred road maintenance in California. And we just had our taxes increased through SB-1 to address that backlog. So why would we approve the creation of a new city that is entirely dependant on building a new billion dollar freeway.	improvements. The substantial majority of the regional employment, household and population supporting the need for the Northwest 138 Improvement Project are related to current and projected regional activities other than Centennial development. Regional transportation plans that were prepared well in advance of the Centennial plan have called for these significant improvements to the State Route (SR) 138 corridor. Consequently, significant portions of the approved Northwest 138 Improvement Project will be implemented irrespective of Centennial. If approved, Centennial will pay for SR-138 roadway improvements that are required to meet the incremental demand generated by the development. For further discussion with regard to the construction of the Northwest 138 Improvement Project in relation to the Centennial Project, please see response to Comment ADD-F.10-5.
RPC-288	Miscellaneous	Again, Centennial is a great deal for Tejon's Wall Street investors but a bad deal for L.A.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-289	Ranch-Wide Agreement	Tejon continues to insinuate that other environmental groups have signed the Ranch-Wide Agreement in support of Centennial. But the Agreement says nothing of the kind. These groups only signed on to the Agreement and agreed not to oppose Centennial in exchange for Tejon agreeing not to develop portions of the ranch.	As noted by the Commenter, signatories to the 2008 Tejon Ranch Conservation and Land Use Agreement ("Ranchwide Agreement" or "RWA") agreed not to oppose four Tejon Ranch development projects, including the Centennial Project, after years of cooperative study and identification of the most appropriate respective locations for preservation and development. Per RWA recitals, "[t]he long-term conservation of Tejon Ranch has been one of the highest priorities" of the signatory organizations, and the agreement "follows many years of scientific analysis of conservation values on Tejon Ranch by TRC and others, including the Resource Organizations. By comprehensively addressing the entire Tejon Ranch, this Agreement avoids fragmentation of many of the environmentally sensitive areas of Tejon Ranch. The conserved lands will be managed in accordance with a comprehensive Ranch Wide Management Plan that will identify the natural resources and conservation values of the conserved lands as well as opportunities to protect, enhance and restore identified resources and values and establish best management practices for continued use of the conserved lands for existing ranch uses." (Final EIR, Appendix 4.7-E, page 2.)
RPC-290	Miscellaneous	Tejon also says that Centennial has been on the books for a very long time. That's true. It was conceived at a time when we did not fully appreciate the cost of such leap-frog development on people, environment, and budgets. But now we	The Commenter's opinion is noted for the record, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. However, the County disagrees. For an in-depth refutation of the assertion that the Project constitutes "leap-frog" or sprawl development, see Final EIR, response to Comment F.8-20.

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		do. And Centennial deserves to be in a museum as an excellent example of 20th century spot-style sprawl development.	
RPC-291	Conclusion	Californians are tired of leaders approving more sprawl at the expense of us, our children, and the environment. We're tired of watching California's landscapes and wildlife slip away under the guise of progress. And we're tired of past leaders putting people in harm's way by allowing large-scale development in areas known for extreme wildfire risk. The traffic we sit through and the smog we breathe every day is the legacy of past generations of leaders who have failed to the needs of people first. But you can do something historic and unprecedented. You can break that cycle and say no to Centennial. Thank you.	The Commenter's opposition to the Project is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the County disagrees with the Commenter's assertions. Areas of potential impacts that the Commenter brings up have been thoroughly evaluated and mitigated to the extent feasible. For an in-depth refutation of the assertion that the Project constitutes sprawl, see Final EIR, response to Comment F.8-20. Land use is addressed in Draft EIR, Section 5.8, Land Use, Entitlements, and Planning; traffic impacts are addressed in Draft EIR, Section 5.10, Traffic, Access, and Circulation; wildfire risks are addressed in Draft EIR, Section 5.3, Hazards and Fire Safety; impacts to wildlife are addressed in Draft EIR, Section 5.7, Biological Resources. This testimony does not address the adequacy of the EIR, and no further response is necessary.
Tom Egan			
RPC-292	Introduction	Good afternoon, Commissioners and Staff. My name is Tom Egan. I'm the California Designated Representative for Defenders of Wildlife. Our members are dedicated to protecting wild animals and plants in the natural community. We employ science, participation, legislative advocacy, litigation, and on-the-ground solutions to impede the loss of biodiversity, habitat alteration, and wildlife loss. I'm a fourth-generation Californian. I've lived, worked, and played in the Western Mojave Desert for almost 30 years. I hold a Bachelor of science in wildlife management. And I have practiced as a professional wildlife biologist in both the public and private sectors for over 34 years.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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RPC-293	Biology	The Southern Tehachapi mountains, where Centennial would be situated, supports one of the highest areas of biodiversity in the entire Mojave Desert. Here the Tehachepi mountains converge with the coast ranges to the west, San Gabriel mountains to the south, and the Greater Mojave Desert to the west -- or east. It's one of the only places which links the deserts and mountains and the coast. It's part of California's gold. And it's remained relatively intact since Jedediah Smith and John C. Fremont trekked these lands marveling at grizzly bears, antelope, California condor and vast wildflower fields.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-294	Biology	I'm here today to voice our opposition to the Centennial Project. Our state has lost too much native wildlife habitat to ill-planned housing development and natural land alteration. Wildlife habitats and travel corridors will be lost as a result of this project. Make no mistake about it. Now, amidst the throes of climate change, these lands also represent, not only our link to the past, but our hope for the future. Now is not the time to sever critical wildlife habitat linkages by permitting massive housing developments like Centennial.	The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees with the Commenter's characterization of the Project. Project design and mitigation appropriately preserve areas for adequate wildlife movement, as further discussed in Response to Testimony RPC-133. This Project does not specifically address the adequacy of the EIR, and no further response is required.
RPC-295	Biology	This project will further endanger the California condor by impacting critical foraging habitat even though we've spent millions of dollars on the world's largest bird species. It cannot afford to lose any more habitat. Nor can the Tri-colored blackbird, recently listed by the State of California as a threatened species, which nests and forages in the Centennial Project area. This project will reduce our opportunities to recover these unique species. The white-tailed kite, Western burrowing owl and American badger would also lose ground they simply can't afford to lose.	The Commenter's opinions about impacts to California condor, tri-colored blackbird, white-tailed kite, Western burrowing owl and American badger are noted, have been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors. However, the County disagrees and notes that after thorough and appropriate analysis, the EIR concludes that impacts to each of these species would be less than significant or less than significant with mitigation incorporated. For further discussion specific to California condor, see Draft EIR, Section 5.7, pages 5.7-94, -119, and -120 and Final EIR, responses to Comments B.4-20 to B.4-23, and F.8-138 to F.8-143. For further discussion specific to tri-colored blackbird, see Draft EIR, Section 5.7, pages 5.7-19, -22, -23, -91, -111 to -114, -145, -149 to 151, -154, -178, -179, Final EIR, responses to Comments B.4-18, B.4-19, F.3-14 to F.3-21, and F.8-155 to F.8-158. For further discussion specific to Western burrowing owl, see Draft EIR Section 5.7, pages 5.7-22, -92, -115, -150, -175, -176, Final

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			EIR, responses to Comments B.4-24, B.4-25, F.8-163 and F.8-164. For further discussion specific to white-tailed kite, see Draft EIR Section 5.7, pages 5.7-65, -94, -117, -118, -150, and Final EIR, response to Comment F.8-149. For further discussion specific to American badger, see Draft EIR, Section 5.7, pages 5.7-50, -51, -53, -54, -98, -126, -153, -175, and -176 and Final EIR, responses to Comments B.4-29 and F.8-159.
RPC-296	Biology	Not long ago early settlers arrived in nearby Antelope Valley, named for the massive herd of prong horn that roamed this landscape. By the 1930's the prong-horn joined the ranks of the grizzly bears and other species lost in this very special part of California. Now with the re-introduction and habitat protection, a small herd now calls the Tejon Ranch home.	The Commenter is correct that a herd of pronghorn resides in the Antelope Valley. The pronghorn is not on the CDFW list of Special Animals, and CDFW in fact occasionally issues permits for hunting of this herd, but the EIR specifically acknowledges that there is an interest in maintaining this herd. Draft EIR, pages 5.7-153; Final EIR, response to Comment B.4-35. The EIR therefore provides an appropriate impact analysis which is consistent with standard practices for sensitive species and the best available scientific information, including on-site observations, in suitable habitat areas. Pronghorn have reportedly been seen on rare occasions in random locations in the region but have been commonly observed and are known to primarily occupy the western portion of the site (upper Oso Canyon in particular), which is preserved mitigation open space and other locations along the foothills continuing to the northeast, which is also preserved mitigation open space. (Draft EIR, pages 5.7-128, 5.7-153) Since release of the Draft EIR, additional population distribution information has also been obtained from the Tejon Ranch Conservancy and is presented in the Final EIR (see Final EIR, Exhibit B.4-34, which indicates the primary usage area for pronghorn along the Tehachapi foothills, predominantly northeast of the Project site). As noted in the Final EIR, the Project's crossing opportunity under SR-138 connecting areas of appropriate habitat would serve the pronghorn. (Final EIR, response to Comment B.4-36) Further, the RWMP requires the Project Applicant to work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures for pronghorn that are also supported by CDFW. (Final EIR, response to Comment B.4-35) For further discussion specific to pronghorn antelope, see Draft EIR, Section 5.7, pages 5.7-50, -54, -127, -128, and -153, and Final EIR, responses to Comments B.4-34 to B.4-37 and F.8-165 to F.8-168.
RPC-297	Conclusion	I urge you to make the only correct decision for the California condor, tri-colored blackbird, American badger, prong horn and a myriad of other species. These species have lost enough. Reject the Centennial Specific Plan.	The Commenter's opposition to the Project is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to the California condor, tri-colored blackbird, American badger, and pronghorn antelope, Project impacts on these species would be less than significant, and/or less than significant with mitigation incorporated. With regard to California condor, tri-colored blackbird, and American badger, see Response to Testimony RPC-

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		Thank you very much.	295. With regard to pronghorn antelope, see Response to Testimony RPC-296. This testimony does not specifically address the EIR, and no further response is required.
Ash Louf			
RPC-298	Introduction	Thank you, Commissioners. My name is Ash Louf. I'm the California Field Campaigner for the Center for Biological Diversity. We have tens of thousands of members here in L.A. County. And I urge you to reject this proposal. L.A. wants a livable future. And Centennial is the wrong future for L.A.	Thank you for your participation in this public process. The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-299	Traffic Population/ Housing	The future of Los Angeles doesn't have to mean gridlock or polluted air. We could be an innovative leader in urban planning that protects our last wild spaces, while also reducing traffic and tailpipe emissions and prioritizes transit accessible affordable housing in places where people already live and work and where they need homes.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. The County disagrees with the Commenter's characterization of the Project, and notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.
RPC-300	Miscellaneous	This is a project proposed by Wall-Street-backed mega-developers. This is a great deal for them. This is a bad deal for L.A. This project caters to Wall Street, not to L.A. residents.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. This comment does not address the adequacy of the EIR, and no further response is required.
RPC-301	Traffic Greenhouse Gas	Centennial is completely inconsistent with sustainable L.A. goals. Transportation emissions now are the greatest climate change driver in California. And this far-flung new city would generate 75,000 commutes and massive carbon pollution that undermines L.A. and California's climate goals. More pollution and sprawl	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. The County disagrees with the Commenter's characterization of the Project, and notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable

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		development is unacceptable when our region is already out of compliances with existing air quality standards.	Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.
RPC-302	Affordable Housing	The County should also focus on permitting developments that increase L.A. County's sustainability and affordable housing -- and affordable housing to improve residents' quality of life while protecting the planet. L.A. needs smart urban planning. It needs housing that is affordable and is close to existing job centers, near public transit. Building housing without planning for workers and families quality of life is short-sighted and flawed. In order to provide Californians with long-term stable affordable housing, we need to adopt policy and build housing that addresses displacement, access, sustainability, and climate change.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. The Commenter's opposition is noted. The County disagrees with the Commenter's characterization of the Project, and notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.
RPC-303	Conclusion	Because Centennial's proposal does not fit the needs of a smart and visionary future for L.A. County residents, the Planning Commission should reject this project. Thank you.	The Regional Planning Commission heard this testimony and will consider it. The Commenter's opposition is noted. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.
Chris Hanson			
RPC-304	General Opposition	I'm Chris Hanson. I come to you today as a performance artist performing mainly in Santa Monica. And my background is as a sociologist at U.C. Riverside. I want to remind us that this is not something we can really take back. And when I interact with so many tourists who visit Santa Monica, I learn that they come here for our art. And a lot of our art is	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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		painted in murals and sculptures. But I learned a lot of the other art is in our wildlife. And Centennial is one of the last remaining pieces of wildlife that we have to offer in Southern California outside of Yosemite and the Sequoias. And we don't really get to rebuild that once we kind of destroy it, which is what we would do essentially through this development. Yeah. So I just wanted to remind you of that. That's it. Thank you.	
Leslie Percell			
RPC-305	Introduction	Hi. My name is Leslie Percell. I have lived in Los Angeles, but I am now living in Ventura. And I would like to say I am affiliated with the California Native Plant Society, Channel Islands Chapter, which includes Santa Barbara and Ventura. And there are some possible impacts to Ventura County from this proposed project in terms of air quality, traffic, and possibly even water.	Thank you for your participation in this public process. The Project EIR appropriately addresses potential Project-related impacts in Ventura County. For example, the EIR's traffic analysis includes an assessment of Project traffic impacts within Ventura County, particularly traveling westbound on State Route 126, as shown Draft EIR Exhibit 5.10-7 and Tables 5.10-2, 5.10-3, 5.10-4, 5.10-5, 5.10-6, 5.10-21, 5.10-22, 5.10-23, 5.10-25, 5.10-26, 5.10-27, 5.10-28, 5.10-24. And Final EIR Appendix 5.11-E includes a supplemental air quality analysis that specifically analyzes the Project's potential air quality impacts within the jurisdiction of the Ventura County Air Pollution Control District. In both cases, the EIR determined that related impacts would be less than significant. See also Final EIR, response to Comment F.8-195, which discusses the Project's potential air quality impacts in Ventura County. There is no evidence that the Project will have a significant adverse effect on water supplies in Ventura County. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-306	Land Use	I would like to just say at the outset that I think it's incumbent on this planning body to consider developing in more appropriate areas and in this regard to say that there are lands that are already disturbed in the Antelope Valley. I drove back from the Lancaster hearing along the 138. And I got to see "For Sale" signs on either side of the highway. I think these were previous agricultural lands or grazing lands. I don't know. But there's a lot of land with already disturbed soils	The Commenter's preference for development in alternative locations is noted, was heard by the Regional Planning Commissioners, and will be provided to the Board of Supervisors for consideration. This testimony does not specifically address the adequacy of the EIR, and no further response is required. Nonetheless, the County notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that

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		that could be used and would be much closer to Lancaster and other developed areas.	reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.
RPC-307	Soils	I would think that it's important to think about this in terms of carbon sequestration in the soil and in natural soils particularly. The State is developing a plan right now for the natural and working lands in terms of how much carbon is sequestered in those kinds of soils. So I think that they're promoting keeping the soil sequestration instead of building on it and developing it.	As this comment correctly notes, the Project would result in the conversion of some vegetative cover that currently sequesters carbon, as disclosed and analyzed in Draft EIR Section 5.21, Climate Change (pages 5.21-5, -50). It should be noted, however, that the Project would plant an estimated 35,123 new trees, as required by the County Tree Planting Ordinance, which would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent, as discussed on Draft EIR page 5.21-83.
RPC-308	Geology Hazards	There are a number of things I was concerned about. I read quickly through some of the documents. A huge amount of blasting and earth moving in terms of this area, which has already seismic instability. And it said there were potential offsite landslide lateral spreading subsidence and liquefaction or collapse. There's a very high fire hazard zone here. Some of it is only medium, but much of it is high and very high. And the document said that there is inadequate access to water and water pressure to fight these fires.	The Commenter's characterization of Project-related impacts is incomplete. With regard to seismic impacts, the risk of both primary (i.e., surface rupture and ground shaking) and secondary (e.g., liquefaction, landslides) seismic risks are fully disclosed and analyzed in Section 5.1 of the Draft EIR, and the EIR concludes after thorough analysis that by implementing expert recommendations and complying with State and County requirements, impacts would be reduced to a less than significant level, including with regard to landslides, lateral spreading, subsidence, liquefaction, and collapse. For further information, see Draft EIR, Section 5.1, Final EIR, responses to Comments F.8-206 through F.8-211, and Response to Testimony RPC-193. Fire hazards and mitigation to reduce impacts to a less than significant level are also thoroughly and appropriately analyzed in the EIR consistent with CEQA requirements, as further discussed in Response to Testimony RPC-309. With regard to access to water and water pressure to fight potential fires, the Draft EIR concludes that prior to Project construction and mitigation, there would be inadequate access, but these access issues would be addressed as the Project site is developed. (Draft EIR, Section 5.2, Hydrology and Flood, page 5.2-35.) For further discussion of access to water and water pressure, please see Final EIR, response to Comment G.28-4.
RPC-309	Hazards	I was in Ventura -- and I'm sorry if I'm emotional. But it was very, very intense and scary to be there for those two weeks of fire nonstop. And I know people that lost their homes. I did not. But the cumulative impact on the whole community up and down the coast and inland was huge. And this is not to be taken lightly because building in these kinds	With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft

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		of zones, where you increase what's called the urban wildland interface, creates a huge amount more hazard.	EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.
RPC-310	Biology	Let's see. I'd like to also mention that the document seems to confuse native versus drought-tolerant. We're using them interchangeably. And I would like to have that noted -- that natives are native. And drought-tolerant can be from any other part of the country or world.	The Commenter's opinion regarding confusion between native and drought tolerant plants is noted, was heard in testimony by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the Commenter is incorrect. The Centennial Specific Plan's plant palette requires that landscaping for the Project use plants that are on the approved list because they are *both* an approved native or adapted species *and* drought tolerant. Please see Final EIR Appendix 4.0-A.Rev, Section 3.4, and specifically the plant palette at subsection 3.4.3, for more details. The EIR also acknowledges that the two are different, discussing reasons for including native and adapted plant species (Draft EIR, Section 5.7, page 5.7-167, -190) and drought tolerant plants (Draft EIR, Section 5.3, Hazards and Fire Safety, page 5.3-37) separately with regard to the Project's plant palette.
RPC-311	Cultural	One more item, please, I did need to mention -- cultural resources. There's a lot of sites that need to be protected in situ rather than excavated if any of this Development goes forward.	The Commenter's preference for in-situ preservation is noted, was heard in testimony by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The Project's potential impacts to cultural resources are assessed in Draft EIR Section 5.6, Cultural and Tribal Resources. The EIR identifies a suite of mitigation measures that are consistent with the requirements of Public Resources Code Section 21083.2 and would ensure that the Project's potential impact on cultural resources would be mitigated to a less than significant level. Per Assembly Bill 52 requirements, consultation with appropriate Native American Tribes was completed for the Project, and mitigation measures were agreed upon as appropriate by all parties involved. Per the request of the Tejon Tribe, key mitigation measure requirements include the employment of Native

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			American monitors during ground disturbing activities, as well as the permanent curation of any prehistoric artifacts and/or Tribal Cultural Resources discovered during construction of the Project. For further discussion, see Draft EIR, Section 5.6, and Final EIR, response to Comment A.2-9, and MMs 6-1 through 6-10 in Final EIR Appendix 2.0-C.Rev, pages C-13 through C-26.
RPC-312	Specific Plan	And also there was a section where they talked about later on in terms of ministerial versus discretionary review. And it says in this document that they actually – … So there could be zoning changes according to this document, with only ministerial review, which means no public notice, no hearing, no appeal.	The Commenter is incorrect about zone changes. Section 4.5 of the Centennial Specific Plan lists actions subject to ministerial review under the Specific Plan, which does not include zone changes. See Final EIR Appendix 4.0-A.Rev at Section 4.5 for further details.
Sandra Hernandez			
RPC-313	Support	Sandra Hernandez. Hello. How do you do? My name is Sandra Hernandez. I live in Bakersfield. I'm from the Tejon Indian Tribe. I'm the treasurer for the Tejon Indian Tribe and assist with the Tribe's cultural reclamation and revitalization work. The Tejon Indian Tribe is a sovereign native nation and the only federally recognized tribe within Kern County. I'm here today to give the tribe support for CENTENNIAL community. Tejon Ranch and the Tejon Indian Tribe have a joint interest in the preservation of the historical and culturally significant lands and artifacts. Together the Ranch and Tribe have maintained significant communication towards the ongoing refinement to culturally-related work and processes. Our shared -- excuse me -- our shared investment in Tejon land and its heritage resources continues to strengthen and bridge Tejon Ranch and the Tejon Indian Tribe's relationship.	Thank you for your participation in this public process. The Commenter's support for the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. For information regarding AB 52 consultation with Native American tribes, please see Draft EIR, Section 5.6, Cultural and Tribal Resources. This comment does not address the adequacy of the EIR, and therefore no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		The Tribe maintains offices within Bakersfield to provide social services to our tribal members. Within this tribal office, we maintain a federally compliant repository where we house heritage resources and also curate federal collections. The Tribe owns an old school building. This is -- ironically, some of our oldest tribal members attended this old school that we purchased and are now rehabilitating. This building is approximately 25 minutes from our current tribal offices and is to be rehabilitated to serve in part as the community center with devoted space to display the Tribe's history and cultural artifacts. Tejon Ranch and the Tejon Indian Tribe work hard together to guarantee that the historic and cultural contributions of our ancestors -- the people of Tejon -- remain respected, protected, and accessible for cultural and educational opportunities for the entire community. The Tribe supports Centennial, and we lend our support today. Thank you all for your time.	
Bryn Linblan			
RPC-314	Introduction	Hi. Good afternoon. My name is Bryn Linblan, Associate Director of Climate Resolve, a local org. focused on climate change solutions. I want to highlight a few issues that were insufficiently addressed in the Applicant's response materials that were submitted for this hearing and therefore not deserving of your approval. And I'm going to focus on the transportation impacts of this sprawl, talk about the Development Project and some of the unreasonable and unsubstantiated assumptions that were included in	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard in testimony by the Regional Planning Commission and considered and will be provided to the Board of Supervisors for consideration. For an in-depth refutation of the assertion that the Project constitutes sprawl, please see Final EIR, response to Comment F.8-20. With regard to remaining issues raised by the Commenter, please see Responses to Testimony RPC-320 through RPC-324.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		the Applicant's Response as well as the misuse of Net-Zero concept.	
RPC-315	Pop/Housing	So starting jobs/housing balance. You've had a number of people pointing out to you that it's not realistic to achieve a balance of jobs and housing in this growth -- this Development Project. Right now, in North L.A. County, we're seeing about two times the development of housing as we are jobs. And I think the hypothetical projections that were presented to you in the phasing response just really doesn't alleviate any doubts that I have about that balance being achieved. I don't think there's any sort of assurances or mechanisms to make that balance growth happen.	This comment's skepticism regarding the Project's projected jobs/housing ratio is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration. The Project's land use plan is projected to provide an estimated jobs/housing ratio of 1.22 through the development of commercial and business park uses on the site, thus positively contributing to the attainment of the AVAP's targeted jobs-to-housing ratio. As explained in Draft EIR Section 5.9.3 (pages 5.9-18 to -22, and pages 5.9-29, -30), such Project-specific projections are based on regional employment growth projections published by the Southern California Association of Governments (SCAG), which SCAG adopted as part of its 2012 and 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) planning documents.
RPC-316	Greenhouse Gas	Second, the E.V. assumptions that were in the Response given to you today claim there would be 50 percent E.V. utilization at project buildout. But compare that to current market share, which is 4 1/2 percent. And the project doesn't have any sort of incentives such as the Newhall Ranch project does have incentives to try to bring about that E.V. adoption. This project doesn't. So that 50 percent assumption, I think, is unfounded.	The Commenter's opinion with regard to whether electric vehicle use is realistic has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees and notes that EIR assumptions are appropriately supported. The Commenter provides no evidence for its assertion. Conversely, Attachment G – GHG Reduction Memo, to the July 11, 2018 Regional Planning Commission Public Hearing Staff Report ("GHG Memo")[3334] clearly explains its assumed increase in EV adoption rate from current 4 percent to 50 percent at the time of Project buildout. The current CalEEMod default value for EV use is approximately 4 percent of all vehicles, which does not reflect reasonably foreseeable future EV adoption rates based on ongoing public and private sector efforts to develop and deploy EV technologies and products.[3335] As discussed further in the GHG Memo, global projections in a Bloomberg New Energy Finance report indicate that by 2040, 55 percent of new car sales will be electric, and a University of California, Berkeley report estimates achieving up to 46 percent market share for EVs nationally by 2030. (GHG

[3334] Memorandum from Tin Cheung and Kristin Starbird of Psomas to Jennifer Hernandez of Holland & Knight, re Updated Greenhouse Gas Calculations for the Centennial Specific Plan, dated Juny 27, 2018, available at: http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180711-attG5.pdf.

[3335] See, e.g., CARB's 2018 Annual Evaluation of Fuel Cell Electric Vehicle Deployment & Hydrogen Fuel Station Network Development, available at: https://www.arb.ca.gov/msprog/zevprog/ab8/ab8_report_2018_print.pdf. As noted in this report, in just the 12 months of 2017, there was a significant shift in momentum of California's hydrogen fueling station network development and Fuel Cell Electric Vehicle (FCEV) development and deployment. Per Executive Order B-48-18, there is a target of 5 million ZEVs by 2030, and FCEVs are expected to comprise a significant portion of this future fleet. The California Fuel Cell Partnership anticipates 1 million FCEVs on the road by 2030.

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			Memo, page 4). An International Monetary Fund working paper indicates that the share of EVs in national vehicle stock would be 30 percent by 2027, and by 2042 this would be over 90 percent. (*Ibid.*) Although these projections vary, they all point toward a much higher level of EV sales and adoption in the country in the near future. See GHG Memo, pages 4-5, for further discussion.
RPC-317	Transit	Third, the TMA that is part of the project -- it said it will offer linkages to some of the job centers -- Santa Clarita, Palmdale, the Grapevine -- but doesn't offer a connection to Los Angeles. And so I think there's -- you're presented with the rail connectivity and that that wasn't feasible. But I think there's still a lot of room to see more specificity on other types of transit connection to L.A. jobs.	With regard to transit connectivity, please see Response to Testimony RPC-126.
RPC-318	Greenhouse Gas	And last -- the concept of Net-Zero -- I was reading a response -- I think he kind of presented the concept as we could be doing this much harm. We're going to not do this. And that -- the harm that we're not doing is larger than the harm we are doing. So they're calling that Net-Zero. I think that that's what's not a correct use of the concept because there still is that harm. So I think there's still a lot of room they could do to be calling themselves Net-Zero such as the Newhall project.	As part of the Project's proposed development agreement with the County, the Project has committed to achieving a "net zero carbon for the electric sector" standard on all public and private facilities constructed within the Project, which means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions as documented over time as part of each application for a tentative tract map. This comment's reference to the Newhall Ranch project that has committed to a goal of zero net GHG emissions (as opposed to the Project's proposed "net zero carbon for the electric sector") is noted. CEQA does not require projects to reduce onsite GHG emissions to the greatest extent practicable, nor does it require the EIR to provide substantial evidence demonstrating that GHG reductions needed to achieve zero net energy are infeasible. Courts have consistently held that single projects cannot be required to bear a greater than proportional share of mitigating a cumulative significant impact.[3336,3337,3338] This limitation is also expressly stated in CEQA Guidelines §§ 15041(a), 15126.4(a)(4). Within this

[3336] *Dolan v. City of Tigard* (1994) 512 U.S. 374
[3337] *Nollan v. Cal. Coastal Comm.* (1987) 483 U.S. 825, 835 n. 4
[3338] Ehrlich v. City of Culver City (1996) 12 Cal. 4th 854

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			cumulative impact mitigation measure framework, all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change.
RPC-319	Conclusion	Really I think, fundamentally, this is sort of a square peg project trying to fit in a round hole. It's not the type of development that our region needs to make good on its climate change goals and solve our transportation issues. So, lastly, at the last hearing, Commissioner Modugno, I heard you describing your role as that this project is going to move forward in some form or another, and it's just what that form looks like. And I just encourage you to call question to that premise -- whether this project really needs to move forward at all. Thank you.	The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County disagrees with the Commenter's characterization of the Project. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.
Orchid Black			
RPC-320	Introduction	My name is Orchid Black. Mr. Louie, Mr. Moon, Commissioners, thank you for allowing me to speak today. I want to state that many projects -- bad projects are approved on overriding considerations -- jobs, housing. This project needs to be disapproved -- not approved -- because there are so many overriding considerations not to do it.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and therefore no further response is required.
RPC-321	Public Health	We've heard most of them today -- public health, the high heat issue. And public health is not just Valley Fever, but all the other issues brought up. The crazy transportation, lack of connectivity.	With regard to transit connectivity, please see Response to Testimony RPC-126. With regard to rising Project site temperatures, please see Response to Testimony RPC-207. With regard to Valley Fever, the EIR appropriately analyzes and discloses potential Project impacts related to Valley Fever, including with regard to the nature of the condition, potential for Valley Fever spores to be found in soils in the Antelope Valley, the effects of contracting Valley Fever, and risks from possible exposure to both construction workers and Project residents. See Draft EIR, Section 5.3, Hazards and Fire Safety, pages 5.3-13 to -14 and 5.3-17 to-19, Section 5.11, Air Resources, pages 5.11-28 through -29, and -64 through -67; Final EIR,

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			responses to Comment F.3-29 through F.3-32, F.3A-5, F.3A-38 through F.3A-45, F.3A-68, F.3A-69, and G.13-1. Implementation of fugitive dust control measures required by AVAQMD and SCAQMD and MMs 3-2 and 3-3 would mitigate impacts related to Valley Fever to be less than significant. See also see response to Comment ADD-F.13-10, which further revises valley fever mitigation.
RPC-322	Infrastructure	The urban core subsidizing the fringe development. That's one that really was only elucidated today -- that no matter what they build, citizens of L.A. County will have to pay for the maintenance. And there's $88 billion needed to update our sewer system right now. And it will be millions and millions for all the cities that exist. And -- but I don't see us attaching millions to Centennial. So -- and that's from the San Gabriel Valley Tribune.	With regard to the Project's independence and fiscal impacts on surrounding communities, please see Response to Testimony RPC-167.
RPC-323	Biology	The environmental concerns are huge. We've lost most of the species that exist on grasslands now. Why? Because we've lost most of the grassland. We will have lost all of the grassland if this Project is approved. So that's a huge overriding consideration -- the last grassland.	The Commenter's assertion that all grassland will have been lost if the Project is approved is incorrect. Draft EIR Section 5.7, Biological Resources, discloses the Project's potential impact to grasslands and determines that direct and indirect impacts would be mitigated to a less than significant level, but cumulative impacts to native grasslands would be a cumulative significant impact. (Draft EIR, pages 5.7-158, -162.) Project implementation would include mitigation at a ratio of at least 2:1 for grasslands, resulting in improved functions and values of grasslands on the Project site, in addition to preservation in perpetuity within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Intensive, multi-year grassland studies have revealed that grasslands of equal or greater value occur in vast quantities in the Mitigation Preserve. Please see Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 for further discussion of grasslands.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-324	Traffic	And 27 million car trips per year. Everybody's using this small number. But that's the daily number -- 27,375,000. And that's the proponents' numbers. Other people can come up with better numbers.	As explained in Draft EIR Section 5.10, Traffic and Circulation, the North County Sub-Area Model provides an estimate of the Project's average daily trips. As shown on Draft EIR Table 5.10-19, the model projects that about 70,246 of the Project's average daily trips (i.e., 48 percent) will be internal to the Project site, while about 75,908 average daily trips (i.e., 52 percent) will be external to the Project site. Based on these numbers, and as this comment correctly notes, the Project would generate approximately 27.4 million average external trips on an annual basis. This comment's speculation that "other people can come up with better numbers" is noted, has been heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration.
RPC-325	Land Use	The West Carson Plan has 2,000 homes plus commercial and 247 acres, if you take out the hospital. Centennial, which was called well designed, the best design ever and infill -- which it isn't -- has 10 times the residences and commercial in 20 times the space. That's not good planning.	The Commenter's opinion that the Project does not constitute prudent planning was heard in testimony by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County disagrees, and notes that the EIR does not indicate the Project is infill. Rather, the EIR specifically recognizes that while the Project is not infill, it has been situated and designed to promote "smart growth" planning principles established by SCAG's 2016 RTP/SCS and the County's AVAP for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas emissions and promotes public health. Please see Final EIR, responses to Comments F.8-20, F.8-191, and F.8-204 for further discussion.
RPC-326	Traffic	Commissioner Modugno suggested that, as Staff said, echoing the proponent, that there would not be two-way traffic, there would only be inbound traffic. But we know there's going to be 23,000 square feet of commercial and industrial space. So, unless they reserve all the houses -- unless they put an addendum saying that you have to be the fire person here, you have to have a job here, to work here -- which none of us have seen -- those -- there's going to be traffic both ways on the 5. 75,000 car trips will probably be both ways on the 5. So 50,000 residents, 60,000 -- fifty seven, plus inbound maybe 20,000. So that's an overriding consideration not to do it.	As this comment correctly notes, the Project will generate traffic that travels to and from the Project site, and some of these trips will travel in both directions along Interstate 5 (as shown on Draft EIR Table 5.10-21). As explained in Draft EIR Section 5.10, Traffic, Access, and Circulation, the North County Sub-Area Model provides an estimate of the Project's average daily trips. As shown on Draft EIR Table 5.10-19, the model projects that about 70,246 of the Project's average daily trips (i.e., 48 percent) will be internal to the Project site, while about 75,908 average daily trips (i.e., 52 percent) will be external to the Project site.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-327	Miscellaneous	And I'm concerned about the process itself. I believe the Planning Commission is as independent as it can be. But at the same time I heard from Staff over and over that -- the same language that the proponent used -- the Net-Zero water, which we know is not true. They have to buy water from the State Water Project. And the Net-Zero energy, which is only the electricity and not the rest of the energy that it takes to make a house work. ... I'd be happy to. And so I thought about why that would be. And I realized that, if I worked with somebody for a decade or more, I would probably adopt their language, too. And I think that a more impartial take on this bad project should be taken. And please, due to the overriding considerations, do not do this project. Thank you.	The Commenter's concerns have been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. As the lead agency, the County has complied with CEQA requirements, and has maintained an appropriate and independent relationship with the Project Applicant. The Project's water supplies are discussed in Section 5.18, Water Resources. As discussed on Draft EIR pages 5.18-2 and -51 to -67, and as summarized in Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years, the Project will utilize several water supplies and on- and off-site water banking facilities to meet potable demand. Available supplies include groundwater and imported water return flows in accordance with the approved Antelope Valley Basin Adjudication Judgment and Physical Solution; State Water Project (SWP) supplies secured for Project use and imported to the site under an agreement with the Antelope Valley – East Kern Water Agency (AVEK); and AVEK service area deliveries. Indoor wastewater will be conveyed to one of two Project on-site treatment facilities; will be treated to State unrestricted reuse standards; and will be distributed to meet approximately 40 percent of buildout water demand. The Project's water supplies will sustainably meet buildout potable and recycled water demands and will maintain an average annual reserve supply of more than 79,000 acre-feet, or more than 11 years of full-buildout potable water demand, after buildout has been achieved. The analysis of the Project's water supplies is consistent with and based on the most current projections prepared by state and regional public agencies with specific expertise and responsibility for analyzing water supplies, including imported and ground water, under applicable laws, regulations and policies. The Project's use of recycled water is consistent with state and regional policies, rules and regulations that encourage the use of recycled water to reduce demand for potable water supplies. In the Project development agreement, the Project has made a commitment to achieve a "net zero carbon for the electric sector" standard on all public and private facilities constructed within the Project, which means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions as documented over time as part of each application for a tentative tract map. This testimony does not address the adequacy of the EIR, and no further response is required.

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3.5 RESPONSES TO CORRESPONDENCE RECEIVED PRIOR TO AUGUST 29, 2018 REGIONAL PLANNING COMMISSION HEARING

All comment letters received by the County through August 22, 2018 have been included and responded to herein. Comments that raise environmental issues pertinent to the analysis presented in the EIR have been thoroughly addressed in these responses.

With respect to the new comments letters received, individual comments within the body of each letter have been identified and numbered. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. Responses to each bracketed comment are included on the page(s) following each comment letter, and the electronic PDF file includes hyperlinks between the comment and the associated response to facilitate ease of review.

Table 3.5-1 below presents a summary listing of the additional comment letters received, including the commenting agency/individual; the assigned numbering for each comment letter; the date of the correspondence; and the page number where the comment letter can be found herein.

TABLE 3.5-1
ADDITIONAL LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
A. Federal Agencies			
-	-	-	-
B. State Agencies			
-	-	-	-
C. County Agencies			
ADD-C.2	Kern County	July 17, 2018	3-344
D. Regional Agencies			
-	-	-	-
E. Local Agencies			
-	-	-	-
F. Organizations			
ADD-F.8	Botanic Gardens Conservation International	July 5, 2018	3-346
ADD-F.9	Antelope Acres Town Council	July 7, 2018	3-348
ADD-F.10	Antelope Acres Town Council	July 9, 2018	3-352
ADD-F.11	Save Our Rural Town	July 9, 2018	3-362
ADD-F.12	California Native Plant Society	July 10, 2018	3-368
ADD-F.13	TriCounty Watchdogs	July 10, 2018	3-370
ADD-F.14	Palmdale Regional Medical Center	July 6, 2018	3-390
ADD-F.15	TriCounty Watchdogs	August 15, 2018	3-392
ADD-F.16	California Native Plant Society	August 17, 2018	3-394

TABLE 3.5-1
ADDITIONAL LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
ADD-F.17	California Native Plant Society	August 17, 2018	3-400
G. Individuals			
ADD-G.49	Form Letter 6 – Various Commenters	Various Dates	3-402
ADD-G.50	Richard J. Jackson, MD, MPH, FAAP	July 6, 2018	3-404
ADD-G.51	Terry Grill	July 10, 2018	3-408
ADD-G.52	Brian Esquivel	July 10, 2018	3-410
ADD-G.53	Carol Bornstein	July 10, 2018	3-412
ADD-G.54	Zack Scrivner	July 18, 2018	3-414
ADD-G.55	Ben Oswald	July 18, 2018	3-416
ADD-G.56	Joseph Medeiros	July 30, 2018	3-418
ADD-G.57	Stephanie Pincetl	August 6, 2018	3-420
ADD-G.58	David Swanson	August 8, 2018	3-428
ADD-G.59	Kathleen Trinity	August 18, 2018	3-430
ADD-G.60	Form Letter 7 – Various Commenters	August 4, 2018	3-436
ADD-G.61	Form Letter 8 – Various Commenters	Various Dates	3-438
ADD-G.62	Form Letter 9 – Various Commenters	Various Dates	3-440
ADD-G.63	Form Letter 10 – Various Commenters	Various Dates	3-442

C. County Agencies

CENTENNIAL

at TEJON RANCH

ADD-C.2

Lorelei H. Oviatt, AICP, Director
2700 "M" Street, Suite 100
Bakersfield, CA 93301-2323
Phone: (661) 862-8600
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PLANNING AND NATURAL RESOURCES DEPARTMENT

Planning
Community Development
Administrative Operations

July 17, 2018

File; LA County
Centennial SP

David W. Louie, Chair
Los Angeles County Regional Planning Commission
320 W. Temple Street
Los Angeles, California 90013

RE: Centennial Specific Plan (Project No. 02-232-(5))

Dear Commissioners,

Kern County Planning and Natural Resources has been tasked by the Kern County Board of Supervisors since 2002 to review and provide comments on the Los Angeles County Centennial Specific Plan project by Tejon Ranch Corp. Located less than 1 mile from the Kern-Los Angeles County boundary in the Antelope Valley, it is a portion of the historic Tejon Ranch which encompasses over 270,000 acres with the majority of the land being located in Kern County.

In 2008, Tejon Ranch made a binding commitment to permanently preserve over 90% (240,000 acres) of the historic ranch lands identified as important for biological values and wildlife corridors with the Ranch wide Agreement. The remaining lands have been designed for complete communities to include a jobs-housing balance and sensitivity to biological and cultural values

With full Environmental Impact Reports and extensive public input, Kern County has approved and is implementing, the Tejon Industrial Complex and Commerce Center (16 million square feet of industrial/commercial) with over 2,300 current jobs with new businesses under construction, the Tejon Mountain Village Specific Plan, (2009) with 3,450 mountain homes and 21,000 acres of open space beyond the Ranch Wide Agreement and the Grapevine Specific and Community Plan (2016) with 12,000 homes of all types with 5.1 million square feet of commercial–industrial development. The remaining developments to be considered are the Centennial Specific Plan in Los Angeles County that is before your Commission and a remaining 7,600 acre project adjacent to the Grapevine plan in Kern County.

ADD-C.2-1

Providing for new housing in California will not be achieved only through infill development. For every rebuilding of an urban community displaces a community that has enjoyed years of reasonable rent or stable home ownership. And placing new homes next to older industrial development solves one problem by creating another. The Antelope Valley Area Plan, the Los Angeles County Board of Supervisors adopted in 2015, articulated the Town and Country Vision Statement that included an acknowledgement that the "growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment." The Centennial Specific Plan, along with the projects approved in Kern County, will provide housing solutions for all income levels along with locations near job centers. It is consistent with the vision and policies of your adopted Antelope Valley Area Plan and with the requirements your Commission has placed on the project along with the new requirements for mandatory solar, this community will represent a significant contribution to providing

homes that do not cost $760,000 for a starter home while implementing the new California communities standards set by Los Angeles County on energy, water, and transportation as well as walkable complete communities.

The Centennial Specific Plan project will complete the work Tejon Ranch started in 2008 to comprehensively plan the ranch for both permanent conservation and thoughtful, well–planned affordable development with jobs, parks, schools, and open space. Certainly this is a complex project with many different viewpoints on where development should occur in California. But the opportunity to master plan over 8,400 acres that will not displace any existing homeowners or renters while providing critically needed new housing and jobs using existing transportation corridors should be an important factor in your decision making process.

ADD-C.2-1 cont.

Thank you for your consideration of these comments. Kern County is in the process of updating our General Plan county-wide and we look forward to our continued work with L.A. Regional Planning on ensuring our neighboring communities communicate and plan together.

Sincerely,

LORELEI H OVIATT, AICP, Director
Kern County Planning and Natural Resources Department

cc: Kern County Supervisor Scrivner – District 2

Response to Comment Letter ADD-C.2
Kern County
July 17, 2018

Response to Comment ADD-C.2-1:

Thank you for your participation in this public process. The Commenter's support for the Project is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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F. Organizations

CENTENNIAL

at TEJON RANCH

Botanic Gardens
Conservation International
Descanso House, 199 Kew Road
Richmond, Surrey, TW9 3BW, U.K.

Tel: +44 (0)20 8332 5953
Fax: +44 (0)20 8332 5956
E-mail: info@bgci.org
Internet: www.bgci.org

ADD-F.8

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Re: Centennial Project Draft Environmental Impact Report

5th July 2018

Dear Mr. Sackett,

I was fortunate enough to visit Tejon Ranch in October 2016, and now read with dismay that the intention is to develop over 5,000 acres of the site into a city of 55,000 inhabitants.

My organisation, Botanic Gardens Conservation International (www.bgci.org), is the largest plant conservation network in the world with 800 member organizations in 100 countries, including around 70 members in the US. We are not a lobbying organization. Instead, the botanical institutions in our network carry out practical plant conservation work, including restoration of transformed habitats. It is inexplicable to us that, while the federal Government, civil society and many of our member organisations spend tens of millions of dollars a year on *restoring* damaged habitats, planning applications are still being made to destroy natural habitats.

ADD-F.8-1

We are asking the Regional Planning Commission to not recommend approval of the project for the following reasons:

The areas earmarked for the Centennial development would destroy thousands of acres of the best native perennial grassland that remains in California. The project site also comprises vast fields of wild flowers and, critically, these habitats have not been invaded by non-native plants. More specifically, the project will affect a number of rare plant species including:

- *Navarretia setiloba*, CRPR 1B (Piute Mountains navarrettia)
- *Microseris sylvatica*, CRPR 4 (sylvan scorzonella)
- *Atriplex coronata* var. *coronata*, CRPR 4 (crownscale)
- *Chorizanthe spinosa*, CRPR 4 (Mojave spineflower)
- *Perideridia pringlei*, CRPR 4 (adobe yampah)
- *Androsace elongata* subsp. *acuta*, CRPR 4 (California androsace)

ADD-F.8-2

Charity Registration No. 1098834

Botanic Gardens Conservation International is a company limited by guarantee in the UK, No. 4673175.
BGCI is a worldwide membership organization established in 1987. Its mission is to mobilise botanic gardens and engage partners in securing plant diversity for the well-being of people and the planet.

Botanic Gardens
Conservation International
Descanso House, 199 Kew Road,
Richmond, Surrey, TW9 3BW, U.K.

Tel: +44 (0)20 8332 5953
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E-mail: info@bgci.org
Internet: www.bgci.org

As well as the direct impacts associated with habitat removal, our concern is that indirect impacts, such as the setting of fires, poaching, noise and pollution, will have an equally detrimental effect on surrounding areas of pristine wilderness and the wildlife that currently inhabits it. In short, the whole of Tejon Ranch will be affected by the proximity of such a high density of people. ADD-F.8-3

None of the proposed mitigation measures come close to addressing these impacts. ADD-F.8-4

Globally, humans have completely transformed >50% of the ice-free terrestrial landscape and an estimated 83% of the terrestrial landscape has been directly influenced by human activities[1]. The state of California has an international reputation for protecting the environment. It is important that California continues to show leadership and sets an example for others. Surely there must be other, more suitable sites already transformed by humans, with low conservation value and with better transport links, lower earthquake risk etc. I do hope that a better outcome for all is possible. ADD-F.8-5

Yours sincerely



Dr Paul P. Smith
Secretary General
Botanic Gardens Conservation International
Descanso House,
199 Kew Road,
Richmond, Surrey,
TW9 3BW
United Kingdom.

Tel: +44 (0)20 8332 5940
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BGCI: www.bgci.org
Global Trees Campaign: www.globaltrees.org
Ecological Restoration Alliance of Botanic Gardens: www.erabg.org

[1] Hooke et al. (2012). Land transformation by humans: a review. *GSA Today*, v. 22, no. 12, doi: 10.1130/GSAT151A.1

Response to Comment Letter ADD-F.8
Botanic Gardens Conservation International
July 5, 2018

Response to Comment ADD-F.8-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Response to Comment ADD-F.8-2:

Draft EIR Section 5.7, Biological Resources, discloses the Project's potential impact to grasslands and determines that direct and indirect impacts would be mitigated to a less than significant level, but cumulative impacts to native grasslands would be a cumulative significant impact. (Draft EIR, pages 5.7-158 to -162, Section 7.0, Cumulative Impacts, page 7-16.) Project implementation would include mitigation at a ratio of at least 2:1 for grasslands, resulting in improved functions and values of grasslands on the Project site, in addition to preservation in perpetuity within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Intensive, multi-year grassland studies have revealed that the grasslands on the Project site are not unique, and grasslands of equal or greater value occur in vast quantities in the Mitigation Preserve. Please see Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 for further discussion of grasslands.

The Commenter is correct that the six specific special-status plant species listed would be impacted by Project implementation, as shown in Draft EIR Exhibit 5.7-11a, Special Status Plant Species Observation with Impact Boundary. The EIR identifies an appropriate overall mitigation ratio of 2:1 to reduce potential impacts to each of these species to a less than significant level. The Project's priority shall be preservation of the six special status plant species. Beyond preservation, the preferred method for achieving the 2:1 replacement ratio of special status plant species is enhancement or expanding of existing populations. Per MM 7-1, prior to issuance of grading permits, detected special status plant species populations on the Mitigation Preserve meeting the 2:1 mitigation ratio, shall be quantified and documented for preservation in perpetuity. If the preservation ratio is less than 2:1 for one or more of the six impacted species, enhancement and/or creation to expand preserved population(s) of the species to a quantity representing a minimum 2:1 ratio within the Mitigation Preserve shall be undertaken. For further discussion of these species, please see Draft EIR, Section 5.7, Biological Resources, pages 5.7-142 to -145 and Final EIR, responses to Comments F.8-128 to F.8-131.

Response to Comment ADD-F.8-3:

Per CEQA requirements, the Project EIR duly analyzes both direct and foreseeable indirect impacts of the Project on the environment, including with regard to fire (Draft EIR, pages

5.7-1, -36 to -39), biological resources (Draft EIR, pages 5.7-1, -139, -141, -142, -149, -150, -166 to -170, -188, -195) noise (Draft EIR, pages 5.12-1, -21 to -34), and both solid waste (Draft EIR pages 5.17-1, 28 to -35) and air quality (Draft EIR, pages 5.11-1, -40 to -78). The Commenter's opinion is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.8-4:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The comment presents no evidence that biological impact mitigation measures would be ineffective in reducing impacts. The EIR thoroughly analyzes potential Project-related impacts on the environment, identifies fully enforceable mitigation measures that reduce impacts to the greatest extent feasible, and identifies impacts for which despite the identification of all feasible mitigation, impacts would be significant and unavoidable. Per CEQA, the Board of Supervisors may determine that the Final EIR has considered the identified means of lessening or avoiding the Project's significant effects and that to the extent any significant direct or indirect environmental effects, including cumulative project impacts, remain unavoidable or not mitigated to below a level of significance after mitigation, such impacts are acceptable in light of the social, legal, economic, environmental, technological and other Project benefits that override them. See Draft CEQA Findings Regarding the Centennial Specific Plan Project and EIR, and Draft Statement of Overriding Considerations, for more details.

Response to Comment ADD-F.8-5:

The Commenter's opinion that an alternative site would be more appropriate for the Project is noted and will be provided to the Regional Planning Commission and the Board of Supervisors. However, the County disagrees. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Draft EIR Section 8.4.1 (which discusses why an alternative site was not evaluated in detail in the Draft EIR) and Final EIR, response to Comment F.8-20 for further discussion.

County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012

July 7, 2018

Attention: Mr. Jodie Sackett:

Centennial Project #02-232 Comments on DEIR

After reviewing the Draft Environmental Impact Report for the Centennial Project, the Summary of Significant Environmental Impacts would be the best reason to deny this development. ADD-F.9-1

There is nothing in the DEIR that states how you can guarantee there would be 1.3 jobs per dwelling unit, as stipulated in the Antelope Valley Area Plan (AVAP) and Economic Opportunity Area (EOA). What measures are there already written up to insure this is done with the first dwelling unit built? If Lancaster and Palmdale have problems recruiting companies to cities, what makes Centennial sure that companies will move there just because they have designated zoning for commercial businesses? ADD-F.9-2

The project states it cannot mitigate traffic impacts on the I-5 and Highway 138 even with proposed mitigations in the Centennial Transportation Improvement Plan. If the mitigations were possible, Los Angeles and the 14 Freeway and the I-5 Freeway would not be the traffic mess that they currently are from Lancaster and Palmdale. ADD-F.9-3

According to the FEIR, the Project will cumulatively exceed official regional or local population projections. How does this contribute to the Quality of Life for residents of Los Angeles County? ADD-F.9-4

The FEIR erroneously states that the Project will not physically divide an established community. The established rural community of Antelope Acres which goes from Avenue J to the Kern County line will be completely divided in half by the “improvements” to Highway 138 as a result of the Project, as per CAL TRANS Northwest Highway 138 EIR . Why was this not correctly stated as part of the cumulative impacts? ADD-F.9-5

Regardless of all the recycling programs, which may or may not develop as envisioned, the County cannot guarantee there will be landfill space for all the "trash" that will be needed to be disposed of because of this project. See Section 5.17.22. Why would a plan like this be approved when the County has acknowledged that the future generations would inherit this problem? ADD-F.9-6

Thank you for addressing our concerns.

Sincerely,

Virginia Stout
President
Antelope Acres Town Council

Response to Comment Letter ADD-F.9
Antelope Acres Town Council
July 7, 2018

Response to Comment ADD-F.9-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Response to Comment ADD-F.9-2:

To the extent this comment assumes that the AVAP or CEQA requires the Project to guarantee that it will create 1.3 jobs per dwelling unit, this comment is incorrect. As explained in the AVAP Economic Development element's "vision and strategy" statement, the AVAP "provides for a jobs-to-housing ratio of approximately 1.3 jobs for every household in the unincorporated Antelope Valley, a far improvement over the ratio of approximately one job for every five households established by the 1986 Antelope Valley Areawide General Plan."[3339] The AVAP does not, however, include any goals or policies that mandate that the Project achieves a 1.3 jobs-to-housing ratio, as this comment incorrectly suggests. Rather, the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or the concentration of a skilled labor force in Economic Opportunity Areas, as explained on page 5.9-3 of the Draft EIR. The Project's land use plan implements this strategy and would provide an estimated jobs/housing ratio of 1.22 through the development of commercial and business park uses on the site, thus positively contributing to the attainment of the AVAP's targeted jobs-to-housing ratio. As explained on Draft EIR page 5.9-31, no measures to reduce the Project's projected population and employment growth would be appropriate because the Project is consistent with approved regional growth plans. With regard to this comment's query regarding the EIR's job growth assumptions, as explained in Draft EIR Section 5.9.3 (pages 5.9-18 through 5.9-22, and pages 5.9-29 through 5.9-30), such assumptions are reasonable and based on the most current regional employment growth projections published by the Southern California Association of Governments (SCAG), which SCAG adopted as part of its 2012 and 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) planning documents.

Response to Comment ADD-F.9-3:

The Commenter's opinion regarding the feasibility of mitigating traffic-related impacts is noted and will be provided to the Regional Planning Commission and Board of Supervisors. However, the County disagrees and notes that the Commenter misstates EIR analysis and conclusions. As explained in Draft EIR, Section 5.10, Traffic, Access, and Circulation, under Thresholds 10-1 and 10-2, in accordance with the MMRP, the Project must provide the

[3339] AVAP at ED-2.

required funding for the implementation of all identified roadway and highway improvements necessary to reduce Project-related impacts to a less than significant level, either through an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. If built, improvements identified in the MMRP would mitigate all potential Project-related significant impacts to SR-138 and other state highways to less-than-significant levels. In each case, the MMRP specifically requires that Project funding be provided either in accordance with the agreement with Caltrans and in accordance with timing set forth in that agreement, or prior to final map recordation. Consequently, all of the highway facility improvements required to address potential Project-related significant impacts identified in the EIR as mitigation measures are fully enforceable and must be completed before each phase of development may occur. However, as recognized in the EIR, Caltrans is legally responsible for implementing planned improvements of State facilities, and the Project Applicant and the County do not have the authority to require that Caltrans do so. For this reason, the EIR concludes that if improvements are not implemented, the Project would contribute to significant and unavoidable impacts. This is appropriate under CEQA, because implementation of the improvements is within the responsibility of another public agency and not the lead agency. See CEQA Guidelines § 15091(a)(2); CEQA §21081(a)(2).

Response to Comment ADD-F.9-4:

As discussed on Draft EIR page 7-18, and in Draft EIR Section 5.9, Population, Housing, and Employment, the Project would accommodate growth in the Antelope Valley consistent with the AVAP and the intent of the designated West EOA. The Project would accommodate projected regional growth in employment, housing, and population that is consistent with the growth projections for the area, as incorporated into the AVAP and the 2012 and 2016 RTP/SCS.

As disclosed in the Draft EIR on pages 5.9-24 and 5.9-28, the resident population of the Project at buildout would be 82.46 percent of SCAG's projected population of the two traffic analysis zones (TAZs) covering the Project site by 2035, but would exceed the SCAG population projections for 2040 by approximately 10 percent. As explained on Draft EIR page 5.9-28, this population exceedance is likely attributable to the average household size used in the SCAG projections. The EIR conservatively assumes an average household size of 3.17 persons per household for single-family detached units and 2.38 persons per household for attached and multi-family units, whereas SCAG assumes an average household size of 2.3 persons per all housing types. Nevertheless, the Project's proposed buildout estimates are consistent with SCAG's 2040 household growth projections for the TAZs that cover the Project site, as discussed on Draft EIR page 5.8-28. Since the Project is consistent with SCAG's household projections, and since SCAG's TAZ level data is considered advisory and non-binding, the Draft EIR does not consider the Project's 2040 exceedance in population projections at the TAZ level a significant adverse impact.

With regard to this comment's concerns regarding quality of life, the Project is expected to have a beneficial impact on the quality of life in the region in that it will help accommodate projected growth in the region, contribute to meeting the County's State-mandated Regional

Housing Needs Assessment housing production targets, help achieve the AVAP's targeted jobs/housing ratio by providing new regional employment opportunities, and by providing a range of new recreational opportunities that will be accessible by residents of the region. Quality of life is a social concern and is not a physical environmental impact required to be analyzed in CEQA documents. See CEQA Guidelines Section 15064(e). All adverse physical environmental impacts that could affect County residents are disclosed in the EIR and all feasible mitigation to reduce such impacts will be incorporated into an enforceable Mitigation Monitoring and Reporting Program that is specific to the Project.

Response to Comment ADD-F.9-5:

The Project's potential to physically divide an established community is analyzed in Draft EIR Section 5.8, Land Use (pages 5.8-18 through 5.8-19). As explained in the EIR, the Project site is generally undeveloped and is not part of an established community that would be divided with implementation of the Project. Caltrans' Northwest State Route 138 Corridor Improvement Project (SR-138 Improvement Project) is a separate action being undertaken by a separate lead agency and is not "a result of the Project," as this comment incorrectly assumes. In any case, the SR-138 Improvement Project's potential to physically divide an existing community were fully analyzed in *Northwest State Route 138 Corridor Improvement Project Environmental Impact Report/Environmental Impact Statement* prepared by Caltrans and was determined to be less than significant with implementation of mitigation. Please also see response to Comment ADD-F.10-5.

Response to Comment ADD-F.9-6:

The Commenter's concern about implementation of the Project's recycling commitments is noted and will be provided to the Regional Planning Commission and Board of Supervisors. However, the County disagrees. Mitigation measures and Development Agreement requirements related to recycling are fully enforceable. With regard to landfill space, Draft EIR Section 5.17, Other Public Services, appropriately evaluates Project impacts, noting that because permitted Class III landfill capacity cannot be guaranteed at the time of Project buildout and throughout the life of the Project, the EIR conservatively concludes that Project buildout would result in a significant impact on the County's anticipated Class III landfill capacity. Draft EIR, page 5.17-2. This is because the Los Angeles County Department of Public Works has a 15-year planning horizon for solid waste disposal. Nonetheless, the County is committed to handling all solid wastes generated within the County now and in the future, and PDFs 17-2 and 17-3 and MMs 17-9 and 17-10 reflect all feasible measures to reduce impacts and divert the Project's municipal solid waste generation. (*Id.,* page 5.17-2; Final EIR Appendix 2.0-C.Rev, pages C-143 to -145.) For further discussion of solid waste, see Draft EIR, pages 5.17-1, -2, -4, and -14 to -35.

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Dear Mr. Sackett: July 9, 2018

The Antelope Acres Town Council met on July 6, 2018 and determined that the Town Council is in opposition to the Centennial Project. ADD-F.10-1

We would like to provide the following comments. At this point in time we oppose the Project based on several factors. There are many unavoidable significant factors with regard to air quality, traffic, biological resources, special hazards, water quality and quantity, emergency services, public health and many additional impacts to our community. ADD-F.10-2

Additionally there are cumulative impacts as yet undefined or not yet adequately reviewed as the final documents have not had a substantial final review given an insufficient amount of time for a final review and comment period. ADD-F.10-3

Over the years the Centennial representatives have briefed our community on the progress of the project. This is an extremely significant undertaking to build a city of over 19,000 homes with a complete infrastructure to support a community of that size with manufacturing and commercial plans in place that will support almost 60,000 people. ADD-F.10-4

This project has permanent and inevitable far reaching effects on surrounding rural communities and

Antelope Acres will see unavoidable effects such as permanent traffic, noise, air quality and health impacts due to the project itself. Over time it will drive projected revisions to Interstate Hwy 5 and Hwy 138 which when implemented will change the face of our community forever and sacrifice at least sixteen properties which mean the loss of sixteen family homes to our community and that is the current projection, not necessarily the final plan. ADD-F.10-5

Our community has already been invaded by solar projects and the entities given the responsibility to protect us have not created a plan to assure that our health and safety are protected. ADD-F.10-6

Lancaster City officials and L. A. County Regional Planning have allowed all planned projects to be completed with no regard to their cumulative effects. ADD-F.10-7

There is no oversight to create sane growth in the renewable energy industry. Jurisdictional boundaries are adding to this dilemma as there are no coordinated efforts between the responsible entities to change these conditions. ADD-F.10-8

It concerns us that the AVAQMD (the lead agency) had “no comment” when the DEIR and the FEIR were released. ADD-F.10-9

The South Coast Air Quality Management District's (SCAQMD)s comments reported that "construction emissions would exceed significant air quality impacts would exceed CEQA significant thresholds for VOCs and NOx after incorporating Mitigation Measure (MM) 11-2 and MM 11-3 14 and that the localized construction impacts could be significant and unavoidable since construction activities in one or several planning areas may affect already-established sensitive uses within the proposed project area. After mitigation these impacts would remain significant and unavoidable." We strongly disagree with that statement and want strict oversight by L. A. County Planning to assure that CUP requirements are not abused. We do not want the future to tell a story of regrets that the Centennial Project overshadowed the rights of the residents of the west side of the Antelope Valley.

ADD-F.10-10

"The Antelope Valley has never been properly assessed for compliance with the National or California Ambient Air Quality Standards (AAQS) for PM 2.5. And not properly assessed for compliance with the National AAQS for PM 10 though it is established that the Antelope Valley community does not comply with California's AAQS for PM 10.

ADD-F.10-11

Is the AVAQMD relying on Fugitive Dust Rule 403 to police the effects of dust and air quality? This document is not adequate and needs review and revision. This is an important element of the project, for without a substantial enforceable plan the stated significant impacts may not be identified and monitored adequately as the air quality data is "undefined."

ADD-F.10-12

Emphysema, COPD, Asthma and Valley Fever statists show dramatic increases in the Antelope Valley with no change in sight. California and the Antelope Valley still face a significant drought which will add to the near and long term air quality and health issues. The Antelope Valley already has the highest incidents of COPD in the United States and in 2017 had the second highest number of Valley fever cases in the State of California according to the L. A. County Dept. of Public Health.

ADD-F.10-13

There are water quality and quantity issues pending due to the water adjudication lawsuit judgment. A Watermaster has been established which will affect everything from the loss of current agricultural land use by possibly forcing as much as 20,000 additional acres of farmland out of production. This will exacerbate the fugitive dust and air quality issues already identified, with no mention to adequate water being available for use.

ADD-F.10-14

The health and safety of our residents and its wildlife are at stake.

ADD-F.10-15

Sincerely,

Virginia Stout, President
Antelope Acres Town Council

Response to Comment Letter ADD-F.10
Antelope Acres Town Council
July 9, 2018

Response to Comment ADD-F.10-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Response to Comment ADD-F.10-2:

The Commenter's opposition to the Project is noted and will be provided to the Regional Planning Commission and the Board of Supervisors. The Commenter is correct that the Project would have some significant and unavoidable impacts. The EIR thoroughly analyzes potential Project-related impacts on the environment, identifies fully enforceable mitigation measures that reduce impacts to the greatest extent feasible, and identifies impacts for which despite the identification of all feasible mitigation, impacts would be significant and unavoidable. Per CEQA, the Board of Supervisors may determine that the Final EIR has considered the identified means of lessening or avoiding the Project's significant effects and that to the extent any significant direct or indirect environmental effects, including cumulative project impacts, remain unavoidable or not mitigated to below a level of significance after mitigation, such impacts are acceptable in light of the social, legal, economic, environmental, technological and other Project benefits that override them. See Draft CEQA Findings Regarding the Centennial Specific Plan Project and EIR, and Draft Statement of Overriding Considerations, for more details.

Response to Comment ADD-F.10-3:

The Commenter's opinion regarding cumulative impacts is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the County notes that the EIR thoroughly and appropriately analyzed potential cumulative impacts related to Project implementation consistent with CEQA requirements. See Draft EIR, Section 7.0, Cumulative Impacts. With regard to time available for review of the EIR, the County has complied with CEQA requirements, granted requests for extended review of the Draft EIR, and has provided ample time for review of the Final EIR, including the opportunity to attend and provide public testimony at Regional Planning Commission hearings dated June 6, 2018, July 11, 2018, and August 29, 2018. This general comment does not assert any specific inadequacies of the Draft EIR's cumulative impact analysis, and no further response is required.

Response to Comment ADD-F.10-4:

This comment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Commenter is correct that the public has been

informed about the Project over the course of its planning and consideration. This general comment does not specifically address the Project or the adequacy of the EIR and no further response is required.

Response to Comment ADD-F.10-5:

As this comment correctly notes, the EIR has concluded that the Project would result in significant and unavoidable impacts related to air resources, biological resources, land resources, population and housing, traffic, noise, visual resources, solid waste, and climate change. Please see Draft EIR Section 5.10, Traffic, Access and Circulation, for a comprehensive analysis of the Project's potential impact on Interstate Highway 5 (I-5) and State Route 138 (SR-138), which concludes that the Project could have a significant impact on SR-138 if Caltrans does not implement planned improvements in accordance with Caltrans's Northwest Corridor Improvement Project.

To the extent this comment suggests that the Project would construct improvements to I-5 and/or SR-138 that would cause the loss of sixteen family homes in Antelope Acres, it is mistaken. In fact, as explained on Draft EIR page 5.8-19, construction associated with the Project would cause the loss of a single existing caretaker/employee residence that is located on the Project site. Project construction would not cause the loss of any residences located off-site. However, as discussed in more detail below, it is anticipated that Caltrans will implement its separate Northwest 138 Improvement Project, which Caltrans approved after publication of the Draft EIR. As discussed in Section 3.4.1.2 of Caltrans' Northwest State Route 138 Corridor Improvement Project Final Environmental Impact Report/Environmental Impact Statement (Caltrans EIR), the Northwest 138 Improvement Project's approved Preferred Alternative (Build Alternative 2) has the potential to displace an estimated 14 housing units and approximately 38 persons.[3340] The displacement area is located within two census tracts (Census Tracts 9009 and 9012.09) that includes Antelope Acres, among other communities.[3341] As explained in the Caltrans EIR, Caltrans has committed to providing relocation assistance and counseling to all displaced persons in accordance with the Federal Uniform Relocation Assistance and Rural Properties Acquisition Policies Act to ensure adequate relocation benefits to all displaced persons.[3342] The Caltrans EIR determined that related impacts would be less than significant.[3343]

With regard to the assertion that the Project will "drive projected revisions" to SR-138, the Northwest 138 Improvement Project addresses significant existing and reasonably anticipated future needs irrespective of Centennial approval and development. The project will be built in phases as need or as demand require, with short-term and mid-term improvements intended primarily to correct existing and potential safety conditions, including operational and safety improvements, such as intersection improvements, shoulder widening, and curve corrections. The corridor currently experiences accident rates double the statewide average, which alone necessitates significant improvements. The

[3340] Caltrans EIR at p. 75.
[3341] Caltrans EIR at p. 71.
[3342] Caltrans EIR at p. 75.
[3343] Caltrans EIR at p. 442.

substantial majority of the regional employment, household and population supporting the need for the Northwest 138 Improvement Project are related to current and projected regional activities other than Centennial development. Regional transportation plans that were prepared well in advance of the Centennial plan have called for these significant improvements to the SR-138 corridor. Consequently, significant portions of the approved Northwest 138 Improvement Project will be implemented irrespective of Centennial. If approved, Centennial will pay for SR-138 roadway improvements that are required to meet the incremental demand generated by the development.

Northwest 138 Improvement Project Background

A Final Environmental Impact Report (FEIR) and a Notice of Determination approving the Northwest 138 Improvement Project were completed by the California Department of Transportation (Caltrans) in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro) in June 2017 ("SR-138 FEIR"). As stated on page i of the SR-138 FEIR, the approved 138 Improvement Project would widen and improve approximately 36.8 miles of State Route 138 between the Interstate 5 interchange and the State Route 14 (SR-14) interchange.

The purpose and need for the Northwest 138 Improvement Project are discussed in detail on pages 4-9 of the Centennial Project Final EIR. As summarized below, the purpose and need for the Northwest 138 Improvement Project are based on many factors that are independent from Centennial development, including the following.

- *Goods movement and safety.* "SR-138 provides one of the primary routes for west-east traffic in NW Los Angeles County, and is an important strategic route during emergency closures of I-5 or SR-14 in this area. In the coming decades, NW Los Angeles County is anticipated to experience large-scale growth and increased economic activity, which is projected to generate traffic demands beyond the capacity of the existing facility. To address these needs, the NW SR-138 Corridor Improvement Project has been proposed. The need for the proposed project is derived from foreseeable increases in travel and goods movement and higher than average state-wide fatal accident rates (actual rate of 0.046/Million Vehicle Mile (MVM) versus 0.023/MVM for the statewide average)." (SR-138 FEIR page 4.)
- *Non-Standard Roadway Features.* "The existing roadway is a two-lane conventional highway with non- standard paved shoulders widths, non-standard stopping sight distance around horizontal and vertical curves and near the I-5 connectors, and four structures within the project limits do not meet the minimum vertical clearance standard and many Southern California Edison (SCE) poles adjacent to the existing highway are located within the Clear Recovery Zone (CRZ). There are a number of bridges and culvert crossings along the existing highway. Many of those structures were constructed prior to 1970. These facilities should be upgraded to current seismic design criteria and standard horizontal and vertical clearances. The area around the roadway has a drainage area in excess of 500 square miles. The western end of the project has several larger drainage crossings that convey the runoff from the southern mountain slopes northerly and westerly to the dry lake east of SR-14

and north of SR-138. The floodplain in this area is over 2 miles wide and flows to the north of SR- 138 west of the SR-14. This large drainage area would require upgrades to existing drainage facilities to meet the current roadway standards for the facility type. The horizontal and vertical curve on the western end of the project can be corrected to improve sight distance needed for safe stopping distance based on the posted speed limits. The intersection channelization would also help to allow vehicles turning off and onto the roadway to have a refuge area while waiting to cross oncoming traffic. Removal or reducing these types of conflicting movements would be important in all the build alternatives. Adding standard shoulders to the facility by widening the paved roadway would provide additional width for errant vehicles to recover and would also provide areas for stranded motorists to pull out of moving traffic." (SR-138 FEIR pages 6-7.)

- *Consistency with prior regional transit needs assessment.* "The North County Combined Highway Corridors Study (NCCHCS), completed in 2004, identified SR-138 as a bypass corridor. The NCCHCS recommended expansion of this section of SR-138 to a 6-lane freeway or expressway to accommodate anticipated traffic demands." FEIR page 8. "The NCCHCS was initiated to develop a multi-modal transportation plan for the northern portion of Los Angeles County that would address both short-term (2010) and long-term (2025) requirements to accommodate a variety of trip purposes and goods movements within the study area. Metro, in collaboration with the County of Los Angeles and the Cities of Lancaster, Los Angeles, Palmdale, and Santa Clarita, completed the study in 2004. The NCCHCS study evaluated three major North County Corridors (I-5, SR-14 and SR-138) to create an integrated major highway and transit investment strategy along the approximately 250 miles of transportation facilities in Northern Los Angeles County. The NCCHCS recommended improving the portion of SR-138 between the I-5 and SR-14 into a six-lane freeway/expressway. This recommendation was based trends at the time the study was conducted. The region was experiencing high growth rates and the improvement to SR-138 was a response to accommodate the projected population growth and expected substantial increases in goods movement truck traffic…. The NCCHCS identified the importance of this route for northern Los Angeles County. The route is one of just a few west to east corridors connecting I-5 on the west to SR-14 on the east. This connection links the Central Valley and the Antelope Valley and beyond. When I-5 or SR-14 experience congestion and delays, this alternate route provides a means for regional traffic to bypass the affected congested areas. This is a critical backup route for emergency access when other critical routes are blocked or closed." (SR-138 FEIR page 9.)

A portion of the Northwest 138 Improvement Project purpose and need is related to future growth, and the approval and development of Centennial would contribute to such growth. A large majority of the future population, household (home) and employment growth used to project future SR-138 traffic demand, however, will be generated by activities and in locations other than Centennial. The Northwest 138 Improvement Project EIR traffic analysis is based on a Traffic Analysis Report (TAR) prepared by Fehr and Peers in 2015. Table 2 of the TAR summarizes the growth assumptions used in the analysis, which includes

growth in Lancaster, Palmdale, Santa Clarita, and portions of Los Angeles County in Northwest 138 Improvement Project study area, such as the central and eastern economic opportunity areas designated by the County's approved Antelope Valley Area Plan. As shown in the following table, nearly 80 percent of the projected population and housing growth, and more than 70 percent of the employment growth in the TAR is projected to occur in locations other than Centennial.

	Net Growth in SR-138 Study Area Assumed in TAR by 2035	**Centennial at Buildout**	**Percent growth in TAR excluding Centennial**
Population	268,293	57,150	79%
Households	90,627	19,133	79%
Employment	84,909	23,675	72%

Due to existing safety, nonstandard roadway and drainage facilities, and projected growth with or without Centennial, the SR-138 FEIR concluded that *not* implementing the Northwest 138 Improvement Project would result in adverse impacts to traffic and the environment even if future SR-138 roadway volumes were lower:

> The No-Build Alternative would not accommodate the projected population growth or expected substantial increase in goods movement truck traffic in Northern Los Angeles County and the existing corridor would not be improved. As discussed in the Project Study Report/ Project Development Study (PSR/PDS), the existing SR-138 corridor is projected to degrade and operate consistently at a Level of Service (LOS) E and F for 2040 conditions (Caltrans, 2008). The No-Build Alternative could result in indirect impacts on air quality, mobility, safety, and the economy within Northern Los Angeles County. There would be increased maintenance costs to maintain the route without any other improvements.
>
> (SR-138 FEIR, Appendix B, page 8.)

Several comments on the SR-138 FEIR addressed the Centennial development. In each case, the FEIR responses emphasized that improvements to SR-138 are required and would be implemented irrespective of Centennial. SR-138 FEIR Comment G-9.3, for example, asserted that improvements along the west end of SR-138 were "obviously a concession" to Centennial, and that it would be "not advisable to use public funds to build a six-lane highway for a project than may not, and should not, be built out." In response to Comment G-9.3, the SR-138 FEIR stated that:

> The Centennial project is located in the Western Economic Opportunity Area as defined in the adopted Antelope Valley Area Plan. The SCAG model includes the approved land use of Los Angeles County and was utilized in developing travel demand forecasts for the project. Safety and operational improvements consistent with the elements identified in the TSM [Transportation System

> Management] Alternative, which has been rejected for further consideration, could be elements included in the early implementation phase of a Build alternative. The types of improvements that will make up the interim safety improvements include intersection improvements, including turning lanes and acceleration/ deceleration lanes; alignment corrections to the vertical and horizontal alignments to provide improved geometry, including the curve correction at County Road N, the Old Ridge route; and shoulder widening in areas to provide additional width for errant vehicles. The interim safety improvements address the short term needs in the corridor, but fail to meet the purpose and need in the long term for the corridor. TSM elements will be the priority for the near term improvements in the corridor. They are consistent with the implementation and improvements needed in the corridor now and will be incorporated as a priority into the selected alternative implementation plan.
>
> (SR-138 FEIR Appendix J, page 129.)

Similarly, SR-138 FEIR Comment L-13.4 questioned whether the potential construction of the western portion of SR-138 and the development of Centennial would adversely affect the rural character of existing communities. In its response to Comment L-13.4, the SR-138 FEIR stated that:

> The need for the project is based on an assessment of the existing and future transportation demand in the project area compared to the existing capacity of the facility. The improvements included in the alternatives were developed based on the approved land use plan by Los Angeles County and as defined in the Southern California Association of Governments (SCAG) forecast traffic volumes for the 2040 horizon year. The improvements will not be needed until the traffic increases and the traffic increases are based on how quickly the land use buildout occurs. As new locations are considered for development, Los Angeles County as the approving agency will need to determine future improvements that are required to meet the access locations agreed to with this project and provide for local circulation for property access as a condition of approval. It is anticipated that the early improvements in the corridor will focus on safety and operations and will not include capacity improvements. As the traffic increases in the corridor, the capacity improvements will be implemented, as funding is available.
>
> (SR-138 FEIR Appendix J, page 84.)

Conclusion

The SR-138 FEIR makes clear that the approved Northwest 138 Improvement Project addresses significant existing and reasonably anticipated future needs irrespective of Centennial. The official Northwest 138 Improvement Project website states that "[t]he project will be built in phases as need or as demand require. Short-term and mid-term improvements will focus on a proactive approach to correct existing and potential safety

conditions. The early phases of the project will include operational and safety improvements, including intersection improvements, shoulder widening, and curve corrections."[3344]

As shown above, at buildout the substantial majority of regional employment, household and population growth considered in the analysis of the need for SR-138 improvements would be generated by regional activities and safety, modernization and other factors that would occur with or without Centennial. Centennial will provide funding for State Route 138 roadway improvements that are required to meet the incremental demand generated by the development. Consequently, comments suggesting that the Northwest 138 Improvement Project would not be implemented without Centennial, or that roadway improvements for Centennial will require a net outlay of public funds, are not accurate.

Response to Comment ADD-F.10-6:

The Commenter's opinion regarding separate solar projects is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does address the Centennial Project or the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.10-7:

The Commenter's opinion regarding separate projects is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the Centennial Project or the adequacy of the EIR, and no further response is required. The County notes that the EIR thoroughly and appropriately analyzes cumulative Project-related impacts consistent with CEQA requirements. See Draft EIR, Section 7.0, Cumulative Impacts.

Response to Comment ADD-F.10-8:

The Commenter's opinion regarding separate, renewable energy projects is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the Centennial Project or the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.10-9:

The Commenter's concern regarding lack of AVAQMD comments on the Draft EIR is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, AVAQMD does have an important role in the CEQA process for this Project. As described in Draft EIR Section 4.8, Intended Use of the EIR, the County is lead agency for the Project and AVAQMD is a responsible agency. (Draft EIR, pages 4-102 and -110.) Approximately 85 percent of the Project site lies within the Mojave Desert Air Basin, over which AVAQMD has jurisdiction for air quality. Developers and businesses who plan to

[3344] Metro. 2018 (July 17, accessed). Northwest 138 Corridor. Los Angeles, CA: Metro. https://www.metro.net/projects/nw138/.

install equipment with the potential to emit air pollutants, including toxic and hazardous air pollutants, must obtain permits from the applicable Air Quality Management District prior to construction or operation. Examples of businesses and equipment that require permits are gas stations, dry cleaners, emergency generators, boilers for heating and hot water in large buildings, restaurant cooking equipment, and manufacturing facilities. Accordingly, AVAQMD was provided with an opportunity to review the EIR and is expected to use the information in the EIR for consideration of approvals related to and involved in the implementation of the Project. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.10-10:

This comment's expressed disagreement with certain comments on the Draft EIR that were submitted by SCAQMD is noted. The referenced SCAQMD comments, however, merely reiterate the independent conclusions of the EIR regarding the Project's potential impacts related to VOC and NOx emissions, as set forth in Draft EIR Section 5.11, Air Resources. As this comment correctly notes, the Project's requested land use approvals include Conditional Use Permits (CUPs) for grading and for the approval of Project-related infrastructure, as explained on Draft EIR page 1-4. Violations of the terms and conditions of a CUP are fully enforceable by the County and are subject to abatement as a public nuisance in accordance with Los Angeles County Municipal Code Chapter 1.23. This comment's general concerns about the Project and its potential impacts on Antelope Valley residents is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment ADD-F.10-11:

Consistent with this comment, Draft EIR page 5.11-23 explains that, with respect to PM10, the Antelope Valley portion of the Mojave Desert Air Basin has been designated as "nonattainment" by CARB (for purposes of state air quality standards) and as "unclassifiable" by USEPA (for purposes of federal air quality standards). With respect to PM2.5, the Antelope Valley portion of the Mojave Desert Air Basin has been designated as "unclassified" by CARB (for purposes of state air quality standards) and as "unclassifiable" by USEPA (for purposes of federal air quality standards). As explained in the Draft EIR at page 5.11-23, the USEPA designates an area as "unclassifiable" if, based on available information, it cannot be classified as either meeting or not meeting the national primary or secondary ambient air quality standard for that pollutant. For CARB, an "unclassified" designation indicates that the air quality data for the area are incomplete and do not support a designation of attainment or nonattainment. This comment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment ADD-F.10-12:

As discussed on Draft EIR page 5.11-65, the Project would be required to implement fugitive dust control measures pursuant to the SCAQMD Rule 403 and the AVAQMD Rule 403, both of which require best available control measures to ensure that dust is not visible beyond

the property line, including but not limited to watering exposed surfaces and haul roads three times daily, replacing ground cover in disturbed areas quickly, covering stock piles with tarps, and limiting speeds on unpaved roads to 15 miles per hour. Consistent with SCAQMD Rule 403, MM 3-1 requires that, prior to beginning any on-site construction activity, a Dust-Control Supervisor be retained who will be on site within 30 minutes of the start of work taking place each morning; will have the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with Rule 403; and will have completed the SCAQMD Fugitive Dust Control class and must have been issued a valid Certificate of Completion for the class. This measure will be a requirement of the Project's Mitigation Monitoring and Reporting Program and fully enforceable by the County. Additionally, as required by AVAQMD Rule 403, a Supplementary Dust Control Plan is required to minimize emissions of respirable particulate matter near sensitive receptors. This comment does not raise any specific concerns regarding the adequacy of the EIR and, therefore, no further response is required.

Response to Comment ADD-F.10-13:

The health effects of air pollutants associated with the Project, including *Coccidioides immitis* spores that cause Valley Fever, are analyzed in Draft Section 5.11, Air Resources (pages 5.11-5 through -10 and 5.11-28 through -29), and in Section 5.3, Hazards and Fire Safety (pages 5.3-13 through -19). As disclosed in the Draft EIR (see, e.g., page 5.3-13), many of these adverse health effects are on the rise in Los Angeles County. As this comment correctly notes, dry conditions contribute to Valley Fever exposure as the fungus is often found in arid soils. This comment does not raise a specific concern regarding the adequacy of the EIR and therefore no further response is required.

Response to Comment ADD-F.10-14:

This comment references the adjudication Judgement and Physical Solution that regulates the Antelope Valley groundwater basin and was approved by the California Superior Court in December 2015, as discussed in the Draft EIR at pages 5.18-14 through 5.18-15. The adjudication establishes a regional watermaster to regulate groundwater use consistent with applicable law under the auspices of the court. This comment's general reference to water quality and quantity issues that are purportedly "pending due to the adjudication lawsuit judgement" is not explained by the commenter and is thus unclear. However, the commenter speculates that the adjudication will result in the fallowing of 20,000 acres of farmland and further speculates that such fallowing will exacerbate fugitive dust and air quality issues. The Project, however, would not cause the fallowing of any farmland, and CEQA does not require the EIR to engage in speculation regarding the adjudication's potential indirect environmental effects on air resources. The EIR acknowledges that the control of fugitive dust is key to preventing exposure to Valley Fever spores and other pollutants that cause adverse health effects.[3345] Fugitive dust control measures would be required and implemented by the Project as required by AVAQMD Rule 403 and SCAQMD Rule 403. Both of these rules require that dust be controlled so as not to be visible beyond

[3345] See, e.g., Final EIR at 5.11-65.

the property line and enforced by the AVAQMD and SCAQMD. The rules also include comprehensive sets of best available control measures that reduce fugitive dust generation and are required for all projects within the AVAQMD and SCAQMD jurisdictions. This comment does not raise a specific concern regarding the adequacy of the EIR and therefore no further response is required.

Response to Comment ADD.F.10-15:

The Commenter's opinion with regard to the health and safety impacts of the Project on residents and wildlife is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the County disagrees, and notes that after thorough and appropriate analysis, the EIR appropriately concludes that potential adverse impacts to wildlife will be reduced to a less than significant level with feasible mitigation incorporated (Draft EIR, Section 5.7, Biological Resources, pages 5.7-142 to -155). Further, the Project has been designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.

SAVE OUR RURAL TOWN

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

July 9, 2018

Subject: Traffic Impacts of the proposed Centennial Project.

Reference: Project No. 02-232, Specific Plan No. 02-232, Zone Change Case No. 02-232, General Plan Amendment No. 02-232, Conditional Use Permit No. 02-232, Development Agreement No. RPPL2016003940, Vesting Tentative Parcel Map No. 060022, Environmental Assessment No. 02-232

Dear Mr. Sackett;

Save Our Rural Town ("SORT") respectfully submits the following comments regarding traffic impacts generated by the referenced Centennial Project; these comments were derived from the project Staff Report, adopted planning documents, and the technical studies obtained from the Centennial Project Environmental Impact Report ("EIR") prepared pursuant to the California Environmental Quality Act ("CEQA").

ADD-F.11-1

The "Staff Analysis" report dated May 24, 2018 initially states that traffic impacts of the Centennial Project will be less than significant [page 14 of 34]. Subsequently, it admits that Centennial Project traffic impacts *will be* significant if the California Department of Transportation ("CalTrans") does not complete certain highway improvements (namely, the "Northwest Corridor" Project along SR-138). Then, the report vaguely dismisses these significant traffic concerns by simply declaring that, as "Lead Agency", the County cannot "mandate" the necessary mitigation because it has no "jurisdiction" over the 138 Corridor. According to this circular argument, it is CalTrans' responsibility to mitigate the traffic impacts of County-approved land use projects, and because the County has no jurisdiction over CalTrans, the County is apparently free to approve land-use projects *with impunity* and *regardless of the traffic impacts that such projects create*. This argument turns CEQA on its head because it absolves the County of its statutory obligation as Lead Agency to mitigate significant impacts to the greatest extent feasible by simply throwing the mitigation responsibilities onto the shoulders of some other agency. ***That is not how CEQA works;*** it is the County that is the Lead Agency and it is the County that is approving the Centennial project, so it is the County (and only the County) that bears the burden of conditioning the project to reduce significant impacts to the greatest extent feasible.

ADD-F.11-2

CEQA requires the Lead Agency to condition a project in a manner that reduces significant impacts and still achieves most of the project objectives [CEQA Statute § 21002]; the only way that the County can reject project conditions or mitigation measures that achieve the project objectives and reduce significant impacts is if there are social, economic, or other factors that render such measures infeasible. CEQA does not permit the Lead Agency to ignore feasible conditions or mitigation measures *especially if all the project objectives are achieved even with the imposition of such conditions or mitigation measures.* In the case of the Centennial Project, the Project Objectives enumerated in the FEIR are set forth on page 4-4 as:

1. Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA.

2. Design the Project to maximize efficient utilization of regional infrastructure while preserving hundreds of thousands of acres of contiguous natural open space and important biological resources.

3. Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips.

4. Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers.

5. Integrate a multi-modal transportation network, renewable energy, water conservation, community wellness, and other green development features into the Project's design, build out, and ongoing operations.

ADD-F.11-3

SORT notes that the first objective encompasses the AVAP (which is the fundamental guidance document for Antelope Valley development through 2035). Because the Centennial Project Objectives intrinsically embrace the long-term perspective of the AVAP, the Centennial Project itself must be implemented in a manner that is consistent with the AVAP's long-term perspective. So, if the record reveals that there are feasible conditions or mitigation measures *that can be imposed by the County* and which eliminate all significant traffic impacts while contemporaneously achieving all the Centennial Project Objectives, then ***the County is obligated by CEQA to adopt such conditions or mitigation measures***. With this foundation established, the next step is to review the project record and identify element(s) that support feasible conditions/mitigation measures which lie within the County's jurisdiction and will reduce traffic impacts to "less than significant". Toward this end, SORT notes the following record elements:

- The Centennial Project will be phased in over a 20-year time frame [EIR 4-92].

- The Centennial Project Applicant has identified 10 project "phases" [EIR 4-91].

ADD-F.11-4

- The EIR acknowledges that the "phases" can be implemented with services and infrastructure (schools, roadways, parks, utilities, etc.) that are sufficient to serve the increased number of residents and occupants that each "phase" is designed to accommodate. [EIR 4-92].

- It is CalTrans' objective to operate its road facilities at a "Level of Service" ("LOS") of "C" or better, and therefore determines facility "need" when the LOS degrades to "D" [CalTrans Northwest 138 Corridor Improvement Project Transportation Analysis Report – Page 19].

- CalTrans projects that the LOS along the 138 Corridor east of the Centennial Project will degrade to "D" by 2020 [CalTrans Northwest 138 Corridor Improvement Project Transportation Analysis Report Appendix I].

- The Supplemental Traffic Study prepared for the Centennial Project (dated November, 2017 and included in Appendix 5.10C of the FEIR) reports that no significant traffic impacts on the existing 138 Corridor are created by the Centennial Project at a 10% completion rate [Section 3-2].

- The Supplemental Traffic Study reports that construction of more than 10% of the Centennial Project will create significant adverse traffic impacts on existing 138 Corridor facilities, but these impacts will be reduced to "less than significant" with implementation of the "Northwest Corridor Project"(specifically, Alternative 2) that CalTrans is processing [Section 3-3 of Appendix 5.10C of the FEIR].

- The Supplemental Traffic Study reports that 100% construction of the Centennial Project (i.e. "full build out") will create significant adverse traffic impacts even after CalTrans completes the "Northwest Corridor Project" but these impacts can be reduced to less than significant with additional roadway modifications [Section 3-4 of Appendix 5.10C of the FEIR].

ADD-F.11-4 cont.

Taken together, these material facts provide a solid and indisputable basis for conditioning the Centennial Project in a manner which guarantees that project traffic impacts will be reduced to "less than significant" for the project duration. Specifically, adding the following 3 conditions of approval for the Centennial Project Community Specific Plan, Development Agreement, CUP, Zone Change, General Plan Amendment, and Vesting Tentative Map will achieve this CEQA mandate:

1. Development of residential and non-residential facilities necessary to accommodate up to 10% of Centennial Project "Buildout" is authorized prior to CalTrans' completion of the Northwest 138 Corridor Project. The 10% "buildout" authorized by this condition must be consistent with the facilities contemplated in the traffic analysis results reported in Section 3.2 of the Supplemental Traffic Study provided in Appendix 5.10C of the Final EIR.

ADD-F.11-5

2. Development of residential and non-residential facilities necessary to accommodate between 10% and 75% of Centennial Project "Buildout" is permitted ***after*** CalTrans' completion of the Northwest 138 Corridor Project. The 75% "buildout" authorized by this condition must be consistent with the facilities contemplated in the traffic analysis results reported in Section 3.3 of the Supplemental Traffic Study provided in Appendix 5.10C of the Final EIR.

3. Development of residential and non-residential facilities necessary to accommodate between 75% and 100% of Centennial Project "Buildout" is permitted ***after*** the Centennial Project Applicant has completed all of improvements required to accommodate full "buildout" beyond those which CalTrans intends to construct for the Northwest 138 Corridor Project. These additional improvements must be consistent with the facilities identified in the traffic analysis results reported in Section 2.3 of the Supplemental Traffic Study provided in Appendix 5.10C of the Final EIR.

ADD-F.11-5 cont.

These conditions are feasible because the Centennial Project EIR firmly establishes that the phased development approach that is intrinsic to these conditions is already "baked" into the project [EIR Section 4-6]. Thus, these conditions do not impose any burden or hardship on the Centennial Project applicant. These conditions will allow the County to achieve all the stated project objectives while continually reducing traffic impact impacts to a level that is "less than significant" throughout the duration of the Centennial Project. These feasible and effective conditions are based on solid technical evidence that remains undisputed in the record; therefore, and pursuant to CEQA, the County is obligated to include them as conditions of approval for the Centennial Project.

ADD-F.11-6

SORT further observes that the two traffic studies provided in the EIR (Appendices 5-10A and 5-10C) presume that Margalo Drive, Three Points Road, 230th West, 170th West, 90th West and 30th West will be configured for access to SR138. These assumptions are not supported by CalTrans' Northwest Corridor Program because CalTrans has not yet determined the final access locations for the Northwest Corridor Project [FEIR Appendix 5.10-A at 4.61]. More importantly, these presumptions are utterly contrary to the adopted AVAP. Specifically, the AVAP establishes that development of the Northwest Corridor Project will significantly impact land use patterns in the Antelope Valley [LU-13] and, if not properly planned, will conflict with the rural preservation priorities established by the AVAP [Ibid]. Correspondingly, the AVAP carefully sets forth the key intersections along the Northwest Corridor Project where access to the 138 can be provided without adversely affecting established rural communities. The Northwest Corridor intersections that are identified by the AVAP outside the Centennial Project Boundary are 60th W, 110thW, 190thW, and 245thW [see Appendix B of the Traffic Study prepared for the AVAP and included in EIR Appendix K].

ADD-F.11-7

It is vital to the preservation of established rural areas (including Antelope Acres, Three Points, Green Valley, Leona Valley, and the Lakes and Valleys Communities) that direct access to SR-138 via the Northwest Corridor Project be limited to the specific intersection points identified in the AVAP. It is also essential that these facts be clearly set forth in the Centennial Project record; therefore, SORT respectfully requests that the County include a

ADD-F.11-8

finding in the Centennial Project Approval which states that Northwest Corridor access at Margalo Drive, Three Points Road, 230th West, 170th West, 90th West and 30th West are contrary to the adopted AV Area Plan and are therefore neither approved nor sanctioned pursuant to any entitlement granted to the Centennial Project.

ADD-F.11-8 cont.

If you have any questions or would like to discuss these issues, please do not hesitate to contact me at airspecial@aol.com,

Sincerely,

/S/Jacqueline Ayer
Jacqueline Ayer
Director, Save Our Rural Town

Response to Comment Letter ADD-F.11
Save Our Rural Town
July 9, 2018

Response to Comment ADD-F.11-1:

Thank you for your participation in this public process. These comments will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This introductory comment does not specifically address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.11-2:

The Commenter's concern regarding EIR analysis and staff report discussion of traffic-related impacts is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the EIR analysis is consistent with CEQA requirements, and the Commenter misstates CEQA requirements and the County's responsibility.

As explained in Draft EIR, Section 5.10, Traffic, Access, and Circulation, under Thresholds 10-1 and 10-2, in accordance with the MMRP at MMs 10-3 and 10-4, the Project must provide the required funding for the implementation of all identified roadway and highway improvements necessary to reduce Project-related impacts to a less than significant level, either through an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. (Final EIR, Appendix 2.0-C.Rev) If built, improvements identified in the MMRP would fully mitigate all potential Project-related significant impacts to SR-138 and other state highways. In each case, the MMRP specifically requires that Project funding be provided either in accordance with the agreement with Caltrans and in accordance with timing set forth in that agreement, or prior to final map recordation. Consequently, all of the Draft EIR mitigation measures calling for highway facility improvements required to address potential Project-related significant impacts are fully enforceable and must be completed before each phase of development may occur.

However, Caltrans is legally responsible for implementing planned improvements of State facilities, and the Project Applicant and the County do not have the authority to require that Caltrans do so. For this reason, the EIR concludes that if improvements are not implemented, the Project would contribute to significant and unavoidable impacts. (Draft EIR, Section 5.10, pages 5.10-1, -2, -130.) The County as lead agency can commit to and enforce feasible mitigation measures that are within its responsibility and jurisdiction. However, because the County does not have the authority to require Caltrans to implement planned improvements of State facilities, the County in its CEQA findings may properly find that those measures are within the responsibility and jurisdiction of another agency, and that such measures can and should be adopted by such other agency. See CEQA Guidelines § 15091(a)(2); CEQA §21081(a)(2). The May 24, 2018 Staff Report, included in materials for both the June 6, 2018 and July 11, 2018 Regional Planning Commission hearings, accurately reflects this discussion

at page 14. The draft CEQA Findings, included in the staff report for the July 11, 2018 Regional Planning Commission hearing, also accurately reflect EIR analysis and conclusions that under Thresholds 10-1 and 10-2, impacts would be significant and unavoidable if Caltrans does not implement improvements. See Staff Report Attachment G, Draft CEQA Findings Regarding the Centennial Specific Plan Project and EIR.[3346]

Response to Comment ADD-F.11-3:

The Commenter provides a summary of CEQA § 21002, which specifies in relevant part that "…public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects…". Further, "…in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." The Commenter correctly identifies the Project objectives. The implication of this comment is that the EIR improperly rejects "project conditions or mitigation measures," but this comment does not specify any such condition or mitigation measure. To the extent that this comment is intended as an introduction to Comments ADD-F.11-4 through ADD-F.11-8, please refer to responses to Comments ADD-F.11-4 through ADD-F.11-8. Since this comment does not specifically address the adequacy of the EIR, no further response is required.

Response to Comment ADD-F.11-4:

The Commenter accurately summarizes content of Centennial Project and Northwest 138 Improvement Project documents. With regard to the identification and incorporation of feasible mitigation measures, Public Resources Code § 21100(b)(3) requires the EIR set forth feasible mitigation measures to minimize significant environmental effects of the Project. The EIR has done this for traffic-related impacts, including with regard to SR 138 capacity. See responses to Comments ADD-F.11-2 and ADD-F.11-5 for further details. This comment does not specifically address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.11-5:

The conditions suggested by the Commenter are not necessary, because mitigation requirements in the Project's Draft EIR, Mitigation Monitoring and Reporting Program ("MMRP"), and Specific Plan implementation requirements together ensure equivalent safeguards against the possibility of Project development occurring without mitigation of potential impacts through implementation of appropriate improvements. Because the EIR/EIS for SR-138 has been approved, and these improvements are included in the Regional Transportation Plan/Sustainable Communities Strategy, it is reasonably foreseeable that these improvements will be timely constructed to serve the region's transportation needs, which exist independent of the project as discussed in response to Comment ADD-F.10-5. SR-138 improvements that are specific to the Centennial Project, such as the access points to the Project site, are required to be constructed by the Developer/Applicant. The project is also required to monitor and report on traffic conditions. Mitigation Measure 10-2

[3346] Available at: http://planning.lacounty.gov/case/view/specific_plan_no_02_232_centennial_specific_plan.

specifically requires that the Applicant "submit a traffic study that addresses site access and local circulation in accordance with the County of Los Angeles Department of Public Works Traffic Impact Analysis Report Guidelines. The Project Applicant/Developer shall retain a Traffic Engineer or Civil Engineer licensed in the State of California to perform the traffic study to the satisfaction of the County." (Final EIR, Appendix 2.0-C.Rev, page C-87.) This requirement applies, per the MMRP, "Prior to approval of Tentative Maps." (*Ibid.*) This monitoring and review process also allows for updated traffic counts, which are expected to continue to evolve based on a wide variety of evolving transportation technologies and services (e.g., app-based ride sharing) and workplace patterns (e.g., home-work and WeWork remote work options that reduce peak hour as well as overall commuter trips). In the unlikely scenario that the SR-138 improvements are delayed and unavailable to serve new project demand, approval of the next discretionary approval for the project (e.g., the tentative tract map) could be delayed until such time as adequate traffic capacity on SR-138 exists. Or, the County may condition the map approval on the construction of the needed improvements or deny the tentative tract map. Further, MM 10-21 specifically requires funding of improvements to accommodate up to 10 percent of Project buildout and anticipated cumulative development, MM 10-22 requires funding improvements to accommodate up to 75 percent of Project buildout and anticipated cumulative development, and MM 10-23 requires funding improvements to accommodate up to 100 percent of Project buildout and anticipated cumulative development.

While the County cannot require Caltrans to implement improvements (as explained in response to Comment ADD-F.11-2), the Specific Plan and subdivision mapping processes further ensure that Project development would not occur without all necessary infrastructure and improvements. Tentative Tract Map applications are discretionary actions subject to CEQA compliance requirements per Specific Plan Sections 4.5.3 and Specific Plan Appendix 3-B, and per CEQA § 21080(a)–this means development of each portion of the Project contemplated in each subdivision map will require further environmental review and approval from the County to ensure appropriate roadway and freeway infrastructure improvements are implemented prior to development and to ensure impacts are reduced to a less than significant level to the greatest extent feasible.

Response to Comment ADD-F.11-6:

The conditions suggested by the Commenter are not necessary and not required under CEQA, because mitigation requirements in the Project's Draft EIR, Mitigation Monitoring and Reporting Program, and Specific Plan implementation requirements, together ensure equivalent safeguards against the possibility of Project development occurring without mitigation of potential impacts through implementation of appropriate improvements. See responses to Comments ADD-F.11-2 and ADD-F.11-5 for further details.

Response to Comment ADD-F.11-7:

Contrary to this comment's assertion, the Centennial Traffic Study dated May 2017 (Draft EIR Appendix 5.10A) assumes access points along SR-138 consistent with the AVAP. The May 2017 traffic study was prepared using the same version of the traffic model as was used by

the County for preparation of the AVAP traffic study. The traffic study specifically assumes the following roadways would have access to SR-138: 60th Street West, 110th Street West, 190th Street West, and 245th Street West. The Centennial Supplemental Traffic Study dated November 2017 (Final EIR Appendix 5.10-C) was prepared after Caltrans selected a preferred alternative for the Northwest 138 Corridor Project. The November 2017 traffic study is consistent with the SR-138 access points as defined in Caltrans' preferred alternative.

The AVAP identifies three Economic Opportunity Areas (EOAs), which are defined as areas where major infrastructure projects are being planned by state and regional agencies, which would bring tremendous opportunities for growth and economic development in the vicinity of these projects (AVAP at p. LU-8). The Centennial Project is located entirely within the area specified in the AVAP as the West EOA. As stated in the AVAP, to minimize potential Antelope Valley land use conflicts with the Northwest 138 Corridor Project, a comprehensive study of each of the AVAP's three Economic Opportunity Areas (EOAs) should be undertaken through a community planning process that balances the need for economic development and local employment with rural preservation and environmental priorities. (AVAP at p. LU-13). The Centennial Specific Plan and Centennial EIR are mechanisms pursuant to which the County is implementing the comprehensive community planning processes anticipated by the AVAP. As explained in Final EIR, response to Comment F.8-20, the Centennial Project is consistent with the AVAP and its land use plan.

Response to Comment ADD-F.11-8:

The County is aware that the Caltrans preferred alternative for the Northwest 138 Corridor Project includes recommendations for roadway access to SR-138 that differs from the AVAP. As noted in response to Comment ADD-F.11-7 above, the Centennial EIR includes analysis consistent with the AVAP assumptions as well as the access points specified in the Caltrans preferred alternative. State Route 138 is under the jurisdiction of Caltrans, not the County, and the County does not have the legal authority to determine or limit access points along SR-138 in the vicinity of the Project site, as this comment recommends.

Moreover, the AVAP does not require that SR-138 access points be sited at any particular location, as this comment mistakenly suggests. Rather, the AVAP expressly provides, "[a]s more details are finalized with … the Northwest 138 Corridor Improvement projects (i.e., route alignments, location of on-ramps, number of lanes, etc.), further planning activities may be necessary for each EOA to ensure that the Area Plan's Goals and Policies, as well as Land Use Policy and zoning are consistent with the final design of the … project[]" (AVAP at p. IMP-3). Caltrans did not select its preferred alternative alignment for the Northwest Corridor 138 Project until after the AVAP was adopted and the Draft EIR was circulated for public review. As contemplated by the AVAP language quoted above, as part of the Centennial Specific Plan EIR, the County prepared the November 2017 Supplemental Traffic Study (STS) to analyze the Project's potential traffic impacts consistent with the SR-138 access points ultimately selected by Caltrans to be its preferred alternative (see Draft EIR Appendix 5.19-C).

The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the AVAP approved by the County in June 2015. The STS determined that the implementation of Caltrans' preferred SR-138 alignment, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

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From: Nick Jensen <njensen@cnps.org>
Sent: Tuesday, July 10, 2018 11:44 AM
To: Rosie Ruiz; Jodie Sackett
Subject: Tejon Ranch Blacklist Article

Dear Ms. Ruiz and Mr. Sackett,

Thank you very much for your careful attention to the Centennial Specific Plan. The California Native Plant Society opposes Centennial for reasons that we have detailed in published articles and our comments submitted in response to the DEIR and FEIR. ADD-F.12-1

Recently, the Mountain Enterprise published a story that explores a new tactic being employed Tejon Ranch Company to ban individuals and organizations from accessing the ranch.

http://secure-web.cisco.com/1IzCS6I2pzMYAIPlYxHqOkG4IpsTTGyhkfJVIV9HX2o8Bod6F7b0UhubZEUxCU8jojcqf2ctbJXAVX2SRGRX-dC0Ed-65fGV6lSsCRVDba2CgRBv289asXLY6SLne0XXzNsxB7FP-WIHFvDCnhsNzJ7OFczje6qwIEs0JwGlFVfww3GdZKvcQCuTupRAmw3QnxRuhEkuMhLqHunzFQlZOf10XpH4FhKgsKfQXnUe4RhqkVaBbWrykp_cROzz43-pk4112w2uolUsxzyNyjWAM74PdYG4ZWSuH0gxmnUXXib0dLhkcs1ZbL8se_fyqd-nUcGghTlvNZAqWUpthM4mqe8xFhDi5G_NaUyQW9E9rooAsYI-4ZRcMy1I2pYHXwFQhXDB14BAzEGjp-DV7zV3F8Q/http%3A%2F%2Fmountainenterprise.com%2Fstory%2Fthe-blacklist-tejon-ranch-wages-war-on-science-and-public-comment-2%2F

I am attaching a complete pdf version of the article, and the associated editorial and letter to the editor for your review. ADD-F.12-2

I hope that this article helps to elucidate Tejon Ranch Company's misguided attitudes toward science, free speech, and public access to this very special location in Los Angeles County. Please make this article available to the Regional Planning Commission ahead of tomorrow's hearing. ADD-F.12-3

Thank you very much for your time. Feel free to contact me with any questions.

Sincerely,
Nick

--
Nick Jensen, PhD
Southern California Conservation Analyst
California Native Plant Society
1500 North College Ave
Claremont, CA 91711
njensen@cnps.org
(530) 368-7839

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The Mountain Enterprise

July 6, 2018

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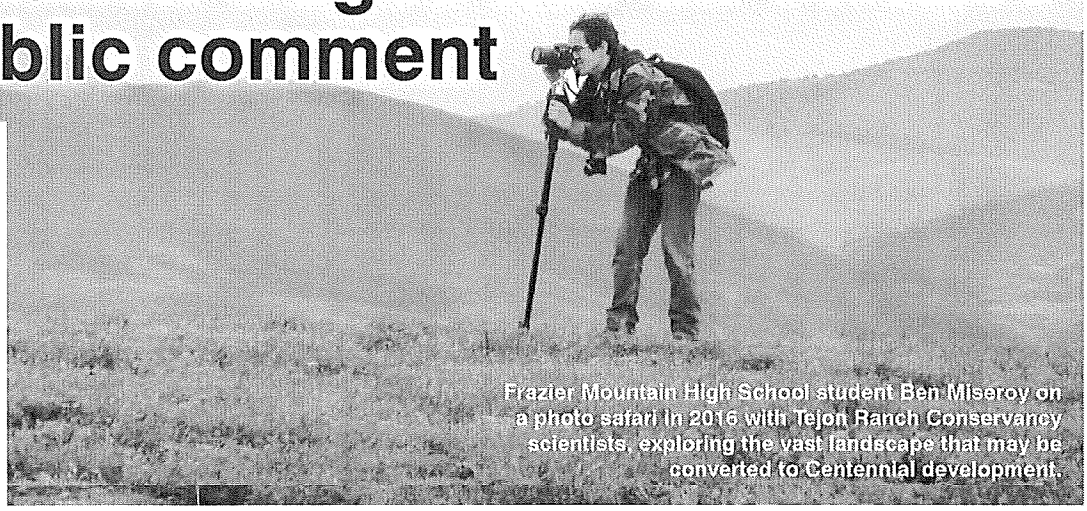
THE BLACKLIST:

Tejon Ranch wages war on science and public comment



Patric Hedlund photo

Frazier Mountain High School student Ben Miseroy on a photo safari in 2016 with Tejon Ranch Conservancy scientists, exploring the vast landscape that may be converted to Centennial development.

By Patric Hedlund, *TME*

The phone rang the day after Kathleen Weinstein of the Pine Mountain community returned from a magical trip to Spain and France with her husband, Mel. They had reserved tickets for an event on July 1 at the Tejon Ranch Conservancy. It involved a challenging hike—a good opportunity to work off some of those delicious Parisian pastries.

The call was from an acquaintance who works for the Conservancy. As a couple, the Weinsteins had been discussing donating money to the nonprofit Tejon Ranch Conservancy.

But what she heard in the phone call last Thursday was a shock. Her friend told her that the Tejon Ranch Company would not allow her on the ranch property because "she said negative things about the ranch."

Weinstein searched her mind to think what the caller could be talking about.

Then it came to her.

She had participated in the comment phase of the California Environmental Quality Act (CEQA) process for the Tejon Ranch Centennial project. CEQA mandates that the public be invited to submit comments, questions and concerns about proposed land developments, so all impacts of a proposed project are examined thoroughly before permits for building are granted.

Public Health Concerns

Weinstein had joined in an analysis of the Centennial Environmental Impact Report (EIR) with the TriCounty Watchdogs, a citizens' group that asked questions about issues such as valley fever risks to residents and construction workers, and about adequate long-term water supplies for Centennial's proposed 19,333 new homes (a possible 50,000 to 70,000 new people), surrounded by industrial parks and commercial developments between Gorman and Neenach.

Asking these questions is what appears to have gotten Kathleen Weinstein, a retired nurse with concerns about public health, banned from the Tejon Ranch Conservancy.

Lucinda McDade, Executive Director of Rancho Santa Ana Botanic Garden (RSABG) was contacted Saturday to ask if she'd heard of a Tejon Ranch blacklist. She replied, "I was indirectly informed that [the Botanic Garden] was on the 'banned' list by my colleague, Travis Columbus."

The Eriogonum Society

"Travis was planning to take a field trip to Tejon Ranch with a group of people who are serious enthusiasts of buckwheats (there are many native California species and a very cool one on the Ranch —genus *Eriogonum*). [He] was informed—not very many days before the trip—that The Eriogonum Society is banned due to its affiliation with California Native Plant Society and [us]."

The Blacklist Gag Order

The Mountain Enterprise has now acquired records that appear to reveal a blacklist, part of a systematic attempt to gag citizens and send a message to scientists to keep them from participating in the CEQA comment process regarding Centennial. The Nixon-style "enemies list" is coming from Tejon Ranch Company management, and is being conveyed through orders given to Tejon Ranch Conservancy scientists.

McDade wrote to the Conservancy: "I'd like to protest Rancho Santa Ana Botanic Garden's inclusion on this list. RSABG is most emphatically not an advocacy group. We have taken no position on the [Centennial] project nor will we take one. We research, document, learn and teach; we do not advocate," the executive director wrote.

Her own words make it very clear that there is an intentional chilling effect in Tejon Ranch's message to the very scientists who are most knowledgeable about Tejon Ranch's natural resources: "Don't speak up. Don't share scientific information with Los Angeles County. Stay silent...or else...."

California Native Plant Society

"This McCarthy-like witch-hunt [tactic] of blacklisting individuals started in June, as far as I know," said Nick Jensen, Ph.D., Conservation Analyst for CNPS. Jensen says he loves Tejon Ranch and has been helping with scientific research projects for the Conservancy for several years.

The Tejon Ranch side of the Western Antelope Valley habitat still supports wild antelope, grazing on rare grasses and that unique Tehachapi buckwheat (*Eriogonum callistum*).

Jensen is also a member of the California Native Plant Society (CNPS). He has volunteered to lead public tours of the Conservancy as a docent. A partial title of his doctoral thesis is "A floristic study of Tejon Ranch...."

The CNPS is a group of professional botanists and

Continued on page 3

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THE BLACKLIST:

Tejon Ranch wages war on science and public comment

Continued from page 1

California native plant enthusiasts. The group joined in to analyze the impact of the Centennial project on the heritage grasslands of the Western Antelope Valley. Their partner in developing that analysis is the Center for Biological Diversity (CBD).

CBD was one of the environmental groups approached over 11 years ago by Tejon Ranch's former management to negotiate the secret 2008 "Big Green" truce. CBD decided it was not wise to keep so much from the public, so it refused to sign the second round of confidentiality agreements and withdrew as a party to the negotiations.

In the years since, the Center for Biological Diversity has filed lawsuits against Tejon Ranch Company, challenging the state's transfer of public assets to private gain with the Kern Water Bank, for instance.

The 2008 accord between the Tejon Ranch Company and the Big Greens—Sierra Club, Audubon California, the Planning and Conservation League, the Natural Resources Defense Council, and the Endangered Habitats League—gave birth to the Tejon Ranch Conservancy. It was applauded by former Governor Schwarzenegger and former Tejon Ranch CEO Bob Stine as a breakthrough win-win partnership between developers and environmentalists.

A full 240,000 acres of Tejon Ranch land was to be under Conservancy management for study and preservation. The public was told the Conservancy would be an independent, science-driven research and preservation group.

That was the public relations spin that brought Tejon Ranch's stockholders into position to receive a passthrough of $15.8 million in public taxpayer funds from California's Wildlife Conservation Board in 2010. The WCB distributes state funds for wildlife habitat acquisition. It gave the money to the Conservancy, which passed it to Tejon Ranch Company, to preserve 62,000 acres for wildlife corridors between habitat islands managed by the Conservancy.

Science is the foundation of all our efforts.... Only through research, monitoring, and adapting our conservation management based on new findings will we fully understand Tejon Ranch's natural resources and how best to protect, enhance, and restore them.

—Tejon Ranch Conservancy website

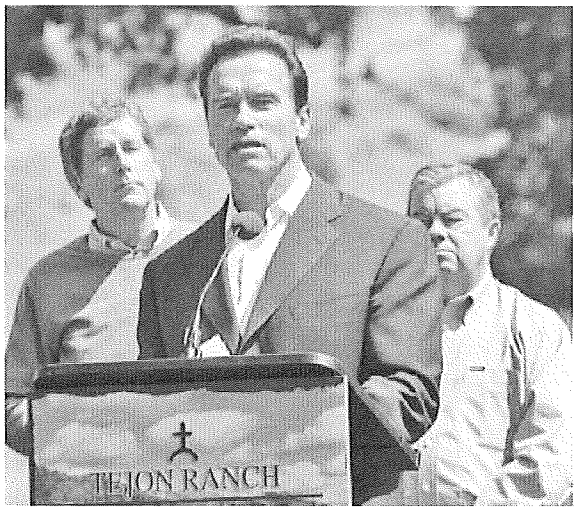
In addition to money, the developers got the promise that their Big Green partners would stand mute through the CEQA call for comments for Tejon Mountain Village, the Grapevine development and Centennial.

Those groups are carefully complying with their end of the deal. But under Tejon Ranch's current CEO, Greg Bielli, the corporation now appears to have little patience with the fact that other concerned citizens and scientific groups are not obligated to comply with the same "no comment" pact as the Big Greens.

Public access was linked to the taxpayers' $15.8 million. Yet Conservancy scientists and public access personnel are now ordered to ban people from access if they submit a negative comment on Centennial.

Conservancy President and CEO Bob Reid said he follows Tejon Ranch employees' orders about access to Conservancy lands and events. On June 21, 2018 at 9:22 a.m. Antone "Tony"

Continued on page 6

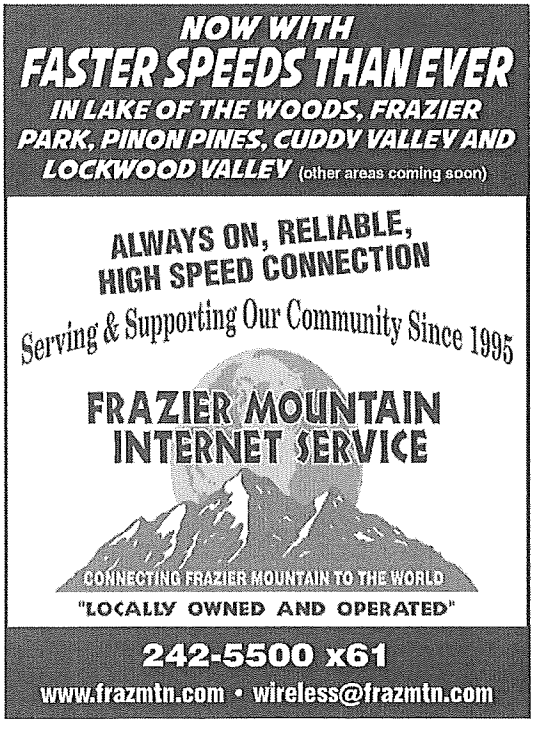


Gary Meyer photo

Former Governor Arnold Schwarzenegger (with Natural Resources Defense Council's Joel Reynolds and Tejon Ranch CEO Robert Stine) spoke at the press conference in 2008 to mark the "Big Green" and Tejon Ranch Company accord. Tejon Ranch Conservancy was introduced as an independent nonprofit. The Governor helped Tejon Ranch obtain the Wildlife Conservation Board payout of $15.8 million in taxpayer funds.







THE BLACKLIST: : Tejon Ranch wages war on science and public comment

Continued from page 3

Mattias—Natural Resources and Stewardship Liaison for Tejon Ranch Company—sent an email to Tim Bulone, on the Conservancy support staff. It was about an access request for visitors coming to the Conservancy for dinner and a tour. The email string tells the tale.

Greetings: You Are Banned

Subject: Lucy Clark / Clyde Golden. The message: "Tim, I would suggest that you look up the current CNPS [*California Native Plant Society*] – Kern Chapter website for Members and Contacts. Both folks are listed."

Mike Campeau, Vice President of Tejon Ranch Operations, was copied in on the note. He is also a member of the Tejon Ranch Conservancy Board of Directors.

At 9:49 a.m. he wrote: "Tim, You will need to inform Lucy Clark and Clyde Golden that due to their association with CNPS they will not be able to attend the dinner or the tour."

At 9:53 a.m. Tim Bulone cc'd this note to Bob Reid.

At 10:20 a.m. Bob Reid wrote: "Dear Lucy and Clyde, Unfortunately the Tejon Ranch Company has denied an access permit (their email below) for your attendance at the upcoming Ranch Round Up and Tour, due to your affiliation with CNPS.

"Our apologies for any inconvenience. Please feel free to call me if you would like to discuss." He signed it, Bob Reid, President and CEO, Tejon Ranch Conservancy.

Access Permits

In an interview this week, Reid explained, "Tejon Ranch Company is the landowner and controls the access permit process. The Conservancy has to get an access permit for anyone who comes on the property. If access is denied by Tejon Ranch Company, it is out of the Conservancy's hands. This is part of the overall ranch-wide agreement, which provides for requests for access permits."

Seeking Comment

We contacted Tony Mattias for a comment about banning people from Conservancy events because of being associated with a CEQA comment on Centennial.

"You need to talk to Barry Zoeller, of Tejon Ranch Public Relations," he said, then hung up. Barry Zoeller's voice-mail said he is on vacation this week. The receptionist said no one is covering the post in his absence.

We left a voice message and sent emails for Mike Campeau, Zoeller, Mattias and Tejon Ranch CEO Greg Bielli. We also called Bielli's office and left a message on his administrative assistant's voicemail—all during the early part of the business day on Tuesday.

Parameters

In the interview, Reid explained that the Tejon Ranch Conservancy board has 12 members—four appointed by Tejon Ranch Company, four appointed by the five original "Big Green" Resource groups and four independent board members, selected by the board at large—"and to my knowledge, the current independent board members do not have any connection to Tejon Ranch," the Conservancy CEO said.

Is Reid uncomfortable with the notion of banning scientists and members of the public based on participation in the Centennial CEQA process?

"I have no comment," Reid replied. "That is between Tejon Ranch Company and the individual they are questioning. We are never involved in the CEQA or permitting. That is at arm's length.... It is part of our arrangement we have in place with the ranch. We have no opinion on the issue."

Does he feel that the scientific credibility of the Conservancy, plus access to research grants, may be compromised if the only scientists that are allowed to come on the land are those willing to report only what Tejon Ranch wants to hear?

Bob Reid seemed comfortable saying again that he can't comment. He repeated, "We have an access process with the landowner. We don't have any authority to question that. I really can't say anything more than that. These are parameters we work within."

Banning Talk of Research

Nick Jensen sees it this way: "TRC is trying to take these punitive actions against anybody who is tangentially associated with anybody who is opposing the development.

"It is private land, but Tejon Ranch did enter into a conservation agreement that has a provision to ensure public access to the land that is conserved. To ban people based on their speaking publicly about the results of their research... well, if it is not illegal, it is against the spirit of the agreement and it is a slap in the face to the public" [which paid the $15.8 million for accesss and wildlife easements].

Don't Share With County

Because the California Native Plant Society shared botanical research information with the Center for Biological Diversity, and co-signed a letter submitted to Los Angeles County during the CEQA Environmental Impact Report comment period, it appears that members of the CNPS and even people who have worked with them as part of other, separate, organizations (such as the Rancho Santa Ana Botanic Garden) are now being "disinvited" from Conservancy events and banned from Tejon Ranch land—even those areas that the taxpayers of California paid $15.8 million to Tejon Ranch Company to establish, Jensen summarized.

Tejon Ranch Company Is Not Local Anymore

Dan Gluesenkamp, Executive Director for the California Native Plant Society, was just sitting down at a restaurant with his wife and children Monday when we reached him.

We asked about the spreading reports of a blacklist created by Tejon Ranch executives.

We also asked about the practice of ordering Conservancy staff, including its CEO, to drop a bomb on Conservancy donors and scientific colleagues by telling them they are being banned from Conservancy activities if they express any contrary opinion about the wisdom of Tejon Ranch's Centennial Project.

As his family ordered lunch, Gluesenkamp didn't have time to mince words.

"Tejon Ranch Corporation is not local anymore," he said. "The California Native Plant Society has had some concerns about Tejon Ranch Company projects and has tried to work with them to improve the projects.

"We could do that with the old management. They shared our values. We could work things out with them.

"But the people who are in charge now are pretty ruthless. They are not Californians. They do not share our values. They do not want to work things through.

"Blacklist? Congratulations. You are on to something there."

Tejon Ranch Company did not return our calls and emails before we went to press. When they do, we will follow up with their comments.

TEJON

For years this logo—splashed on signs, walls, shirts, burlap gift bags and wine glasses—was accompanied by the slogan: 'Preserving California's Legacy.' Those days are gone. As if to say, 'Let the buldozers roll!,' the slogan has been changed. The new slogan: 'Building California's Legacy.'

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Is First Amendment Obsolete in Tejon Ranch's Piece of California? *There should be consequences for undermining the CEQA process*

Tejon Ranch's logo is often accompanied by the claim that the company is "Preserving California's Legacy." Apparently, Tejon's version of California's legacy does not include the First Amendment to the United States Constitution.

As Fourth of July flags were flying this week and the nation was celebrating the birthday of its Declaration of Independence from the oppression of Britain's King George III, *The Mountain Enterprise* was astonished to acquire a list with names of scientists who have been banned by order of Tejon's corporate executives from engaging in scientific research on lands under management of the allegedly independent Tejon Ranch Conservancy.

The legal comment process required by the California Environmental Quality Act (CEQA) appears to be under attack by Tejon Ranch Company. It is seeking to suppress public participation in the CEQA comment protocol.

Let us hope that the L.A. County Regional Planning Commissioners still believe in these ideals of our democracy, and that they will not be manipulated by Tejon Ranch Company's cynical tactics.

In addition, the spirit of the 2008 accord that created an independent Tejon Ranch Conservancy is being violated by heavy-handed bully tactics employed by the executives and the board of Tejon Ranch Company.

Conservancy scientists who had been promised that they are part of an independent, nonprofit organization with a mission to focus on research, learning and conservation are instead being enlisted as henchmen by the developer to suppress freedom of scientific research and freedom of association. They are being converted into enforcers of the Tejon Ranch blacklist.

Some say "the suits are afraid that scientists are going to find another endangered species when they are out there" [on ranch lands]. It appears now that the most vulnerable endangered species on Tejon Ranch these days are old-fashioned American traditions of free speech and due process.

The Tejon Ranch Company is acting to suppress free exchange of information among scientists and to impede public policymakers from receiving all the facts before adopting Centennial's Final Environmental Impact Report.

TRC's manipulation of the CEQA process is in effect lying to the Los Angeles County Regional Planning Commissioners.

By sending out a threat to all young scientists that they must not speak up or their future careers will be damaged by vengeful corporate overlords, Tejon Ranch Company is seeking to suppress public comments. It is hoping to deny full-spectrum information from reaching the commissioners charged with making informed public policy choices. The damage being done to the credibility of the Tejon Ranch Conservancy in the process is stunning.

A theory now circulating among those watching Tejon Ranch Company is that they plan to line up their entitlement portfolio for Grapevine's 12,000 homes; for the 3,450 Tejon Mountain Village homes (plus resort hotels and commercial areas); and for Centennial's 19,333 homes (with commercial and industrial zones) to sell the entire property — all the acreage with all the value-added entitlements — to deep-pocket foreign investors from Bahrain, Saudi Arabia or China.

The underlying theory of our democracy celebrated this 4th of July is that free speech leads to free and open debate and that in open exchange of information the best ideas will rise to the top.

Let's hope that L.A.'s planning commissioners still believe in these ideals of our democracy, and that they will not be manipulated by Tejon Ranch Company's cynical tactics.

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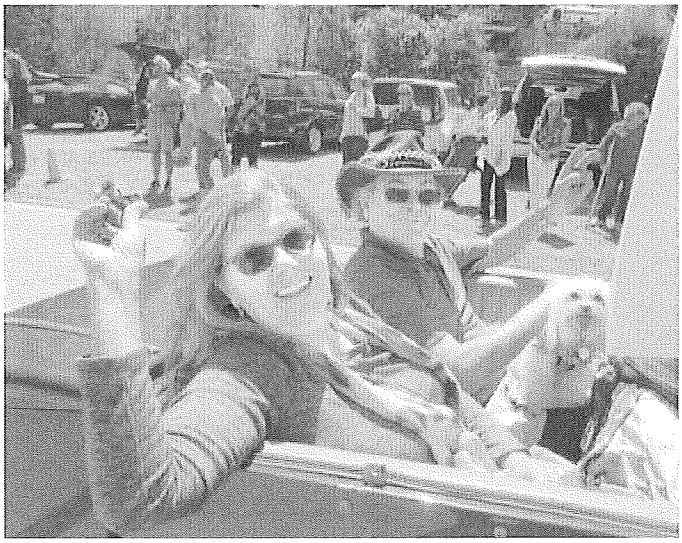
•We are a community newspaper. • Differing opinions and the underlying facts for each are welcomed. • Letters are 250 words or less; OpEds are 350-500 words. Your submission should include your full name, village of residence and phone number (for editor's use) to *Editor@MountainEnterprise.com.*

Recipe for Getting Blacklisted



Patric Hedlund photo

Kathleen and Mel Weinstein (along with their furry family member, Reggie) were named the Grand Marshals of the 2018 Lilac Festival Parade for their extraordinary devotion to the Mountain Community. Mel was named Humanitarian of the Year in 2017 by Jizo Peace Center.

July 2, 2018
Dear Editor:

I love Tejon Ranch. It is a unique part of California, a very special place.

I also love America. I especially love my right to free speech.

In responding to the Centennial Environmental Impact Report, I offended the Tejon Ranch Company. I went on public record against the proposed Centennial plan. I expressed my opinion, based on my own experience of living here and research into TRC's plans. The Centennial Project is a bad idea for our communities, in my opinion.

But here is the kicker. I was told over the telephone I was not allowed to go on a Tejon Ranch Conservancy event on Sunday, July 1.

I was told by the Conservancy that TRC would not permit me on ranch property because I made negative comments about the ranch's development plans.

I wasn't told who at TRC made that decision, or what my negative comment was.

While I was disappointed about missing an opportunity to be on the ranch, I was chilled by the implications that I was somehow "blacklisted" because I spoke out against something in an EIR comment.

Is this where we are going in America? Does my solicited opinion threaten the Tejon Ranch Company to the point of retaliation? This is what concerns me most.

Kathleen Weinstein
Pine Mountain community

Wonderful

July 2, 2018
Dear Editor:

Volunteers will be cleaning up Neenach on July 10, 11, 12 and 13 in concert with the Oso (Neenach) Town Council, the Los Angeles County Illegal Dumping Task Force and Rural Protection Services (a nonprofit public benefit corporation).

Volunteers are needed to help load bulky items into a roll-off container, to be located at 22847 West Avenue D (Highway 138) at the Neenach Market and Café. Volunteers will also help clean up creek beds, sensitive ecological areas, roadways and the Ripley Woodland State Park area.

We welcome anyone who can assist us with this community project. Our goal is to clean up illegal dump sites from 190th Street West to 300th Street West.

We will start each morning at 8 a.m. at the Neenach Market. Please bring work gloves, sunscreen, a hat and drinking water. We will tackle illegal dumping along the transitional habitat property at 190th Street West, with illegally dumped construction debris. Several people asked us to clean the creek bed near 245th Street West, all the way up to Avenue A. Volunteers are needed!

Thanks to everyone for their effort to make Neenach a wonderful place to live.

Jeff Zimmerman
Neenach

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Response to Comment Letter ADD-F.12
California Native Plant Society
July 10, 2018

Response to Comment ADD-F.12-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted, and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Response to Comment ADD-F.12-2:

This article is noted, has been provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. However, for informational purposes the County notes that many scientists have been and continue to be allowed access to the ranch per the RWA and RWMP, and thorough, independent scientific review of Tejon Ranch, including the Project site, has been conducted. The Project Applicant also addressed this article in its July 11, 2018 testimony to the Regional Planning Commission, explaining that the RWA does not provide unrestricted public access to Tejon Ranch, but rather provides the express right to withhold access permission. The Applicant further explained that its intention has been to deny access to Center for Biological Diversity and their partner organization, the California Native Plant Society, who have active, ongoing litigation against Kern County, Los Angeles County, and Tejon Ranch regarding Tejon Ranch projects.

Response to Comment ADD-F.12-3:

Please see response to Comment ADD-F.12-2. This comment does not specifically address the Project or adequacy of the EIR, and no further response is required.

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TriCounty Watchdogs

PO Box 6407 Frazier Park, CA 93222

ADD-F.13

10 July 2018

To: Commissioners David W. Louie, Pat Modugno, Elvin W. Moon, Laura Shell, and Doug Smith
Los Angeles County Planning Commission (via Jodie Sackett)

RE: Centennial Project

Dear Commissioners,

I write on behalf of the Tri-County Watchdogs to respond to the FEIR and to bring four particularly urgent issues to your attention. The most urgent issue is **Alternative E**, which was identified as the "environmentally superior alternative" in the CEQA Findings but dismissed as "infeasible." Although I was told on June 6 that it would not be discussed by the Planning Commission, we hope you will change your minds. The second urgent issue is **Valley Fever mitigation**, and the third is **water**. We found the responses to our comments on these issues inadequate. The fourth issue is **TRC's chilling behavior during the CEQA process,** which may have reduced the number of negative comments you have received and forebodes untrustworthy behavior in the mitigation preserve lands. ADD-F.13-1

.

1. As required by law, the Writers of the FEIR (whom I will abbreviate hereafter as WOTF), have identified" an **Environmentally Superior Alternative (Alternative E)** that would achieve the basic project alternatives. Since it appears to be neither impracticable nor ineffective in avoiding significant environmental impacts (the only grounds allowed), there is no legitimate reason to dismiss it. On the contrary, it is imperative that the Planning Commission consider it before making recommendations to the Board of Supervisors.

Despite finding that "Alternative E would result in a reduced grading footprint of approximately 656 acres; would have a corresponding increase in open space; and would meet all the Project Objectives," the WOTF dismiss it on the following puzzling grounds:

> "Since Alternative E would not avoid any of the Project's significant and unavoidable impacts and would increase certain adverse impacts on park resources, and since Alternative E would not extend a planned regional trail extension north of Quail Lake, the Board of Supervisors hereby rejects Alternative E as infeasible on the basis of such considerations.[CEQA Findings pdf p. 237]

"Infeasible" normally means not practicable, not easy or convenient to do, but here it seems to mean simply "we'd rather not." ADD-F.13-2

I will address the arguments in order.

First, if the Board of Supervisors decides to allow Centennial to plunk 57000 thirsty people into a naturally arid and now drought-plagued rural area, there are of course going to be significant and unavoidable impacts on the water supply as well as air quality, biological resources, greenhouse gases, etc. But just because one cannot eliminate impacts, one need not refuse to lessen them, especially if the cost is minimal. Alternative E, which clusters higher density development east of the aqueduct, would definitely have a lesser impact on air, water, ADD-F.13-3

grading, open space, greenhouse gases, and visual resources. Keeping 656 acres north of the aqueduct development free would, in particular, remove the impact to biological resources in the tri-color blackbird foraging habitat northwards from Quail Lake.

ADD-F.13-3 cont.

Quail Lake's wetlands and surrounding grasslands are crucial for the survival of at least 70 species of migrating birds, providing an essential oasis stopover during biennial travels of hundreds or thousands of miles. Most importantly, a documentation project by two local photographers and a certified biologist, has shown that Quail Lake provides nesting habitat to the tri-color blackbird, which has recently been designated a threatened species by the California Fish and Game Commission. Up to 1000 and possibly 2000 adult tri-color blackbirds have nested at Quail Lake during 2015, 2016, and 2017. Our photographs indicate that most of their foraging is done north and east into land that is proposed to be Centennial Village 9–the very land that would be spared by Alternative E. Since it is very likely that building Village 9 will permanently destroy the colonies of tri-colored blackbirds, and since there is no guarantee that the colonies would accept the substitute wetlands in the "Mitigation Preserve," it would be much better to accept Alternative E and save the precious habitat currently in use.

ADD-F.13-4

The two further arguments (parks and regional trail) used in the CEQA Findings to dismiss this environmentally superior Alternative E are not persuasive, given the important habitat contained in those 656 acres north of Quail Lake.

ADD-F.13-5

It turns out that "certain adverse effects on park resources" means that since more folks (2177 more families, to be exact) will be using the lone 3-acre park in Village 3, that park will cost more to maintain. Well, yes, but I have this to say in response: *the future residents of Village 3 are being cheated of parkland already in the Project as well as in Alternative E.* I note that the Project's much-lower-density Village 9 will enjoy two parks totaling 13 acres for its 1574 families. Medium, high and very high density Village 3, on the other hand, can currently expect only a tiny 3 acres of park for its 1872 families [Table 4-2 and Exhibit 4-1]. We are dismayed by this disparity in what is being offered to presumably lower wealth families. Parity could be achieved if the 13 acres of Village 9 parks could be shifted to Village 3 along with its residents. It appears that there exists the open acreage to do it. 16 acres divided into two or three parks would serve Village 3's Alternative E total of 4049 families reasonably well. We regret that we have to ask: are the planners not creating more parkland in Village 3 because they want to make Alternative E less appealing?

The second item in the Findings' dismissal of Alternative E points to the loss of a regional trail extension if Village 9 is not built. However, the creation of an 8-foot wide trail well north of Quail Lake is not necessary to complete the proposed Regional trail. Instead, as Fig 3-39 shows, a hiking/biking/riding trail could easily continue from the southwestern part of the condensed project across the cement road bridge and down the west side of the aqueduct to the maintenance road around Quail Lake, and thence to the Gorman Post Road. We note too that the hiking/biking/riding trails that we use in nearby areas are usually no more than 4' wide.

ADD-F.13-6

In addition to the plant and animal habitat Alternative E would save, we note the more equitable human habitat it might create. Higher density clustering offers superior opportunity for affordable housing. Several of the Commissioners were concerned about the amount of affordable housing that would be available. We suggest that shifting housing units from the mostly low and very low density housing of Village 9 to the much higher density Village 3 is a way to achieve more moderately priced housing. Alternative E's version of Village 3 is the perfect place to put low and very low income housing units, whether they be rental units or

ADD-F.13-7

purchase units. We add the caveat, of course, that these units must be accompanied by the same proportion of parkland as in the other eight villages.

ADD-F.13-7 cont.

Because of water issues (see below) and the inevitable destruction and pollution of precious plant, animal and human habitat, the Tri-County Watchdogs would prefer that neither the proposed Project nor any of the proposed Alternatives go forward. But if the Planning Committee and the Board of Supervisors must choose one, we urge Alternative E, which will use somewhat less water and has correctly been designated "environmentally superior" to the others.

ADD-F.13-8

2. **Before construction, testing is needed for Valley Fever spores** given that residents of the Antelope Valley are nine times more susceptible to Valley Fever than folks who live elsewhere in Los Angeles county. WOTF responded to our request for soil-testing by drawing on an outdated 2013 California Department of Public Health document in order to state that "there is no reliable way to test the soil for spores before working in a particular place" [Response to Comment F.3A-44, FEIR 2-337]. More recent research indicates that there is a reliable and relatively inexpensive way to identify regions of spores, and that doing so would allow special measures to be taken in those regions.

ADD-F.13-9

At a recent Valley Fever seminar in Lancaster, Professor of Microbiology Antje Lauer informed us that it would cost less than $200,000 to test for cocci-bearing zones throughout the Centennial region [see *The Mountain Enterprise*, June 29, pp. 2-3]. In those regions, Tyvek suits for workers should be mandatory not optional, and street signs should a warn nearby passersby to take special precautions. Contrary to WOTF's belief that such signs would "elicit fear without reasonable basis" [*loc cit*], warning signs educate and give the public a measure of control over their own health.

ADD-F.13-10

3, **The water supply assessment**, which is constantly brought forth to show that there is sufficient water for 20 years of building out, is paper water only. According to Table 5.18-5, the Antelope Valley will see demand surge over supply if drought continues, as it very likely will in southern California. If a lengthy drought happens AVEK will get less water from SWP and won't be able to return to Tejon Ranchcorp the water it borrowed in previous drought years. The Total Safe Yield for groundwater pumping will plummet. Water "rights" will not necessarily translate into water flow. Furthermore, we note that Table 5.18-12, which gives the figures for Centennial supply during variously spaced "multiple-dry year periods," chooses three years (rather than five or seven) as the set period. This choice seems foolish, since southern California has gone through a five-year drought recently, and after a one year respite in 2017, we are back in drought conditions. Centennial's stock holders will be left holding the bag when MM.18.2 kicks in and the corporation is forced to prove water supply after building 4000 units and then again after 10,000. It seems unconscionable to greenlight such a huge development project --and dare I say investment boondoggle?-- in this time of climate change.

ADD-F.13-11

4. **Because of startling information we have just discovered, we are concerned about TRC's trustworthiness concerning both the CEQA process and the proposed mitigation preserve.**

It appears that, TRC is imposing a litmus test on scientists and hikers who wish to join Tejon Conservancy's public access events on Conservancy Lands, including the 62,000 acres whose conservation easement was purchased by $15.8 million taxpayer dollars (and within which Mitigation Preserve Areas 3 and 4 seem to be taken). We know this partly because one of our own members and her husband, who signed up for a hike that took place on July 8, was denied

ADD-F.13-12

entry because, she was told, she had made negative comments about the proposed Centennial development. Whatever negative comments she may have made at a meeting or by association with the Tri-County Watchdogs, were made as part of the CEQA process.

Our local mountain communities newspaper, *The Mountain Enterprise*, immediately began an investigation to see if others had been banned. They quickly discovered six other individuals who had been forbidden access, and they unearthed evidence that membership in or even just association with certain environmental groups was enough to get one banned. The groups that appear to have been banned so far are: the California Native Plant Society (which has 10,000 members, mostly in California), the Rancho Santa Ana Botanic Garden, The Eriogonum (buckwheat) Society (because of its affiliation with Rancho Santa Ana Botanic Garden), the Center for Biological Diversity, and the Tri-County Watchdogs. [See *The Mountain Enterprise* July 6, pp.1,3,6, for details.]

ADD-F.13-12 cont.

Included in the Centennial FEIR is the (Ranch-Wide Agreement, 2009), which sets up the Conservancy and prepares the way for the Conservancy's acquisition of the 62,000 acres mentioned above. An important part of the Agreement is TRC's allowing public access to Conservancy lands. There we are told:

> *Components of the Public Access Plan shall include, but not be limited to: (i) encouraging and facilitating access by the Public, including to underserved communities and populations; (ii) selecting appropriate locations for Public Access, trails and facilities consistent with the RWMP to preserve the Conservation Values of the Conservation Easement Area; (iii) coordinating such Public Access with the Reserved Rights so that such Public Access does not unreasonably interfere with Owner's or other occupant's operation of the Conservation Easement Area for the Reserved Rights; and (iv) entry and use guidelines to ensure the safety of the Public while on the Conservation Easement Area.* [FEIR Appendix 5.7 E, Section 3.11, p. 41; italics added]

None of those four components (nor the additional component of TRC's right to schedule private recreational activities on Conservation lands) mentions the right to block individual members of the public. Component 4, "safety of the Public" might be so interpreted, but a banned member of the California Native Plant Society, who used to be a doctoral student researcher and volunteer docent at the Conservancy, clearly poses no danger to public safety. It is more likely that TRC has relied on the phrase "not limited to" in order to add another component to the Public Access Plan: the safety of its own financial plans to develop three cities on Tejon Ranch.

ADD-F.13-13

What three of the banned groups have in common is having submitted comments questioning the favorable conclusions of the DEIR. According to *The Mountain Enterprise*, the California Native Plant Society shared its botanical research with the Center for Biological Diversity and then the two groups co-signed a comment on the DEIR [July 6, p. 1]. Tri-County Watchdogs also submitted a critical comment. The other two groups are considered guilty by association with the California Native Plant Society [*ibid* p. 6].

ADD-F.13-14

TRC has not been shy about letting people know that they are banned because of their public comments during the CEQA process. Think about the effect this may have had and will have on scientists who hope to study the important habitats on Conservancy lands. Will they be silent if they discover things that may not be in the financial interest of TRC? Will the very "Best Management Practices" actually be devised and employed to rehabilitate and preserve those precious lands?

ADD-F.13-15

And how many nature lovers and hikers will refrain not only from offering public comment but also from financially supporting the Conservancy, knowing that even if they become members of the Conservancy they could be denied access if they also support other environmental groups?

ADD-F.13-15 cont.

We ask, therefore, that you give the Mitigation Preserve extra scrutiny and give the science in the comment letters from the Center for Biological Diversity and California Native Plant Society another read.

ADD-F.13-16

Sincerely yours,

Katherine C. King
Secretary, Tri-County Watchdogs

Response to Comment Letter ADD-F.13
TriCounty Watchdogs
July 10, 2018

Response to Comment ADD-F.13-1:

This introductory comment summarizes four issues of concern to the Commenter, all of which are detailed in the Commenter's subsequent comments and addressed in the County's responses thereto. With regard to this comment's summarized concerns regarding Alternative E, please see responses to Comments ADD-F.13-2 through ADD-F.13-8. With regard to this comment's summarized concerns regarding Valley Fever, please see responses to Comments ADD-F.13-9 and ADD-F.13-10. With regard to this comment's summarized concerns regarding water resources, please see response to Comment ADD-F.13-11. With regard to this comment's summarized concerns regarding the Project Applicant, please see responses to Comments ADD-F.13-11 through ADD-F.13-16.

Response to Comment ADD-F.13-2:

As this comment correctly notes, the EIR identifies Alternative E as the "environmentally superior alternative" under CEQA. However, per Public Resources Code § 21081(a)(3) and CEQA Guidelines § 15091(c)(3), a lead agency in its CEQA findings may reject a project alternative it finds to be "infeasible." When considering the feasibility of a project alternative, CEQA provides that the lead agency may take into account economic, environmental, social, technological, and legal factors, as well as "other considerations." See, Public Resources Code § 21081(a)(3); CEQA Guidelines § 15091(a)(3); *California Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1002. After weighing these considerations, a lead agency may determine that a project is undesirable from a policy perspective and on that basis reject a project alternative as infeasible. *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417.

The Commenter cites proposed CEQA findings to support its assertion that there is no legitimate reason dismiss to Alternative E as infeasible. As an initial matter, it should be noted that the draft CEQA findings cited by the Commenter are in preliminary draft form and do not represent, and should not be relied upon, as the final findings that may ultimately be made by County decisionmakers. Moreover, this comment does not provide a full description of the various considerations taken into account by the draft findings. For example, the draft findings explain that, unlike the Project, Alternative E would not provide a second vehicle crossing over the California Aqueduct, which could limit emergency evacuation options for Project residents and thus be inconsistent with County policies regarding public safety. Similarly, this comment's assertion that Alternative E "would not be ineffective in avoiding significant environmental impacts" is not accurate. As explained in the draft findings cited by the Commenter, as well as Draft EIR page 8-60, Alternative E would not avoid any of the Project's significant and unavoidable effects, though it would somewhat reduce some significant impacts as compared to the Project. Also, as discussed in the draft findings cited by the Commenter, Alternative E would not provide a regional trail connection that is

proposed by the Project and could result in higher costs for public infrastructure improvements that correlate with higher intensity of uses, such as parks.

In addition, Alternative E implicates policy considerations that are not discussed in the preliminary draft findings but could be added to the final findings. For example, if approved, Alternative E would eliminate the Project's proposed Village Nine, and Village Eight's Low Density Residential-designated lands located east of 300th Street would instead be designated as Very Low Residential, as explained on Draft EIR page 8-18. Thus, Alternative E would provide approximately 865 fewer acres of land designated for Low Density Residential uses, as compared to the proposed Project. Although Alternative E would provide the same number of residential units as the proposed Project, most of these units would either be medium/high density attached residential units or very low density detached units, with substantially fewer low density detached units included in the community's overall housing mix. Accordingly, Alternative E, would provide an unbalanced range of housing types by reducing the supply of low density single family detached residential units that are typically attractive to middle income families. This result could dissuade both middle income workers (and employers hoping to hire them) from relocating to the Project site. Moreover, Alternative E's lack of balanced housing choice would be inconsistent with General Plan Housing Element Policy 3-1, which seeks to promote mixed income neighborhoods and increase housing choices for all economic segments of the population.

In addition, Alternative E could lead to higher housing cost for those families looking to purchase high density housing in Village Three. As explained in response to Comment ADD-F.13-6, under Alternative E, all of the units planned for Village Nine and approximately 603 units in Village Eight would be accommodated in Village Three's multifamily Medium Density, High Density, and Very High Density designations. According to a recent report prepared by housing experts at the University of California, Berkley (UCB Report), high-rise and even mid-rise (e.g., six story) residential buildings are far more costly to build on a per square foot basis than single family homes – three to five times higher – and are thus infeasible in most California markets.[3347] Even less costly multi-family units such as quadplexes (four units in a two-story building) and stacked flats (one or two units per floor, generally limited to four stories) – are approximately 30 percent more costly than single family homes on a per square foot basis.[3348] Thus, Alternative E would likely result in higher sales prices for Village Three's attached dwelling units.

The UCB Report also indicates that Southern California counties faced a larger negative fiscal impact for compact multi-family residential development than is the case with lower density development.[3349] Thus, Alternative E may result in fiscal losses to the County or otherwise reduce or eliminate the fiscal surplus projected by the Project. Finally, it should be noted that, in adopting the AVAP and its "Rural Preservation Strategy," the County has made a policy choice to maximize development in designated Economic Opportunity Areas (EOAs)

[3347] Nathaniel Decker et al., Right Type Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. U.C. Berkeley Terner Center for Housing Innovation and Center for Law, Energy and the Environment (March 2017): http://ternercenter.berkeley.edu/uploads/right_type_right_place.pdf

[3348] Ibid.

[3349] Ibid.

so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of the Antelope Valley outside of EOAs, as discussed in Final EIR, response to Comment F.8-20. Alternative E would be inconsistent with this policy choice, however, by limiting the type and extent of development that could occur in the West EOA.

In summary, although Alternative E would reduce some of the Project's significant and unavoidable environmental effects, it would not reduce any such effects to less-than-significant levels. Moreover, it would (i) not provide a secondary evacuation route across the California Aqueduct, (ii) increase maintenance costs of certain categories of public infrastructure, such as parks, (iii) provide an unbalanced mix of housing options, (iv) increase housing costs for multifamily residential units, (v) have a negative fiscal impact on the County, and (vi) be inconsistent with certain County housing and planning policies. When these factors are taken into consideration, this comment's claim that there is no basis for finding that Alternative E is infeasible for purposes of CEQA is without merit.

Response to Comment ADD-F.13-3:

As disclosed in the EIR, the proposed Project would cause certain significant and unavoidable impacts related to water resources, air quality, biological resources, and greenhouse gases, as this comment correctly notes. The Commenter is also correct that CEQA requires the EIR to identify those alternatives and mitigation measures that could feasibly reduce such significant and unavoidable impacts. As explained on Draft EIR page 8-59, Alternative E would result in similar or slightly reduced effects to most population-driven impacts (e.g., noise, traffic, public services, and utility demands) as compared the Project; Alternative E would result in decreased impacts to grading-driven impacts (e.g., biological resources, cultural resources, and visual resources); and Alternative E would reduce some on-site automobile-driven impacts (e.g., air quality, greenhouse gas emissions). Alternative E would not reduce any of the Project's significant and unavoidable impacts to less-than-significant levels, however, as discussed on Draft EIR page 8-60. This comment's stated preference for Alternative E over the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment ADD-F.13-4:

The Commenter's opinion regarding the Project's impacts on tricolored blackbird is noted. The Draft EIR discussed that focused tricolored blackbird surveys conducted for the Project in 2015 found nesting colonies at Quail Lake and found that foraging occurred on the Project site as well as elsewhere (Draft EIR Appendix 5.7-B, Birds-6). As stated on page 5.7-149 of the Draft EIR, a review of the Quail Lake and the on-site colony subset identified a potential post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In the Draft EIR, the indirect impacts described above were considered potentially significant pursuant to CEQA, and mitigation was proposed to reduce the impact to a less than significant level. MM 7-7 has been included as dedicated mitigation for the

tricolored blackbirds, and MM 7-10 and MM7-12 include mitigation for tricolored blackbird habitat.

As stated in Final EIR, response to Comment F.3-14, the land use adjacent to Quail Lake up to approximately ½ mile is almost entirely open space recreation and, therefore, will be permeable and available for foraging under Project conditions. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance riparian areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding and foraging opportunities. In regard to the commenter's concern for the acceptance of "substitute" wetlands, it should be noted that some of the freshwater marsh habitat within the Mitigation Preserve is existing and has confirmed tri-colored blackbird use. Additionally, most of the habitat used by colonies in the region are created wetlands (such as Holiday Lake and Fairmont Reservoir) and there is more than a reasonable expectation that future created wetlands with potentially suitable habitat would be utilized by tri-colored blackbirds. Nevertheless, this comment's stated preference for Alternative E over the Project is noted and will be provided to County decision makers for their consideration.

Response to Comment ADD-F.13-5:

This comment is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. With regard to this comment's concerns regarding parks and the Project's proposed regional trail connection, please see response to Comment ADD-F.13-6. With regard to this comment's assertions regarding the habitat value of the acreage that makes up the Project's proposed Village Nine area, please see response to Comment ADD-F.13-4.

Response to Comment ADD-F.13-6:

As discussed on Draft EIR page 8-55, Alternative E could result in higher costs for public infrastructure categories that correlate with intensity of uses, and the EIR uses sports playing fields within parks as an example of such infrastructure. This is so because, under Alternative E, the 1,574 dwelling units that the Project's proposes in Village Nine would be accommodated within the existing residential land use density ranges within Village Three (i.e., the town center). Moreover, under Alternative E, the Project's proposed Low-Density Residential-designated lands on the east side of 300th Street West would be re-designated to Very Low Density Residential, resulting in a net reduction of 603 dwelling units. These units would also be accommodated within the existing Village Three land use density ranges. Thus, under Alternative E, Village Three would accommodate 2,177 more dwelling units as compared to the Project, as discussed on EIR page 8-52. Since Village Three would be much denser under Alternative E, local park resources will likely see more use as compared to the Project. This will likely result in higher maintenance costs for such facilities, as discussed above.

This comment's assertion that the residents of Village Three are somehow "being cheated" because Village Three has a smaller park overlay than does Village Nine is without merit. As an initial matter, this comment implicitly assumes that residents of Village Three will only be permitted access to parks located within Village Three, which is not the case. The residents of Village Three will have access to hundreds of acres of parks, open space and recreational opportunities offered by the Centennial Specific Plan. Moreover, the Specific Plan's park acreages are calculated pursuant to the methodology established by the County's Parkland Dedication Ordinance and exceeds both the County General Plan's parkland policy objectives, as well as state requirements established under the Quimby Act, as explained on Draft EIR page 5.14-1. Finally, this comment ignores the fact that Village Three is located immediately adjacent to a planned community regional park that will be a minimum of 20 acres in size and will provide a broad range of regionally serving amenities, such as ball fields, tennis courts, playgrounds, and barbecue and picnic areas, as discussed on EIR page 5.14-20. In light of these facts, the Commenter's suggestion that residents of Village Three are "being cheated" by a disparity of park resources as between villages, or that Alternative E was designed to intentionally limit Village Three access to park resources, is inaccurate.

With regard to the Commenter's proposed substitute for the regional trail connection that would not be provided under Alternative E, the Commenter incorrectly assumes that a regional trail could cross the National Cement Plant Road bridge. Currently, there is a pedestrian sidewalk on this bridge, but it is not wide enough to accommodate bicycle or horse traffic, nor does it meet the County's regional trail design standards. Alternative E does include any improvements to such bridge. Moreover, this comment incorrectly assumes that pedestrian/bike/horse traffic can legally access the Department of Water Resources maintenance road. This maintenance road is fenced off and closed to the public and it is not legally feasible to allow public access to the road for trail uses. Even if the public could legally access the DWR maintenance road, there is no road or trail that currently connects the maintenance road to Gorman Post Road and no such connection would be provided by Alternative E. Finally, it is not legally feasible to construct a regional trail that is four feet wide because County standards mandate that recreational trails be a minimum of 8 feet in width.[3350]

Response to Comment ADD-F.13-7:

This comment's recommendations are noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. However, the comment's assertion that higher density clustering in Alternative E offers superior opportunity for affordable housing is inaccurate. According to a recent report prepared by housing experts at the University of California, Berkley, high-rise and even mid-rise (e.g., six story) residential buildings are far more costly to build on a per square foot basis than single family homes –

[3350] County of Los Angeles. May 17, 2011. County of Los Angeles Trails Manual, Table 2.4-1, p. 2-6: http://file.lacounty.gov/SDSInter/dpr/208899_TrailsManual.pdf.

three to five times higher – and are thus infeasible in most California markets.[3351] Even less costly multi-family units such as quadplexes (four units in a two-story building) and stacked flats (one or two units per floor, generally limited to four stories) – are approximately 30 percent more costly than single family homes on a per square foot basis.[3352] Nevertheless, ten percent of the residential units constructed throughout the Project will be made available as affordable units to very low, low, and moderate income individuals and families earning between fifty percent and one hundred twenty percent of the Los Angeles County area median income. Moreover, the Project's affordable units will be subject to deed restrictions and affordability covenants. As discussed in response to Comment ADD-F.13-6, parkland requirements for the Project are calculated pursuant to the methodology established by the County's Parkland Dedication Ordinance.

Response to Comment ADD-F.13-8:

This comment's general opposition to the Project and its stated preference that Alternative E be approved instead of the Project are noted and will be provided to Regional Planning Commission and Board of Supervisors for their consideration. This comment does not raise a specific concern regarding the adequacy of the EIR and therefore no further response is required.

Response to Comment ADD-F.13-9:

As this comment correctly notes, the Antelope Valley has the highest rate of reported cases of Valley Fever in Los Angeles County, as disclosed on Draft EIR page 5.3-15. As explained in the Final EIR, there is no reliable way to test the soil for Valley Fever spores before working at a particular location. (Final EIR, response to Comment F.3A-43). According to the Centers for Disease Control and Prevention, "testing soil for *Coccidioides* [i.e., Valley Fever spores] isn't likely to be useful because the fungus is thought to be common in the soil in certain areas. A soil sample that tests positive for *Coccidioides* doesn't necessarily mean that the soil will release the fungus into the air and cause infection. Also, there is no commercially-available tests to detect *Coccidioides* in soil. Testing soil for *Coccidioides* is currently only done for scientific research."[3353] The CDC's conclusions are consistent with the 2013 California Department of Health document referenced in this comment and cited in the Final EIR. With regard to the "recent research" referenced in this comment, please see response to Comment ADD-F.13-10.

Response to Comment ADD-F.13-10:

As discussed in response to Comment ADD-F.13-9, the Center for Disease Control and Prevention (CDC) advises that there is no reliable way to test the soil for Valley Fever spores before working at a particular location. The Commenter disagrees with that expert

[3351] Nathaniel Decker et al., Right Type Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. U.C. Berkeley Terner Center for Housing Innovation and Center for Law, Energy and the Environment (March 2017): http://ternercenter.berkeley.edu/uploads/right_type_right_place.pdf.

[3352] Ibid.

[3353] Center for Disease Control and Prevention. *Sources of Valley Fever (Coccidioidomycosis)*. CDC: https://www.cdc.gov/fungal/diseases/coccidioidomycosis/causes.html (accessed on July 24, 2018).

determination, however, citing a newspaper article that reports on a community meeting at which a professor from California State University, Bakersfield discussed academic "pilot projects" regarding soil testing for Valley Fever.[3354] However, the cited newspaper article provides no evidence that the pilot soil testing methodologies have undergone scientific peer review, have been published, or that such tests are commercially available for use. As discussed in response to Comment ADD-F.13-9, the CDC sees little value in testing soils in areas where Valley Fever spores are common, such as Antelope Valley. In any case, testing would not reduce health risks because the EIR conservatively *presumes* that Valley Fever spores affect the entire Project site and present a health risk to existing and future residents and workers in the Project area through ground-disturbing activities. In light of this presumption, the EIR imposes feasible mitigation measures to reduce the EIR's assumed Valley Fever risk to less than significant levels, as discussed on Draft EIR page 5.3-19.

In addition, in response to comments regarding the Project's potential health impacts related to Valley Fever, the Final EIR revised MM 3-2 to require the Project Applicant/Developer to provide construction workers with Tyvek coveralls available in a range of sizes upon request, and to require workers using such suits to remove them at the Project site at the end of each working day. (Final EIR, response to Comment F.3A-38) The Final EIR also added new mitigation measure MM 3-11, which requires the Project Applicant/Developer to create and maintain during the Project construction period a website that provides public information regarding dust generating activities at the Project site, and requires that notice of the website be provided to all surrounding communities and to all schools located in Gorman, Lebec, and Frazier Park. (Final EIR, responses to Comments F.3-29 and F.3A-38)

Finally, in response to the Commenter's concerns regarding Valley Fever, MM 3-2, as shown on Final EIR pages 3-3 and 3-4, is hereby further revised for adoption in the CEQA findings as follows:

MM 3-2 To aid in the prevention of Valley Fever among construction crews on the Project site, the following measures shall be implemented by the Construction Contractor during all construction activities:

- Have Tyvek™ coveralls/suits available in a range of sizes for construction worker use upon request. If used, require the worker to remove the Tyvek™ suit at the work site at the end of the day.
- Hire crews from Los Angeles and/or Kern County populations, or other areas where Valley Fever is endemic, where possible, since it is more likely that they have been previously exposed to the fungus and are therefore immune.

[3354] Patric Hedlund. *Centennial could test for valley fever spore hotspots.* The Mountain Valley Enterprise, June 29, 2018, pp. 2-3.

- Prior to Project construction initiation, and for any personnel additions after initial Project construction initiation, the following California Department of Public Health (CDPH) materials on Valley Fever (or the most updated materials applicable to Los Angeles County) shall be distributed to worksite supervisors:
    - CDPH pamphlet entitled "Preventing Work-Related Coccidioidomycosis (Valley Fever)" available at: http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf. (CDPH 2013a)
- Prior to Project construction initiation, and for any personnel additions after initial Project construction initiation, the following CDPH materials on Valley Fever (or the most updated materials applicable to Los Angeles County) shall be distributed to construction workers:
    - CDPH pamphlet entitled "Valley Fever Fact Sheet" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf. (CDPH 2013b)
    - CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf (CDPH 2013c).
    - CDPH pamphlet entitled "Fact Sheet Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf (CDPH 2013d).
- During rough grading and construction, the access way into the Project site from adjoining paved roadways shall be paved or treated with environmentally safe dust-control agents.
- <u>Provide evidence to the Department of Regional Planning that the Project Applicant/Developer has developed a "Valley Fever Training Handout," training, and schedule of sessions for education to be provided to all construction personnel. All evidence of the training session materials, training handout(s) and training schedule shall be submitted to the Department of Regional Planning within 24 hours of the first training</u>

session. Multiple training sessions may be conducted if different work crews will come to the Project site for different stages of construction; however, all construction personnel shall be provided training prior to beginning work. The evidence submitted to the Department of Regional Planning regarding the "Valley Fever Training Handout" and training sessions shall include the following:

  - A sign-in sheet (to include the printed employee names, signature, and date) for all employees who attended the training session;
  - Distribution of a written flyer or brochure that includes educational information regarding the health effects of exposure to criteria pollutant emissions and Valley Fever (including the CDPH informational materials described in this mitigation measure);
  - Training on methods that may help prevent Valley Fever infection; and
  - Train employees how to use personal protective equipment, such as respiratory equipment, how to reduce exposure to pollutants, how to recognize symptoms of Valley Fever, and to promptly report any suspected systems to a work supervisor. Training shall also emphasize the benefits of wearing Tyvek suits in relation to Valley Fever exposure and explain that such protective clothing is available upon request. Proof that the demonstration is included in the training shall be submitted to the Department of Regional Planning.

- Provide construction workers separate, clean eating areas equipped with hand-washing facilities.
- Require crews to use masks or half-faced respirators equipped with a minimum N-95 protection factor and that are adequate to restrict inhalation of particulates during Project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations. Respirator equipment shall be readily available and shall be provided to employees during work.

- Require employees to be medically evaluated, fit-tested, and properly trained on the use of the required masks or respirators
- Provide High-Efficiency Particulate Air (HEPA) filters for heavy equipment with factory enclosed cabs capable of accepting the filters. Require contractors utilizing applicable heavy equipment to furnish proof to the Department of Regional Planning of worker training on proper use of applicable heavy equipment cabs, such as turning on air conditioning prior to using the equipment.
- Provide communication methods, such as two-way radios, for use in enclosed heavy equipment cabs.
- Install equipment inspection stations at each construction equipment access/egress point. Examine construction vehicles and equipment or excess soil materials and clean, as necessary before equipment is moved off-site.
- When possible, position construction workers upwind or crosswind when digging a trench or performing other soil-disturbing tasks.
- Prohibit smoking at the worksite outside of designated smoking areas; designated smoking areas will be equipped with hand-washing facilities.
- Post Valley Fever warnings at on-site construction areas and restrict access to such areas by visitors without adequate training and respiratory protection.
- Audit and enforce compliance with applicable California Occupational Safety and Health Administration health and safety standards on the job site.

This comment's suggestion that MM 3-2 be revised to ensure that Tyvek suits for workers be mandatory, rather than optional, is noted and will be provided to County decisionmakers for their consideration. Workplace safety requirements are comprehensively regulated by the Cal/OSHA. Cal/OSHA regulations do not require construction workers operating in areas subject to Valley Fever to wear Tyvek suits or similar clothing, though they do recommend that Tyvek suits be provided to workers. As noted above, MM 3-2 was revised in the Final EIR to require the Project Applicant/Developer to provide Tyvek suits to construction workers. MM 3-2 has been further revised to require all Project construction workers to be trained on the benefits of wearing Tyvek suits when engaging in ground-disturbing activities and their availability at the construction site. Temperatures at the Project site are hot in the summer months, and research demonstrates that wearing Tyvek suits in working conditions

contributes to adverse heat stress effects.[3355] Given the competing health concerns associated with Tyvek suit use and the applicable regulatory requirements, it has been determined that the MM 3-2, as revised, strikes an appropriate balance with respect to use of Tyvek suits on the Project site during construction activities, and would further assure health risk impacts are mitigated to less than significant levels.

Response to Comment ADD-F.13-11:

The Commenter's opinion regarding the reliability of water supply is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the County disagrees and concludes that Project EIR analysis demonstrates reliable and sustainable water supplies, including with regard to the Project's Water Supply Assessment. See Draft EIR, Appendix 5.18-A. After thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts.

As shown on EIR Tables 5.18-10 through 5.18-12, multiple-dry year projections are presented in five-year increments with the first two years shown as normal years and the last three years as a dry period or drought. This data was derived from the peer-reviewed Centennial Specific Plan Water Supply Assessment (WSA), which is included as EIR Appendix 5.18-A. The WSA was prepared in accordance with Senate Bill 610 (Water Code § 10910 et seq.) and the California Department of Water Resources' Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 (DWR Guidebook). The DWR Guidebook was designed to provide step-by-step instructions for preparing an SB 610 water supply assessment and specifically provides that each water supply assessment should evaluate a multiple-dry year scenario over a five-year period with the first two years shown as normal years and the last three years as a dry period. Thus, the EIR's water supply impact analysis was prepared in accordance with state law and expert agency recommendations and presents a reasonable, good faith disclosure and analysis of the Project's potential impacts on water resources appropriately based on an industry-standard analytical approach. That is all that CEQA requires. (*Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal*. (1988) 47 Cal3d 376, 392; *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App. 357, 372.) The EIR's water supply analysis is not required to address all variations of the issues or permutations of the data, and a lead agency is not required to conduct every recommended test and perform all recommended research in evaluating a project's environmental impacts. (*San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal. App.4th 645, 680; *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1125.)

[3355] Debra A. Griffith, Dr. William Reddan, William Schmitz. (1992) *Heat Stress Associated With the Use of Tyvek Coveralls in Asbestos Removal Inspection*. University of Wisconsin. Proceedings of the Human Factors Society 36th Annual Meeting: http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.898.6202&rep=rep1&type=pdf (accessed July 24, 2018).

With regard to the reliability of imported water supplies for the Project, the potential delivery reliability and variability of Project State Water Project supplies is discussed in Draft EIR Section 5.18, Water Resources, pages 5.18-20 to -28 and -54 to -64. The analysis of Project imported water supplies uses the Early Long Term scenario also used in the California Department of Water Resources' State Water Project Delivery Capability Report, and incorporates the effects of the most severe droughts during the 82-year historical record, plus additional adjustments to account for potential climate change effects and the 5 percent single dry year delivery level used by the Antelope Valley-East Kern Water Agency in the Agency's 2015 Urban Water Management Plan. Consequently, the Draft EIR includes a discussion of State Water Project delivery reliability that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. The Commenter provides no evidence for its assertion that this analysis is inadequate, and no further response is required.

With regard to MM 18-2, it is a precautionary measure, and requires implementation of water use monitoring and reporting to ensure that the Project is meeting demand for water supply and that water efficiency requirements are met, including through the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. If supply demand is not met, no additional development will occur until sufficient supplies are identified for the Project.

For further discussion of Project water supply analysis, including with regard to drought and climate change, see Final EIR, responses to Comments E.1-5, F.3-4 through F.3-9, F.3A-6, F.3A-9, F.8-213, F.8-214, and F.8-220.

Response to Comment ADD-F.13-12:

This comment and the Mountain Enterprise article are noted, have been provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. However, for informational purposes the County notes that many scientists have been and continue to be allowed access to the ranch per the RWA and RWMP, and thorough, independent scientific review of Tejon Ranch, including the Project site, has been conducted. The Project Applicant also addressed this article in its July 11, 2018 testimony to the Regional Planning Commission, explaining that the RWA does not provide unrestricted public access to Tejon Ranch, but rather provides the express right to withhold access permission. The Applicant further explained that its

intention has been to deny access to Center for Biological Diversity and their partner organization, the California Native Plant Society, who have active, ongoing litigation against Kern County, Los Angeles County, and Tejon Ranch and oppose Tejon Ranch projects,

Response to Comment ADD-F.13-13:

This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. However, for informational purposes, the County notes that the Commenter is correct that Section 3.11 of the RWA addresses public access, indicating that the Owner shall provide significant and appropriate access to Tejon Ranch to the public. Section 3.11 of the RWA required the preparation of a Public Access Plan as part of the RWMP, which has been duly prepared, and the Applicant has been implementing the public access plan. See Final EIR, Appendix 5.7-D, Ranchwide Management Plan, Volume 3, Public Access Plan, for more information. Neither the RWA nor the RWMP restricts the Applicant's legal right to refuse access to its private property if it is not "appropriate". For further discussion of withholding access to Tejon Ranch, see response to Comment ADD-F.13-12.

Response to Comment ADD-F.13-14:

This comment and the Mountain Enterprise article are noted, have been provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. For further discussion, please see responses to Comments ADD-F.13-12 and ADD-F.13-13.

Response to Comment ADD-F.13-15:

This comment and the Mountain Enterprise article are noted, have been provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. For further discussion, please see responses to Comments ADD-F.13-12 and ADD-F.13-13.

Response to Comment ADD-F.13-16:

The Commenter's request will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The County has thoroughly considered the creation of the Mitigation Preserve and has considered and addressed correspondence and public testimony from the Center for Biological Diversity and the California Native Plant Society. The County further notes that with regard to the above-mentioned the Commenter's assertions that scientific EIR evaluation of biological impacts is insufficient, the entirety of the Project site has been evaluated for biological resources in numerous studies conducted over a 16-year period, all of which are described in Section 5.7, Biological Resources, of the Draft EIR.

More specifically, with respect to the focused surveys done on the Project site and addressed in the Draft EIR, these have been conducted on the Project site since 1999 in potentially suitable habitat for the species being surveyed—an industry-wide methodology. Wildlife species generally inhabit certain habitats while avoiding others. For example, a survey for breeding tricolored blackbirds would focus on areas potentially containing their breeding habitat (marsh) and would avoid areas where no potential for that habitat occurs (oak woodland). A combination of tools such as vegetation and/or topography maps, aerial photograph, and historical knowledge of the site help biologists narrow down their survey area for a given species. Certain surveys, such as plant surveys, have been conducted comprehensively and cover the entire Project footprint.[3356] Other surveys are more general in nature, such as raptor surveys, and again in that instance the entire Project site would be surveyed. Focused surveys have been conducted in accordance with approved protocols.[3357] The various biologists studying the site since 1999 have had full access to the Project site. The diversity of the wildlife species is as expected for an extensively grazed landscape (compacted soil, invasive species) with relatively low vegetative cover over the majority of the Project site. As such, all plant and wildlife species observed or with potential to exist on the Project site based on the extensive site-specific and regional body of data is addressed in the Draft EIR. It is noted that, as appropriate under CEQA, the Draft EIR focuses on impacts associated with solely the Project site, and not the Tejon Ranch as a whole.

The EIR has an obligation to follow State CEQA Guidelines and to report on the findings of the various focused and general plant and wildlife surveys that have occurred over the life of the Project.[3358] Detailed studies and mapping provide clearer, not obfuscated information. The EIR's grassland studies were conducted with input from the Significant Ecological Areas Technical Advisory Committee (SEATAC) and detailed information was required in an effort to more accurately map and describe the different types of grasslands occurring on the Project site. Mitigation for sensitive habitats requires accurate vegetation mapping procedures, and the grassland studies were integral to the modeling and mapping process on the Project site. The methodology for vegetation mapping is described beginning on page 5.7-24, with further details of the methodology for delineation of grasslands provided beginning on page 5.7-25. The Draft EIR analyzes Project impacts to native grasslands and includes conservation measures to mitigate for losses.[3359]

[3356] DRP 2017, Table 5.7-2
[3357] *Id.,* Appendix 5.7-B
[3358] *Id.,* Table 5.7-2, p. 5.7-19
[3359] *Id.,* Sections 5.7.6 and 5.7.7

The following EIR Table 5.7-2 describes the extensive biological surveys conducted on the Project site to date:

TABLE 5.7-2
BIOLOGICAL SURVEYS CONDUCTED
ON THE PROJECT SITE (1999–2015)

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods
Plants	BonTerra Psomas	March 23–April 5; May 25–June 5, 2015	Focused special status plant surveys throughout the impact area during the spring and summer (BonTerra Psomas 2015b).
		August 4, 2015	Vegetation mapping of the newly incorporated portion of the Project site (east of 300th St W).
	BonTerra Consulting	January–March 2009	Supplemental oak tree surveys south of SR-138 (BonTerra Consulting 2009a).
		March 2007	Vegetation mapping of the off-site impact areas (results provided in this document).
		August–September 2005	Vegetation mapping of areas west of the Aqueduct and the 262-acre portion south of SR-138 (results provided in this document).
	Natural Resource Consultants	April–August 2008	Special status plant surveys in the Project site and off-site mitigation areas (NRC 2008a).
		spring 2008	Grassland composition studies on the Project site and in off-site mitigation areas (NRC 2008b).
		spring 2007	Second year of grassland sampling of Project site (NRC 2007c).
		spring 2007	Regional grassland distribution assessment (NRC 2007a).
		April–June 2006	Grassland sampling study on the Project site (NRC 2006a, 2007b).
		April–June 2006	Special status plant survey of previously mapped populations (NRC 2006b).
	Tree Life Concern	June 2006–February 2007	Oak tree survey updated based on new impact area (Tree Life Concern 2008).
		July 2001–November 2001	Survey of all oak trees measuring 8 inches or greater in dbh, inside of or within 200 feet of identified Project grading boundary (Tree Life Concern 2003).
	Vollmar Consulting	April 1–11, June 23–27, 2003; April 15–24, June 10–13, 2004	Focused plant surveys throughout the site for special status species during the spring and summer (Vollmar Consulting 2004, revised 2006).
	Impact Sciences	March 2001–September 2001	Surveys for common and special status plant species concurrently with wildlife surveys and during the wetland and streambed delineation throughout many portions of the site (Impact Sciences 2002a, 2003).

TABLE 5.7-2
BIOLOGICAL SURVEYS CONDUCTED
ON THE PROJECT SITE (1999–2015)

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods
	Paul Pruett & Associates	March 23, 27, April 3, June 15, 1999; April 25, 29, May 18, 2000	Focused plant surveys for special status species throughout the site (Impact Sciences 2003).
Jurisdictional Waters and Wetlands	BonTerra Psomas	June 2015	Updated jurisdictional delineation and functional assessment/CRAM including new areas (BonTerra Psomas 2015a)
	Glenn Lukos Associates	2008	Updated functional assessment of jurisdictional features (GLA 2009a).
		2008	Updated jurisdictional delineation assessment and report (GLA 2009b).
		May 2006–July 2006	Jurisdictional delineation of Phase One unimpacted areas and Future Phase areas; functional assessment of jurisdictional features (GLA 2006c).
		October 2005–November 2005	Jurisdictional delineation of Phase One areas (GLA 2005c).
	Impact Sciences	April 2001–August 2001	Preliminary jurisdictional delineation of Project site using USACE/CDFG delineation protocols (Impact Sciences 2002b).
Invertebrates	Glenn Lukos Associates	September 2006–January 2007	Dry-season protocol surveys for listed fairy shrimp species in 8 seasonal depressions (GLA 2007).
		October 2005–April 2006	Wet- and dry-season protocol surveys for listed fairy shrimp species in potentially suitable locations in the impact area west of the Aqueduct and the 262-acre portion south of SR-138 (GLA 2006a, 2006d).
		October 2005	Habitat assessment surveys for listed fairy shrimp species throughout the proposed impact area west of the Aqueduct and the 262-acre portion south of SR-138 (GLA 2005b).
		2004/2005 Wet Season	Wet-season protocol surveys for listed fairy shrimp species at 2 locations (GLA 2005a).
	Guy Bruyea	May 2004–September 2004	Same goals and emphasis as the 2001 surveys (see below), but a larger geographic area was surveyed (Bruyea Biological Consulting 2004).
		May 2003–August 2003 (5 days)	Same goals and emphasis as the 2001 surveys (see below), but a larger geographic area was surveyed (Bruyea Biological Consulting 2003).
		May 2001–August 2001 (5 days)	Surveys within potentially suitable areas of the site for special status butterfly species and adult and larval host plants potentially occurring on or

TABLE 5.7-2
BIOLOGICAL SURVEYS CONDUCTED
ON THE PROJECT SITE (1999–2015)

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods
			near the site (Bruyea Biological Consulting 2001).
	Impact Sciences	March 2001	Non-protocol surveys for fairy shrimp at select locations. Under a USFWS permit, sampled several areas of potentially suitable habitat (i.e., vernal or seasonal pools and cattle ponds). Collected specimens with hand nets and identified them using a hand lens. Specimens were sent to Mr. Brent Helm, a fairy shrimp expert, for species confirmation (Impact Sciences 2001c).
Herpetofauna	BonTerra Consulting	February 2006 – June 2006	Focused protocol surveys for arroyo toad, red-legged frog, and Tehachapi slender salamander in areas west of the Aqueduct and the 262-acre portion south of SR-138 (results provided in this document).
		Spring and Summer 2005	Focused surveys for western spadefoot in potentially suitable areas west of the Aqueduct and the 262-acre portion south of SR-138 (BonTerra Consulting 2005).
	Impact Sciences	June 2004	Surveys for western spadefoot in potentially suitable areas of the site (Impact Sciences 2004b).
		June 2–6, June 30–July 3, July 7–12, 2003	Surveys and specific searches for special status amphibian and reptile species in potentially suitable areas of the site (Impact Sciences 2003).
		March 23, April 12, 23, 30, May 12, August 2001	Surveys and specific searches for special status amphibian and reptile species. USFWS protocol-level surveys for California red-legged frog. Surveys for two-striped garter snake and western pond turtle were conducted concurrent with frog surveys in potentially suitable areas of the site (Impact Sciences 2001a).
		May 27, 2000	General biological surveys for amphibians and reptiles conducted simultaneously with more focused survey efforts in potentially suitable areas of the site (Impact Sciences 2003).
	Paul Pruett & Associates	March 23, 27, April 3, 15, 20, 1999; April 21–29, May 1, 3, 13 2000	General biological surveys that included amphibian and reptile surveys in potentially suitable areas of the site (Impact Sciences 2003).

TABLE 5.7-2
BIOLOGICAL SURVEYS CONDUCTED
ON THE PROJECT SITE (1999–2015)

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods
Birds and Mammals	BonTerra Psomas	July 2015	Update to the 2009 California condor assessment (BonTerra Psomas 2015d)
		March–July 2015	Focused surveys for tricolored blackbird (BonTerra Psomas 2015c)
		March – July 2013	Focused surveys for Swainson's hawk (BonTerra Psomas 2013)
	BonTerra Consulting	February–April 2010	Focused surveys for mountain plover (BonTerra Consulting 2010).
		April 2008–July 2008	Focused protocol surveys for least Bell's vireo and southwestern willow flycatcher (BonTerra Consulting 2008).
		April 2006–July 2006	Focused protocol surveys for least Bell's vireo and southwestern willow flycatcher (BonTerra Consulting 2006b).
		March 2006–July 2006	Focused protocol surveys for California spotted owl (BonTerra Consulting 2006a).
	Peter Bloom	spring–summer 2007	California condor records review, habitat assessment, and impact assessment (Peter Bloom 2009).
	Natural Resource Consultants	April 2006	Burrowing owl surveys in select areas of the Project site and mitigation lands (NRC 2006c).
	Ecological Sciences	May 2006–July 2006	Focused surveys for Tehachapi pocket mouse in the Phase One areas (Ecological Sciences 2006).
		2005	Small mammal trapping survey conducted at the Centennial site (Ecological Sciences 2005).
	Impact Sciences	June 2–6, June 30–July 3, July 7–12, 2003	Surveys for special status bird species; focused burrowing owl surveys conducted in potentially suitable areas of the site (Impact Sciences 2003).
		October 2–5 and 9–12, 2001	Small mammal species were trapped with Sherman live traps in potentially suitable sample areas representative of all habitat types on the site (Impact Sciences 2003).
		March 2001–October 2001	Special status bird and mammal species were noted during general reconnaissance and focused surveys for plants, amphibians, and reptiles (Impact Sciences 2003).
	Dave Crawford	June 3–7, 2003	Small mammal species were trapped with Sherman live traps in sample habitat areas primarily located east of the Aqueduct (Crawford 2003).

TABLE 5.7-2
BIOLOGICAL SURVEYS CONDUCTED
ON THE PROJECT SITE (1999–2015)

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods
	Paul Pruett & Associates	March 23, 27, April 3, June 15, 1999; April 25, 29, May 18, 2000	Wildlife surveys conducted concurrent with plant surveys in potentially suitable areas of the site (Impact Sciences 2003).
Wildlife Movement	BonTerra Consulting	Spring 2007	Wildlife movement assessment of on-site areas to update baseline data and expected movement areas (results provided in this document).
		2005	Review of previous studies and analysis of topographic maps and aerial photographs of the vicinity (results provided in this document).
	Trust for Public Lands	2004–2005	Review of Tejon Ranch lands to develop a proposed 100,000 acre preserve (TPL 2004).
	Pioneer Environmental Services	2004	Wildlife movement study of Tejon Ranch lands including the Project site (Pioneer Environmental Services 2004).
	Dr. Paul Beier	2002	Tejon Ranch landscape connectivity study, including the Project site (Beier 2003).
	Impact Sciences	September and October 2001	Regional habitat connectivity assessment conducted with use of aerial photographs, topographic maps, and field reconnaissance. Track surveys in riparian zones (Impact Sciences 2001b).

SR: State Route; dbh: diameter at breast height; CRAM: California Rapid Assessment Method; USACE: U.S. Army Corps of Engineers; USFWS: U.S. Fish and Wildlife Service

Sources: The survey reports listed in this table are included in Appendix 5.7-B.

For expanded discussions and detailed methodologies, please refer to these reports contained in EIR Appendix 5.7-B.

In addition to the many surveys described above, third-party data, such as the scientific biological resources information developed as part of the Tejon Ranch Land Use and Conservation Agreement (Ranch-Wide Agreement or RWA) between Tejon Ranch and the Sierra Club, Natural Resource Defense Council, California Audubon Society, Endangered Habitats League, and Planning and Conservation League; the biological resource information developed and used in environmental impact reports (EIRs) for areas that include the Project site such as the Antelope Valley Area Plan EIR (Los Angeles County), the Northwest SR-138 Corridor Improvement Project EIR (Caltrans), and the 2012 and 2016 Regional Transportation/Sustainable Communities Strategy EIRs (SCAG); and relevant third-party scientific literature is cited in the extensive bibliography included in Section 5.7, Biological Resources, of the Draft EIR.[3360] Given the Project's consistency with the County's Antelope

[3360] DRP 2017, Section 5.7.9, p. 5.7-195

Valley Area Plan and both the 2012 and 2016 Regional Transportation/Sustainable Communities Strategy planning documents, the Project impact on biological resources have been analyzed in at least three different environmental impact reports in addition to the Centennial EIR. Given this history and the nearly two decades of biological study of the Project site, any suggestion that the EIR's biological determinations are based on insufficient scientific data is without merit.

This comment does not specifically address the adequacy of the EIR, and therefore no further response is required.

ADD-F.14

PALMDALE REGIONAL
MEDICAL CENTER

38600 Medical Center Drive | Palmdale, CA 93551 | (661) 382-6600

July 6, 2018

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

Dear Mr. Sackett,

This letter of support and encouragement is in regards to the Centennial development at Tejon Ranch located near the junction of state highway 138 and interstate 5.

Palmdale Regional Medical Center ("PRMC") is the region's newest and only private bed (184) hospital in the Antelope Valley and continues to be rated as the hospital with the highest quality outcomes in the region by outside agencies such as Leapfrog and Women's Choice Award. In 2017 PRMC admitted 9,178 patients, treated 74,238 patients in the emergency room and performed 7,364 surgeries. PRMC is dedicated to providing quality care, delivering innovative service and exceeding expectations in healthcare since it opened in December 2010.

PRMC is owned by Universal Health Services, Inc. ("UHS"). UHS is one of the nation's largest hospital companies operating, through its subsidiaries, 350 acute care hospitals, behavioral health facilities and ambulatory centers located throughout the United States, the United Kingdom, Puerto Rico and the U.S. Virgin Islands. Listed on the New York Stock Exchange, UHS reported $10.4 billion in revenue and $725.4 million in net income in 2017. UHS was founded in 1979 by Alan B. Miller, Chairman and CEO, and today has more than 83,000 employees. UHS maintains one of the strongest balance sheets and is rated among the highest in the hospital services industry by Moody's and Standard & Poor's. This strong capital position has enabled the company to develop and acquire many new facilities over the past few years.

ADD-F.14-1

PRMC has been following the progress of the Centennial development at Tejon Ranch for some time. This development is sorely needed to help alleviate the housing shortage in the Antelope Valley. Recently, I have had discussions with Nathan Keith, Director of Planning, Real Estate at Tejon Ranch. PRMC and Tejon Ranch both share a vison that the new development at Centennial would be an ideal location for a future medical facility. With a planned development of 19,333 homes, the future residents at Centennial would need access to local, quality healthcare facilities and PRMC/UHS would study the possibility of opening such facilities in the development.

We look forward to the completion of the Centennial development.

Best regards,

Sean P. Morrisroe

Sean P. Morrisroe
Director, Business Development
sean.morrisroe@uhsinc.com

RECEIVED
2018 JUL -9 PM 3:31
DEPT OF REGIONAL PLANNING

Response to Comment Letter ADD-F.14
Palmdale Regional Medical Center
July 6, 2018

Response to Comment ADD-F.14-1:

Thank you for your participation in this public process. The Commenter's support for the Project and desire to locate a future medical facility in the Project is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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From: King, Katherine <king@humnet.ucla.edu>
Sent: Wednesday, August 15, 2018 11:40 PM
To: Rosie Ruiz
Cc: Jodie Sackett
Subject: Centennial project material for Planning Commission



Tri-County Watchdogs PO Box 6407 Frazier Park, CA 93222

15 August 2018

To: Commissioners David W. Louie, Pat Modugno, Elvin W. Moon, Laura Shell, and Doug Smith
Los Angeles County Planning Commission

RE: **Centennial Project: Alternative E**

Dear Commissioners,

Tri-County Watchdogs has created an illustrated booklet about Quail Lake that we attach and ask you to read in conjunction with our request (previously submitted) that you consider Alternative E before voting to pass the Centennial Project on to the Board of Supervisors.

The booklet was created under the leadership of biologist Lynn Stafford with the help of local photographers and dedicated members of our organization. We hope it will show you the beauty and value of what will be lost if Centennial City stretches to the west of the aqueduct as planned on the original map.

ADD-F.15-1

Sincerely yours,

Katherine King, Secretary, Tri-County Watchdogs

Quail Lake Wildlife Habitat is in Danger

An important migratory bird stopover and habitat gem is threatened by Tejon Ranch Corporation's Centennial City Project, Especially Village 9



Quail Lake [BB]

In northern Los Angeles County at the extreme western end of the Antelope Valley, hills press down from the north and south towards a little lake. Slightly over a mile long and half a mile wide, Quail Lake's waters, shores and uplands host at least 150 species of birds.



Ruddy Ducks [BB]



American White Pelicans [BB]

ADD-F.15-1 cont.

The land around the lake is sparsely populated, with only three residences within one mile. Nonetheless, one can often see human visitors enjoying the lake along with the birds.



Fishing at Quail Lake, 2016 [BB]

Starting at a public parking lot at the western end off of Highway 138, a maintenance road circles the Lake, allowing public access for shore fishing, hiking, biking, birdwatching and photography.

ADD-F.15-1 cont.



Quail Lake, North Shore [BB]

Quail Lake was originally two ephemeral ponds created by cataclysmic action on the San Andreas Fault. They comprised one section of an important string of sag ponds in the region.



Gorman Post Sag Pond Three Miles East of Quail Lake on San Andreas Fault [BB]

By 1972, the California Department of Water Resources had constructed and filled a larger reservoir in the space of the two ponds. This reservoir, now called Quail Lake, has dual functions of conducting the West Branch California Aqueduct over the San Andreas Fault and providing a regulatory storage body for the water system.

ADD-F.15-1 cont.



Inlet to Quail Lake [BB]

Habitat of Quail Lake and Surrounding Uplands

Since the conversion of the two natural ponds into Quail Lake, the lake has developed several wetland wildlife habitats to compliment the surrounding natural and rural uplands. The lake consists primarily of open water with surrounding shoreline.

RC



Bald Eagle at Quail Lake [RC]

A few small islands and rocks are present. There are areas of steep, relatively bare banks separated by patches of emergent vegetation, mostly bulrushes. Above the shoreline in several locations are stands of riparian brush and trees.



Island in Quail Lake [BB]

ADD-F.15-1 cont.

Grass-covered fields to the immediate west, north and east belong to Tejon Ranch Corporation. A two-lane rural highway (Highway 138) near the south shore carries travelers to the Antelope Valley. South of the highway are brush and grass-covered hills and canyons.



Uplands Adjacent to Quail Lake [BB]



View Northwards onto Adjacent Tejon Ranch Corp Lands [BB]



California Poppies [BB]

ADD-F.15-1 cont.

These habitats in and adjacent to Quail Lake provide refuge for an abundance of wildlife.



Northern Harrier [BB]



Pronghorn [BB]



Western Meadowlark [BB]



Cliff Swallows collecting mud for nests [BB]



Bobcat [BB]

ADD-F.15-1 cont.

Quail Lake's Role Supporting California's Native Birdlife Populations: A Photographic study

For more than three years, local photographers Bill Buchroeder and Randy Cushman and biologist Lynn Stafford have documented wildlife at and adjacent to Quail Lake, with an emphasis on bird life.



Randy Cushman at Quail Lake [BB]

During this time, they have identified 133 species by photographs taken from the maintenance road surrounding the lake or from the shoreline. Undoubtedly even more species move through the area.

These photographs verify that Quail Lake and its immediate surroundings function as an important migration route and winter stopover as well as for summer breeding for many native bird species, many of whom have experienced a severe drop in population numbers in California due to human-related factors.



Blue-winged and Cinnamon Teal [RC]

ADD-F.15-1 cont.

Many hours of driving, hiking, searching, photographing and processing photographs, have revealed that Quail Lake is on an important flyway and that it also functions, in concert with the upland pastures nearby, as vital breeding grounds for several species, including at least one endangered species, the tri-colored blackbird.

BB



Tri-colored Blackbird [BB]

Migratory Bird Corridor Usage of Quail and Immediate surrounding Uplands

Many water, shore, and land bird species migrate between winter grounds south of the United States to summer breeding areas in California and further north as far as the Arctic coast of Canada and Alaska.



White-faced Ibis, Black-necked Stilt and American Avocet During Spring Migration [BB]

ADD-F.15-1 cont.

An important migratory route funnels birds from the Southern California deserts and the Salton Sea region through Antelope Valley past Quail Lake, through mountain gaps in the vicinity of Gorman, Lebec and Grapevine on north into the San Joaquin Valley and destinations still further north. In the fall of each year bird species return to their southern wintering grounds via the same route.



Migration Route Google Earth

At least sixty-eight species have been observed using Quail Lake and the surrounding uplands during migration. These species include loons, grebes, white pelicans, herons, egrets, ibis, swans, geese, at least 16 species of ducks, raptors, shorebirds and many songbirds. Notable numbers observed in migratory flocks include 200 white-faced ibis, 200 American white pelican and 500 common merganser. Quail Lake appears to be particularly attractive to fish-eating birds. Migrating sandpipers, plovers, stilts and avocets work the shoreline.

ADD-F.15-1 cont.



Greater Yellowlegs Resting During Migration [BB]

Migrating swallows ply the airways above the Lake for insects. Quail Lake provides an essential oasis stopover for birds traveling hundreds or thousands of miles during their biennial travels.

During the past hundred years or more, much of California's wetland habitat has been destroyed or degraded by human development. The few remaining natural wetlands and enhanced or created wetlands, such as Quail Lake are crucial for the survival of migratory birds.

Breeding Birds of Quail Lake

Several species of birds nest at or in immediate vicinity of Quail Lake. Human structures provide overhangs for colonies of cliff swallows.



Swallow Breeding Colony [BB]

Small groves of cottonwoods and willows harbor a variety of riparian species.



Raptor Nest in Cottonwood Tree [BB]

ADD-F.15-1 cont.

The patches of reed beds along the shore create a hidden world of marsh birds. These include three members of the rail family, the American coot, sora and Virginia rail.



Virgina Rail in Quail Lake Reeds [BB]

Marsh wrens, common yellowthroat (a wood warbler) and song sparrow also reside here. Red-winged blackbirds and possibly yellow-header blackbirds nest in these dense vegetation tangles. Of special conservation significance are the colonies of tri-colored blackbird.

Tri-colored Blackbird Nesting Colonies at Quail Lake

The tri-colored blackbird is found almost entirely within the state of California. It's numbers have plummeted with the development of wetlands, particularly in the Central Valley. Under consideration for Endangered status, it is the subject of regular population assessments by the University of California to determine its vulnerability to extinction.

At Quail Lake, two to four colonies were observed in the shoreline reed beds each summer from 2015-2017. The total individuals in these colonies probably number between 1000 and 2000 adult birds.

Unlike its close relative the common red-winged blackbird, the tri-color needs to exist in large colonies during nesting. This blackbird has a complex social dynamic. All females in one colony ovulate at the same time.

ADD-F.15-1 cont.

Tri-color blackbirds weave their nests close together between reed stems hanging over shallow water out of sight.



Tri-colored Blackbird Nesting Colony at Quail Lake
[BB]

While the females tend the nests, the males converse loudly, then all leave together to forage for insects in nearby pastures. They are known to travel as much as five miles in search of insects.

ADD-F.15-1 cont.



Tri-coloured Blackbird Males Foraging North of Quail Lake
[BB]

Because they nest in large colonies, tri-colored blackbird require abundant food resources close to each colony. The present situation at Quail Lake appears to be ideal. The reed beds are

undisturbed, and the Tejon Ranch pastures to the west, north and east of the Lake provide most of the food supply.



Blackbird Colony Close to Proposed Village 9 of Centennial City [BB]

The proposed Centennial City development will completely alter the surrounding uplands to the west, north and east of the Lake, whose pastures will disappear into residential subdivisions. This alteration will certainly destroy the existing breeding populations of tri-colored blackbirds. The widening of Highway 138 to accommodate this development will further degrade the potential for breeding by this species.

ADD-F.15-1 cont.

CEQA Alternative E

Although the building of Centennial City will do great permanent damage to the connectivity of natural ecosystems within California, will basically destroy the natural environmental qualities of Western Antelope Valley, and will have far-reaching ecosystem degradation effects on California, **Alternative E** would at least limit the damage to east of the aqueduct. It would preserve the important grassland hill habitat north of Quail Lake where the tri-colored blackbird forages, and it would allow Quail Lake to continue to function as an important breeding ground and migratory rest-stop for many species of birds.

Lynn Stafford, Biologist, Board Member, Tri-County Watchdogs

Bill Buckroeder [BB] and Randy Cushaman [RC], photographers

Tri-County Watchdogs

Response to Comment Letter ADD-F.15
TriCounty Watchdogs
August 15, 2018

Response to Comment ADD-F.15-1:

The Commenter's concern about the natural history of Quail Lake is noted. The Commenter has provided a document of photographs describing the species that currently utilize Quail Lake with the title "Quail Lake Wildlife Habitat is in Danger". The document describes the history of the lake, as well as photographs of wildlife and plants in the area. Species mentioned in the document include: the California poppy, ruddy duck, American white pelican, bald eagle, northern harrier, pronghorn antelope, western meadowlark, cliff swallows, bobcat, blue-winged and cinnamon teal, tricolored blackbird, white-faced ibis, black-necked stilt, American avocet, greater yellowlegs, Virginal rail, marsh wren, common yellowthroat, and song sparrow.

No direct Project impacts to Quail Lake are proposed; in fact, Village 9 is approximately 2,000 feet to the north. Indirect Project impacts to Quail Lake are included in the biological impacts section (Draft EIR Section 5.7.6). The Draft EIR acknowledges the migration of common bird species through the Project site on page 5.7-49 and analyzes the migration of individual special status species through the Project site beginning on pages 5.7-112 through 5.7-124, and 5.7-148 through 5.7-151. Additionally, please refer to response to Comment F.8-162 of the Final EIR regarding migratory birds.

The special status species mentioned in the comment (e.g. northern harrier, bald eagle, pronghorn antelope, and tricolored blackbird), are analyzed separately in the Special Status Wildlife section of Draft EIR Section 5.7.3, Environmental Setting. The northern harrier is discussed on pages 5.7-50, 5.7-92, 5.7-117, and 5.7-150 of the Draft EIR. The bald eagle is discussed on pages 5.7-88, 5.7-95, 5.7-120, 5.7-121, 5.7-145, and 5.7-148 of the Draft EIR, and at length in responses to Comments B.4-72 F.8-137, F.8-146, F.8-147, F.8-148 of the Final EIR. (Mitigation Measure 7-8 is provided to mitigate for potentially significant impacts to bald eagle.) Pronghorn antelope is discussed on pages 5.7-50, 5.7-54, 5.7-127, 5.7-128, and 5.7-153 of the Draft EIR, and at length in responses to Comments B.4-34, B.4-35, B.4-36, B.4-37, F.8-165, F.8-166, and F.8-167 of the Final EIR.

Regarding the tricolored blackbird breeding colony at Quail Lake, all permanent direct impacts to potential breeding ponds will be avoided as discussed in the Draft EIR. However, MM 7-7 has been revised in the Final EIR to require that all temporary impacts will be avoided within ¼ mile during the nesting season to avoid indirect effects during construction. No tricolored blackbird have been seen at the northern portion of the Project site in recent years; however, the permanent setback described for this species in MM 7-7 in Section 5.7, Biological Resources, on pages 5.7-178 and 5.7-179 will apply to both the Quail Lake use area as well as the pond use area in the northern portion of the Project site.

With respect to foraging habitat, the Draft EIR indicated that loss of foraging habitat could interrupt breeding if both Quail Lake and the north pond were used for breeding at the same

time. As noted above, it has been nine years since any tricolored blackbird were found at the north pond, the habitat has become severely degraded, and the area is not likely to become suitable in the future. The species routinely shifts breeding locations, and there are also existing suitable breeding locations within the Mitigation Preserve as described in Appendix 5.7-C of the Draft EIR, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the existing foraging habitat for that season during construction, and the land use adjacent to Quail Lake up to approximately ½ mile is almost entirely open space recreation and, therefore, will be permeable and available for foraging. Please also see discussion of coordination with CDFW in response to Comment B.4-1.

Tricolored blackbird is discussed on pages 5.7-19, 5.7-112 through 5.7-114, 5.7-116, 5.7-145, 5.7-148, 5.7-149, 5.7-150, 5.7-151, and 5.7-154 of the Draft EIR, and at length in responses to Comments B.4-18, B.4-43, B.4-70, F.3-14, F.3-15 through F.3-20, F.3A-23 through F.3A-29, F.7-22, F.8-117, F.8-156, and F.8-158 of the Final EIR. A separate tricolored blackbird report is also attached (Draft EIR Appendix 5.7-B) that documents breeding at Quail Lake. The potential impacts to tricolored blackbird associated with the widening of SR-138 (including potential impacts to Quail Lake nesting habitat) were analyzed by Caltrans in the Northwest State Route 138 Corridor Improvement Project Final Environmental Impact Report/Environmental Impact Statement (Caltrans EIR).[3361] The Caltrans EIR, which assumes development Project, determined that, with mitigation, impacts to tricolored blackbird associated with State Route 138 Corridor Improvement Project activities would not be significant.[3362]

The comment does not present evidence indicating that the Draft EIR's analysis of impacts to Quail Lake biological resources, including special status species, was inadequate.

With respect to the Commenter's recommendation to select Alternative E, the Commenter's preference is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Commenter has previously expressed this preference in much more detail, and the County has responded appropriately. For detailed responses, please see Supplemental Staff Memo to RPC 8-16-18, Attachment G – Responses to Hearing Testimony, at Responses RPC-70 through RPC-74, available at http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180816-attH2.pdf; and Attachment H – Responses to Additional Correspondence Received through August 13, 2018, at Responses to Comments ADD-F.13-2 through ADD-F.13-8, available at http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180816-attH5.pdf.

[3361] Caltrans EIR at 380
[3362] *Id.*

CALIFORNIA
NATIVE PLANT SOCIETY

August 17, 2018

Los Angeles County Regional Planning Commission
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012
(213) 974-6411
Submitted via email to: rruiz@planning.lacounty.gov and
sackett@planning.lacounty.gov

Dear Los Angeles County Regional Planning Commission,

Thank you for the continued opportunity to engage in the very important dialogue related to the proposed Centennial Specific Plan. The scale of this project and the habitats that are threatened make this a project of utmost importance to the California Native Plant Society.

The California Native Plant Society ("CNPS") is a non-profit environmental organization with nearly 10,000 members in 35 local chapters. CNPS' mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed and environmentally friendly policies, regulations, and land management practices.

During our review of testimony presented at past Regional Planning Commission hearings on Centennial and continued analysis of the Centennial Specific Plan FEIR we have uncovered some issues that need to be addressed ahead of the August 29 hearing.

ADD-F.16-1

Issue 1: Misrepresentation of the Tejon Ranchwide Agreement

In 2008, Tejon Ranch Company (TRC) entered into an agreement with five environmental organizations, the Sierra Club, Endangered Habitats League, Audubon of California, Natural Resources Defense Council, and Planning and Conservation League.

The complete text of the Ranchwide Agreement is available at:
https://www.sec.gov/Archives/edgar/data/96869/000119312508138009/dex1028.htm

In testimony at public hearings of the Regional Planning Commission, TRC has repeatedly misrepresented the nature of this agreement by implying that the five environmental organizations party to the 2008 Ranchwide Agreement support TRC's

ADD-F.16-2

proposed development actions. For example, on June 6, at the Regional Planning Commission hearing, Greg Medeiros, TRC Vice President Community Development, stated that Centennial "complies and conforms and is consistent with all of the scientific work done by the Sierra Club, NRDC, and other signatories of the Ranchwide Agreement. Boundaries were drawn. This site fits inside of the place where people think, okay. This is where development should go. To meet our needs, this is where development should go. What is around it should be preserved."

This statement is simply not accurate. The primary product of TRC's Ranchwide Agreement with the five environmental organizations was for these groups to "not oppose the development of the Projects, or any of the Project Approvals, consistent with the terms of the Agreement." See Ranchwide Agreement Exhibit S pages 1-4.

It is important for the Regional Planning Commission and Board of Supervisors to recognize that an agreement to "not oppose" is not equivalent to support. The Centennial Specific Plan does not have broad support of the environmental community or any other community for that matter.

ADD-F.16-2-cont.

Issue 2: The Mitigation Preserve Design in the FEIR is Inadequate

For the latest version of the mitigation preserve design proposed by TRC for the Centennial Specific Plan please see PDF pages 1455-1457 in FEIR Volume 2: http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-feir-2.pdf. Please see the map labeled Exhibit 5.7-10 on pdf page 1455.

This version of the mitigation preserve supersedes the previous version presented in DEIR Appendix 5.7 pages 136-138 and Exhibit 5.7-10. A notable difference between the DEIR and FEIR is the addition of a large area of proposed mitigation land to the east of the project site in Area 7 (FEIR pdf page 1455).

In order to evaluate the adequacy of the mitigation preserve design CNPS conducted a GIS exercise that involved manually digitizing FEIR Exhibit 5.7-10 and analyzing proposed mitigation areas in relation to existing conservation easements. A GIS map of conservation easements on Tejon Ranch was obtained from the National Conservation Easement Database: https://www.conservationeasement.us/.

The following maps and table show quite clearly that TRC is relying heavily on lands already preserved with conservation easements for its mitigation preserve design. A brief description of each map follows:

Map 1: Shows areas proposed as mitigation by TRC in green with area numbers corresponding to those in FEIR Exhibit 5.7-10. Areas covered by existing conservation easements appear as black-hashed lines.

Map 2: Shows the current land use designation for each of the areas in the mitigation preserve. Areas in yellow are "Onsite mitigation", those in red are offsite mitigation

ADD-F.16-3

areas that occur within conservation easements, and those that are in green are offsite mitigation areas that are outside of the areas covered by conservation easements.

Map 3: Maps the grassland habitat in the proposed mitigation preserve. These areas were digitized to the best of our ability, but the complex nature of the polygons in FEIR Exhibit 5.7-10 mean that there may be some small differences between Map 3 and the grassland map in the FEIR.

The table below and Map 1 summarize the acreage and land use designation in the Centennial Mitigation Preserve:

Mitigation Areas	Grassland Acreage	Total Acreage	Acreage in Easements	Grassland Acreage in Easements
On-site				
North	1899	2898	0	0
South	90	968	0	0
Sub-total	1989	3866	0	0
Off-site				
Area 1	1734	6497	1340	90
Area 2	1597	2556	0	0
Area 3	3059	4183	4183	3059
Area 4	4494	7319	6480	3865
Area 5	643	643	643	643
Area 6	1005	2429	0	0
Area 7	7877	15668	3126	1440
Sub-total	20409	39295	15772	9097
Total	**22398**	**43161**	**15772**	**9097**
Percentage of Total in Easements	**36.5**			
Percentage of Grassland in Easements	**40.6**			

A total of 36.5 percent of all land in the mitigation preserve is already covered by conservation easements. The Ranchwide Agreement provided "an option to purchase conservation easements over an additional 62,000 acres of Tejon Ranch" (see Ranchwide Agreement, page 1). These 62,000 acres, in addition to the 178,000 acres conserved as part of the Ranchwide Agreement sum to 240,000 acres, or 88.9% of the land owned by TRC. In 2010, the state's Wildlife Conservation Board (WCB) agreed to purchase 62,000 acres of TRC land using 15.8 million taxpayer dollars (see WCB

ADD-F.16-3 cont.

minutes from November 2010, see Attachment 1_WCBminutes.pdf). Areas in the Centennial mitigation preserve include portions of the Bi-Centennial and Tri-Centennial Easements and correspond to mitigation Areas 3, 4, and 5 in the mitigation preserve (see 5.7-10 and Map 1). The land within the mitigation preserve that was purchased by WCB amounts to 11,306 acres or 29% of the total offsite mitigation acreage. An additional, 10,000 acres of easements were acquired in 2014 to accommodate the re-routing of the Pacific Crest Trail (PCT) on Tejon Ranch (see http://www.latimes.com/travel/deals/la-trb-tejon-ranch-pacific-crest-trail-20140506-story.html). Areas proposed for offsite mitigation within the PCT easement total 4,466 acres. Combined, areas covered by existing easements total 15,772 acres, or 36.5% of the mitigation preserve.

ADD-F.16-3 cont.

FEIR Volume 2 (pdf page 1456), states that areas covered by existing easements are "available for mitigation activities that include enhancement, restoration, or creation, are not available for preserved mitigation acreage since the existing Conservation Easement already requires preservation." To our knowledge, TRC has yet to detail the enhancement, restoration, or creation that it intends to complete on these lands. Furthermore, has TRC detailed which, if any, of the areas within the WCB easements needs these actions? This leads us to question why these areas are even being considered as part of the mitigation preserve? Has the WCB, which provided the taxpayer funds to purchase these easements, been contacted about the use of these lands as part of TRC's Centennial mitigation preserve? Are these areas simply being included to augment the number of acres used for mitigation, possibly to increase, on paper, the mitigation to disturbed area ratio? Are these lands included to simply make the lands available for mitigation look more robust than they actually are? For a picture of what the mitigation preserve actually looks like if more accurately depicted please refer to Map 2, in which areas already covered by conservation easements are depicted in red.

ADD-F.16-4

ADD-F.16-5

ADD-F.16-6

Furthermore, we continue to have serious concerns about the ability of TRC to mitigate for the loss of grassland habitats on Centennial. The rich nature of the grassland habitats on Centennial have been detailed in the study by Vollmar Consulting from 2003-2004 (See Attachment2_VollmarReport.pdf). In this report, Vollmar details the native grassland and wildflower habitats as the product of a variety of environmental factors endemic to Centennial. These factors include geologic origin, soil texture, topographic position in the landscape and climate. Map 3 details the distribution of grassland habitats in the mitigation preserve. This map makes it entirely clear that a large proportion of the grassland habitats proposed as mitigation, approximately 9,000 acres (40% of the grassland total), is located within land covered by existing easements. The addition of the eastern portion of Area 7 in the FEIR increases the amount of grassland mitigation acreage by 7,877 acres. Given that the quality of grassland habitats within Centennial is related to a combination of environmental factors, we question the comparability of these habitats with those to the Ares 6 and the eastern portion of Area 7. Has TRC provided a scientifically-defensible analysis of grassland habitats in Area 6 and the eastern area of 7 with those on Centennial?

ADD-F.16-7

ADD-F.16-8

From my own observations, having done botanical research on Tejon Ranch for more than four years as part of my dissertation, I can conclusively say that environmental factors and habitats change quite dramatically as one travels east along the foothills of the Tehachapi Mountains. Habitats become drier and more influenced by Mojave Desert vegetation as one travels east from Centennial. A striking example of this is the absence of Joshua tree (*Yucca brevifolia*) on Centennial and its prevalence farther to the east. The composition of perennial grasslands also changes as one travels from west to east. For example, grassland habitats dominated by nodding needlegrass (*Stipa cernua*) in the foothills of the western Tehachapi Mountains give rise to grasslands dominated by desert needle grass (*Stipa speciosa*) to the east. How can the grassland habitats in the eastern part of Mitigation Area 7 and Area 6 serve adequately as mitigation for the loss of grassland habitats on Centennial? Empirically, there are also numerous examples of plant species that are not known from east of Big Sycamore Canyon, which is roughly in line with the eastern edge of Centennial. I have hypothesized that this is related to microclimatic patterns, which result in higher annual precipitation rates to the west of this "divide." If TRC wants to use land in the eastern portion of Tejon Ranch to mitigate for the loss of habitat on Centennial they should be required to prove that these lands are equivalent using reproducible methods with the results published in peer-reviewed journals.

ADD-F.16-8 cont.

ADD-F.16-9

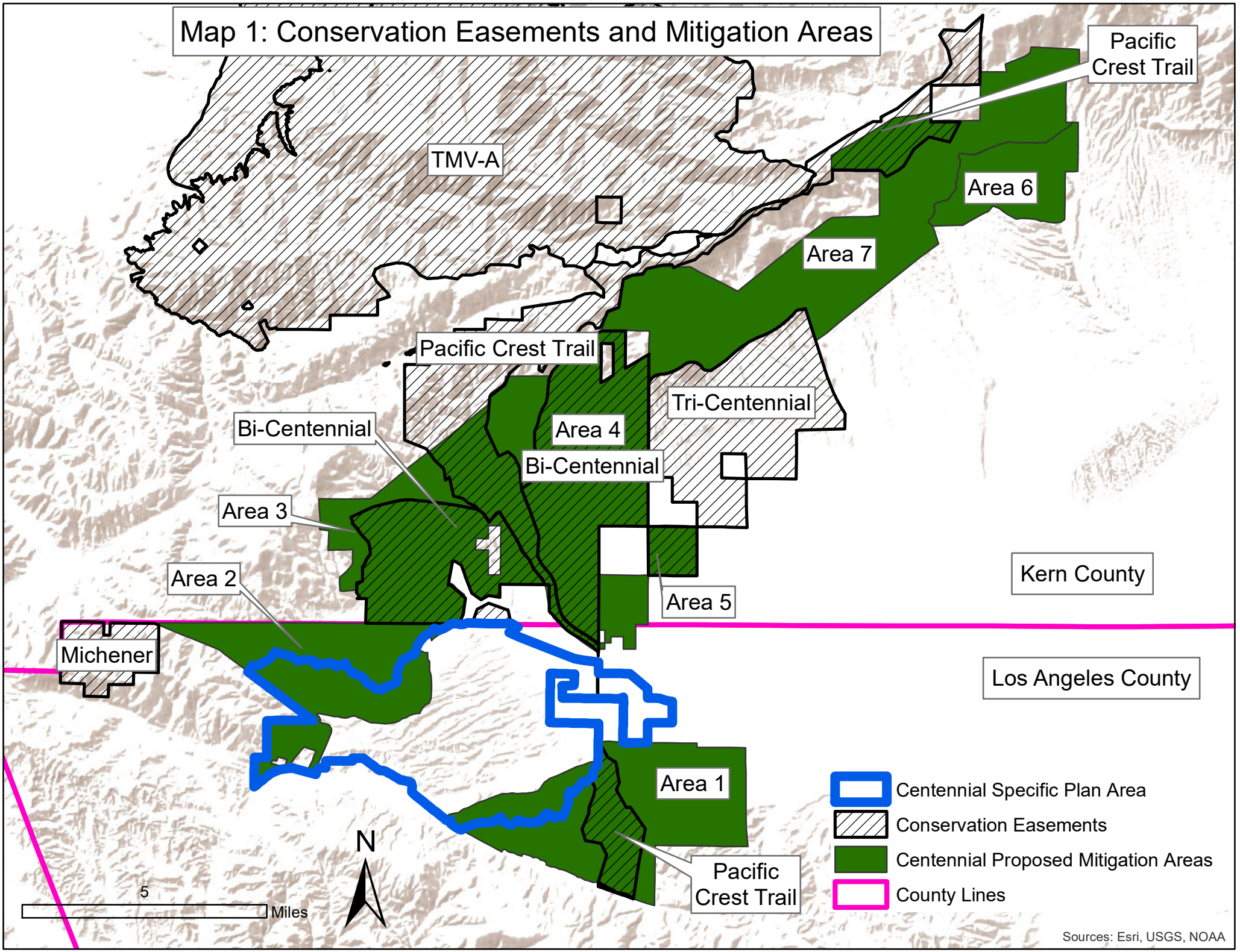
In summary, TRC has presented a mitigation proposal that includes more than 15,000 acres of land that have already been spoken for, in that they are already covered by existing conservation easements. Additionally, the use of the eastern portion of Area 7 and Area 6 to mitigate for habitat losses on Centennial is dubious and merits further study. When these eastern habitats are taken away from mitigation preserve along with the 15,772 acres of lands already covered by conservation easements does TRC have a viable mitigation preserve? Numerous scientists have detailed the unique and special nature of the habitats on Tejon Ranch. Among these special habitats, the grasslands on Centennial are exemplary, unique, and irreplaceable. Given the value of these habitats, a more creative and comprehensive mitigation preserve design is warranted. Until this is prepared by TRC, the design presented in the FEIR should be deemed inadequate.

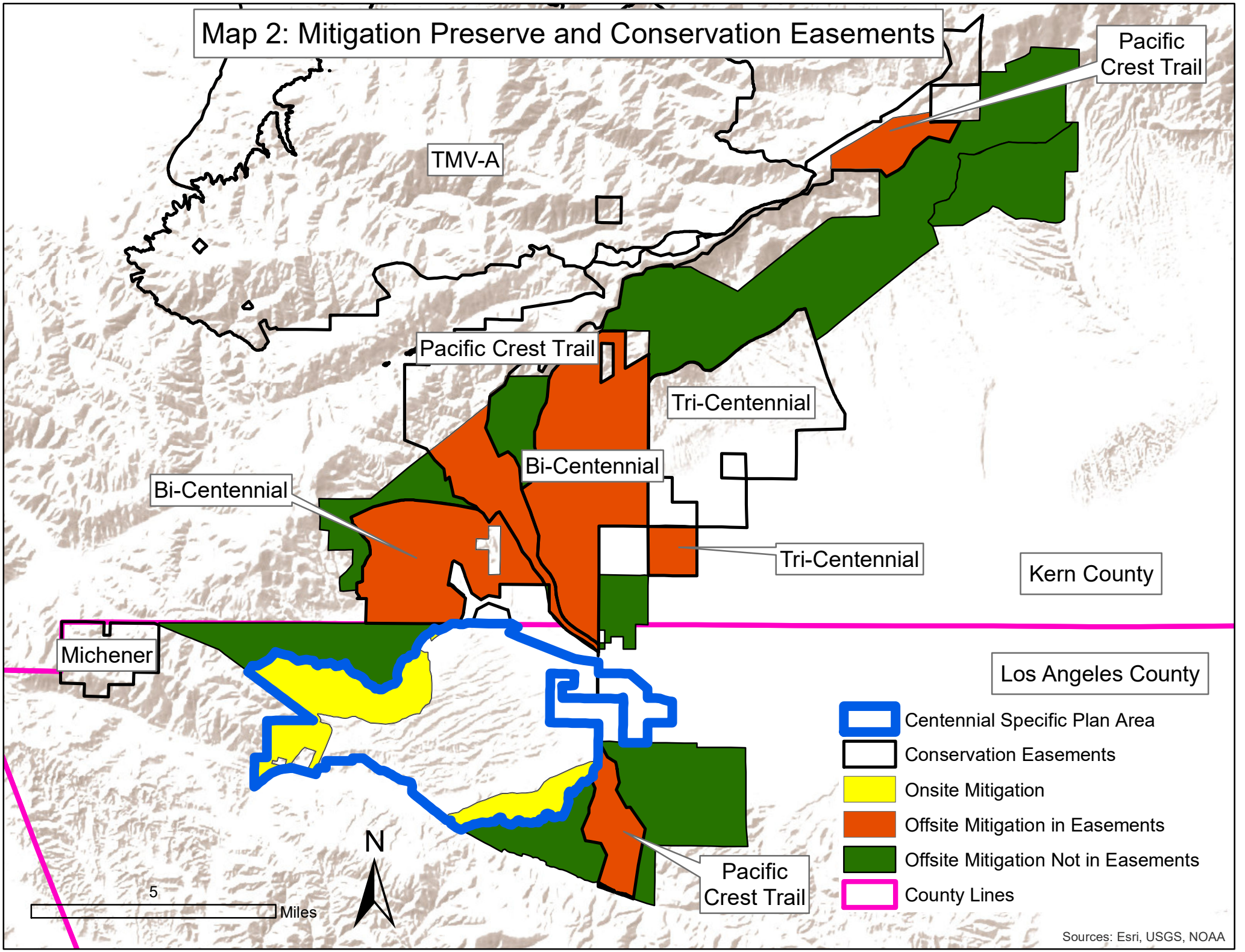
ADD-F.16-10

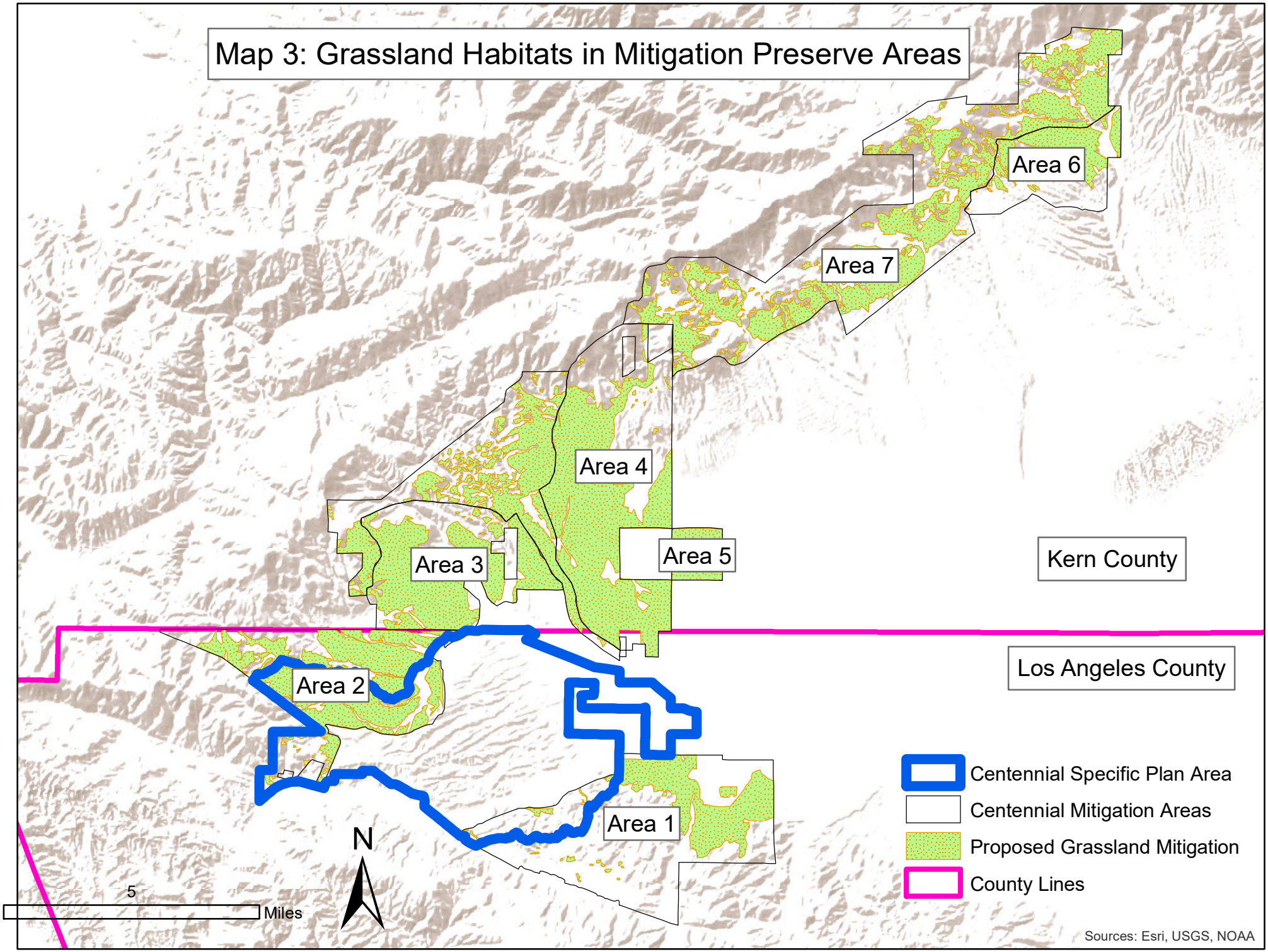
Sincerely,



Nicholas Jensen, PhD
Southern California Conservation Analyst
California Native Plant Society
1500 North College Ave
Claremont, CA 91711
(530) 368-7839
njensen@cnps.org


Map 1: Conservation Easements and Mitigation Areas
Pacific Crest Trail
TMV-A
Area 6
Area 7
Pacific Crest Trail
Tri-Centennial
Bi-Centennial
Area 4
Bi-Centennial
Area 3
Area 2
Kern County
Area 5
Michener
Los Angeles County
Area 1
Pacific Crest Trail
N
5
Miles
Centennial Specific Plan Area
Conservation Easements
Centennial Proposed Mitigation Areas
County Lines
Sources: Esri, USGS, NOAA


Map 2: Mitigation Preserve and Conservation Easements
Pacific Crest Trail
TMV-A
Pacific Crest Trail
Tri-Centennial
Bi-Centennial
Bi-Centennial
Tri-Centennial
Kern County
Michener
Los Angeles County
Centennial Specific Plan Area
Conservation Easements
Onsite Mitigation
Offsite Mitigation in Easements
Offsite Mitigation Not in Easements
County Lines
Pacific Crest Trail
N
5
Miles
Sources: Esri, USGS, NOAA


Map 3: Grassland Habitats in Mitigation Preserve Areas
Area 6
Area 7
Area 4
Area 3
Area 5
Area 2
Area 1
Kern County
Los Angeles County
N
5
Miles
Centennial Specific Plan Area
Centennial Mitigation Areas
Proposed Grassland Mitigation
County Lines
Sources: Esri, USGS, NOAA

ATTACHMENT 1

WILDLIFE CONSERVATION BOARD
MINUTES

DEPARTMENT OF FISH AND GAME
WILDLIFE CONSERVATION BOARD
1807 13TH STREET, SUITE 103
SACRAMENTO, CALIFORNIA 95811
(916) 445-8448
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State of California
Natural Resources Agency
Department of Fish and Game
WILDLIFE CONSERVATION BOARD
Minutes
November 18, 2010

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WILDLIFE CONSERVATION BOARD

Minutes

November 18, 2010

The Wildlife Conservation Board met on Thursday, November 18, 2010, at the State Capitol, Room 4203 in Sacramento, California. Mr. John McCamman, Director of the Department of Fish and Game, called the meeting to order at 10:00 A.M., introduced himself, Ms. Karen Finn, Program Budget Manager, Department of Finance; Ms. Diane Colborn, Assembly Member Jared Huffman's representative; Ms. Erin Shaw, Assembly Member Ira Ruskin's representative; Mr. John Donnelly, Executive Director of the Wildlife Conservation Board, and Ms. Natalya Kulagina, Mr. Donnelly's Executive Assistant. Mr. McCamman turned the meeting over to Mr. Donnelly.

1. Roll Call

WILDLIFE CONSERVATION BOARD MEMBERS

John McCamman, Chairman
Director, Department of Fish and Game

Karen Finn, Program Budget Manager
Vice, Ana Matosantos, Member
Director, Department of Finance

JOINT LEGISLATIVE ADVISORY COMMITTEE

Senator Fran Pavley

Teresa Schilling
Vice, Senator Patricia Wiggins

Diane Colborn
Vice, Assembly Member Jared Huffman

Erin Shaw
Vice, Assembly Member Ira Ruskin

EXECUTIVE DIRECTOR

John P. Donnelly

Wildlife Conservation Board Staff Present:

John P. Donnelly, Executive Director
Dave Means, Assistant Executive Director
Peter Perrine, Assistant Executive Director
Scott McFarlin, Public Land Management Specialist IV
Debbie Townsend, Senior Land Agent (R.A.)
Natalya Kulagina, Executive Assistant
Liz Yokoyama, Senior Land Agent
Janell Bogue, Staff Counsel
Nancy Templeton, Staff Counsel
Brian Gibson, Senior Land Agent
Robert Kane, Senior Land Agent (R.A.)
Tony Chappelle, Public Land Management Specialist IV
William Gallup, Senior Land Agent
Erin Ingenthron, Office Technician
Jasen Yee, Associate Budget Analyst
Dawn Drowne, Staff Services Analyst
Chad Fien, Public Land Management Specialist IV
Roland Shield, Research Analyst I
Ashley Lackey, Staff Services Analyst
Celestial Baumback, Office Technician
Mary Westlake, Staff Services Analyst
Teri Muzik, Senior Land Agent
Jon Wilcox, Senior Land Agent
Scott Clemons, Public Land Management Specialist IV (R.A.)
Marilyn Cundiff, Public Land Management Specialist IV

Others Present:

Andy Atkinson, Department of Fish & Game
Eric Haney, Department of Fish & Game
Julie Horenstine, Department of Fish & Game
Jennifer Navicky, Department of Fish & Game
Kent Smith, Department of Fish & Game
Larry Wyckoff, Department of Fish & Game
Carl Studebaker, Department of Fish & Game (retired)
Todd Ferrara, Natural Resources Agency
E. J. Remson, The Nature Conservancy
Gregg Werner, The Nature Conservancy
Marlyce Myers, The Nature Conservancy
Chris Fischer, The Nature Conservancy
Trish Strickland, Trust for Public Land
David Sutton, Trust for Public Land
Erik Vink, Trust for Public Land
Taylor Mee-Lee, Trust for Public Land
Tasha Newman, CA Strategy Group
Catherine Koehler, UC Davis
Pat Dyas, Wildlife Conservation Board (retired)
Bill Burrows, Red Bluff, CA
Tory Burrows, Red Bluff, CA
Bob King, TRI Commercial
Athena Shlien, Malibu, CA
Jamison Watts, North Coast Regional Land Trust
Joel Reynolds, Natural Resources Defense Council
Dave Burrows, Cottonwood, CA
Duncan Estabrook, Red Bluff, CA
Susan Schohr, Schohr Ranch, Inc.
Suzanne Goode, Department of Parks & Recreation
Roberta Marshall, DMB Associates
Edward Stanton, American Land Conservancy
Melinda Marks, San Joaquin River Conservancy
Tom Maloney, Tejon Ranch Conservancy
Eileen Reynolds, Tejon Ranch
Rob Stine, Tejon Ranch
Derek Abbott, Tejon Ranch
Allen Lyda, Tejon Ranch
Kathleen Parkinson, Tejon Ranch
Paul Hardy, Feather River Land Trust
David Newbert, General Public
Gretchen Lieff, General Public
Marcia Hanscom, Wetlands Defense Fund
Dan Taylor, Audubon California
Frank Giordano, Member of Public
Vicky Dawley, Big Bluff Ranch
Wendy Sherman, Big Bluff Ranch
Frank Dawley, Big Bluff Ranch
Julie Taylor, Big Bluff Ranch
Adele Pommerenck, Penn Valley, CA
Paul Aigner, UC Davis
Lauren Ward, Sonoma, CA
Holly Dawley, Redding, CA
Suzanne Easton, BRBNA Conservation Partnership
Joseph Bride, Eagles Nest Cattle
Tara Burrows, Red Bluff, CA
Wendy Sherman, Red Bluff, CA
Lynne Gould, Greenfield, CA
Chris McArthur, McArthur, CA

Others Present (continue):

Mary Small, State Coastal Conservancy
Kara Kemmler, State Coastal Conservancy
George McArthur, McArthur, CA
Mark Abramson, Santa Monica Bay Restoration Foundation

Mr. Donnelly welcomed everyone to the Wildlife Conservation Board November 2010 meeting and reported that the first item on the agenda is an information item. Mr. Donnelly asked if there were any questions about this item. There were none.

2. Funding Status — Informational

(a) 2010-11 Wildlife Restoration Fund Capital Outlay Budget

Budget Act	$1,000,000.00
Previous Board Allocations	-117,000.00
Unallocated Balance	$883,000.00

(b) 2010-11 Habitat Conservation Fund Capital Outlay Budget

Budget Act	$20,668,000.00
Previous Board Allocations	-0.00
Unallocated Balance	$20,668,000.00

(c) 2009-10 Habitat Conservation Fund Capital Outlay Budget

Budget Act	$20,668,000.00
Previous Board Allocations	-333,783.00
Unallocated Balance	$20,334,217.00

(d) 2008-09 Habitat Conservation Fund Capital Outlay Budget

Budget Act	$20,668,000.00
Previous Board Allocations	-2,542,490.00
Unallocated Balance	$18,125,510.00

(e) 2006-07 Habitat Conservation Fund Capital Outlay Budget

Budget Act	$20,699,000.00
Previous Board Allocations	-9,357,844.30
Unallocated Balance	$11,341,155.70

(f) 2006-07 Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Fund Capital Outlay Budget

Budget Act (2010-11 Reappropriation)	$15,224,000.00
Previous Board Allocations	-12,755,109.00
Unallocated Balance	$2,468,891.00

(g) 1999-00 Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Fund Capital Outlay Budget

Continuously Appropriated [Sec. 5096.350 (a)(1), (2), (4) & (7)]	$36,100,000.00
Previous Board Allocations	-27,515,085.39
Unallocated Balance	$8,584,914.61

(h) 2004-05 California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund Capital Outlay Budget (2010-11 Reappropriation)

Budget Act (San Joaquin River Conservancy Projects)	$11,000,000.00
Previous Board Allocations	-434,302.00...
Unallocated Balance	$10,565,698.00

(i) Chapter 983, Statutes of 2002, Oak Woodlands Conservation Act

Budget Act (2009-10 Reappropriation)	$4,800,000.00
Previous Board Allocations	-4,586,689.51
Unallocated Balance	$213,310.49

(j) 2001-02 California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund Capital Outlay Budget

Continuously Appropriated (Section 5096.650)	$273,000,000.00
Previous Board Allocations	-185,331,174.82
Unallocated Balance	$87,668,825.18

(k) 2003-04 Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 Capital Outlay Budget (Section 79568)

Budget Act (2010-11 Reappropriation)	$32,500,000.00
Previous Board Allocations	-21,681,299.35
Unallocated Balance	$10,818,700.65

(l) 2002-03 Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 Capital Outlay Budget

Continuously Appropriated (Sections 79565 and 79572), including Chapter 81, Statutes of 2005	$814,350,000.00
2003-04 Budget Act Transfer to HCF from Section 79565	-21,000,000.00
2004-05 Budget Act Transfer to HCF from Section 79565	-21,000,000.00
2005-06 Budget Act Transfer to HCF from Section 79565	-4,000,000.00
2005-06 Budget Act Transfer to HCF from Section 79572	-3,100,000.00
2006-07 Budget Act Transfer to HCF from Section 79572	-17,688,000.00
2007-08 Budget Act Transfer to HCF from Section 79572	-5,150,000.00
2008-09 Budget Act Transfer to HCF from Section 79572	-1,000,000.00
Previous Board Allocations	-666,754,469.48
Unallocated Balance	$74,657,530.52

(m) 2010-11 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Budget Act (San Joaquin River Conservancy Projects)	$3,380,000.00
Previous Board Allocations	-0.00
Unallocated Balance	$3,380,000.00

(n) 2009-10 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Budget Act (San Joaquin River Conservancy Projects)	$10,000,000.00
Previous Board Allocations	-0.00
Unallocated Balance	$10,000,000.00

(o) 2008-09 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Budget Act (San Joaquin River Conservancy Projects)	$10,000,000.00
Previous Board Allocations	-0.00
Unallocated Balance	$10,000,000.00

(p) 2007-08 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget (2010-11 Reappropriation)

Budget Act (San Joaquin River Conservancy Projects)	$10,000,000.00
Previous Board Allocations	-75,000.00
Unallocated Balance	$9,925,000.00

(q) 2009-10 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Budget Act (NCCP Section 75055(c))	$10,000,000.00
Previous Board Allocations	-0.00
2010-11 Budget Act Reversion	-3,000,000.00
Unallocated Balance	$7,000,000.00

(r) 2009-10 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Chapter 2, Statutes of 2009 (SB 8)	$24,000,000.00
Previous Board Allocations	-0.00
Unallocated Balance	$24,000,000.00

(s) 2008-09 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Budget Act (NCCP Section 75055(c))	$25,000,000.00
Previous Board Allocations	-1,180,000.00
Unallocated Balance	$23,820,000.00

(t) 2007-08 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget (2010-11 Reappropriation)

Budget Act (NCCP Section 75055(c))	$25,000,000.00
Previous Board Allocations	-13,887,872.00
Unallocated Balance	$11,112,128.00

(u) 2007-08 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Budget Act (Section 75055(d)(1)), (2010-11 Reappropriation)	$14,293,000.00
Previous Board Allocations	-8,464,968.00
Unallocated Balance	$5,828,032.00

(v) 2007-08 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Budget Act (Section 75055(d)(2)), (2010-11 Reappropriation)	$14,293,000.00
Previous Board Allocations	-5,378,444.00
Unallocated Balance	$8,914,556.00

(w) 2007-08 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Budget Act (Section 75055(d)(4)), (2010-11 Reappropriation)	$4,762,000.00
Previous Board Allocations	-1,722,600.00
Unallocated Balance	$3,039,400.00

(x) 2006-07 Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 Capital Outlay Budget

Continuously Appropriated (Section 75055a)	$164,700,000.00
Previous Board Allocations	-14,490,000.00
Unallocated Balance	$150,210,000.00

Continuously Appropriated (Section 75055(b))	$123,525,000.00
Previous Board Allocations	-50,762,633.50
Unallocated Balance	$72,762,366.50

RECAP OF FUND BALANCES

Wildlife Restoration Fund (a)	$883,000.00
Habitat Conservation Fund (b), (c), (d) and (e)	$70,468,882.70
Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Fund (f) and (g)	$11,053,805.61
California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Bond Fund (h), (i) and (j)	$98,447,833.67
Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 (k) and (l)	$95,567,185.94
Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (m), (n), (o), (p), (q), (r), (s), (t), (u), (v), (w) and (x)	$339,991,482.50

RECAP OF NATURAL HERITAGE PRESERVATION TAX CREDIT ACT OF 2000

Chapter 113, Statutes of 2000 and Chapter 715, Statutes of 2004	
Tax credits awarded through June 30, 2008	$48,598,734.00
Chapter 220, Statutes of 2009 (effective January 1, 2010)	
Tax credits awarded	$0.00

3. Special Project Planning Account — Informational

The Board has historically used a special project account to provide working funds for staff evaluation (appraisals, engineering, preliminary title reports, etc.) of proposed projects. Upon the Board's approval of a project, all expenditures incurred and recorded in the Special Project Planning Account are transferred to the Board approved project account which then reduces the Special Project Planning Account expenditures. This procedure provides a revolving account for the pre-project expenses.

Some appropriations now made to the Board do not include a specific budgeted planning line item appropriation necessary to begin a project without prior Board authorization. Pre-project costs are a necessary expenditure in most all capital outlay projects. The Special Project Planning Account is available to be used for these costs.

The Board, at its May 6, 1986 meeting, authorized the Executive Director to use up to 1% of a budgeted appropriation to set up and maintain an appropriate planning account with the provision it would be reported to the Board as an informational item.

Accordingly, a planning account has been set up as follows:

Safe Neighborhood Parks, Clean Water, Clean Air
and Coastal Protection Fund.....$35,000.00

Habitat Conservation Fund.....$35,000.00

Mr. Donnelly provided a brief description on how a project planning account works. Mr. Donnelly explained that at the end of each agenda item, in addition to the allocation of a grant or the acquisition cost, there is an additional request for project expenses, and once the funding is approved by the Board, those funds, authorized by the Board for project-related expenses, are put back into the planning account. Mr. Donnelly commented that we try to keep the planning account whole as much as we can, but sometimes projects incur cost and are not completed and it is necessary to use planning account. Mr. Donnelly asked if there were any questions about this item. Ms. Finn asked if the most you can get from planning account at any time is $70,000.00. Mr. Donnelly responded that it is up to one percent of the fund itself.

4. Proposed Consent Calendar (Items 4—17)

Mr. Donnelly reported that several letters of support were received for the following projects presented in Consent Calendar:

- **Item #*11** (Eticuera Creek Watershed Habitat Restoration, Napa County) Letters of support received from: Noreen Evans, Assembly Member, District 7; Patricia Wiggins, Senator, Second Senate District; Rich Burns, Field Manager, Ukiah, United State Department of the Interior, Bureau of Land Management, Ukiah Field Office; Phillip Blake, District Conservationist, United States Department of Agriculture; Morgan Doran, Livestock and Natural Resources Advisor for Napa, Solano and Yolo Counties, University of CA, Agricultural and Natural Resources; Karl Burke, Closure Manager –McLaughlin Mine, Homestake Mining Company.
- **Item #*13** (Insectaries for Pollinators and Farm Biodiversity, Sonoma County). Letters of support received from: Charlette Epifanio, District Conservationist, Natural Resources Conservation Services; Kathy Kellison, Executive Director, Partners for Sustainable Pollination; Ron Rolleri, Secretary, North Coast Resource Conservation & Development Council.

*5. Approval of Minutes — August 26, 2010

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve the minutes of the August 26, 2010 meeting.

Motion carried.

*6. Recovery of Funds

The following projects previously authorized by the Board are now completed, and some have balances of funds that can be recovered and returned to their respective funds. It is recommended that the following totals be recovered and that the projects be closed.

$8,881.83	to the	**Habitat Conservation Fund**
$0.00	to the	**Wildlife Restoration Fund**
$1,191,838.99	to the	**California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Fund**
$43,795.21	to the	**Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002**
$735.00	to the	**Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006**

HABITAT CONSERVATION FUND

Montna Farms Wetland Restoration, Sutter County

Allocated	$150,000.00
Expended	-149,635.17
Balance for Recovery	$364.83

Truckee River Wildlife Area, Gray Creek Canyon Unit, Nevada County

Allocated	$15,000.00
Expended	-6,483.00
Balance for Recovery	$8,517.00

Total Habitat Conservation Fund **$8,881.83**

WILDLIFE RESTORATION FUND

Kings River Fishing Access, Fresno County

Allocated	$11,824.00
Expended	-11,824.00
Balance for Recovery	$0.00

Total Wildlife Restoration Fund **$0.00**

CALIFORNIA CLEAN WATER, CLEAN AIR, SAFE NEIGHBORHOOD PARKS, AND COASTAL PROTECTION FUND

California Fisheries Restoration Projects - 2007, Chorro Creek Floodplain and Riparian Restoration, San Luis Obispo County

Allocated	$1,157,073.00
Expended	-158.50
Balance for Recovery	$1,153,231.50

Eastern Mojave Desert Springs Habitat Restoration, San Bernardino County

Allocated	$43,000.00
Expended	-4,075.01
Balance for Recovery	$38,924.99

Kings River Fishing Access, Fresno County

Allocated	$112,176.00
Expended	-112,176.00
Balance for Recovery	$0.00

Pacifica Fishing Pier Improvements, San Mateo County

Allocated	$500,252.00
Expended	-500,252.00
Balance for Recovery	$0.00

Total California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Fund **$1,191,838.99**

WATER SECURITY, CLEAN DRINKING WATER, COASTAL AND BEACH PROTECTION FUND OF 2002

Loch Lomond Marina Intertidal Enhancement, Marin County

Allocated	$207,775.00
Expended	-163,979.79
Balance for Recovery	$43,795.21

Total Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 **$43,795.21**

SAFE DRINKING WATER, WATER QUALITY AND SUPPLY, FLOOD CONTROL, RIVER AND COASTAL PROTECTION FUND OF 2006

Iron Mountain Wildlife Area, Expansion 4, San Diego County

Allocated	$15,000.00
Expended	-14,265.00
Balance for Recovery	$735.00

Total Safe Drinking Water, Water Quality and **$735.00**

Supply, Flood Control, River and Coastal Protection Fund of 2006

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve the Recovery of Funds for the projects listed on pages 7 through 9 of the agenda and close the project accounts. Recovery totals include $8,881.83 to the Habitat Conservation Fund; $0.00 to the Wildlife Restoration Fund; $1,191,838.99 to the California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Fund; $43,795.21 to the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002; and $735.00 to the Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Fund.

Motion carried.

*7. Fund Shift, Various Projects $887,855.00
Fresno, Madera and Monterey Counties

Mr. Donnelly pointed out that there is a wording modification in item #7 (Fund Shift, Various Projects; Fresno, Madera and Monterey Counties), and he'll be happy to pull this project for a discussion, if necessary. Mr. Donnelly reported that on page 11 of this agenda the first sentence on the top of the page says "The no cost time extensions are due, in part, to the Pooled Money Investment Account (PMIA) bond freeze." Mr. Donnelly commented that the account actually did not freeze the bonds, so Mr. Donnelly recommended that "Pooled Money Investment Account (PMIA)" should be taken out and further in that sentence remove the words "which recently lifted", and that sentence would read "The no cost time extensions are due, in part, to the bond freeze of December 2008." Then, in the next sentence, Mr. Donnelly recommended to take out the words "of the PMIA freeze", and that sentence would read "As a result, the Grantee's work was either slowed or stopped by the Grantor until funding for the project allocations could be secured from up front bond sale proceeds." Mr. McCamman asked if there is no material difference with these corrections. Mr. Donnelly confirmed that this is correct.

This proposal was to consider various fund shifts for six previously approved San Joaquin River (SJR) Conservancy and Wildlife Conservation Board (WCB) projects. The cooperative projects involve the SJR Conservancy, Department of Fish and Game, City of Fresno, County of Madera, and Ducks Unlimited, Inc. The proposed fund shifts are necessary to meet existing Grant Agreement obligations and will utilize funding authorized for the same purpose from a subsequent enactment year appropriation.

The table below outlines the fund shifts for the previously approved cooperative projects which include five projects for the SJR Conservancy from the California

Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Fund (Proposition 40) and one project for the WCB from the Wildlife Restoration Fund (WRF).

Grant Agreement	Grantee	WCB Approval Date*	Project Name	County	Fund Shift Amount (Maximum)
WC-2043TC	City of Fresno	11/17/05	SJR Parkway, Lewis S. Eaton Trail, Friant Road Segment	Fresno	$140,000.00
WC-6084TC	County of Fresno	05/24/07	SJR Parkway, Lost Lake Regional Park Master Plan	Fresno	$223,445.00
WC-7019TC	SJR Conservancy	08/23/07	SJR Parkway, Lewis S. Eaton Trail River West CEQA	Fresno	$125,600.00
WC-7056BT	Department of Fish and Game	02/20/08	SJ Hatchery Public Access, Phase I, Preconstruction Planning & Design	Fresno	$187,500.00
WC-8004BT	County of Madera	05/22/08	SJR Parkway, River West-Madera Restoration Planning & Environmental Review	Madera	$37,100.00
WC-9022AL	Ducks Unlimited, Inc.	05/27/10	Moss Landing Wildlife Area Public Access	Monterey	$174,210.00
Total (Maximum Amount)					**$887,855.00**

* The project descriptions for the previously approved items may be viewed at www.wcb.ca.gov in the WCB Meeting Minutes for the respective Board meeting.

The fund shifts for the SJR Conservancy projects are necessary as the Grant Agreements require no cost time extensions in order for the Grantee's to fulfill existing obligations. The no cost time extensions are due, in part, to the bond freeze of December 2008 which recently lifted. As a result, the Grantee's work was either slowed or stopped by the Grantor until funding for the project allocations could be secured from up front bond sale proceeds. The current allocations for these Grantee obligations are due to revert at the end of the fiscal year.

With regard to the Moss Landing Wildlife Area Public Access project, the fund shift is necessary due to an accounting error wherein a previous approved WCB project allocation was paid from a later year appropriation from the same fund source for the same purpose. The error was discovered during reconciliation and within one week of release of the monthly Agency Reconciliation Report. A Correction Memorandum was immediately sent to the State Controllers Office (SCO); however, the SCO was unable to revive the reverted appropriation. This unfortunate situation has left a cash shortage in the appropriation from which the Moss Landing Wildlife Area Public Access project was funded requiring the WCB

to fund shift a part of this Grantee obligation to the current fiscal year WRF appropriation established for the same purpose.

The table outlines the maximum amount proposed for the fund shift. The amount of the shift will be based on the unliquidated agreement balance at the time of the fund shift. A revised Funding Certification will be prepared for each Grant Agreement and submitted to the SCO. The fund shifts will utilize funding authorized for the same purpose from a subsequent fiscal year appropriation. The shifted amounts from the previous WCB allocations will be recovered and returned to their respective fund sources; therefore, the net effect of the project fund shift on the WCB allocation for the project is zero.

Staff recommended that the Wildlife Conservation Board approve the fund shifts as proposed; allocate up to $713,645.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Fund (Proposition 40), Section 5096.650(b)(5); allocate up to $174,210.00 from the Wildlife Restoration Fund; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve the fund shifts as proposed; allocate up to $713,645.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Fund (Proposition 40), Section 5096.650(b)(5); allocate up to $174,210.00 from the Wildlife Restoration Fund; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*8. Hamilton City Flood Damage Reduction and Ecosystem Restoration
Glenn County — $10,000.00

This proposal was to consider the disposal of 120± acres of a larger 482± acre property located in the Sacramento River Conservation Area, Expansion 4 (Expansion 4), and to authorize the reuse of the proceeds to acquire 104± acres in fee title for the protection of riparian and riverine habitat supporting threatened and endangered species. The property was acquired with a Wildlife Conservation Board (WCB) grant to The Nature Conservancy (TNC), which was approved by WCB in November 2001.

LOCATION
The disposal property and proposed acquisition property (Stiles Ranch) are located approximately 10 miles west of Chico and southeast of the Hamilton City, on the west side of the Sacramento River in Glenn County. Both properties are improved with orchards and are located outside the immediate

levee system of the Sacramento River. Various governmental agencies and nonprofits own property within the vicinity, including TNC, Department of Fish and Game (DFG), California Department of Parks and Recreation (DPR) and the U.S. Fish and Wildlife Service (USFWS).

The DFG's Sacramento River Wildlife Area (SRWA) is located further east of Expansion 4, along the Sacramento River. SRWA is 1,078± acres in size and was acquired in a number of separate transactions between the late eighties and early nineties. USFWS holdings in the area include the Sacramento River National Wildlife Refuge (SRNWR), located immediately north of Stiles Ranch property. Immediately east of the Stiles Ranch property is the Bidwell - Sacramento River State Park.

The Expansion 4 property lies on the protected side of the J levee, outside the main floodplain of the Sacramento River. When Expansion 4 was presented to the Board in 2000 for funding, it was anticipated the new setback levee would run through the middle of the Expansion 4, from north to south. The portion of the Expansion 4 located on the river side of the levee would be restored to riparian habitat and the portion outside the levee would be excess and considered for disposal.

PROJECT DESCRIPTION

Since the early 2000s, the WCB has approved six grants for acquisitions and expansions at its meetings under the title of the Sacramento River Conservation Area (SCRA). The WCB's grant to acquire Expansion 4 was one of these. The SCRA acquisitions provide protection of riparian habitat for threatened and endangered species and public access, as well as assistance in the implementation of the Hamilton City Flood Damage and Ecosystem Restoration project (Flood and Ecosystem Project).

The two main objectives of the Flood and Ecosystem Project are to expand the floodplain to create a more natural hydrology, increasing riverine and riparian habitat and provide an improved level of flood protection for Hamilton City. The riparian areas will provide an important seasonal habitat for migratory birds, waterfowl, native amphibians and salmonids. This includes a number of federal and State listed threatened and endangered species, such as the western yellow-billed cuckoo, giant garter snake, greater sandhill crane, bank swallow, western pond turtle and Swainson's hawk. Improved riverine habitat will provide improved spawning areas for the central valley steelhead and winter-run Chinook salmon. With regard to Expansion 4, the Flood and Ecosystem Project essentially called for the removal of a private levee, referred to as the J levee, and construction of a new (setback) levee further away from the river.

At this time, the current configuration of the Setback Levee Project has been established so that excess portion of Expansion 4 can be determined. Part of this proposal is for TNC to dispose of the excess 120± acres of Expansion 4

and reuse the proceeds from this disposal to assist in the acquisition of additional property along the Sacramento River. The acquisition will further implement the Flood and Ecosystem Project. The Stiles Ranch property is located within the boundary area of the Flood and Ecosystem Project and will allow for the construction of the new setback levee and the further restoration of riparian habitat within the newly expanded floodplain area of the Sacramento River.

WCB PROGRAM

The proposed acquisition of this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program, acquisition activities are carried out in conjunction with the DFG, which will evaluate the biological values of property. In this particular case the DFG, as a member of the Sacramento River Conservation Area Forum (SRCAF), authorized acquisition of properties lying within the boundary of the purview of the SRCAF.

The SRCAF was established from Senate Bill 1086, passed by the State Legislature in 1986, calling for development of a management plan to protect, restore and enhance fisheries and riparian habitat along the Sacramento River and its tributaries along the 222 miles of the Sacramento River between Keswick and Verona. The SRCAF is governed by a board of directors that includes both private landowners and public interest appointees from each of the seven involved counties and an appointee of the Natural Resources Agency. The SRCAF is advised by a panel of representatives from three State agencies: the Department of Water Resources, DFG and the Reclamation Board; and three federal agencies: the Army Corps of Engineers, the USFWS and the Bureau of Reclamation. Both proposed projects have been presented to the SRCAF Board as informational items.

MANAGEMENT OBJECTIVES AND NEEDS

TNC and its partners, including the USFWS, the DFG, the WCB, and stakeholders participating in the SRCAF, have undertaken the largest riparian restoration project in the United States. The goal is to restore a continuous 100-mile stretch of ecologically viable riparian habitat to flood-prone lands along the river between Red Bluff and Colusa. On some sites the river will revegetate its banks and meander through the natural process of winter flooding and deposition. On other sites, TNC is contracting with local farmers to plant native trees and shrubs, pumping money into the local economy and helping to generate interest and involvement in local communities in the fate of the river ecosystem.

TNC, the USFWS, the DFG, and the WCB have acquired 14,000 acres along the river. Three thousand acres have been restored thus far to native riparian forest.

TNC intends to manage the properties in the immediate future, with the possibility of combining Expansion 4 with the adjacent SRWA, Pine Creek Unit. The Stiles Ranch property could potentially be added to the SRNWR.

TERMS

The grant for Expansion 4 provides that the Grantee, TNC, may dispose or transfer ownership of all or a portion of the property with the approval of the WCB Executive Director. The Executive Director has authorized the disposal of the excess portions of Expansion 4. Those proceeds are to be held in an escrow account. If approved by the Board, the funds will be used to help acquire the 104± acre Stiles Ranch property. The newly acquired Stiles Ranch property will also fall under the terms of the grant agreement and a Notice of Unrecorded Grant referring back to the original agreement will be recorded on the property. If the Board does not approve, then the funds will be returned to the WCB. The remaining portions of Expansion 4 will remain encumbered by the grant terms of the original agreement.

It is understood both the value of the disposed portion of Expansion 4 and the purchase price of the Stiles Ranch property will be based on the fair market value appraisals, approved by the Department of General Services (DGS) on August 26, 2010 (Expansion 4,Vereschagin property), and September 13, 2010 (Stiles Ranch property).

The terms and conditions of the existing grant still require staff of the WCB to review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition and disposal of the two subject properties. In the event of breach of the grant terms, the WCB can encumber the properties with a conservation easement and seek reimbursement of funds.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Disposal of Expansion 4 (dry side)	$672,581.00
Purchase Stile Ranch Property	- 934,257.00
TNC contribution (via DWR grant)	261,676.00
TOTAL	$0.00
Other Project-related Costs:	$10,000.00
TOTAL WCB Allocation	**$10,000.00**

It is estimated that an additional $10,000.00 will be needed to cover project-related expenses, including DGS review costs.

FUNDING SOURCE

The proposed funding source for this project is the Habitat Conservation Fund (Proposition 117), Section 2786 (b/c)(1E) that provides funding for protection of threatened and endangered species within floodplains and is consistent with the objectives of this project. The original funding source used for Expansion 4 was the Habitat Conservation Fund (Proposition 117), Section 2786 (b/c) that provides funding for protection of threatened and endangered species and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION

The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The Department of Fish and Game has reviewed this proposal and recommends it for approval

STAFF RECOMMENDATION

Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $10,000.00 from Habitat Conservation Fund (Proposition 117), Section 2786 (b/c)(1E) for internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve this project as proposed; allocate $10,000.00 from Habitat Conservation Fund (Proposition 117), Section 2786 (b/c)(1E) for internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*9. Loch Lomond Vernal Pool $25,000.00
Ecological Reserve Exchange
Lake County

This proposal was to consider the acceptance of 1.7± acres and the disposal of 1.4± acres through an exchange of fee title land between the Department of Fish and Game (DFG) and a private landowner to expand protection of vernal pool habitat at the Loch Lomond Ecological Reserve (Reserve). The proposed exchange will complete the DFG's acquisition of the complete vernal pool while disposing of property not related to the protection of critical habitat. The exchange will ensure that the total vernal pool is protected from unauthorized use but will be available for visits by schoolchildren and researchers.

LOCATION
The subject property is located adjacent to the community of Loch Lomond, along the north side of State Highway 175 corridor, within the Big Canyon/ Putah Creek Watershed, in Central Lake County. The area consists of vernal pool habitat, healthy, large conifers, black oak, and an understory of manzanita, mountain-mahagony and ceanothus. Most of the surrounding development is rural residential with some small commercial development in the vicinity.

PROJECT DESCRIPTION
The proposed exchange will complete the DFG's acquisition and protection of the intended vernal pool habitat within the Reserve. The Reserve was created by three prior acquisitions, totaling approximately 13 acres. The exchange will increase the area to 14± acres and complete the last piece necessary to provide full protection of vernal pool complex. Currently there are plans to construct a perimeter fence around the entire project area once the exchange is completed. The disposal area was acquired under one of the prior acquisitions, and has been reviewed by DFG and determined not to contain any significant habitat values.

A survey of the subject property was completed by licensed staff from the California Department of Forestry and Fire Protection (CalFire). The survey was given to the real estate appraiser and will be used to record a new parcel map for the area if the project is approved. The subject property contains a Northern Ash Flow Vernal Pool and is one of two protected in the Napa-Lake County region. It contains rare, endemic vernal pool plants, including button-celery, many flowered navarretia, few-flowered navarretia, and Konocti manzanita. Acquisition of the property will also increase the public's educational opportunities, with educational field trips and access provided under the direction of DFG staff.

WCB PROGRAM
The proposed exchange is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original

enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.), which gives the WCB the authority to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program, acquisition activities are carried out in conjunction with the DFG, which evaluates the biological values of property and whether or not to recommend it for funding.

MANAGEMENT OBJECTIVES

The maintenance, conservation, security and caretaker services on the property will be managed by the DFG's North Central Region staff. The DFG already has the fencing materials needed to enclose the property, and installation will be handled by the DFG's staff. Any additional costs associated with this project will be nominal and absorbed under the current operation and maintenance budget for the Reserve.

TERMS

The property owner has agreed to trade the property for a portion of the existing ecological reserve. Both properties were appraised for $67,000.00 by a local independent appraiser, and the appraisals were reviewed and approved by the Department of General Services (DGS). The terms and conditions of the proposed exchange agreement provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, exchange documents, escrow instructions and instruments of conveyance prior to recordation of the deeds transferring title to the properties.

PROJECT FUNDING

This project is an even exchange. There are no capital costs for this project.

Other project-related costs:	$25,000.00
TOTAL WCB Allocation	**$25,000.00**

It is estimated that $25,000.00 will be needed for internal project-related expenses, including title insurance, fifty percent of the escrow fees, appraisal review costs by the DGS and the survey costs incurred by the CalFire.

FUNDING SOURCE

The proposed funding source for this project is the Habitat Conservation Fund (Proposition 117), Section 2786(b/c)(1E), that allows for the protection of habitat for threatened and endangered species and preservation of wildlife values within a floodplain or flood corridors and is consistent with this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION

The project has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for

fish and wildlife conservation purposes, and under Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space and habitat. Subject to approval by the WCB, a Notice of Exception will be filed with the State Clearinghouse.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $25,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(b/c)(1E), for internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve this project as proposed; allocate $25,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(b/c)(1E), for internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*10. Swiss Ranch, Expansion 3 $430,000.00
Calaveras County

This proposal was to consider the acquisition by the Department of Fish and Game (DFG) of a conservation easement over 304± acres to maintain and protect unfragmented habitat in Calaveras County for the migratory Rail Road Flat deer herd, protection of oak woodland, hardwood-conifer, mixed chaparral, and riparian habitats for black bear, mountain lion, and bobcat, and contribute to linkages and corridors between upper and lower Sierra habitat. The DFG will hold and monitor the conservation easement.

LOCATION
This privately owned property is located in central Calaveras County, along Swiss Ranch Road approximately 18± miles northeast of San Andreas, between the communities of Mountain House and Rail Road Flat. The property is within the approved Railroad Flat Deer Winter Range Conceptual Area Protection Plan (CAPP). The Board allocated funding in 1985, 1988 and 1998 for the purpose of acquiring conservation easements on lands immediately south and west of the subject property. Last year, the property owner donated a conservation easement to Calaveras County over a separate 197± acres immediately east of this property thereby completing a linkage between Eagle Ridge to the immediate west with federal forest and Bureau of Land Management (BLM) land to the immediate east. The BLM land extends to

federal forest land to its east and south with DFG managed Sheep Ranch Wildlife Area. In close proximity, but non-contiguous, are the Calaveras Big Trees State Park and more federal forest land to the east and southeast.

PROJECT DESCRIPTION

This conservation easement will preserve and protect in perpetuity migratory deer habitat, oak woodland, hardwood-conifer, mixed chaparral, and riparian habitats for black bear, mountain lion, and bobcat. The conservation easement will provide habitat corridors and connectivity between adjacent lands that have been preserved for conservation purposes. The key species benefiting from this proposed conservation easement are migrant California mule deer, with the entire property providing winter habitat forage for large numbers of migrant deer. The ranch also supports a variety of other wildlife, including black bear, mountain lion, bobcat, coyote, and California quail. Other species that will benefit from the acquisition include ringtail cats and golden eagles.

According to the DFG's Railroad Flat deer herd management plan, 75 percent of the winter range of this herd is privately owned. Land uses in the area are gradually changing from large acreage cattle ranches to small acreage ranchettes, potentially reducing the property's wildlife values, making public protection critical to protection of this herd.

WCB PROGRAM

The proposed acquisition of this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program, acquisition activities are carried out in conjunction with the DFG evaluating the biological values of property through development of a Conceptual Area Protection Plan (CAPP). The CAPP is then submitted to DFG's Regional Operations Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

This project provides the DFG with an opportunity to protect critical habitat, benefiting a host of wildlife species, while incurring very little management costs. It is estimated that 1-2 person days per year would be needed to conduct an onsite inspection to monitor the conservation easement area. DFG will hold title to the easement and will monitor the property on an annual basis to ensure that conservation easement conditions are being met. Monitoring costs will be covered and absorbed under the current regional operation and maintenance (O&M) budget.

TERMS

The property owner has agreed to sell the conservation easement to the DFG for the Department of General Services (DGS) approved appraised fair market value of $410,000.00. The terms and conditions of the proposed property acquisition agreement provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition. Additionally, DFG staff will be responsible for monitoring the property at least once annually.

PROJECT FUNDING

The WCB will fund the entire purchase price of the easement which is $410,000.00.

Wildlife Conservation Board	**$410,000.00**
Other Project-related Costs	20,000.00
TOTAL WCB Allocation	**$430,000.00**

It is estimated that an additional $20,000.00 will be needed to cover project-related expenses, including appraisal costs, DGS review costs, and escrow fees bringing the total recommended allocation for this proposal to $430,000.00.

FUNDING SOURCE

The proposed funding source for this project is the Habitat Conservation Fund (Proposition 117), Section 2786 (a) that provides funding for protection of deer, mountain lion, and oak habitats and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION

The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The DFG has reviewed this proposal and recommends it for approval.

STAFF RECOMMENDATION

Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $430,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(a), to cover the acquisition and internal project-related expenses; authorize staff to enter into appropriate agreements

necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve this project as proposed; allocate $430,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(a), to cover the acquisition and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*11. Eticuera Creek Watershed Habitat Restoration $515,000.00
Napa County

This proposal was to consider the allocation for a grant to the Land Trust of Napa County for a partnership project with the State Coastal Conservancy, the U.C. McLaughlin Reserve, the Blue Ridge Berryessa Natural Area Conservation Partnership, and the Department of Fish and Game (DFG) to restore riparian habitat in the Eticuera Creek Watershed.

LOCATION
The project is located in the Eticuera Creek Watershed between the town of Knoxville and the north shore of Lake Berryessa in Napa County. The project is located on three separate ownerships: property owned by the Homestead Mining Company (HMC), but managed through long-term agreement by the University of California McLaughlin Reserve (McLaughlin), a second portion that is privately owned, and the remainder of the project is on the Knoxville Wildlife Area, owned by the Department of Fish and Game (DFG).

PROJECT DESCRIPTION
The Eticuera Creek Watershed has for millenia supported riparian habitat, one of the most important habitats for wildlife in California. Statewide, most of this habitat type has been impacted by human activities through development, agriculture, and flood control. This particular watershed has been altered primarily by mining and the introduction exotic invasive plant species. Exotic invasive plant species like tamarisk, one of the main targets of this project, out-compete native plants and provide little wildlife habitat value. In some areas of the State, tamarisk has formed a complete monoculture in riparian corridors, excluding all native vegetation.

This project is a watershed-wide endeavor addressing multiple issues with multiple partners in a four pronged approach:

1. Knoxville Creek at the Knoxville town-site has been heavily impacted by both gold and mercury mining. While no longer present, a mining town was once located on the banks of Knoxville Creek and, as a consequence, nearly all riparian vegetation was removed. Later, mine tailings were disposed of along the creek banks. HMC, the current owner of the area, is in the process of moving these mine tailings away from the Knoxville Creek channel to protect water quality in the creek. While HMC owns the property, it is managed through long-term agreement by McLaughlin, and HMC is not required to replant with native plants or control invasive species. WCB funding will allow for the enhancement of the aquatic and habitat benefits of the project by eliminating exotic invasive species on the site and planting both woody and herbaceous native riparian species on 21.6 acres of floodplain created by the removal of the tailings. Additional riparian vegetation will be installed along 3500 lineal feet of creek channel. The floodplain plants will be irrigated for three years after planting and all plants will be monitored and replanted as necessary to achieve 80% survivorship.

2. Portions of Knoxville Creek at the Knoxville town site have become heavily incised and disconnected from the floodplain as a result of human activity along the creek. A hydrologic study will be implemented to identify solutions to restore more natural creek morphology and function, which will be implemented in future projects.

3. In 2002 and 2006, the Board funded a two-phase project to remove tamarisk from Knoxville and Eticuera Creeks on the Knoxville Wildlife Area. This project will continue that work on other creeks and properties in the watershed. These will include Eticuera Creek, Adams Creek and Nevada Creek on the Gamble Ranch and Long Canyon Creek, Zim Zim Creek and Nevada Creek on the Knoxville Wildlife Area. In addition, Eticuera Creek on the newly acquired Todd Ranch portion of the wildlife area will also be treated.

4. Barbed goatgrass, an exotic invasive grass, has begun to invade the Eticuera Creek watershed. This species is of particular concern because it can invade serpentine seeps, a rare wetland type with endemic plants that would be highly susceptible to such an invasion. This has already occurred in nearby watersheds. This portion of the project will control the invasion in its early stages, before it is irreversible. Preliminary surveys and mapping have been done in anticipation of herbicide treatments to be funded by this grant.

WCB PROGRAM

This project is funded through the California Riparian Habitat Conservation Program and meets program's goal of increasing riparian habitat across California by implementing riparian habitat restoration projects.

MANAGEMENT OBJECTIVES AND NEEDS

According to the Grant Agreement, signed by both the Grantee and Landowners, the five-year implementation period is to be followed by long-term management of the project by the Grantee for riparian habitat values for at least 25 years. Furthermore, all areas where tamarisk, barbed goatgrass and other invasives were removed by this project will be monitored for reinvasion and retreated when necessary.

This project will meet the objectives of the Knoxville Wildlife Area Management Plan, The U.C. McLaughlin Reserve Management Plan and the Blue Ridge Berryessa Natural Area Conservation Framework.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Wildlife Conservation Board	**$515,000.00**
State Coastal Conservancy	118,113.00
Homestake Mining Company	100,000.00
Other Partners	92,500.00
TOTAL	**$825,613.00**

Project costs will be for project management; hydrologic assessment and mapping; planning and design; site preparation; weed control; planting; irrigation and plant protection; maintenance; monitoring/evaluation; replanting; and project administration.

FUNDING SOURCE

The proposed funding sources for this project are the Habitat Conservation Fund (Proposition 117), Section 2786 (e/f)(1E) and the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650. Respectively, these sources provide funding for the protection, restoration or enhancement of riparian habitat located in floodplains and for habitat that provides corridors linking separate habitat areas to prevent habitat fragmentation. They are consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION

The DFG has reviewed this proposal and recommends it for funding by the WCB. The DFG, as lead agency, has prepared and filed a Mitigated Negative Declaration for the project and staff has prepared written findings based upon the Mitigated Negative Declaration. Subject to approval by the WCB, a Notice of Determination will be filed with the State Clearinghouse.

STAFF RECOMMENDATION

Staff recommended that the Wildlife Conservation Board adopt the written findings and approve this project as proposed; allocate $370,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786 (e/f)(1E) and

$145,000.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board adopt the written findings and approve this project as proposed; allocate $370,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786 (e/f)(1E) and $145,000.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*12. Napa-Sonoma Marshes Wildlife Area, $10,000.00
American Canyon
Napa County

This proposal was to consider the acceptance of 352± acres of land for the Department of Fish and Game (DFG) for protection of bay wetlands, as an addition to the DFG's Napa-Sonoma Marshes Wildlife Area. The property contains scarce salt marsh habitat that support a number of waterfowl and shorebirds species in the San Francisco North Bay area, including a number of listed species.

LOCATION
The subject property is located east of the Napa River, along Eucalyptus Drive, on the western edge of the City of American Canyon, in Napa County. The property abuts up to the northeast edge of the DFG Napa-Sonoma Marshes Wildlife Area (Wildlife Area) at an area referred to as the American Canyon Unit salt plant site. Portions of the project site are encumbered with an easement for development and connection with the San Francisco Bay Trail in Napa County that runs along the eastern border of the Wildlife Area, north toward the City of Napa.

PROJECT DESCRIPTION
The original site was acquired from the Port of Oakland, with funding provided by a CALFED grant, requiring at least 70% of the property be deeded to DFG. The other 30% is being retained by the City of American Canyon as public open space. The property is being accepted by the DFG and will be assembled into the Wildlife Area. The property is predominately bay wetlands,

and there are no plans for any future restoration. The habitat on the property will support waterfowl and shorebird species, including California clipper rail, California black rail, salt marsh yellow throat and western snowy plover.

WCB PROGRAM

The proposed acquisition of this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.), which gives the WCB the authority to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program, acquisition activities are carried out in conjunction with the DFG, which evaluates the biological values of property and whether or not to recommend it for funding.

MANAGEMENT OBJECTIVES AND NEEDS

The property will be assembled into the Wildlife Area and managed as tidal wetlands by the DFG. There are no pumps or hard structures on site requiring maintenance. The bay trail will be managed by the City of American Canyon. Because the property is primarily a wetland in its current condition, and is being assembled to wetland areas, any operation and maintenance costs are expected to be nominal and easily absorbed under the current operating and maintenance budget of the Wildlife Area.

TERMS

The original CALFED grant used to acquire the property was for $2,600,000.00. The grant funding terms allows for the protection, restoration and enhancement wetlands and the transfer of the property to DFG. Staff has reviewed the title documents and conferred with DFG staff, and have agreed to accept the property subject to the terms of the CALFED grant agreement.

PROJECT FUNDING

This is a non-cash transfer from the City of American Canyon to DFG. The purchase price is $0.00.

Other Project-Related Costs:	$10,000.00
TOTAL WCB Allocation	**$10,000.00**

It is estimated that $10,000.00 will be needed for internal project-related expenses, including title insurance, escrow fees, and review charges by the Department of General Services.

FUNDING SOURCE

The proposed funding source for this project is the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 (Proposition 50), Section 79572(c), which allows for protection of wetland habitat within the San Francisco Bay Area and is consistent with this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The project has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for fish and wildlife conservation purposes, and under Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space and habitat. Subject to approval by the WCB, a Notice of Exception will be filed with the State Clearinghouse.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $10,000.00 from the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 (Proposition 50), Section 79572(c), for internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve this project as proposed; allocate $10,000.00 from the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 (Proposition 50), Section 79572(c), for internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*13. Insectaries for Pollinators and Farm Biodiversity $73,000.00
Sonoma County

This proposal was to consider the allocation for a grant to Gold Ridge Resource Conservation District (Grantee) for a cooperative project with the Natural Resources Conservation Service, the Sonoma County Fish and Game Commission, the Community Alliance with Family Farmers, Farm Stewards and the landowners to restore and enhance wildlife and pollinator habitat by maximizing nesting and food sources for a variety of native bee species on eight privately owned properties located in Sonoma County.

LOCATION
The project is located in western Sonoma County in the Green Valley Creek Watershed, Salmon Creek Watershed, and Blucher Creek Watershed between the towns of Santa Rosa and Bodega Bay.

PROJECT DESCRIPTION

Native bees and other beneficial insects play an integral role in California farm industries, pollinating one-third of all food crops and numerous native plant species that compose the State's agricultural and biological diversity. Despite their significance, populations of native and European bees throughout the U.S. have crashed dramatically over the past several decades. Concerned for both their own farm productivity and the vitality of the landscape around them, innovative producers have sought to restore and enhance pollinator habitat and attract bees back to their farms.

This project represents a collaborative effort with the Gold Ridge Resource Conservation District (GRRCD), the Community Alliance with Family Farmers (CAFF), and Farm Stewards to create and improve substantial pollinator habitat on eight working farms in western Sonoma County. The partners will work with participating landowners to develop and implement Pollinator Farm Plans. These plans are comprehensive property assessments that will be designed to maximize nesting and food sources for a variety of native bee species while providing secondary benefits such as pest management, improved water and soil quality, and harvestable products. Efforts will focus on innovative applications of insectary habitat creation, such as drought-tolerant hedgerows on non-irrigated ranchland, and an emphasis on non-Pierce's disease host plants for vineyards. Particular emphasis will be given to habitat creation for native bee species, which have been shown to be resilient to many of the current threats to managed honeybees, and essential to many plant species throughout California. The project will include the creation of field borders, nesting structures, appropriate cover crop mixes, contour buffer strips and drift barriers, critical area planting, filter strips, riparian and farm pond revegetation, and pest management practices. Plantings will be specifically designed to provide year-round pollen and nectar sources and shelter for native bees and other pollinators, while also harboring other beneficial predatory insects that control crop pests. Planting areas will also provide essential wildlife corridors for birds and mammals, while improving riparian and pond habitat for aquatic species.

The project will take place on eight privately owned farms that represent a range of agricultural land uses, including conventional and organic vineyards, an organic orchard, organic vegetables, and grazed rangelands. The plantings will be installed to create insectary habitat throughout the eight properties, using available spaces that will expand riparian areas and provide wildlife corridors along fence lines.

WCB PROGRAM

This project is funded through the Ecosystem Restoration on Agricultural Lands Program and meets program's goal of assisting farmers in integrating agricultural activities with ecosystem restoration and wildlife protection.

MANAGEMENT OBJECTIVES AND NEEDS

The Grantee has agreed to manage and maintain the facilities for 25 years, pursuant to the terms and conditions of the grant. If at any time during the life of the project, the grantee is unable to manage and maintain the project improvements, they will refund to the State of California an amortized amount of funds based on the number of years left on the project life.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Wildlife Conservation Board	**$73,000.00**
Natural Resources Conservation Service	71,520.00
Sonoma County Fish and Wildlife Commission	7,495.00
Gold Ridge Resource Conservation District	8,400.00
Landowners	42,000.00
TOTAL Project Cost	**$202,415.00**

Project costs will be for planting and irrigation, nursery plants, materials, vegetation maintenance, and project signs; and project design, construction supervision, and administration.

FUNDING SOURCE

The proposed funding source for this project is the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund (Proposition 84), Section 75055(d)(4). This funding allows for assisting farmers in integrating agricultural activities with ecosystem restoration and wildlife protection, and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION

This restoration project is exempt under Sections 15304 of the CEQA Guidelines because the project will consist of a minimal amount of earthmoving and there will be no negative impacts to the physical environment that would reduce its ability to produce native or agricultural plants. Subject to approval by the WCB, the appropriate Notice of Exemption will be filed with the State Clearinghouse. The DFG has reviewed this proposal and recommends it for funding by the WCB.

STAFF RECOMMENDATION

Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $73,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(d)(4); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation

Board approve this project as proposed; allocate $73,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(d)(4); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*14. Goleta Slough Ecological Reserve Restoration, Augmentation and Change of Scope — $366,000.00
Santa Barbara County

This project was to consider the allocation for a funding augmentation and change of scope for a grant to the Land Trust of Santa Barbara County (LTSBC) for a cooperative project with the Army Corps of Engineer and the Federal Aviation Administration to restore and enhance the Department of Fish and Game's Goleta Slough Ecological Reserve (Reserve).

LOCATION

The project is located within the City of Goleta, adjacent to and south of the Goleta Airport, in Santa Barbara County. The Reserve area was once part of an estuarine ecosystem connected directly to the tidal influences of the Goleta Slough. During World War II, portions of the Reserve were filled in and developed, restricting tidal action and effectively eliminating the estuarine areas. More recently, the Reserve area was purchased by the California Department of Transportation as a potential highway route. Plans for the route were abandoned and the property was later conveyed to the DFG. Today, the Reserve functions mostly as a freshwater wetland and upland habitat, trapping rain and run-off water from surrounding development.

The Reserve is long and triangular in shape, bounded by the University of California, Santa Barbara (UCSB) on the south, Goleta Airport property to the west and the airport and light industrial uses to the north. A major thoroughfare, Los Carneros Road, runs north-south essentially through the middle of the reserve, dividing it into two main units connected by culverts, referred to as the West Unit and East Units.

PROJECT DESCRIPTION

The goal of project is to enhance and expand wetland habitat values throughout the 34.41 acres owned by the DFG in the Reserve by: (a) creating seven acres of new wetlands, (b) removing non-native plant species; (c) improving hydrologic conditions to sustain existing wetlands; (d) removing man-made features; (e) enhancing upland habitats adjacent to wetlands; (f) providing for future tide circulation opportunities; and (g) providing up to five years maintenance and monitoring to ensure the success of the project.

West Unit

The West Unit is approximately 12 acres in size. Work on the West Unit, referred to as Phase 1, entailed removal of fill materials, grading and contouring to expand and enhance wetland areas, culvert removal and improved water conveyance, removal of non-native plants and replanting of native vegetation within the wetland and upland areas, and construction of a public access trail with interpretive signs along the southern perimeter of the site. Most of the Phase 1 work on the West Unit is completed, though some infill planting, maintenance and monitoring are still required.

East Unit

The East Unit is approximately 22 acres and contains freshwater wetlands, upland areas and a tidally-influenced channel. The site also contains two old military bunkers and roads and parking areas that are used by the UCSB facilities operations. The proposed work on the east Unit includes creation of seven acres of new wetland; removal of non-native plants and planting of native vegetation; removal of the two old military world war two era bunkers, paved areas, rubble and fill; fencing; grading and contouring to enhance wetland areas; and installation of culverts and gates to improve water management along Mesa ditch, which provides muted tidal flows from Goleta Slough located near the south east portion of the site.

To date most of the necessary preconstruction work, including permits and a Remedial Action Plan to identify and test for hazardous materials, has been completed for the East Unit and the project is ready for construction. Already much of the site preparation, including removal of the bunkers and other improvements has occurred, along with removal of some of the invasive plants. The contract to begin the major restoration work on the wetland areas is in place and scheduled to occur in the fall and winter of 2010/11.

Change of Scope

As a result of an archeological survey on the site and the identification of potential sensitive areas (a Chumash Native American site), a larger than expected buffer areas was required that reduced the planned restoration site on the northwest side of the East Unit, reducing the amount of transitional wetland and upland areas planned for restoration by 1.75 acres. Total restoration acreage will be reduced from 26.26 acres to 24.51 acres.

WCB PROGRAM

The original grant and the augmentation for this project are being made under the WCB's Habitat Enhancement and Restoration Program. The Habitat Enhancement and Restoration Program (General) is the Board's general restoration program that includes native fisheries restoration and restoration of tidal or fresh wetland habitats, coastal scrub, grasslands, oak woodlands, and threatened and endangered species habitats. This authority is pursuant to the

Board's original enabling legislation, The Wildlife Conservation Law of 1947 (Fish and Game Section 1300, et seq).

MANAGEMENT OBJECTIVES AND NEEDS

The grant and restoration project requires five years of monitoring for performance. Over the first two years bi-monthly visits will be conducted by the LTSBC to determine the success of removing invasive species and the regrowth of new native species. After two years, site visits will occur quarterly. The target survival rate is 80% after five years. Bird surveys will also be conducted through the first five years. Annual reports will be provided to the WCB each November. Maintenance during the first five years will include maintaining newly planted areas, including temporary irrigation systems, weeding, repairs to fencing, trash removal, paths and temporary erosion control items. After five years, the DFG will take over maintenance responsibilities, which are expected to be minimal.

If at any time during the life of the project, the landowners are unable to manage and maintain the project improvements, they will refund to the State of California an amortized amount of funds based on the number of years left on the project life.

PROJECT FUNDING

The original budget total for the project was $1,738,312.00. The funding breakdown from the different partners was as follows:

Wildlife Conservation Board	**$ 903,312.00**
US Army Corps of Engineers	795,000.00
Federal Aviation Administration	40,000.00
TOTAL	**$1,738,312.00**

Of the original WCB grant approximately $260,000.00 remains unexpended.

Because of project delays related to obtaining permits, completing remediation for contaminated soil found onsite, and higher than expected prevailing wage costs, the total project cost has gone up by $996,000.00. The additional needed funds will come from the following:

Federal grant funds	$593,000.00
Wildlife Conservation Board	**366,000.00**
Federal Interest Accrued	37,000.00
Total additional funds	996,000.00
Total Project Cost	**$2,734,312.00**

Project costs will be primarily for completion of construction on the East Unit, entailing clearing, grading, contouring of land, installation of water control structures, planting, and maintenance and monitoring throughout the term of the agreement, which expires December 31, 2011.

FUNDING SOURCE
The proposed funding sources for this project are the Habitat Conservation Fund (Proposition 117), Section 2786(d) (Wetlands Outside the Central Valley, (P-50 SoCal) and the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 (Proposition 50), Section 79572(a), both of which provide funding for the protection, restoration or enhancement of wetland areas along the southern California coast.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The DFG has reviewed this proposal and recommends it for funding by the WCB. A coastal development permit has already been obtained from the California Coastal Commission for this project. The Department of Fish and Game, as lead agency, prepared a Negative Declaration for the original project pursuant to the provisions of the California Environmental Quality Act (CEQA). Staff considered the Negative Declaration for the project and has prepared proposed written findings documenting the WCB's compliance with CEQA. Upon approval by the WCB, the appropriate Notice of Determination will be filed with the State Clearinghouse.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board adopt the written findings and approve this project as proposed; allocate $300,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(d) (Wetlands Outside the Central Valley, (P50 SoCal) and $66,000.00 from the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 (Proposition 50), Section 79572(a); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board adopt the written findings and approve this project as proposed; allocate $300,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(d) (Wetlands Outside the Central Valley, (P50 SoCal) and $66,000.00 from the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 (Proposition 50), Section 79572(a); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*15. James San Jacinto Mountains Reserve Renovation $248,000.00
Riverside County

This proposal was to consider the allocation for a grant to the Regents of the University of California to purchase and install five new manufactured cabins and one laundry facility, make renovations to two existing buildings, and repair roads at the James San Jacinto Mountains Reserve, located in the San Jacinto Mountain Range approximately 10 miles south of the town of Banning in Riverside County.

LOCATION
James Reserve (Reserve) sits on an alluvial bench at the lower end of Hall Canyon, a steep western flank of Black Mountain, part of the San Jacinto Mountains. The Reserve hosts a wide variety of plant communities: Sierra mixed conifer forest, oak woodlands, montane chaparral, alder-willow-cedar riparian forest. A rapidly flowing mountain stream with a manmade reservoir (Lake Fulmor) is immediately downstream. The entire watershed is protected for research and study by the U.S. Forest Service (500 acres). The reserve has recorded 259 species of vascular plants, 35 bryophytes, 6 amphibians, 18 reptiles, 125 birds (60% nesting), 35 mammals, and over 1000 invertebrates. The Reserve is also home to one of the oldest and largest ponderosa pines in southern California, at around 500 years old and 200 feet tall.

PROJECT DESCRIPTION
The project will add five cabins to provide additional and longer-term accommodation for users, with one cabin having space to be used as a classroom facility. The project will also add a laundry facility for the residents with an outdoor access bathroom for day users. The renovations will take place at Lolomi Lodge and Trailfinder Lodge. Lolomi Lodge is an integral and historic part of the Reserve and provides vital housing for the resident director. The roof, flooring, and foundation all need to be replaced. The Trailfinder Lodge also needs renovation as it has long outgrown its original design purpose. It was originally only meant to provide dormitory style housing, but has since become the main office, library, and headquarters for the Reserve. The project will renovate the kitchen facilities, office, library, meeting room and roof. The project also includes site prep for the cabins, utilities, and roadway rehabilitation.

WCB PROGRAM
Under Proposition 84, the Wildlife Conservation Board (WCB) received funding to provide matching grant dollars to the University of California for the Natural Reserve System for land acquisitions, construction and development of facilities that will be used for research and training to improve the management of natural lands and the preservation of California's wildlife resources. The mission of the University of California, Natural Reserve System (UCNRS) is to contribute to the understanding and wise management of the earth and its

natural systems by supporting university-level teaching, research, and public service at protected areas throughout California. To implement this funding, the WCB and the UCNRS developed guidelines for selecting eligible projects. This also included establishment of a UCNRS Ad Hoc Advisory Subcommittee to review and set priorities for project proposals prior to submittal to the WCB.

MANAGEMENT OBJECTIVES AND NEEDS

The grantee has agreed to manage and maintain the facilities for 25 years, pursuant to the terms and conditions of the grant. If at any time during the life of the project, the grantee is unable to manage and maintain the project improvements, they will refund to the State of California an amortized amount of funds based on the number of years left on the project life.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Wildlife Conservation Board	**$248,000.00**
University of California, Riverside	248,000.00
TOTAL	**$496,000.00**

Project costs will be for site prep, utility upgrades, five manufactured cabins, one laundry facility, renovations to two existing buildings, roadway improvements, construction supervision, and administration.

FUNDING SOURCE

The proposed funding source for this project is the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund (Proposition 84), Section 75055(b)(3). This funding may be granted to the University of California for the Natural Reserve System for the construction and development of facilities that will be used for research and training to improve the management of natural lands and the preservation of California's wildlife resources and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION

This project is exempt under Sections 15301 and 15303 of the CEQA Guidelines because the project will consist of less than 2,500 sq. ft. of new structures and less than six dwelling units and there will be no negative impacts to the physical environment. Subject to approval by the WCB, the appropriate Notice of Exemption will be filed with the State Clearinghouse. The project was vetted through the University of California Natural Reserve System's Ad Hoc Subcommittee and recommended for funding.

STAFF RECOMMENDATION

Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $248,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006

(Proposition 84), Section 75055(b)(3); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve this project as proposed; allocate $248,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(b)(3); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*16. Peninsular Bighorn Sheep $5,000.00
Riverside County

This proposal was to consider a cooperative project with the United States Fish and Wildlife Services (USFWS), Coachella Valley Mountains Conservancy, and the Department of Fish and Game (DFG), to acquire 947± acres of private land adjacent to the Santa Rosa and San Jacinto Mountains National Monument for the protection of habitat for the peninsular bighorn sheep. This acquisition is part of the Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan approved for the Coachella Valley portion of Riverside County.

LOCATION
The property is located within the Santa Rosa Mountains and Coachella Valley, west of 77th Avenue, southwest of Old State Highway 86, west of the community of Oasis, and just west of the Salton Sea. Most of the property is surrounded by mountains, held by public agencies. The surrounding areas in the valley are mostly agriculture, with residential development located just to the east.

PROJECT DESCRIPTION
The subject property is mostly desert mountain area, sloping down into a fluvial plain with some follow vineyards located at the lower eastern portions of the property. The acquisition of the subject parcels will provide core habitat, linkages, and transport corridors which are important for the Peninsular Bighorn sheep (PBS). Placement of this area in public ownership will add a significant buffer from the developing residential lands to the east and north. The subject property has multiple species values including habitat for desert tortoise, least Bell's vireo, and the southwestern willow flycatcher. There is also potential habitat for several sensitive bat species including the western yellow bat, pallid bat, California leafnosed bat, spotted bat, pocketed free-tailed bat, and western

mastiff bat. Protection of the property would also benefit many other species that inhabit the area including mountain lion, mule deer, golden eagle, and prairie falcon.

WCB PROGRAM

The proposed acquisition of this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300, et seq.), which gives the WCB the authority to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program, acquisition activities are carried out in conjunction with the DFG, which evaluates the biological values of property and whether or not to recommend it for funding.

MANAGEMENT OBJECTIVES AND NEEDS

The DFG has identified the subject property as being within a Significant Natural Area and has recommended the purchase of the property which would be incorporated into and managed in conjunction with other existing wildlife areas and ecological reserves in the region. The subject property may be appropriate for both passive and consumptive recreational uses. The acquisition of the subject property, if approved, brings the total number of acres protected within the Santa Rosa and Santa Jacinto Mountains National Monument area to over 115,000 acres. Management costs will be covered and absorbed under the current regional operation and maintenance (O&M) budget.

TERMS

The owners have agreed to sell the property at the appraised value of $1,798,730.00, as approved by the Department of General Services (DGS). The USFWS will provide a Recovery Land Acquisition Program Grant, in an amount not to exceed $1,259,111.00 to be applied toward the purchase price of the property. The Coachella Valley Mountains Conservancy has agreed to provide funds in the amount of no less than $539,619.00 to assist in this acquisition. The terms and conditions of the proposed grants provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

USFWS Section 6 Grant (E-27-RL-3)	$1,259,111.00
Coachella Valley Mountains Conservancy Grant	539,619.00
TOTAL Purchase Price	$1,798,730.00
Other Project-related Costs:	5,000.00

TOTAL WCB Allocation **$5,000.00**

It is estimated that an additional $5,000.00 will be needed to cover internal project-related expenses, including DGS review costs, bringing the total recommended allocation for this proposal to $5,000.00.

FUNDING SOURCE
The purposes of this project are consistent with the proposed funding source, California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5906.650 that allows for grants to protect habitat corridors and prevent habitat fragmentation.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The project has been reviewed by DFG through the establishment and approval of the NCCP and has been recommended for approval.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve the project as proposed; approve the acceptance of a Recovery Land Acquisition Program Grant from USFWS in the amount of $1,259,111.00; allocate $5,000.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5906.650 to cover internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve the project as proposed; approve the acceptance of a Recovery Land Acquisition Program Grant from USFWS in the amount of $1,259,111.00; allocate $5,000.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5906.650 to cover internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

*17. East Elliott and Otay Mesa Regions (Sunroad) $5,000.00
San Diego County

This proposal was to consider the acceptance of a U.S. Fish and Wildlife Service Habitat Conservation Planning Land Acquisition grant and the approval to subgrant $67,200.00 of the federal funds to the City of San Diego (City) to assist with the acquisition of 1± acre of land to protect critical regional wildlife linkages, coastal sage scrub, and to protect and preserve core areas of vernal pool habitat that will enhance the existing Multiple Species Conservation Program (MSCP) area.

LOCATION
The subject property is located on the western Otay Mesa, south of Highway 905 and east of Highway 805 within the San Diego city limits. The property is within a Mutli-Species Conservation Plan (MSCP) that is a joint federally approved Habitat Conservation Plan and a state approved Natural Community Conservation Plan (NCCP). The MSCP covers approximately 900 square miles in southwestern San Diego County and includes the City of San Diego, portions of the unincorporated County of San Diego, and ten other local jurisdictions. The planning area is bordered by Mexico to the south, National Forest lands to the east, the Pacific Ocean to the west, and the San Dieguito River Valley to the north.

The City of San Diego, along with 12 other local jurisdictions, developed the MSCP to address potential impacts from increased development and related infrastructures and the need to protect and preserve important habitat areas and corridors within the 900 square mile area covered under the plan. Together with the wildlife agencies, the local communities developed a conservation plan that addresses both development and wildlife needs within the planning area, along with individual subarea plans that provide the details on how each jurisdiction will implement the plan within their boundaries.

PROJECT DESCRIPTION
The Otay Mesa is a core biological resource in southern San Diego County, but is under threat from nearby development and related external impacts. Protection and preservation of properties on the Otay Mesa and surrounding area is critical to maintaining the regional wildlife linkages, coastal sage scrub, and vernal pool habitat that will further the objectives of the MSCP. Acquisition of the subject property will contribute to the protection of critical habitat used by many sensitive species found in the area. Among these are the California gnatcatcher, San Diego fairy shrimp and the burrowing owl. Acquisition of this property will also benefit several are and/or narrow endemic species within the County's subarea plan. San Diego thornment, willow monardella, Otay mesa mint, and the Otay tarplant are only found in San Diego County. Orcutt's grass is limited to a very few locations, with one of the main sites located within the proposed acquisition area on the Otay Mesa.

WCB PROGRAM

The proposed acquisition of this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.). The acquisition program enables the WCB to pursue acquistions on behalf of the DFG, accept federal grant funds to facilitate acquisitions or subgrant the federal funds to assist with acquisitions as recommended by the DFG, provide State bond funding to assist in proposed acquisitions and to cover its project-related expenses.

MANAGEMENT OBJECTIVES AND NEEDS

The subject property is bordered on the west and south side by matching City-owned and managed one acre properties. The City will manage the property in accordance with the MSCP adopted in 1997. The City currently monitors and manages over 20,000 acres of City-owned lands. The subject property will be added to this responsibility. It is anticipated that once the acquisition is complete and the biological values of the property are evaluated, appropriate public access will be considered.

TERMS

The property owner has agreed to sell the property for the Department of General Services (DGS) approved appraised fair market value of $105,000.00. The terms and conditions of the proposed subgrant to the City provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Wildlife Conservation Board (USFWS Subgrant)	**$67,200.00**
City of San Diego	37,800.00
TOTAL Purchase Price	$105,000.00
Other Project-related Costs:	5,000.00
TOTAL WCB Allocation	**$5,000.00**

It is estimated that $5,000.00 will be needed to cover internal project-related expenses, including DGS appraisal review costs.

FUNDING SOURCE

The proposed funding source for this project is the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(c) that provides funding for grants to

implement or assist in the establishment of NCCPs and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The Department of Fish and Game has reviewed this proposal and recommends it for approval.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; authorize acceptance of the Habitat Conservation Planning Land Acquisition Grant from the U.S. Fish and Wildlife Service and approve the Agreement to Subgrant in the amount of $67,200.00 to the City of San Diego; allocate $5,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(c) to cover internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

As one of the consent items heard at the beginning of the meeting, it was moved by Mr. McCamman that the Wildlife Conservation Board approve this project as proposed; authorize acceptance of the Habitat Conservation Planning Land Acquisition Grant from the U.S. Fish and Wildlife Service and approve the Agreement to Subgrant in the amount of $67,200.00 to the City of San Diego; allocate $5,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(c) to cover internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

18. Cow Creek Conservation Area, Expansion 2 $1,340,000.00
Shasta County

Mr. Donnelly reported that letters of support for this project were received from Alan A. Forkey, Assistant State Conservationist for Programs, Natural Resources Conservation Services, United States Department of Agriculture; and Mary Pfeiffer, Agricultural Commissioner/Sealer, Shasta County Department of Agriculture/Weights & Measures.

This proposal was to consider the allocation for a grant to the American Land Conservancy (ALC) for a cooperative project with the Natural Resource Conservation Service and the Department of Fish and Game (DFG) to acquire a conservation easement over 5,868± acres of land for protection of rangeland, riparian corridors and other significant ecosystems. Mr. Bill Gallup of the Wildlife Conservation Board briefly described the project and its location.

LOCATION
The subject property is a privately owned rangeland parcel located in the Cascade Range foothills, north of State Highway 44 about 10 miles east of the City of Redding in Shasta County. The parcel is more specifically located on Whitmore Road, north of Millville, north of highway 44. The property is bisected by two creeks Old Cow Creek and Clover Creek. Each creek runs through the property in an east to west direction and ultimately both flow to the Sacramento River. The property has been operated as a ranch, grazed and farmed, since the 1860's. Current land uses in the area includes agriculture, recreation, residential, natural areas and water supplies.

The property is part of the DFG Cow Creek Conceptual Area Protection (CAPP) that includes a combination of blue oak woodlands, chaparral, mixed conifer, riparian, aquatic, vernal pools and grasslands habitats that support sensitive species and significant populations of native fish and wildlife. There have been two major acquisitions within the Cow Creek CAPP including Cow Creek Ranch totaling about 5,000 acres (adjacent to JS Ranch) and the Hathaway Ranch totaling about 6,600 acres. The Shasta Land Trust is expecting to close on a third property, the Richert Ranch, totaling about 5,000 acres, in the next few months. Including this proposed conservation easement, the total protected area in the Cow Creek CAPP will be in excess of 22,000 acres after the completion of this project.

PROJECT DESCRIPTION
The property contains developed springs and irrigation ditches that provide water to large tracts of land that parallel the creeks on the property. There are a number of miscellaneous barn and farm structures on site that support the ranch operation. This project will help create a landscape-scale reserve that contains a variety of different habitats, including oak woodland, chaparral, mixed conifer, riparian, grassland and aquatic habitats. These habitat areas

will support multiple species of plants and animals, including deer and mountain lion, as well as fall-run, late-fall run Chinook salmon and steelhead trout.

WCB PROGRAM

The proposed grant for this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreational opportunities. Under this program, acquisition activities are carried out in conjunction with the DFG, evaluating the biological values of property through either development of a Land Acquisition Evaluation (LAE) or a CAPP. The LAE/CAPP is then submitted to the DFG Regional Operation Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

ALC will manage the conservation easement over property for the benefit of threatened and endangered species. The grazing use will continue into perpetuity and ALC will monitor for compliance of the terms and conditions of the easement. The owners of the property will be donating an endowment for monitoring the easement. ALC will eventually transfer the easement interest with all of the terms and conditions as well as the endowment over to the California Rangeland Trust. Because this is an easement on private land, public access will be restricted.

TERMS

The property owner has agreed to sell a conservation easement to ALC for the Department of General Services (DGS) approved appraised fair market value of $2,640,000.00 The terms and conditions of the proposed grant to ALC provides that staff of WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition. In the event of breach of the grant terms the WCB can encumber the property with a conservation easement and seek reimbursement of funds.

PROJECT FUNDING

Wildlife Conservation Board	**$1,320,000.00**
Natural Resource Conservation Service	1,320,000.00
Total Purchase Price:	$2,640,000.00
Other Project-related Costs:	20,000.00
TOTAL WCB Allocation	**$1,340,000.00**

This is estimated that $20,000.00 will be needed to cover internal project-related costs, including the Department of General Services review costs.

FUNDING SOURCE
The proposed funding source for this project is the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Projection Fund of 2006 (Proposition 84), Section 75055(b), which provides funding for grants for the protection of wildlife corridors, significant natural landscapes and the protection endangered and threatened species, and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The project has been reviewed and approved for funding by WCB staff.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $1,340,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Projection Fund of 2006 (Proposition 84), Section 75055(b) for the grant and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. Gallup introduced Mr. Ed Stanton, Program Manager from American Land Conservancy, and Mr. & Mrs. George McArthur, the property owners, who were in the audience and available to answer questions.

Ms. Finn asked if public access on the property is restricted or prohibited. Mr. Gallup responded that there won't be any public access on the property. Mr. McCamman asked if this property will be eventually transferred to the Rangeland Trust. Mr. Gallup confirmed. Mr. McCamman asked if there is a time line on that. Mr. Gallup replied that he does not have a specific time line and asked Mr. Stanton to provide more information. Mr. Stanton introduced himself before the Board and responded that the transfer to the California Rangeland Trust has not been determined at this point. Mr. Stanton also said that American Land Conservancy has some projects funded by National Fish and Wildlife Foundation, and this is follow-up work on the ranch to do some habitat improvement and planning work and that may alter the timing to transfer the easement. Mr. McCamman asked if this is consistent with the California Rangeland Trust goals and objectives. Mr. Stanton confirmed that this is

correct and added that the American Land Conservancy is working closely with the California Rangeland Trust, and that the American Land Conservancy totally qualified to hold this easement and endowment. Mr. Stanton also added that the endowment will be transferred with the easement.

Mr. McCamman asked if there were any questions about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $1,340,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Projection Fund of 2006 (Proposition 84), Section 75055(b) for the grant and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

19. Red Bank Creek $3,960,000.00
Tehama County

Mr. Donnelly reported that letters of support were received for this project from the following people: Tracy K. Schohr, Rangeland Conservation Director, CA Cattlemen Association; and Pelayo Alvarez, Conservation Program Director, Defenders of Wildlife.

This proposal was to consider an allocation for a grant to the Northern California Regional Land Trust (NCRLT) to acquire conservation easements over 7,132± acres of two contiguous ownerships (3,356± acres Burrow Ranch and 3,776± acres Big Bluff Ranch) in Tehama County. The project will allow the continued operations of the ranches and at the same time protect important oak woodland habitat areas, and maintain the property's relatively natural, scenic, and open-space characteristics. Mr. Randy Nelson of the Wildlife Conservation Board briefly described the project and its location.

LOCATION
The ranches are located approximately 20 miles southwest of the City of Red Bluff, seven miles west of the town of Red Bank, along Colyear and Red Bank Roads, in Tehama County. Most of the surrounding lands comprise ranches similar to those to be protected by this project. To the north, the project area abuts over 6,000 acres of protected Bureau of Land Management land and another 1,017 acres that is part of the Mendocino National Forest.

PROJECT DESCRIPTION
An estimated 60 to 70 percent of the acreage is occupied by individual oak trees, oak savannah, or oak woodland. Oak tree species present within the project area include black, valley, interior live, canyon live, blue, scrub, and tan. The project would also protect annual grassland, farmland, chamise-redshank chaparral, mixed chaparral, valley-foothill riparian land, spring-fed wetlands and creek frontage along Red Bank and North Fork Elder Creeks and a number of other perennial and seasonal creeks.

WCB PROGRAM
This project funding proposal was submitted to the Wildlife Conservation Board through its Oak Woodlands Conservation Program. The project is reviewed and approved by WCB staff, and must be located within a county that has adopted an Oak Woodlands countywide conservation plan. The Program is designed to help local efforts to achieve oak woodland protection. More importantly, this program provides a mechanism to bring ranchers and conservationists together in a manner that allows the achievement of both sustainable ranch and farming operations and healthy oak woodlands. The project meets the objectives of the Oak Woodland Conservation Program by conserving some 4,275 contiguous acres of oak woodlands and allowing for the continued ranching and farming operations on the land. Because this is an easement of a private land, public access will be restricted.

In May 2010, the WCB authorized a grant to the California Association of Resource Conservation Districts for a cooperative project with the Department of Fish and Game, U.S. Fish and Wildlife Service, Audubon Society and the landowners to restore riparian habitat, reduce sedimentation and streambank erosion and improve water quality along Red Bank Creek. This project will complement those restoration improvements and will improve the wildlife values the restoration project aims to enhance.

MANAGEMENT OBJECTIVES AND NEEDS
The NCRLT will hold, manage and be responsible for the monitoring of the easement in perpetuity per the WCB grant terms. A baseline report will have been completed by the Grantee and approved by the WCB. The conservation easement deed allows access to the subject properties by both the NCRLT and the WCB for monitoring purposes.

TERMS
The property owners have agreed to sell conservation easement over their properties to the NCRLT for the Department of General Services (DGS) approved appraised fair market values of $1,850,000.00 and $2,100,000.00, respectively. Combined the total purchase is $3,950,000.00. The terms and conditions of the proposed grant to the NCRLT provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of

conveyance prior to disbursement of funds directly into the escrow account established for the acquisition. In the event of breach of the grant terms, the WCB can seek specific performance or require that title to the conservation easement be transferred to the WCB or another qualifying entity. The project lands are encumbered by Land Conservation Contracts under the Williamson Act that are not affected by the terms of the easement.

PROJECT FUNDING
The WCB proposes to make a grant to NCRLT for the full amount of the purchase price:

WCB Grant	**$3,950,000.00**
Other Project-related Costs:	10,000.00
TOTAL WCB Allocation	**$3,960,000.00**

It is estimated that $10,000.00 will be needed to cover internal project-related costs including the appraisal review costs by the DGS.

FUNDING SOURCE
The proposed funding source for this project is the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(d)(2), that allows for the acquisition of conservation easements on agricultural properties for the protection of oak woodland habitat and is consistent with the purposes of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The project has been reviewed under the WCB's Oak Woodlands Conservation Program and has been recommended for approval.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $3,960,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(d)(2) to cover the grant amount and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. Nelson introduced Mr. Jamison Watts, Executive Director of the Northern California Rangeland Trust, who was in the audience and available to answer questions.

Ms. Finn asked if public access will be allowed in the property. Mr. Nelson replied that this easement does not provide for public access. Mr. Nelson added that the NCRT will be allowed on the property with members of the public periodically for educational purposes. Ms. Finn asked if the lands are under Williamson Act contract. Mr. Nelson confirmed that this is correct. Ms. Finn asked what happens with the conservation easement – will this contract be canceled or does it remain in place. Mr. Nelson responded that the contract remains in place. Mr. Donnelly added that Wildlife Conservation Board does two things when we either acquire a conservation easement or give grants for conservation easements or acquire fee title for the Department of Fish and Game, we have the obligation to notify both the Department of Conservation, which we have done, as well as the counties in which Williamson contracts apply.

Mr. McCamman asked if there were any questions or comments about this project. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $3,960,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(d)(2) to cover the grant amount and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

20. Heart K Ranch $1,090,000.00
Plumas County

Mr. Donnelly reported that letters of support were received for this project from the following people: Don Williamson, Indian Valley Recreation & Parks District Board Chair; and Brian L. Morris, General Manager, Plumas County Flood Control & Water Conservation District.

This proposal was to consider the acquisition by the Department of Fish and Game (DFG) of a conservation easement over 880± acres in Plumas County. The conservation easement would restrict future development and help insure that the biological and cultural resources found on the property are protected in perpetuity. The DFG will hold and monitor the conservation easement.

Mr. Brian Gibson of the Wildlife Conservation Board briefly described the project and its location.

LOCATION

The Heart K Ranch is located in Plumas County, approximately 2 hours north of the town of Truckee, 45 minutes north east from the town of Quincy, and 15 minutes east of the small down of Taylorsville. It is a top priority property within the DFG Genesee Valley Conceptual Area Protection Plan (CAPP). Genesee Valley is characterized by a large (~3,000 acres) relatively level mountain valley, bisected by Indian Creek, and surrounded on all sides by coniferous and oak forests. The north side of the Genesee Valley contains unique geologic features including large talus slopes. The mountains to the south side are dominated by dense, Douglas-fir dominated mixed conifer forests. Land uses surrounding the Heart K Ranch are primarily agriculture (ranching) with some private residences interspersed as single lots or small subdivisions. Forest lands bordering the north and south of the property are open for public use and administered by the Plumas National Forest.

PROJECT DESCRIPTION

This conservation easement will preserve and protect in perpetuity a variety of animal and plant habitat. Terrestrial and riparian vegetation types around the Heart K Ranch include mixed conifer forests and black oak woodlands along upland portions of the property. These forested habitat types transition to perennial grasslands, wet meadows, and eventually the montane riparian and river habitats associated with Indian Creek, which flows through the center of the ranch. The habitat types support a wide range of terrestrial and aquatic species, including both State and federal species of special concern.

The riparian area and associated cottonwood-willow riparian habitats along Indian Creek support a large colony of state threatened bank swallow as well as state endangered willow flycatcher. The pastures and grasslands adjacent to the riparian area have regular occurrences of greater sandhill crane and bald eagle. In combination with upland conifer and hardwood forests, these habitat types provide nesting and foraging habitat for several birds of prey, including the golden eagle, northern goshawk, Cooper's hawk, and the California spotted owl. Indian Creek currently supports six species of native fishes, which include: hardhead, Sacramento pikeminnow, speckled dace, riffle sculpin, Sacramento sucker, and rainbow trout. The property also supports a highly diverse assemblage of mammal species, including Sierra Nevada mountain beaver, southwestern river otter, beaver and ringtail. There are several more common land mammals, including black bear, bobcat, mountain lion, grey fox, and blacktail deer, which are abundant throughout Heart K Ranch year-round.

WCB PROGRAM

The proposed acquisition of this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered

pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program acquisition activities are carried out in conjunction with the DFG, evaluating the biological values of property through development of a Conceptual Area Protection Plan (CAPP). The CAPP is then submitted to DFG's Regional Operations Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

The DFG will hold title to the conservation easement and will monitor the property on an annual basis to ensure that conservation easement conditions are being met. The Feather River Land Trust, which owns the property, has agreed to fully fund an endowment which will pay all costs associated with monitoring the conservation area.

TERMS

The property owner has agreed to sell the conservation easement to the DFG for less than the Department of General Services (DGS) approved appraised fair market value of $2,200,000.00. The DFG will acquire the conservation easement for $1,075,000.00, with a landowner donation (bargain sale) of $1,125,000.00. The terms and conditions of the proposed property acquisition agreement provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition. Additionally, DFG staff will be responsible for monitoring the property at least once annually.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Wildlife Conservation Board	**$1,075,000.00**
Landowner donation (bargain sale)	1,125,000.00
TOTAL Purchase Price	$2,200,000.00
Other Project-related Costs:	15,000.00
TOTAL WCB Allocation	**$1,090,000.00**

It is estimated that an additional $15,000.00 will be needed to cover project-related expenses, including DGS review costs and escrow fees.

FUNDING SOURCE

The proposed funding source for this project is the Habitat Conservation Fund (Proposition 117), Section 2786 (a)(1E) that provides funding for protection of deer, mountain lion, oak habitats, and preservation of wildlife values within a floodplain or flood corridor, and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The Department of Fish and Game has reviewed this proposal and recommends it for approval.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $1,090,000.00 form the Habitat Conservation Fund (Proposition 117), Section 2786(a)(1E) to cover the acquisition and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. Gibson introduced Mr. Paul Hardy, Executive Director of the Feather River Land Trust, who was in the audience and available to answer questions.

Ms. Finn asked how the Feather River Land Trust acquired the property. Mr. Gibson responded that the property was purchased from The Nature Conservancy, and The Nature Conservancy acquired the property from a private landowner. Mr. McCamman asked if the WCB was involved in earlier transactions. Mr. Gibson replied that it was not. Ms. Finn asked if public money was used in either of the previous transactions.

Mr. Hardy introduced himself before the Board and commented that only private money was involved with The Nature Conservancy acquisition and Feather River Land Trust subsequent acquisition. Mr. McCamman asked if an endowment will be established to cover DFG's costs for monitoring. Mr. Hardy confirmed that this is correct, but the contract has not been finalized yet.

Mr. McCamman asked if there were any questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $1,090,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(a)(1E) to cover the acquisition and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

21. Upper Butte Basin Wildlife Area, Expansion 6 $1,120,000.00
Butte County

This proposal was to consider for the acquisition of 222± acres of land for the Department of Fish and Game (DFG), for the protection of wetland habitat and as an expansion to the Upper Butte Basin Wildlife Area (UBBWA). The property will provide habitat for waterfowl, shorebirds and riparian songbirds and will contribute to the public use and other management objectives of the UBBWA. Mr. Randy Nelson of the Wildlife Conservation Board briefly described the project and its location.

LOCATION
The subject property is located approximately five miles west of the City of Biggs, in Butte County. The site is next to Cherokee Canal, and fronts the southerly side of Schohr Ranch Road, a gravel roadway that provides access to the property from Afton-Biggs Road. The DFG Upper Butte Basin Wildlife Area (UBBWA), which the property will be a part of, is open to the public and allows for waterfowl hunting and other outdoor wildlife related uses. The surrounding lands consist mostly of farm, mostly rice farms, and hunting clubs.

PROJECT DESCRIPTION
The UBBWA contains a mosaic of diverse and moist soil habitat that provides quality vegetation for wintering waterfowl, wading birds, and shorebirds. The project area will provide nesting areas and brood ponds for breeding waterfowl and other resident wetland related wildlife, and riparian habitat. The project will benefit mallards, gadwall, American green-winged teal, cinnamon teal, northern pintail, northern shoveler, American wigeon, riparian songbirds, white faced ibis and the long-billed curlew.

The property is currently encumbered by a conservation easement held by the DFG. Because of its location to the Cherokee Canal, and the facilities for water conveyance and appropriation, both current and future, this property could be an integral part of the overall water management on the UBBWA. For these reasons, DFG requested that staff of the Wildlife Conservation Board (WCB) negotiate a Right of First Refusal as part of the original easement project. Consequently, the land owner notified the DFG of his intent to sell a portion of the property, and the DFG has recommended that we pursue acquisition.

In addition to waterfowl and other wildlife diversity found on site, this particular property is significant for ownership by the DFG because of the water infrastructure located within its boundaries. The property hosts an important pumping facility at its southwest boundary that appropriates/diverts water from the Cherokee Canal to the existing properties of the UBBWA. While the DFG maintains an easement for the use of this pumping facility, the landowner and UBBWA staff has made improvements to the water infrastructure to allow water to be diverted through existing ditches across the property for the benefit of the

UBBWA. The diversion and eventual flow into the UBBWA is by way of gravity flow ditch, thus reducing pumping costs and maintenance the DFG would otherwise incur. If the property were sold to another land owner, the DFG may not have the ability to access or improve the property's infrastructure to meet current and /or future water needs. This could significantly increase the costs of providing water to the area while at the same time reducing overall habitat and species management.

WCB PROGRAM

This project funding proposal is being made through the Wildlife Conservation Board's Inland Wetland Conservation Program. The Inland Wetlands Conservation Program (IWCP) was created to assist the Central Valley Joint Venture (CVJV), a federal entity, with specific goals to increase populations of wintering waterfowl, breeding waterfowl, non-breeding shorebirds, breeding shorebirds, waterbirds, and breeding riparian songbirds. The project meets the objectives of the IWCP by protecting habitat for waterfowl, shorebirds and riparian songbirds.

MANAGEMENT OBJECTIVES AND NEEDS

The Department of Fish and Game will manage these additional 222 acres as part of the Little Dry Creek Unit of the UBBWA, as a mixture of seasonal wetlands, semi-permanent wetlands, upland and riparian habitats. The property will be managed with existing DFG staff working on the UBBWA.

TERMS

The property owner has agreed to sell the property for the Department of General Services (DGS) approved appraised fair market value of $1,110,000.00.

The terms and conditions of the proposed acquisition provide that staff of the WCB review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition. The property is encumbered by a Land Conservation Contract under the Williamson Act, and notification has been provided accordingly to the Department of Conservation.

PROJECT FUNDING

The WCB will be funding the entire purchase price of $1,110,000.00.

Wildlife Conservation Board	**$1,110,000.00**
Other Project-related Costs:	10,000.00
TOTAL WCB Allocation	**$1,120,000.00**

It is estimated that an additional $10,000.00 will be needed to cover project-related expenses, including appraisal and DGS review costs.

FUNDING SOURCE
The proposed funding source for this project is the Habitat Conservation Fund, (Proposition 117), Section 2786(d)(1E) Inland Wetland Conservation Program, which allows for the protection of wetland habitat within the Central Valley and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The Department of Fish and Game has reviewed this proposal and recommends it for approval.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $1,120,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(d) (1E) Inland Wetland Conservation Program, to cover the cost of acquisition and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. Nelson introduced Mr. Kent Smith, Regional Manager, Region 2, and Mr. Andy Atkinson from the Department of Fish and Game; and Mr. Lauren Ward, the property owner, who were in the audience and available to answer questions.

Ms. Finn asked if we already have a conservation easement on this property. Mr. Donnelly explained that there is currently a conservation easement over the entire property, which is just a little over 400 acres. Mr. Donnelly reported that the Wildlife Conservation Board negotiated a Right of First Refusal when the conservation easement was put into place. Because of the importance of this particular property and the Department of Fish and Game programs up there, we felt it necessary to secure the opportunity to acquire this property should it ever come up for sale, so now we are exercising our First Right of Refusal for this project. Mr. McCamman asked Mr. Kent Smith if this property is going to be managed with the existing Upper Butte complex. Mr. Smith responded that this is correct. Mr. McCamman asked if Mr. Smith has estimated cost of how to incorporate this project into existing program. Mr. Andy Atkinson responded that it is $23,000.00. Mr. Smith commented that because of the challenging fiscal times we continue to work on new creative partnership ways to develop and implement management strategies on lands.

Mr. McCamman asked if there were any questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $1,120,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(d)(1E) Inland Wetland Conservation Program, to cover the cost of acquisition and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

22. Lower Yuba River, Excelsior, Phase I $3,216,440.00
Nevada and Yuba Counties

This proposal was to consider the acquisition by the Department of Fish and Game (DFG) under a cooperative project with The Trust for Public Land (TPL) and Caltrans to acquire approximately 527± acres of land for protection of deer and mountain lion habitat. The project will help maintain the natural biodiversity of the Lower Yuba River watershed and surrounding foothill areas, and expand public access and fishing opportunities to the Yuba River. Ms. Liz Yokoyama of the Wildlife Conservation Board briefly described the project and its location.

LOCATION
The subject property is located adjacent to the historic community of Smartsville, along the north side of the Highway 20 corridor in the eastern portion of Yuba County, and the western edge of Nevada County. The property is situated on the Lower Yuba River between Rose Bar and Englebright Dam and includes approximately two miles of river frontage, at the confluence of the Yuba River and Deer Creek. The site is bordered by Penn Valley, Grass Valley and Nevada City to the east and Marysville and Yuba City to the west. A historic Miner's Trail used during the Gold Rush remains on the site, providing a scenic hiking access through the property. The proposed acquisition is located within the DFG Lower Yuba River Conceptual Area Protection Plan (CAPP) and will provide habitat and recreational linkage between the DFG Daugherty Wildlife Area; University of California Foothill Research Station on the north; DFG Spenceville Wildlife Area; and the Beale Air Force Base on the south.

PROJECT DESCRIPTION
The project is being completed in two phases. The first phase before the Board for consideration is the fee acquisition of 527± acres of land. The second phase involves the acquisition of a conservation easement over 157± acres of adjoining land and will be completed in a future transaction between the

property owner and TPL. At this time, there are no plans for WCB to participate in this second transaction.

The subject property is well known for its scenic beauty and attractiveness to fisherman for its Chinook salmon and steelhead trout. It offers recreational boaters and hikers with panoramic views of the river, Rose Bar Bridge to the west, and the Englebright Dam on the east. The acquisition will also provide connections to over five miles of recreational areas previously deemed inaccessible. The site is representative of early California history and includes a traversable Miner's Trail that was constructed and used by miners during the California Gold Rush. Remnants of an historic Chinese wall and mining tunnel also remain intact on the property from California's gold mining past.

The subject property is rich in biodiversity, and includes grassland pastures, blue oak woodlands and riparian corridors containing riverine aquatic and associated riparian/wetland habitats. The property also supports wildlife that includes at least 29 reptiles and amphibian species, 57 bird species and 10 mammal species. Listed species found on the site include the Peregrine falcon, spring run Chinook salmon, Central Valley steelhead, California black rail, valley elderberry longhorn beetle, foothill yellow-legged frog, and the burrowing owl. The proposed acquisition will contribute to the regional conservation planning efforts carried out by various entities including the California Department of Parks and Recreation; the Sierra Nevada Conservancy; the Counties of Nevada, Yuba, Placer and Butte; Nevada County Land Trust; and the Placer Land Trust.

WCB PROGRAM

The proposed acquisition of this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program acquisition activities are carried out in conjunction with the DFG, evaluating the biological values of property through development of a Conceptual Area Protection Plan (CAPP). The CAPP is then submitted to DFG's Regional Operations Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

The maintenance, conservation, security and caretaker services on the property will managed at no cost to the State, according to the terms of a Stewardship Agreement between the DFG and the Excelsior Foundation, a California nonprofit corporation, for a period of five years. At any time during the five year period and afterwards the DFG can take over management.

TERMS

The property has a fair market value of $3,700,000.00 based on an independent appraisal of the property, reviewed and approved by the Department of General Services (DGS). The property owner has agreed to sell the property at less than its approved appraised value, for $3,505,000.00. Once the property is acquired by TPL, it will immediately be conveyed to the DFG. The terms of the option agreement between TPL and seller require that escrow must be closed no later than December 31, 2010. Should the State grant funds not be available to close escrow as stipulated in the State's purchase agreement, TPL has agreed to fund the acquisition and hold the property until State funding is available to complete the acquisition by the DFG.

The terms and conditions of the proposed purchase agreement with TPL provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition.

PROJECT FUNDING

Proposed funding breakdown for the project is as follows:

Wildlife Conservation Board Grant	**$3,196,440.00**
California Department of Transportation	308,560.00
Landowner Donation	195,000.00
Total Purchase Price	$3,700,000.00
Other Project-related Costs:	20,000.00
TOTAL WCB Allocation	**$3,216,440.00**

It is estimated that an additional $20,000.00 will be needed for internal project-related expenses, including title and escrow fees and appraisal and transaction review costs by the Department of General Services.

FUNDING SOURCE

The proposed funding source for this project is the Habitat Conservation Fund (Proposition 117), Section 2786(b/c)(1E), which allows for the protection of habitat threatened and endangered species and preservation of wildlife values within a floodplain or flood corridor and is consistent with this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION

The project has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for fish and wildlife conservation purposes, and under Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space and habitat.

Subject to approval by the Wildlife Conservation Board, a Notice of Exception will be filed with the State Clearinghouse.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $3,216,440.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(b/c)(1E), for the acquisition and project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Ms. Yokoyama introduced Mr. Kent Smith, Regional Manager, Region 2, and Mr. Andy Atkinson from the Department of Fish and Game; Mr. Erik Vink, Senior Project Manager of The Trust for Public Land; and Mr. Brian Bisnett, the property owner, who were in the audience and available to answer questions.

Ms. Finn asked if the public access on the property, such as Miner's Trail, is marked or visible for the public. Ms. Yokoyama responded that there is access from the side, and there are plans to open it up to the public. Ms. Finn asked if it is open to the public right now. Ms. Yokoyama confirmed that the Miner's Trail is not open to the public now, but will be once we acquire this property. Mr. Kent Smith added that this is a very special piece of property as the Yuba River offers very limited public access, and this is an opportunity to create public access, as well as conservation opportunity, in an area that has historically had little or none to this reach of this river system. Mr. Smith also said that this project will provide public access to well managed system of fisheries opportunities in this particular part of Yuba River.

Ms. Finn said that the project is being completed in two phases: the first phase is 527 acres but the State is not involved in the second phase. Ms. Yokoyama confirmed that the State is not involved in the second phase of this project at this time. Ms. Finn asked if this project is only 527 acres. Ms. Yokoyama confirmed that this is correct. Ms. Finn asked if there is anything in the agreements that will make the State obligated to take on the second phase. Mr. Donnelly replied that there is no obligation for the State to be involved in the second phase of this project at this particular time. Ms. Finn asked with this property being transferred to the Department of Fish and Game, if the DFG has enough resources to cover it. Mr. Smith replied that we have at least partner support for five years, and after that we will see how it goes. Mr. Smith also added that the DFG has lots of management activities in this particular area, associated with the UC Davis property which is adjacent to this property. Mr. Donnelly pointed out that when you look at the map of this project, this property is in the heart of significant amount of the DFG's ownership.

Mr. McCamman acknowledged the presence of Ms. Teresa Schilling, Senator Wiggins representative, who joined the meeting at this point.

Mr. McCamman asked if there were any additional questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $3,216,440.00 from the Habitat Conservation Fund (Proposition 117), Section 2786(b/c)(1E), for the acquisition and project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

23. Bruin Ranch Phase I $4,515,000.00
Placer County

This proposal was to consider the allocation of a grant to Placer Land Trust for a cooperative project with the Department of Fish and Game (DFG), Caltrans and Placer County to acquire 1,773± acres of property to protect habitat for threatened and endangered species, including blue oak woodland habitat and approximately three miles of riparian corridor along the Bear River. Mr. Brian Gibson of the Wildlife Conservation Board briefly described the project and its location.

LOCATION
This privately owned property is located west of Highway 49, just west of the junction of Bell Road and Lone Star Road, adjacent to the Auburn Valley Golf and Country Club in Placer County. The property is within the DFG approved Spenceville Wildlife Area Conceptual Area Protection Plan (CAPP). The Wildlife Conservation Board (WCB) made an allocation of two grants in 2007 to Placer Land Trust (PLT) for the purposes of acquiring fee interest in approximately 320 acres and a conservation easement over approximately 313 acres of land south of the subject property.

PROJECT DESCRIPTION
Bruin Ranch is the largest parcel containing blue oak woodland in western Placer County, and includes over three miles of frontage on the Bear River. The property also includes a wide diversity of wildlife habitat, including potential habitat for the western pond turtle and its subspecies, the northwestern pond turtle, California red-legged frog and foothill yellow legged frog. In addition, protection of Bruin Ranch is a very high priority for Placer County, which is a funding partner, as part of its effort to implement the Placer County Habitat Conservation Plan (HCP) and the Natural Community Conservation Plan (NCCP) for the preservation habitat and open space corridors in the face of increasing development pressure. Protection of this property may also allow

the connection of a regional trail through previously protected land to Placer County's Hidden Falls Regional Park and Coon Creek, if appropriate.

WCB PROGRAM

The proposed grant for this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Section 1300, et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program acquisition activities are carried out in conjunction with the DFG, evaluating the biological values of property through development of a Land Acquisition Evaluation (LAE)/Conceptual Area Protection Plan (CAPP). The LAE/CAPP is then submitted to DFG's Regional Operations Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

Under the terms of the grant agreement, PLT will manage the property for the benefit of wildlife habitat preservation, restoration and management, wildlife-oriented education and research, and for compatible public and private uses, all as may be consistent with wildlife habitat preservation and protection of sensitive biological resources.

TERMS

The property owner has agreed to sell the property for the Department of General Services (DGS) approved appraised fair market value of $9,500,000.00. The terms and conditions of the proposed grant to PLT provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition. In the event of breach of the grant terms the WCB can encumber the property with a conservation easement and seek reimbursement of funds. The property is encumbered by a Land Conservation Contract under the Williamson Act, and notification has been provided accordingly to the Department of Conservation.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Wildlife Conservation Board	**$4,500,000.00**
Placer County's Placer Legacy Program (Pending)	5,000,000.00
Caltrans EEMP	350,000.00
Total Purchase Price	$9,850,000.00
Other Project-related Costs:	15,000.00
TOTAL WCB Allocation	**$4,515,000.00**

It is estimated that an additional $15,000.00 will be needed to cover project-related expenses, including DGS review costs and escrow fees.

FUNDING SOURCE
The proposed funding source for this project is the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650 that allows for protection of habitat for threatened and endangered species and protection of habitat corridors and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The Department of Fish and game has reviewed this proposal and recommends it for approval.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $4,515,000.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650 to cover the grant amount and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. Gibson introduced Mr. Dave Sutton, Director, Northern California/Nevada Program, Ms. Trish Strickland, Project Manager, both with the Trust for Public Land; and Mr. Jeff Darlington, Executive Director of the Placer Land Trust. All three were in the audience and available to answer questions.

Mr. Donnelly pointed out that a clarification needed to be made to this item in the agenda. Mr. Donnelly said that the appraised value is listed as $9,500,000.00, and in the Project Funding section the total purchase price is $9,850,000.00. Mr. Donnelly stated that the correct purchase price is $9,500,000.00. Mr. Donnelly said that as of the Board meeting, it was not certain whether or not the $350,000.00 from Caltrans would be available to help fund the project. Mr. Donnelly went on to say that in the event the Caltrans money would not be available the County was prepared to consider a grant of $5,000,000.00. Mr. Donnelly clarified that the agenda should show Placer County's Placer Legacy Program (Pending) as $4,650,000.00.

Mr. McCamman asked how Placer County's Placer Legacy Program (Funding) is to work. Mr. Gibson responded that the parties are working out the details,

such as a conservation easement language, and the Board of Supervisors will vote on funding for Bruin Ranch in early December. Mr. Gibson went on to say that the meetings between the Placer Land Trust, the Trust for Public Land, and the County were going very well and a "yes" vote from the Board of Supervisors was anticipated. Mr. McCamman asked what would happen if the County voted not to fund the project. Mr. Donnelly responded that in that case the Grantees would look for some another funding source and the project would likely come back to the WCB.

Ms. Finn asked who will own the property. Mr. Gibson replied that the Placer Land Trust will own the property. Mr. McCamman asked if this acquisition was consistent with the NCCP, and if it is a part of the acquisition purpose. Mr. Donnelly confirmed that this is correct.

Mr. Dave Sutton, Director, Northern California/Nevada Program of the Trust for Public Land, introduced himself before the Board and spoke in support of this item. Mr. Sutton said that this project is a component of a ten-year partnership underway with the Wildlife Conservation Board, Department of Fish and Game, Placerville Land Trust, Nevada County Land Trust, and the Trust for Public Land. Mr. Sutton stated that this project was part of a comprehensive effort to protect a 30 mile north and south swath of blue oak woodland habitat, as well as the river corridors that run 30 miles and encompass key Fish and Game investments in Spenceville. Mr. Sutton added that this project is a joint venture partnership with the Placer Land Trust, who will manage the property. Mr. Sutton said that this project is a critical investment for the Placer County conservation plan that is being develop, the NCCP. Mr. Sutton also stated that the Trust for Public Land has been working closely with each of the Board Members of Placer County Board of Supervisors, and the public session is going to be held on December 14 to approve the $5,000,000.00 funding. Mr. Sutton said that he was confident there would be a "yes" vote. Mr. Sutton thanked the Board for considering this project.

Mr. McCamman asked if there were any additional questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $4,515,000.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650 to cover the grant amount and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

Mr. McCamman announced that there was a speaker card for the item #21 (Upper Butte Basin Wildlife Area, Expansion 6, Butte County) that was overlooked. Mr. McCamman called the name, Ms. Susan Schor, but she was not in the audience at that time. Mr. McCamman apologized and proceeded forward with the meeting.

24. Oak Hills Ranch $2,296,000.00
Yolo County

Mr. Donnelly reported that a letter of support was received for this project from Mr. Graham Chisholm, Executive Director of Audubon California.

This proposal was to consider the allocation for a grant to the California Rangeland Trust (CRT) for a cooperative project to acquire a conservation easement over 3,316± acres of land for the protection of oak woodlands, riparian habitat, and conservation of critical wildlife migration corridors. Mr. Jon Wilcox of the Wildlife Conservation Board briefly described the projects and its location.

LOCATION

The property is located south of the community of Dunnigan and north of the town of Esparto in Yolo County. The property provides a wildlife migration corridor adjacent to the existing and currently negotiated conservation easements in the Hungry Hollow area. The property also provides linkage with the Cache Creek watershed open space areas to the west.

PROJECT DESCRIPTION

The property provides a high diversity of wildlife habitats that are intact and contiguous. The property is part of a much larger mosaic of intact oak woodland and oak savannah in the region and is adjacent and nearby to numerous large-acreage private ranches with similar habitat types and conditions. There are a multitude of natural vegetation communities present within the property, including California annual grassland, live oak woodland, blue oak woodland, valley oak savannah, chaparral, and riparian woodland, as well as salt water springs. Blue oaks are the dominant species and demonstrating an extremely significant regeneration rate. The live oak, blue oak and riparian woodland communities all exhibit trees of mixed age from seedlings to maturity.

Water on the property is provided by numerous springs, wells, and four seasonal creeks. The major drainages within the property provide important wildlife migration corridors and foraging, nesting, breeding and protection for a variety of birds, mammals, amphibians, and reptiles. There are also sixteen stock ponds on the property that provide water for seasonal grazing and abundant wildlife.

WCB PROGRAM

This project funding proposal was submitted to the Wildlife Conservation Board through its Oak Woodlands Conservation Program (Program). The project is reviewed and approved by WCB staff, and must be located within a county that has adopted an Oak Woodlands countywide conservation plan. The Program is designed to help local efforts achieve oak woodland protection. More importantly, this Program provides a mechanism to bring ranchers and conservationists together in a manner that allows both to achieve sustainable ranch and farming operations and healthy oak woodlands. The project meets the objectives of the Program by conserving some 4,275 contiguous acres of oak woodlands and allowing for the continued ranching and farming operations on the land.

MANAGEMENT OBJECTIVES AND NEEDS

The conservation easement and project area will be managed in accordance with local land use planning under the County of Yolo's Oak Woodland Conservation and Enhancement Program. As a condition of the grant, baseline studies will be completed and provided to the WCB prior to closing escrow. The CRT, which will hold title to the conservation easement, will monitor the property on an annual basis to ensure that conservation easement conditions are being met. Because this is an easement on private land, public access will be restricted.

TERMS

The property owners have agreed to sell a conservation easement to the CRT for the Department of General Services' (DGS) approved appraised fair market value of $2,286,000.00. The terms and conditions of the proposed grant to the CRT provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition. In the event of breach of the grant terms the WCB can request the conveyance of the conservation easement to the State and/or seek reimbursement of funds.

PROJECT FUNDING

The WCB proposes to make a grant to the CRT for the full amount of the purchase price:

Wildlife Conservation Board Grant	**$2,286,000.00**
Other Project-related Costs:	10,000.00
TOTAL WCB Allocation	**$2,296,000.00**

It is estimated that an additional $10,000.00 will be needed to cover internal project-related expenses, including DGS review costs.

FUNDING SOURCE

The proposed funding source for this project is the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006, (Proposition 84), Section 75055(d)(2) and provides funding to ensure continued wildlife, water quality, watershed and open space benefits to the State of California for oak woodlands preservation and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION

The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The project has been reviewed and approved for funding by WCB staff under the WCB's Oak Woodlands Conservation Program.

STAFF RECOMMENDATION

Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $2,296,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(d)(2) for the grant and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. McCamman commented that in the agenda he does not see endowment-related language in this item. Mr. Wilcox responded that it will be worked out with the property owner. Ms. Finn asked if the acreage is 3,300 acres or 4,300 acres. Mr. Wilcox replied that it is 3,316 acres. Ms. Finn pointed out that it says in the agenda, under "WCB Program" section, "…some 4,275 contiguous acres of oak woodlands…" and asked if it is in addition to the 3,316 acres. Mr. Wilcox confirmed that the right size is 3,316 acres and apologized for this mistake in the agenda. Mr. McCamman expressed his concern about the monitoring issue and asked if we get monitoring baseline report before the transaction closes. Mr. Wilcox confirmed that this is correct and that there is an annual monitoring to occur that is not funded yet, but is being worked out between the Rangeland Trust and the property owner.

Mr. McCamman asked if there were any additional questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $2,296,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal

Protection Fund of 2006 (Proposition 84), Section 75055(d)(2) for the grant and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

25. San Joaquin River Parkway, Jensen River Ranch Phase II Construction
Fresno County — $1,982,513.00

Mr. Donnelly explained that the San Joaquin River Conservancy is the State Conservancy, and their funding is within the Wildlife Conservation Board's (WCB) appropriations. As the Conservancy recommends a project to move forward, the WCB acts to fund those transactions and approve the project as well.

This proposal was to consider the allocation for an interagency agreement with the Department of Water Resources for a cooperative project with the San Joaquin River Conservancy (SJRC) to restore wetland and riparian habitat and construct public access trails on the San Joaquin River Parkway (Parkway) just east of Highway 41 in the City of Fresno, Fresno County. Mr. Scott McFarlin briefly described the project and its location.

LOCATION
The Parkway is defined in State Legislation as approximately 5,900 acres within a twenty-two mile long stretch between Friant Dam and State Route 99 on the San Joaquin River in Fresno and Madera Counties. The SJRC was created in 1992 to preserve and enhance the San Joaquin River's extraordinary biological diversity, protect its valued cultural and natural resources and provide educational and recreational opportunities to the local communities. The SJRC's mission includes both public access and habitat restoration within the Parkway.

The 167± acre Jensen River Ranch, acquired by the WCB in 1997, is located on the Parkway near the junction of Highway 41, in the City of Fresno, in Fresno County. Phase I was restored by the DWR in the fall of 2007 and consisted of the 100± acres south of the D/K storm water channel, which roughly divides the property into north and south halves. Planning and design for the restoration of the remainder of the property lying north of the D/K storm water channel, which is the property to be restored with this proposal, was approved by the WCB on May 22, 2008.

PROJECT DESCRIPTION

Completing the Jensen River Ranch Project is the SJRC and the Interagency Project Development Committee's (IPDC) highest priority restoration project. The IPDC is an independent committee and serves to provide recommendations to the San Joaquin River Conservancy staff and board on priorities for both land acquisitions and restoration or public access projects. The recommended action will authorize funding for DWR to construct the remaining infrastructure on the portion of the Jensen River Ranch site north of the water retention channel, identified as Phase 2. The scope of work includes:

1. Habitat enhancement infrastructure, which includes demolition of pasture irrigation pipes; installing irrigation to the planting cells; construction of a gravel maintenance road on the perimeter; grading swales and depressions for runoff to create wetlands; and installing barbed wire fencing to allow for future prescribed grazing for weed management;

2. Improvements to public access trail within the Phase 1 area, which will improve performance and reduce maintenance by paving the surface of the Americans with Disabilities Act-compliant trail and improving trail drainage;

3. Recreation and public access infrastructure, which includes the construction of split rail fencing to demark the hiking trail (co-located on the maintenance road) and a trail ascending the bluff to connect the northern trail loop with the Lewis S. Eaton multiple purpose trail above. The City of Fresno, which maintains existing public access facilities on the site and on adjacent Parkway lands, currently has a moratorium on building new trails and parks until new local funding is identified; therefore the recreation and public access components will not be included in the bid package unless additional resources are secured; and

4. Construction oversight and environmental permitting.

Construction is planned to begin in late summer or early fall of 2011.

WCB PROGRAM

The WCB's Habitat Enhancement and Restoration Program and Public Access Program provide the basis for WCB's ability to restore habitat and provide public access State-wide. In addition, funds were appropriated to the WCB from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40) to be provided to the SJRC for the acquisition, development, rehabilitation, restoration and protection of land and water resources.

MANAGEMENT OBJECTIVES AND NEEDS

The 167± acre Jensen River Ranch is owned by the San Joaquin River Conservancy. The SJRC, as the landowner, will be responsible for

managing the property after the project is complete, as it does at present. For all of its properties, the SJRC maintains fences and gates, maintains grazing and other leases, removes illegal dumping and nuisances, addresses citizen complaints, coordinates with the local mosquito abatement districts, performs fire prevention activities, and maintains access licenses with stewardship and educational groups. The proposed project will not significantly increase current management demands.

The San Joaquin River Parkway and Conservation Trust has also been a partner in the overall Jensen Ranch project, and received a River Parkways Grant from the California Natural Resources Agency to plant, irrigate, and maintain the habitat restoration component of Phase 1. The River Parkway Trust's work on the grant is on-going. Funding for habitat planting and maintenance is expected to be brought to the San Joaquin River Conservancy Board in the near future. Work to be funded will include weed eradication, planting native trees and shrubs, and managing irrigation and weeds for at least three years of plant establishment.

Existing recreational access has, and will continue to, be managed by the City of Fresno. However, the City of Fresno enacted a moratorium on extending trails and building new parks until new local funding can be identified. As a result, the recreational components for Phase II are budgeted but will not be constructed if the moratorium continues. Should funds be identified, the new public access facilities will be constructed, and the City of Fresno will maintain the new facilities consistent with their current responsibilities.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Wildlife Conservation Board	**$1,982,000.00**
Other Project-related Costs:	513.00
TOTAL WCB Allocation	**$1,982,513.00**

Project costs funded by the WCB will include DWR's construction oversight and environmental permitting and compliance; site preparation; earthmoving; gravel for access road; irrigation; trail construction; trail renovation within the Phase I area; and fencing. In addition to the costs listed above, an additional $513.00 will be required for Department of General Services' review costs, bringing the total allocation necessary for this project to $1,982,513.00.

FUNDING SOURCE

The proposed funding source for this project is the California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Fund (Proposition 40), Section 5096.650(b)(5). This funding provides for the acquisition, development, rehabilitation, restoration and protection of land and water resources consistent with the SJRC's mission and the Parkway Master Plan.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
As lead agency, the SJRC filed a Mitigated Negative Declaration pursuant to the provisions of the California Environmental Quality Act (CEQA) in March 2002. Staff considered the Mitigated Negative Declaration prepared by SJRC and has prepared written findings documenting WCB's compliance with CEQA. Subject to approval by the WCB, the appropriate Notice of Determination will be filed with the State Clearinghouse.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board adopt the written findings and approve this project as proposed; allocate $1,982,513.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650(b)(5); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff to proceed substantially as planned.

Mr. Scott McFarlin introduced Ms. Melinda Marks, Executive Officer of the San Joaquin River Conservancy, who was in the audience and available to answer questions.

Ms. Finn had a question regarding the issue with the City of Fresno providing public access and asked if they are going to provide it or not. Mr. McFarlin replied that right now it does not look like the City will be able to fund this part of the project, and the Conservancy indicated that they are trying to get funding some other way. Mr. McCamman asked, with this property being public, would the public be able to access it. Mr. McFarlin responded that the trails will be closed off to the public if the City can not manage it, but the restoration project will still go forward in that area. Ms. Finn asked if the Conservancy just turned the property over to the City. Mr. McFarlin replied that the Conservancy manages the site overall with the City of Fresno providing maintenance of the trails. Mr. McCamman commented that it would be ideal to integrate this property into the adjacent park. Mr. Donnelly commented that the Conservancy itself is made up of Madera and Fresno Counties and a number of other organizations locally, including the Department of Fish and Game, and ownership pattern along the river is mosaic of different types of public ownership, and this has been an issue of ongoing struggle for the Conservancy, as well as for other public entities that own the properties along the San Joaquin River. Ms. Melinda Marks spoke before the Board in support of this project. Ms. Marks explained that the Phase I of this site has an existing trail and the City of Fresno operates that. Regarding the Phase II, we need to figure out how we can make sure that the City has adequate funding to manage it. Ms. Marks said that the Phase II will provide access roads that are necessarily to build a restoration component, and those roads will become trails at the point when we know that we have that adequate funding to proceed.

Mr. McCamman asked if the Conservancy has a master plan for this whole stretch of the river. Ms. Marks confirmed that this is correct. Mr. McCamman asked if the master plan is available on the Conservancy's website. Ms. Marks responded that it is available on their website and also the San Joaquin Parkway Trust's, and mentioned that the plan needs to be updated. Ms. Marks added that there will be a request before the Board at its February 2011 meeting to allocate funds for a Parkway Master Plan update. Mr. McCamman added that there are some hatchery expansion issues associated with this project. Ms. Marks commented that the Conservancy is working closely with the hatchery on this project to resolve those issues.

Ms. Finn asked if we are only paying $500.00 to the Department of General Services (DGS). Mr. Donnelly replied that this is the cost of a contract review, and it used to be $176.00 but the DGS raised their fees.

Mr. McCamman asked if there were any questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board adopt the written findings and approve this project as proposed; allocate $1,982,513.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650(b)(5); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff to proceed substantially as planned.

Motion carried.

26. Los Vaqueros Ranch Conservation Easement, Phase II — $1,210,000.00
Monterey County

This proposal was to consider the allocation for a grant to The Nature Conservancy (TNC) to assist with its acquisition of a conservation easement over 800± acres of property to protect critical steelhead trout habitat as well as habitat for sensitive wildlife species. Ms. Teri Muzik of the Wildlife Conservation Board briefly described the project and its location.

LOCATION

The Los Vaqueros Ranch (Ranch) totals 2,137± acres and is located in central Monterey County in the Coast Range Mountains on the west side of the Salinas Valley, approximately 7 miles southwest of the town of Greenfield. The property includes portion of the Arroyo Seco River and its riparian corridor as well as portions of Sweetwater Creek and Vaqueros Creek.

Phase 1 of the project was approved on November 19, 2009, by the Wildlife Conservation Board (WCB). The WCB approved a subgrant of federal funds to assist TNC with the acquisition of a conservation easement over 1,337± acres of the Ranch. Phase 1 covered the western portion of the Ranch and the proposed project (Phase 2) will allow TNC to acquire a conservation easement over the eastern 800± acres of the Ranch.

The majority of the land south and west of the Ranch is public land owned by the Federal Government. Immediately south of the Ranch is the Ventana Wilderness area, administered by the Los Padres National Forest as part of the United States Forest Service. The Ranch borders large tracts of privately owned land on its eastern and northern borders. The Department of Fish and Game has developed the Arroyo Seco River Conceptual Area Protection Plan (CAPP) and the Ranch is located within that CAPP.

PROJECT DESCRIPTION

DFG has identified the Arroyo Seco River, in Monterey County, as a conservation priority. Protection of the river and its surrounding properties would create a terrestrial and hydrologic connection between the northern boundary of the Los Padres National Forest and the Arroyo Seco River basin and would help protect the last remaining known southern steelhead trout run in the Salinas River basin. Extensive riparian habitat will provide neotropical migratory songbird and waterfowl habitat and several sensitive wildlife species including the California red-legged frog, a federally threatened species, foothill yellow-legged frog, a federal and state species of concern, the western pond turtle and several intact populations of native fish are found on site.

WCB PROGRAM

The proposed grant for this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreational opportunities. Under this program, acquisition activities are carried out in conjunction with the DFG, evaluating the biological values of property through either development of a Land Acquisition Evaluation (LAE) or a CAPP. The LAE/CAPP is then submitted to the DFG Regional Operation Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

TNC has owned and managed lands for biodiversity conservation purposes for over 50 years. The policies and procedures adopted by the TNC's Board of Governors require that when TNC acquires any legal interests in conservation land that it intends to hold, funds must be set aside by the date of closing for the perpetual management or stewardship of that interest.

The WCB grant agreement requires the grantee prepare, and WCB approve, a baseline conditions report for the property being protected. The WCB grant agreement also requires annual monitoring by TNC and access to the property by WCB/DFG staff not less than once every three years to conduct monitoring. TNC proposes to manage the conservation easement to maintain and restore habitat for breeding populations of red-legged frogs, for steelhead passage and for potential steelhead spawning and rearing. Conservation of aquatic and riparian habitat within the Arroyo Seco watershed will help maintain red-legged frog and steelhead presence within the greater Salinas drainage, and may provide a starting point for future restoration of historic steelhead runs in other Salinas tributaries. Because this is an easement on private land, public access will be restricted.

TERMS

The Phase 2 conservation easement was appraised for $1,465,000.00 and the appraisal has been reviewed and approved by the Department of General Services (DGS). The property owner has agreed to sell the conservation easement at a bargain sale price of $1,200,000.00. The difference of $265,000.00 represents a donation by the landowner. The terms and conditions of the proposed grant to TNC provide that staff of the WCB will review and approve all documents pertaining to the acquisition of the conservation easement, including, without limitation, appraisals, preliminary title reports and items referenced therein, options, agreements for purchase and sale, escrow instructions, and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition.

PROJECT FUNDING

The WCB proposes to make a grant to TNC for the full amount of the purchase price:

WCB Grant	**$1,200,000.00**
Landowner Donation	265,000.00
Total Purchase Price	$1,465,000.00
Other Project-related Costs:	10,000.00
TOTAL WCB Allocation	**$1,210,000.00**

It is estimated that $10,000.00 will be needed to cover internal project-related costs including the appraisal review costs by the DGS.

FUNDING SOURCE

The proposed funding source for this project is the Habitat Conservation Fund, (Proposition 117), Section 2786 (b/c)(1E), that allows for the acquisition of habitat to protect rare, threatened and endangered or fully protected species, provide corridors linking separate habitat areas and protect significant natural lands and is consistent with the purposes of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as the acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of ownership in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The DFG has reviewed the project and recommends approval of the grant.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $1,210,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786 (b/c)(1E) to cover the grant amount and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Ms. Muzik introduced Ms. Chris Fisher from The Nature Conservancy, and Ms. Lynne Gould, the landowner, who were in the audience and available to answer questions.

Ms. Finn asked if there are funds set aside for management of this easement. Ms. Muzik confirmed that this is correct. Ms. Finn asked to confirm the purchase price. Ms. Muzik responded that the purchase price is $1,200,000.00 and explained that $1,465,000.00 was the approved appraised value, but the landowner agreed to sell the property at a lower price of $1,200,000.00. Ms. Finn pointed out that it says in the agenda that we were proposing to make a grant for the full amount of purchase price of $1,465,000.00. Mr. Donnelly commented that this includes the landowner donation, which should had been backed out of the $1,465,000.00. Mr. Donnelly explained that the property has appraised value of $1,465,000.00. The purchase price is $1,200,000.00, which recognizes $265,000.00 donation on behalf of the landowner.

Mr. McCamman asked if there are agricultural/grazing operations on the property. Ms. Muzik confirmed that there are agricultural operations on the property, and they will continue.

Mr. McCamman asked if there were any questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $1,210,000.00 from the Habitat Conservation Fund (Proposition 117), Section 2786 (b/c)(1E) to cover the grant amount and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

27. Santa Clara River Watershed, Totlcom $2,298,500.00
Ventura County

Mr. Donnelly reported that several letters of support were received for this project from the following people: Fran Pavley, Senator, 23rd Senate District; Julia Brownley, Assemblywoman, 41st District; Dr. Tom Dudley, Research Associate, Marine Science Institute, University of California, Santa Barbara (and family farmer in the Santa Clara Valley); Phillip W. Rundel, Distinguished Professor, University of California, Los Angeles; Barbara M. Harison, Executive Director, Ventura Hillsides Conservancy; Kirsten James, Water Quality Director, Heal the Bay; Ron Bottorff, Chairman, Friends of the Santa Clara River.

This proposal was to consider the allocation of a grant to The Nature Conservancy (TNC), the acceptance of a Recovery Land Acquisition Grant from the U.S. Fish and Wildlife Service, and the authorization to enter into an Agreement to Subgrant to TNC for a cooperative project with the State Coastal Conservancy, Santa Clara River Trustee Council and the Department of Fish and Game (DFG). The project consists of the acquisition of 123± acres of land for the protection of threatened and endangered species and habitat corridors. Mr. Bill Gallup of the Wildlife Conservation Board briefly described the project and its location.

LOCATION
The subject property is a privately owned agricultural parcel located within the floodplain of the Santa Clara River east of Harbor Drive and west of Victoria Avenue, just southerly of the city limits of the city of Ventura. The property abuts the Santa Clara River and is within the 100-year flood plain area. The Santa Clara River is one of the largest watersheds in Southern California without a major dam; as such, it is one of the priority watersheds for protection and restoration. TNC has acquired the property adjacent to the subject property and intends to complete two more acquisitions nearby, thus protecting total 350± acres in the vicinity. All of the properties within the immediate area are in agricultural use.

PROJECT DESCRIPTION
The subject property has been farmed over the past seventy five years and is improved with an agricultural well with diesel engine pump and miscellaneous temporary farm structures to assist during the harvest season. The project will allow for the protection of riparian and floodplain habitat along the Santa Clara River, one of the most intact river systems remaining in southern California. Southwestern willow flycatcher, least Bell's vireo and the southern California steelhead; all federally endangered species, are the primary targets of the project. However, other listed and candidate species are expected to benefit from this project, including the arroyo toad and the California red-legged frog. This acquisition is part of a larger effort to project and restore the river and

floodplain ecosystem, which supports exceptional biodiversity. The goal of the larger effort is to protect the river and floodplain from channelization, urban development, bank stabilization and other actions that alter the river and floodplain processes.

WCB PROGRAM

The proposed grant for this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program acquisition activities are carried out in conjunction with the DFG, evaluating the biological values of property through development of a Land Acquisition Evaluation (LAE)/Conceptual Area Protection Plan (CAPP). The LAE/CAPP is then submitted to DFG's Regional Operations Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

Under the terms of the grant, TNC will manage the property for the benefit of threatened and endangered species. The agricultural use will continue under specific seasonal leases managed by TNC. Monitoring for the agricultural lease will be conducted periodically by TNC and the lease will be modified to achieve the maximum protection of the resource. If appropriate for the property, levees may be removed allowing more naturally occurring floodplain and creating a wider riverine and riparian habitat area.

TERMS

The property owner has agreed to sell the property in fee to TNC below the Department of General Services' (DGS) approved appraised fair market value of $8,800,000.00. The negotiated purchase price is $8,577,000.00 The terms and conditions of the proposed grant to TNC provides that staff of WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account established for the acquisition. In the event of breach of the grant terms the WCB can encumber the property with a conservation easement and seek reimbursement of funds.

PROJECT FUNDING

Wildlife Conservation Board	**$2,288,500.00**
State Coastal Conservancy	2,288,500.00
Santa Clara River Trustee Council	3,000,000.00
US Fish and Wildlife Service – Sec. 6 Grant	1,000,000.00
Total Purchase Price:	$8,577,000.00

Other Project-related Costs:	10,000.00
TOTALWCB Allocation	**$2,298,500.00**

It is estimated that an additional $10,000.00 will be needed to cover project-related costs, including the Department of General Services review costs.

FUNDING SOURCE
The proposed funding source for this project is the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Act of 2002 (Proposition 40), Section 5096.650, that provides funding for grants to acquire property for habitat protection for endangered and threatened species and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse. The project has been reviewed and approved for funding by WCB staff.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $2,298,500.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650 for the grant and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. Gallup introduced Mr. EJ Remson, Program Manager from The Nature Conservancy, who was in the audience and available to answer questions.

Mr. McCamman asked about extended agricultural use of this property. Mr. Gallup commented that he was standing on the levee that is built between the farm and the river, and that a levee keeps the water out of the farm land and those levees are going to be removed ultimately to expand the habitat. Mr. McCamman commented that it is indicated in staff report that there is a lot of agricultural uses going on on this property. Mr. EJ Remson introduced himself before the Board and responded that TNC is acquiring several properties in this area to convert them into riparian or restoration activity. Mr. Remson said that TNC intends to keep this in agriculture until they have enough resources to do the restoration. Mr. McCamman asked if it would affect the operation of the Olivas Park. Mr. Remson replied that it would not because there is a natural bench which provides excellent protection.

Ms. Finn asked if we are acquiring a clean site. Mr. Remson responded that Phase I was conducted on this project, and there was no further action required, so the property we are acquiring is clean. Mr. Remson also added that, because of a diesel pump there, TNC will monitor the property.

Mr. McCamman pointed out the importance of these kinds of acquisitions where WCB has multiple partners, saying that we are not contributing all the funding but providing a portion with a partnership, which is a most effective way to leverage our funds.

Mr. Donnelly asked to make an addition to the motion, which was to include the acceptance of federal Section 6 grants as well as the authorization to subgrant those grants to The Nature Conservancy. Mr. McCamman and Ms. Finn agreed to make this addition.

Ms. Finn asked if the Coastal Conservancy took action on this project. Mr. Gallup confirmed that it had.

Mr. McCamman asked if there were any comments or questions about this item. There was none.

It was moved by Ms. Finn that that the Wildlife Conservation Board approve the project as proposed; accept federal Section 6 grants and authorize to subgrant those funds to The Nature Conservancy; allocate $2,298,500.00 from the California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Fund (Proposition 40), Section 5096.650 for the grant and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

28. Malibu Lagoon State Beach $4,000,000.00
Lagoon Restoration, Construction Phase
Los Angeles County

Mr. Donnelly reported that there has been significant support for this project from different organizations such as Los Angeles Audubon, Sierra Club, Santa Monica Bay Keeper, Malibu Surfing Association, Santa Monica Bay Restoration Commission, National Park Service, United States Environmental Protection Agency, Los Angeles Regional Water Quality Control Board, and many others. Mr. Donnelly also reported that we received two opposition letters for this project, one from Ms. Marcia Hanscom, Director, Wetlands Defense Fund, and one from Ms. Alessandra DeClario, Ph.D., Malibu, CA.

This proposal was to consider the allocation for a grant to the California Department of Parks and Recreation (DPR) to improve water circulation, remove non-native vegetation, restore native vegetation, and provide additional educational and public use facilities in Malibu Lagoon State Beach. Mr. Peter Perrine of the Wildlife Conservation Board briefly described the project and its location.

LOCATION

The project is located in Malibu Lagoon State Beach at Pacific Coast Highway and Cross Creek Road in Los Angeles County. The lagoon is a 31-acre shallow water embayment and coastal wetland complex occurring at the terminus of the Malibu Creek Watershed, the second largest watershed draining into Santa Monica Bay. The lagoon empties into the Pacific Ocean at world famous Malibu Surfrider Beach, renowned as a surfing and recreational destination, hosting approximately 1.5 million visitors every year.

PROJECT DESCRIPTION

The lagoon has undergone many changes in its recent history. In the 1950's and 60's it was used as a dump site for fill material by the California Department of Transportation (Caltrans) and others. By the late 1970's the site was completely filled and housed two baseball fields. The lagoon has also been greatly diminished by urban development along the coast. In addition, urbanization upstream in the Malibu Creek Watershed has increased the volume of water transported into the lagoon and significantly diminished the quality of the water.

In 1983, DPR initiated restoration work on the lagoon, by excavating fill to create three channels with sloping mudflats to reintroduce tidal flow. The channels were seeded with salt marsh plants and series of boardwalks were created to allow access by the public. Over time, sediments were deposited, creating pickleweed marshes and upland habitat. In 1996 Caltrans funded a successful restoration program to mitigate impacts incurred during the Malibu Lagoon Bridge Replacement Project. Specific restoration measures, coordinated by the Resource Conservation District of the Santa Monica Mountains (RCDSMM) and DPR, included a successful tidewater goby habitat enhancement project and the revegetation of areas disturbed by construction activities. However, the problems of Malibu Creek and Malibu Lagoon and its adjacent coastal waters continue. The lagoon is currently listed as impaired under the Clean Water Act Section 303(d) for benthic impacts, pathogens, nutrients, eutrophication, swimming restrictions, and shellfish harvesting. Studies have indicated high pathogen concentrations in the lower Malibu Creek, the lagoon and surf zone that could potentially impact the health of swimmers and surfers. The current configuration of channels causes poor circulation, eutrophication, and low dissolved oxygen levels in the lagoon. Large algal blooms erupt in the dry season, further depleting oxygen and endangering fish and other aquatic organisms. In the summer when direct

flows to the ocean are impeded by the build up of sand bars, circulation is further reduced, thus worsening the problem.

The purpose of this project is to enhance existing water quality conditions and restore and enhance habitat areas that have diminished functions or are in a currently degraded state. Restoration activities have been designed to improve water circulation, increase tidal inundation, improve and expand critical habitat for tidewater goby and steelhead trout, remove non-native and restore native vegetation, minimize human and pet disturbance while maximizing educational and recreational use of the site. The goal of the project is to create a natural self sustaining system that minimizes future maintenance requirements.

Restoration activities will encompass two primary components. First, salt marsh enhancement in the western complex will increase tidal flushing, improve water circulation, increase holding capacity and reduce predator encroachment. Second, east lagoon restoration will restore typical salt marsh hydrology and enhance habitat for sensitive bird species. Construction activities at the lagoon will primarily involve earthwork coupled with non-native species removal and enhancement and creation of native/wetland vegetation.

In addition, the project will enhance the visitor experience through improvements to access and interpretive amenities. The existing trail along the perimeter of the western lagoon will be enhanced through the addition of five new interpretive nodes, with interpretive signage that will provide information on intertidal habitat and kelp forest ecology, watershed processes, sensitive bird and aquatic species, tidal inundation and seasonal water level fluctuations, as well as the cultural history of the site. Interpretive signage will also be installed along the trail, which will enable passive interaction without disturbing the wildlife using the lagoon.

WCB PROGRAM

This project is funded through the Habitat Enhancement and Restoration Program, which allows for the restoration of native fisheries restoration, restoration of tidal or freshwater wetlands and upland areas including coastal scrub, grasslands, oak woodlands, and threatened and endangered species habitats in the State. This authority is pursuant to the Board's original enabling legislation, The Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq).

MANAGEMENT OBJECTIVES AND NEEDS

The grantee has agreed to manage and maintain the facilities for 25 years, pursuant to the terms and conditions of the grant.

PROJECT FUNDING

The proposed funding breakdown for the project is as follows:

Wildlife Conservation Board	**$4,000,000.00**
State Water Resources Control Board	2,495,858.00
State Coastal Conservancy	50,000.00
Los Angeles County	1,129,808.00
TOTAL	**$7,675,666.00**

Project costs will be for site preparation, grading, erosion control, planting, parking lot rehabilitation, interpretive features, monitoring and project management.

FUNDING SOURCE
The proposed funding source for this project is the Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002 (Proposition 50), Section 79572(a), which allows for the restoration of coastal wetlands in southern California, and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The DFG has reviewed this proposal and recommends it for funding by the WCB. The Department of Parks and Recreation, as lead agency, prepared a Final Environmental Impact Report (EIR) and Notice of Determination for the project pursuant to the provisions of the California Environmental Quality Act (CEQA). Staff considered the EIR and has prepared written findings documenting WCB's compliance with CEQA.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board adopt the written findings and approve this project as proposed; allocate $4,000,000.00 from the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund (Proposition 50), Section 79572(a); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. Perrine introduced Ms. Suzanne Goode, Senior Resource Ecologist from the Department of Parks and Recreation; Ms. Mary Small, Deputy Director, and Ms. Kara Kemmler, Project Manager, both from the State Coastal Conservancy; and Mr. Mark Abramson from Santa Monica Bay Restoration Foundation, who were in the audience and available to answer questions.

Ms. Finn asked why we are doing the restoration again if it was already done about 30 years ago. Mr. Perrine responded it was not done wrong but that we have learned a lot after all these years, and now all this knowledge will be applied to the restoration process. Mr. McCamman asked if this property has been in Department of Parks and Recreation ownership since 1960s.
Mr. Perrine confirmed that this is correct.

Ms. Athena Shlien, a surfer and Malibu resident, spoke in opposition to this

project. Ms. Shlien stated that she believes that the draining, dredging and bulldozing of 13 acres at Malibu Lagoon is not a good solution and that over 4,000 petition signatures were collected. According to Ms. Shlien, the real problem is the urban run-off, which contains fertilizers, pesticides, medication and other pollutants, and this restoration is not going to solve that. Ms. Shlien added that the lagoon is filtering the toxins before they reach the ocean. Ms. Shlien said that she agrees with the plan to add 2 acres to this existing area, but she does not believe that taking away this current wetland will solve the problem. Ms. Shlien mentioned the inconvenience for beach visitors during the restoration, such as diesel smell, inability to use the beach, and water contamination from construction run-off. Ms. Shlien cited the plan as not democratic, non-transparent over the years, and inconsistent with desires of the public. Ms. Shlien added that she and other opponents of this project favor a gentler plan to restore this lagoon and asked the Board to not approve this project.

Ms. Marcia Hanscom with the Wetlands Defense Fund introduced herself and spoke in opposition to this project. Ms. Hanscom said that she came here representing several other organizations, such as San Bernardo Audubon and Pasadena Audubon, which are in agreement with her. Ms. Hanscom stated that there are a lot of mischaracterizations in terms of what this project is. Ms. Hanscom said that the description talks about removing non-native plants, and while she agrees with that, the majority of the acreage is native habitat. Ms. Hanscom stated that this wetland is not regular salt water marsh, and it is open to the sea only during winter months, so it is more fresh water environment. Ms. Hanscom added that this entire habitat will be lost due to the restoration. Ms. Hanscom said that, according to CEQA, it is required to make sure that there are no other less damaging alternatives, and Mr. Wayne Ferren, a top wetland scientist in Southern California, who worked for UC Santa Barbara for 25 years, presented a feasible alternative where we would restore only two acres. Ms. Hanscom said that draining the entire marsh, dredging it and trying to turn it into tidal system is not a solution here. Ms. Hanscom added that she thinks that the DFG biologists did not have enough staffing to do the proper analysis on this project. Ms. Hanscom stated that the endangered fish, the tide water goby, does not need the high water circulation; it needs still water, and it has been thriving there since 1990s. Ms. Hanscom stated that changes in the system will result in the long-term damage and it is unknown if the tide water goby will survive in this new system. Ms. Hanscom also added that, in a biological opinion from the Fish and Wildlife Service, summer months are very important for tide water goby's reproduction, and that is when the project is happening. Ms. Hanscom urged the Board to decline this project.

Mr. McCamman asked about the time frame of the construction on this project. Mr. Perrine responded that the construction phase for this project is two years – one year for actual construction and one for replanting, if necessary.

Ms. Finn asked if staff could speak to the comments made by Ms. Shlien and Ms. Hanscom.

Ms. Suzanne Goode from the Department of Parks and Recreation introduced herself before the Board and spoke in support of this project. Ms. Goode said that the intense construction phase will be done in less than three months, and the two years include the monitoring, which will continue for five years, to make sure that the re-vegetation method succeeds. Mr. Goode responded to the previous testimony on this project by saying that this project in not intended to change the nature of the lagoon; it is a brackish lagoon and it will remain closed most time of the year. Ms. Goode explained that with the restoration, there will be additional circulation in the western portion of the lagoon, both when lagoon is open and when it is closed. Ms. Goode said that lagoon opens up in winter time, allows all of the tide to come in and this normal occurrence will continue to happen, and when it closes, it will stay closed. Ms. Goode added that the tide water goby is thriving in the lagoon, and it tends to hang out more in the main channel of the lagoon because there is a sandy bottom that it prefers for breeding substrate. The additional flushing that will occur once this project is completed will create more of a sandy bottom in the western arm of the lagoon and making it more attractive to the tide water goby. Ms. Goode commented that the bridges on the site create pinch points which prevent the circulation within the lagoon. Ms. Goode stated that this project has a widespread support and has been in the works for about twenty years. Ms. Goode added that this project is the number one tidal wetland priority for Southern California, and that many scientists worked in project's scientific advisory panel, including Dr. Richard Ambrose of UCLA and Dr. Martha Satula of Southern California Coastal Waters Research Project. Ms. Finn asked what impact will be done to the beach. Ms. Goode responded that the beach will not be impacted, and added that there is a very complicated and thorough de-watering plan in place that will discharge completely clean water from the lagoon.

Ms. Kara Kemmler from the State Coastal Conservancy introduced herself and spoke in support of this project. Ms. Kemmler clarified that there are multiple sensitive species on this site that we are managing for, and while it was recognized that during construction there would be some short-term impact, the project will have long-term benefits to all sensitive species. Ms. Kemmler added that there is no work proposed on the main lagoon, providing a refuge area for birds and fish during construction. Ms. Finn asked if the public access will improve with this project. Ms. Kemmler responded that with a new parking lot a perimeter path will be about 200 feet longer, and there is an interpretive program proposed that involves multiple notes on that new pathway. Ms. Finn asked if the Water Resources Control Board funding has already been approved. Ms. Kemmler confirmed that it has been approved.

Mr. McCamman asked if there were any additional questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board adopt the written findings and approve this project as proposed; allocate $4,000,000.00 from the Water Security, Clean Drinking Water, Coastal and Beach Protection Fund (Proposition 50), Section 79572(a); authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

29. Tejon Ranch $15,800,000.00
Kern and Los Angeles Counties

Mr. Donnelly reported that letters of support for this project were received from the following people: Mr. Joel Reynolds, Senior Attorney, Director, Urban Program, Natural Resources Defense Council; Mr. Graham Chisholm, Executive Director, Audubon California; Mr. Dan Silver, Executive Director, Endangered Habitat League; Ms. Traci Sheehan, Executive Director, Planning and Conservation League; Mr. Bill Center, Chair of the Board, Planning and Conservation League; Mr. Harry Love, Conservation Chair, Kern Audubon Society; Mr. Richard Hawley, Executive Director, Greenspace-the Cambria Land Trust; Mr. Jeffrey D. Parrish, Ph.D., Executive Director, Freedom to Roam; and Ms. Kristeen Penrod, Conservation Director, Science and Collaboration for Connected Wildlands.

This proposal was to consider the allocation for five grants to the Tejon Ranch Conservancy (Conservancy) to acquire five perpetual conservation easements over a total of 62,003± acres to protect significant natural landscapes and ecosystems, provide corridors linking separate habitat areas to prevent fragmentation, and promote the recovery of threatened and endangered species. The five easement properties are all situated within a larger property, known as Tejon Ranch, which comprises approximately 270,000 acres located in Kern and Los Angeles Counties. Mr. Jon Wilcox of the Wildlife Conservation Board briefly described the project and its location.

LOCATION
The Tejon Ranch is located along Interstate 5, approximately 60 miles north of Los Angeles and 30 miles south of Bakersfield. Its 422 square miles make it almost as large as the City of Los Angeles and about 40% the size of Rhode Island. The project provides a key linkage and wildlife corridors between the southern region of the Sierra Nevada Mountains and the Tehachapi Mountains.

PROJECT DESCRIPTION
Tejon Ranch was founded in 1843 as a Mexican land grant and through the decades the Ranch grew in size as additional land grants were purchased by

General Edward Fitzgerald Beale. The Ranch contains a mosaic of rugged mountains, steep canyons, oak covered rolling hills, and broad valleys.

The landowner has agreed to convey five conservation easements over Tejon Ranch in accordance with the terms and conditions of the Tejon Ranch Conservation and Land Use Agreement. The Agreement was struck with the landowner, Natural Resources Defense Council, National Audubon Society, Planning and Conservation League, Sierra Club, Endangered Habitats League and the Conservancy.

Further the Tejon Ranch Company (TRC) has agreed to dedicate conservation easements over an additional 135,000 acres as TRC receives development approvals, with all dedications to occur within 30 years from final approval of the first development project.

Tejon Ranch straddles the Tehachapi Mountains, and lies at the confluence of four major ecological regions: Great Central Valley, Sierra Nevada, Mojave Desert, and Southwestern California. Thus, the diversity of plants and animals found on Tejon Ranch reflects its position at what has been termed a bio-geographic crossroads, where species unique to each of these regions can be found together on the Ranch. The east-west trending Tehachapi Mountains serve as the spine of regional landscape linkage between the Coast/Transverse Ranges to the west and the Sierra Nevada to the east.

Tejon Ranch lies at the center of this continentally significant linkage, protection of which has long been a conservation priority for many organizations and agencies. This linkage includes the last grassland corridor around the agricultural lands in the southern San Joaquin Valley, oak and pinyon-juniper woodlands that connect to the west and east slopes of the Sierra Nevada respectively, and “sky islands” of conifer habitat connecting the more extensive conifer forests in the adjacent Transverse Range and Sierra Nevada. Tejon Ranch appears to be a hotspot of evolution, where a large number of different species and subspecies have evolved over time. The Ranch is also characterized by a significant amount of topographic complexity – over 6,000 feet of elevation change, major north-south and east-west trending canyons, and a well distributed diversity of slopes and aspects – thereby providing landscape resilience and a potential refugium for species in the face of climate change.

The easement areas support a wide-variety of plant and animal species, including a number of special status species. These include bald and golden eagles, tricolored black bird, San Joaquin kit fox, Swainson’s hawk, American badger, and Bakersfield cactus.

Tejon Ranch contains a very rich record of intact prehistoric archaeological sites resulting from three different adaptive systems, dating back at least 4000

years. Tejon Ranch was the location of the first Indian reservation in the U.S., established in 1853. The sites associated with this reservation are remarkably well preserved. They represent the single best, and most complete, archaeological district of historical-era Native American sites in California.

The Pacific Crest Trail (PCT) runs through a portion of the Ranch and one of the easement areas will be bisected by the future realignment of the PCT.

The five easement areas are explained in more detail below:

White Wolf. The 16,178-acre White Wolf easement area is located entirely within Kern County. The easement area is bounded by the Tejon Ranch property boundary to the west, near top of slope to the north, and a varying contour line to the south and east. Highways 58 and 223 traverse the easement area, and secondary county-maintained roads include Deer Trail Road in the southern portion and Bena and Caliente-Bodfish roads cut across the northern portion. The Bakersfield National Cemetery inholding lies within White Wolf. Current land uses in the easement area are cattle ranching, wildlife management (hunting), and mining. Approximately 10,969 acres of the easement area is under Williamson Act contract, within which 93 acres of that have a non-renewal notice filed.

White Wolf supports four primary natural community types: grassland, oak woodland, scrub, and riparian. The grassland community type (14,222 acres) is found on the San Joaquin Valley floor and lower foothills of the Tehachapi Mountains. At higher elevations and northeast facing slopes of the Tehachapi Mountain foothills, grasslands transition to oak woodlands (1,748 acres), both open savanna and closed woodland types.

Shrub communities (133 acres) are scattered on slopes within grassland communities. Riparian communities (75 acres) are associated with drainages on the flank of Bear Mountain, tributaries of Caliente Creek, and springs and areas with very high groundwater. Within these four major communities, a wide array of plant species associations or alliances can be found. Excluding designated mining areas, all of the natural communities within White Wolf are generally devoid of human alteration and support high quality resource conditions.

Some of the special status species documented within the White Wolf easement include Tejon poppy, Swainson's hawk, tricolored blackbird, American badger and San Joaquin kit fox.

Michener. The 1,585-acre Michener easement area is located within Los Angeles County. The easement area is bounded by the Tejon Ranch property boundary to the south, west and east, and the north ends of T8N, R19W, Section 1 and T8N, R18W, Section 6. Current land uses in the easement area

are cattle ranching and wildlife management (hunting). There are no Williamson Act contracts in Los Angeles County. The majority of the property (1,456 acres) lies with Los Angeles County Significant Ecological Area #59.

Michener supports grassland and oak woodland natural community types. Oak woodlands (467 acres) tend to be associated with north and east facing canyons, which are surrounded by grassland communities (1,118 acres). It is a fairly species rich area for its size, with a relatively high percentage of native species. All of the natural communities within Michener are generally devoid of human alteration and support high quality resource conditions.

Michener supports two primary drainages: Bear Canyon and Crane Canyon, which drain north to Castac Lake. Michener comprises an approximately 2-mile portion of a regional habitat linkage design proposed by the South Coast Wildlands Project (Penrod et al. 2003) to conserve connectivity for a broad suite of plant and animal species.

Tri-Centennial. The 7,183-acre Tri-Centennial easement area is located entirely within Kern County. The easement area is bounded by the Tejon Ranch property boundary to the south, the approximately 4,500-foot elevation contour to the north, the extension of 290th Street to the west, and T9N, R16W, Section 9 to the east. Current land uses in the easement area are cattle ranching and wildlife management (hunting). The entire easement area is under Williamson Act contract.

Tri-Centennial supports natural communities that can be grouped into four major types: grasslands, shrub, riparian, and Joshua tree woodland. The grassland community type (3,316 acres) is found on the Antelope Valley floor and dissected alluvial terraces of the Tehachapi Mountains. Scrub communities (2,652 acres), including both chaparral and desert scrub habitats, occur along the foothills and alluvial terraces of the Tehachapi Mountains. Riparian communities (534 acres) are found in Antelope Canyon, the only significant stream draining the southern slopes of the Tehachapi Mountains, and springs discharging along the foothills and alluvial terraces. Joshua tree woodlands (681 acres) are found within Canyon del Gato Montes and some adjacent alluvial fans. All of the natural communities within Tri-Centennial are generally devoid of human alteration and support high quality resource conditions. The flora of Tri-Centennial is characterized by a high percentage (92%) of native species and many unique plant assemblages. The desert scrub communities in Tri-Centennial are of particularly high quality. These scrub communities generally have very low levels of disturbance, low levels of nonnative plant species, and a high diversity of native shrubs, forbs and grasses.

Tri-Centennial supports a series of small, intact watersheds draining the southern slope of the Tehachapi Mountains. Tri-Centennial comprises an

approximately 4-mile portion of a regional habitat linkage design proposed by the South Coast Wildlands Project to conserve connectivity for a broad suite of plant and animal species.

Special status species documented within Tri-Centennial include the Loggerhead shrike and Tehachapi pocket mouse.

Old Headquarters. The 26,716-acre Old Headquarters easement area is located entirely within Kern County. The easement area is bounded by the Tejon Ranch property boundary to the northeast, approximately the 2,000-foot contour to the southeast, between a 1,100 to 2,400-foot contour to the north and a varying contour line to the west. The site of the original headquarters of the Tejon Ranch Company lies within the easement area, which currently support numerous houses, barns, and workshops. Current land uses in the easement area are cattle ranching, wildlife management (hunting), and oil and gas extraction. Approximately 12,920 acres of the easement area is under Williamson Act contract.

Old Headquarters supports natural communities that can be grouped into three major types: grasslands, oak woodlands, and riparian. The grassland community type (21,435 acres) is found on the San Joaquin Valley floor, Tejon Hills, and lower foothills of the Tehachapi Mountains. At higher elevations and northeast facing slopes of the Tehachapi Mountain foothills, grasslands transition to oak woodlands (2,537 acres), both open savanna and closed woodland types. Riparian communities (1,592 acres) are associated with drainages traversing Old Headquarters and springs and areas with very high groundwater. Within these three major communities, a wide array of plant species associations or alliances can be found. There is also a grove of nonnative eucalyptus trees near the agricultural areas (18 acres).

There are three major watersheds comprising Old Headquarters: Tejon Creek, El Paso Creek, and Tunis Creek. All of these watersheds drain to the Tulare Lake Hydrologic Region of the southern San Joaquin Valley.

Old Headquarters comprises an approximately 10-mile portion of a regional habitat linkage design proposed by the South Coast Wildlands Project to conserve connectivity for a broad suite of plant and animal species. With the exception of the Designated Farming and Disturbance Areas, the majority of natural communities within Old Headquarters is generally devoid of human alteration and provides connectivity functions for many San Joaquin Valley species.

Some of the special status species documented within Old Headquarters include the Bakersfield cactus, Striped adobe lily, Tejon poppy, Western spadefoot, bald eagle, golden eagle, San Joaquin kit fox, northern harrier and tricolored blackbird.

Bi-Centennial. The 11,026-acre Bi-Centennial easement area is located within both Kern (10,777 acres) and Los Angeles (249 acres) counties. The easement area is bounded by the Tejon Ranch property boundary and the Kern/Los Angeles County line to the south, the extension of 290th Street to the east, the National Cement lease boundary to the west, and extends north to a boundary line between the 3,500 and 4,500-foot contours. The Bi-Centennial easement area is essentially bisected by the proposed future conservation easement corridor for a realignment of the Pacific Crest Trail through Tejon Ranch. Current land uses in the easement area are cattle ranching, wildlife management (hunting), mining, agriculture, and a series of infiltration basins associated with the Tejon Ranch Company (TRC) Water Bank. The California Aqueduct traverses the western portion of the easement area. Approximately 7,044 acres of the eastern two-thirds of the easement area is under Williamson Act contract.

Bi-Centennial supports natural communities that can be grouped into four major types: grasslands, shrub, oak woodlands, and riparian. The grassland community type (5,847 acres) is found on the Antelope Valley floor and dissected alluvial terraces of the Tehachapi Mountains. Scrub communities (3,475 acres), including both chaparral and desert scrub habitats, occur along the foothills and alluvial terraces of the Tehachapi Mountains. At higher elevations between Los Alamos and Big Sycamore canyons, grasslands transition to open oak woodlands (628 acres). Riparian communities (847 acres) are associated with streams draining the southern slopes of the Tehachapi Mountains and springs discharging along the foothills and alluvial terraces. Except for the designated mining and agricultural areas and TRC Water Bank, all of the natural communities within Bi-Centennial are generally devoid of human alteration and support high quality resource conditions. In particular, Bi-Centennial supports outstanding native grasslands, and Bi-Centennial is well-known for its very showy native wildflower displays in the spring.

Bi-Centennial supports a series of small watersheds draining the southern slope of the Tehachapi Mountains, including Los Alamos Canyon, Little Sycamore Canyon, Bronco Canyon, and Pescado Creek, and a number of unnamed drainages. All of these watersheds drain to the Antelope Hydrologic Unit of the Lahontan Region in the western Antelope Valley.

Some of the special status species documented within Bi-Centennial include the silvery false lupine, Adobe yampah, coast horned lizard, northern harrier, loggerhead shrike, tricolored blackbird, burrowing owl and the Tehachapi pocket mouse.

The Bi-Centennial easement area in the Antelope Valley portion of the Ranch supports an approximately 7-mile wide swath of the southern foothills of the Tehachapi Mountains rising approximately 1,500 feet from the Mojave Desert

floor. Bi-Centennial is visible from surrounding communities, such as Palmdale, Lancaster, and Neenach, visitors to the Antelope Valley Poppy Preserve, and by travelers on Highway 138.

WCB PROGRAM

The proposed grant for this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, the Wildlife Conservation Law of 1947 (Fish and Game Section 1300, et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program acquisition activities are carried out in conjunction with the DFG, evaluating the biological values of property through development of a Land Acquisition Evaluation (LAE)/Conceptual Area Protection Plan (CAPP). The LAE/CAPP is then submitted to DFG's Regional Operations Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

Under the terms of the conservation easements, the landowner will continue Ranch activities, including ranching /livestock management, farming, hunting and other wildlife management activities and water banking. The Conservancy will hold the conservation easements and will monitor the property for compliance with the purposes, terms and conditions of the conservation easements. Monitoring will be performed by the Conservancy staff.

Day to day operations and overall management will be carried out consistent with a management plan. The Interim Ranch-Wide Management Plan (IRWMP) and subsequent Ranch-Wide Management Plan (RWMP), identifies and assess natural resource and conservation attributes of the conserved lands in order to develop sustainable stewardship management strategies that provide for protection and enhancement of natural resources values and management of existing ranch uses. In addition the RWMP will establish best management practices for continued use of the conserved lands for existing ranch uses.

Public enjoyment of the conserved lands is high priority of the Conservancy and TRC. Both parties have agreed to establish and implement a public access plan that encourages and facilitates public access, including public access opportunities for underserved populations.

TERMS

The property owner has agreed to sell the conservation easements for the Department of General Services' (DGS) approved combined appraised fair market value of $15,750,000.00. The DGS approved combined fee interest value is $49,720,000.00. The terms and conditions of the proposed grant to the Conservancy provide that staff of the WCB will review and approve all title documents, appraisals, preliminary title reports, documents for purchase and

sale, escrow instructions and instruments of conveyance prior to disbursement of funds directly into the escrow account(s) established for the acquisition. In the event of breach of the grant terms, the WCB can request the conveyance of the conservation easement to the State and/or seek reimbursement of funds.

The separate DGS approved conservation easement values are broken down below:

Conservation Easement Area	Conservation Easement Value	Acres
White Wolf	$4,340,000.00	15,500
Old Headquarters	$7,050,000.00	26,717
Michener	$450,000.00	1,585
Bi-Centennial	$2,910,000.00	11,019
Tri-Centennial	$1,000,000.00	7,183

PROJECT FUNDING
The WCB will be funding the entire purchase price.

Wildlife Conservation Board	**$15,750,000.00**
TOTAL Purchase Price	$15,750,000.00
Other Project-related Costs:	50,000.00
TOTAL WCB Allocation	**$15,800,000.00**

It is estimated that and additional $50,000.00 will be needed to cover project-related expenses, including DGS appraisal review and independent appraisal reviews.

FUNDING SOURCE
The proposed funding source for this acquisition is the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(b). This fund allows for acquisition and protection of habitat that promotes recovery of threatened and endangered species; provides corridors linking separate habitat areas to prevent fragmentation; and protects significant landscapes and ecosystems, including old growth redwoods, mixed conifer forests, oak woodlands, riparian habitat and other significant habitats and is consistent with the objectives of this project.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The project has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve the grants to the Tejon Ranch Conservancy for its acquisition of the conservation easements as proposed; allocate $15,800,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(b) to cover the grant amounts and pay internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Mr. Wilcox introduced Mr. Robert Stine, President of the Tejon Ranch Company; Mr. Tom Maloney, Executive Director, from the Tejon Ranch Conservancy; and Mr. Graham Chisholm, Executive Director of the Audubon California, who were in the audience and available to answer questions.

Ms. Finn asked why we are having five separate grants in this project. Mr. Wilcox responded that there are special requirement uses for each area, and there are four different regions involved in this project. Ms. Colborn asked if the oil and mining activities will continue and if they are compatible with the conservation plans and purposes. Mr. Wilcox responded that these activities are limited to where they occur now and the uses are provided for in the conservation easement and will continue. Mr. Wilcox added that the Tejon Conservancy will monitor the activities and will be responsible for those items.

Mr. Maloney introduced himself before the Board and spoke in support of this project. Mr. Maloney mentioned the importance of public access and said that the Tejon Ranch Conservancy has been working closely with different organizations and the public to get a better understanding and use of public access on the property. Mr. Maloney said that community hikes are very popular in the area, especially during wildflowers blooming season. Mr. Maloney commented that the Pacific Crest Trail realignment, that represents 38 miles of public access, routing has been agreed to between the US Forest Service, Pacific Crest Trail Association, Tejon Ranch Conservancy and the fee holder, Tejon Ranch Company, are currently working on conveyance agreement.

Mr. McCamman mentioned hunting opportunities that are now on the property and asked if they will continue as the Tejon Conservancy will manage the property. Mr. Maloney responded that hunting opportunities will continue. Mr. Maloney also added that four principal uses that the fee holder will continue on the conserved lands are cattle ranching, the hunt program, wildlife management program, and the filming activity; each of these activities will be subject to the ranch-wide management plan, prepared by the Conservancy.

Ms. Finn had a question about public access. Mr. Maloney replied that, until the first ranch-wide management plan is due in 2013, the Conservancy is

working on an annual basis in coordination with Tejon Ranch Company natural resources staff to arrange hikes, and commented that this coordination is working extremely well. Mr. Maloney said that the public access plan will be essential component of the ranch-wide management plan.

Mr. EJ Remson of TNC introduced himself and said that he came to today's Board meeting representing two groups: The Nature Conservancy and Southern Sierra Partnership, and spoke in support of this project. Mr. Remson said that this project is among the highest priority for conservation in the State. Mr. Remson also stated that this project represents about a 60 mile linkage that connects the coastal ranges with the southern Sierra Nevada Mountains.

Mr. McCamman commented that several years ago, the Governor signed the agreement which led to this acquisition and was identified at that time as a high priority project.

Mr. Donnelly commented that it is hard to summarize the amount of work, the amount of frustration and pleasure that goes into landmark projects such as this one, and he wanted to acknowledge and express his gratitude to the people who put their work into this project and were in the audience today. Mr. Donnelly recognized Ms. Nancy Templeton and Mr. Jon Wilcox of the Wildlife Conservation Board; Ms. Catherine Caldwell, the initial land agent who started working on this project; Mr. Bob Stine, President of the Tejon Ranch Company; Mr. Graham Chisholm, Executive Director of the Audubon California. Mr. McCamman also acknowledged in audience Mr. Todd Ferrara from California Natural Resources Agency who has been working on this project for several years.

Mr. McCamman asked if there were any other questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve the grants to the Tejon Ranch Conservancy for its acquisition of the conservation easements as proposed; allocate $15,800,000.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(b) to cover the grant amounts and pay internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

30. Bottle Peak $3,562,900.00
San Diego County

Mr. Donnelly reported that a letter of support for this project was received from Mr. Dan Silver, Executive Director of the Endangered Habitat League.

This was a proposal to consider the allocation for a grant to The Escondido Creek Conservancy (TECC) to assist with the acquisition of 418± acres of property to anchor regional habitat conservation planning efforts, in central San Diego County and provide a critical ecological link between coastal habitat and the higher elevation Cleveland National Forest. Ms. Teri Muzik of the Wildlife Conservation Board briefly described the project and its location.

LOCATION
The subject property is located east of Interstate Highway 15 and west of Lake Wohlford on the northeasterly border of the City of Escondido in San Diego County. The property has been identified by the Department of Fish and Game (DFG) as a priority for protection in the Rancho Guejito Conceptual Area Protection Plan (CAPP). The subject property is strategically located west of Guejito Ranch and contributes to a north-south habitat linkage between the South San Diego County Multiple Species Conservation Program (MSCP) and the North San Diego County Multiple Species Conservation Plan (NC MSCP).

PROJECT DESCRIPTION
The subject property contains a variety of significant biological resources. The existing natural open space represents a large portion of the remaining open space in the contiguous unincorporated region of the City of Escondido and supports many sensitive plant and animal species including the federally threatened coastal California gnatcatcher, coast live and Engelmann oak woodlands, various types of chaparral, coastal sage scrub, grasslands and riparian habitats. Based on its topography, native vegetation, large north-south canyon/drainage and adjacent open space areas, the property provides essential landscape linkage, habitat biodiversity and an important natural linkage for wildlife corridors at the intersection of the MSCP and the NC MSCP. Acquisition of the subject property will also create a significant habitat and open space buffer from the more urbanized areas to the west.

WCB PROGRAM
The proposed grant for this project is being made under the Land Acquisition Program at WCB. The Acquisition Program is administered pursuant to the WCB's original enabling legislation, The Wildlife Conservation Law of 1947 (Fish and Game Code Section 1300 et seq.) to acquire areas that can successfully sustain wildlife and provide for suitable recreation opportunities. Under this program, acquisition activities are carried out in conjunction with the DFG, evaluating the biological values of property through development of a Land Acquisition Evaluation (LAE)/Conceptual Area Protection Plan (CAPP).

The LAE/CAPP is then submitted to DFG's Regional Operations Committee (ROC) for review and approval and later transmitted to the WCB with a recommendation to fund.

MANAGEMENT OBJECTIVES AND NEEDS

TECC is a non-profit, public benefit corporation dedicated to the preservation, restoration and protection of the natural open space within the Escondido Creek watershed. It currently owns and/or manages approximately 266 acres of land in seven separate ownerships in the Escondido Creek watershed, spanning roughly between the Cities of Encinitas and Escondido. The landowner is considering making an endowment to TECC for management of this property.

Since this project will be managed by TECC consistent with the guidelines established for the MSCP and NC MSCP plans, public access to the property will be minimal but will likely include access for educational and scientific studies. If appropriate, guided tours by local groups may also be considered by TECC.

The WCB grant agreement requires annual monitoring by TECC and access to the property by WCB/DFG not less than once every three years to conduct monitoring.

TERMS

This proposed acquisition is for approximately one-half (417±) of the total acreage (800±) of the subject property. The full property was appraised and the appraisal was approved by the Department of General Services (DGS). Before the project could be completed, the available bond funding was frozen and the project was placed on hold. When funding was again available, the appraisal was updated. The value had decreased and the updated appraisal was reviewed and approved by the DGS. Due to budget constraints, the project was scaled back to the current acreage. After consultation with the DGS appraisal review staff, the per-acre value in the updated appraisal of the whole property was deemed to be applicable to the current project. The landowner has agreed to sell the property for the approved, appraised value of $3,552,900.00.

The terms and conditions of the proposed grant to TECC provide that staff of the WCB will review and approve all preliminary title reports, title documents, documents for purchase and sale, instruments of conveyance, and escrow instructions prior to disbursement of funds directly in the escrow account established for the acquisition.

PROJECT FUNDING

The WCB proposes to make a grant to TECC for the full amount of the purchase price.

Wildlife Conservation Board	**$3,552,900.00**
Other Project-related Costs:	10,000.00
TOTAL WCB Allocation	**$3,562,900.00**

It is estimated that an additional $10,000.00 will be needed to cover project-related expenses, including DGS appraisal review costs.

FUNDING SOURCE
The purposes of this project are consistent with the proposed funding source, Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(c), that allows for grants to implement or assist in the establishment of Natural Community Conservation Plans.

ENVIRONMENTAL COMPLIANCE AND STATE RECOMMENDATION
The acquisition has been reviewed for compliance with the California Environmental Quality Act (CEQA) requirements and is proposed as exempt under CEQA Guidelines Section 15313, Class 13, as an acquisition of land for wildlife conservation purposes, and Section 15325, Class 25, as a transfer of an ownership interest in land to preserve open space. Subject to authorization by the WCB, a Notice of Exemption will be filed with the State Clearinghouse.

STAFF RECOMMENDATION
Staff recommended that the Wildlife Conservation Board approve this project as proposed; allocate $3,562,900.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(c) to cover the grant amount and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Ms. Muzik introduced Mr. Greg Lowther, the landowner's representative, who was in the audience and available to answer questions.

Ms. Finn asked if the Escondido Creek Conservancy has enough resources to manage the property. Ms. Muzik confirmed that this is correct.

Mr. Lowther introduced himself before the Board and said that the landowner is giving an endowment for $240,000.00 with an option for the State to purchase the remaining 800 acres. Ms. Finn asked if this option is for the State, not for the Conservancy. Ms. Muzik commented that this is the Right of First Refusal, so this is the option for the State.

Mr. McCamman asked if there were any questions or comments about this item. There were none.

It was moved by Ms. Finn that the Wildlife Conservation Board approve this project as proposed; allocate $3,562,900.00 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006 (Proposition 84), Section 75055(c) to cover the grant amount and internal project-related expenses; authorize staff to enter into appropriate agreements necessary to accomplish this project; and authorize staff and the Department of Fish and Game to proceed substantially as planned.

Motion carried.

31. DFG Presentation Informational
Conservation and Habitat Mapping

Ms. Monica Parisi from the Department of Fish and Game presented this item.

In 2010, the Department of Fish and Game (Department) completed work on two complementary statewide mapping and modeling efforts. To guide and inform its priorities for species and habitat conservation in service of its broad mission to conserve California's natural resources for both ecological and recreational values, the Department undertook Areas of Conservation Emphasis II (ACE II). The primary focus of ACE II was to collect and summarize the best available statewide spatial data on biological richness, including species diversity, rarity, and sensitive habitats. Information on recreational needs and opportunities throughout the State, including fishing, hunting and wildlife-viewing, was also compiled. Because a functional network of connected wildlands is essential to the continued support of California's diverse natural communities in the face of both human development and climate change, the Department partnered with Caltrans on the California Essential Habitat Connectivity (Connectivity) Project -- a commissioned study to identify large remaining blocks of intact habitat or natural landscape and model linkages between them that need to be maintained, particularly as corridors for wildlife.

The projects shared the goal of using the best available science, data sets, spatial analyses and modeling techniques in a process both transparent and repeatable. They supplement, and in many cases validate, earlier approaches to identify priorities by having experts with on-the-ground knowledge hand draw areas of high biological, recreational, or connectivity value on large maps.

Rather than produce single statewide maps depicting priorities, both projects produced a set of Geographic Information System (GIS) data layers than can be used flexibly to inform decision-making. ACE II layers represent specific biological and recreational values, threats, and landscape considerations at a consistent scale of 2.5 square mile hexagons that can be combined in various ways to identify priorities for conservation, depending on management question

or funding opportunity. The Connectivity Project has one layer identifying large intact habitat blocks, another modeling the “path of least resistance” or “least cost corridor” between them, and a third showing places where only a road disrupts habitat connectivity and Caltrans can offer solutions for restoring a connection.

These two complementary mapping efforts will continue to aid the DFG and conservation partners in the development of Land Acquisition Evaluations and Conceptual Area Protection Plans. They are key to achieving a network of large connected reserves of high biological value -- a focus of the State Wildlife Action Plan, the California Climate Change Adaptation Strategy, land acquisition and management, and conservation planning across jurisdictional boundaries.

Ms. Finn asked if other conservancies or other land groups in the State can benefit from using this information. Ms. Parisi responded that the connectivity data has been out since February and people can download maps and other supporting materials. Ms. Parisi also added that the conservancies are represented on the technical mutli-disciplinary teams for the connectivity project. Ms. Diane Colborn had a question about miles Ms. Parisi mentioned in reference to the ACE Program. Ms. Parisi clarified that it is 2.5 square miles. Ms. Colborn asked how the Wildlife Conservation Board might be able to use the data. Ms. Parisi responded that this is a very simple process with connectivity data when you are looking at the corridor, which is actually rasterized data set, you can make it sort of semi-transparent, and you lay all the conserve lands underneath that in GIS, so you can see where the gaps are, and where one more acquisition can be completed. Ms. Colborn asked if Caltrans participated with the DFG in this connectivity project. Ms. Parisi replied that this is correct, and added that Caltrans are combining the data with their own database where they have wildlife crossings statistics where wildlife get hit, and Caltrans will use these two systems together to prioritize where they need to retrofit highway projects, and it would also help them being proactive to where actually site new transportation projects.

Mr. McCamman said that he would like to see how the projects that are being approved by this Board fit into CAPP programs in relation to the connectivity project. Mr. Donnelly commented that we have started this process as a part of restructuring of LAE and CAPP guidelines and criteria. Mr. Donnelly said that ACE II in the corridor mapping considerations are built into the work, and we should be able to incorporate into the agenda write-ups. Mr. Donnelly commented that there may be projects that we considered that come through other planning avenues such as Central Valley Joint Venture or South Coast Wetland Recovery Project, and Mr. Donnelly said that he would not want to foreclose the opportunity for the Wildlife Conservation Board to consider those projects even though the data was not secured through ACE II. Mr. McCamman agreed and commented that these data collection processes are

important. Mr. Donnelly commented that having this information available on the Internet and accessible by the public is very important. Ms. Finn asked if the Board Members can be updated on this item at a future meeting. Mr. Donnelly confirmed.

32. 2011 Wildlife Conservation Board Tentative Meeting Schedule — Informational

The Wildlife Conservation Board adopted the following Board Meeting schedule for the 2011:

February 24, 2011

June 2, 2011

August 25, 2011

November 17, 2011

Mr. Donnelly expressed his gratitude for the entire WCB staff for making this Board meeting successful. Mr. Donnelly also reported that one of the WCB staff, Ms. Janell Bogue, will be leaving the Wildlife Conservation Board. Mr. Donnelly also mentioned that this is the last meeting we will have our Board Members, Senator Patricia Wiggins and Assembly Member Ira Ruskin, represented at our Board. Mr. Donnelly thanked Ms. Teresa Schilling, Senator Wiggins's representative, and Ms. Erin Shaw, Assembly Member Ruskin's representative, for serving on the Board Legislative Advisory Committee.

With no further business to discuss, the meeting was adjourned at 12:45 P.M.

Respectfully submitted,

John Donnelly
Executive Director

PROGRAM STATEMENT

At the close of the meeting on November 18, 2010, the amount allocated to projects since the Wildlife Conservation Board's inception in 1947 totaled $2,234,062,144.78. This total includes funds reimbursed by the Federal Government under the Accelerated Public Works Program completed in 1966, the Land and Water Conservation Fund Program, the Anadromous Fish Act Program, the Sport Fish Restoration Act Program, the Pittman-Robertson Program, and the Estuarine Sanctuary Program.

The statement includes projects completed under the 1964 State Beach, Park, Recreational and Historical Facilities Bond Act, the 1970 Recreation and Fish and Wildlife Enhancement Bond Fund, the Bagley Conservation Fund, the State Beach, Park, Recreational and Historical Facilities Bond Act of 1974, the General Fund, the Energy Resources Fund, the Environmental License Plate Fund, the State, Urban and Coastal Park Bond Act of 1976, the 1984 Parklands Fund, the 1984 Fish and Wildlife Habitat Enhancement Bond Act, the California Wildlife, Coastal and Park Land Conservation Act of 1988, Cigarette and Tobacco Products Surtax Fund of 1988, California Wildlife Protection Act of 1990, the Safe, Clean, Reliable Water Supply Act of 1996, the Natural Resources Infrastructure Fund, the Harbors and Watercraft Revolving Fund, Forest Resources Improvement Fund, the Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond, Safe Drinking Water, Clean Water, Watershed Protection, and Flood Protection Fund, California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Fund, Water Security, Clean Drinking Water, Coastal and Beach Protection Fund of 2002, Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Fund of 2006, and the Wildlife Restoration Fund. In addition to projects completed with the above funding sources, this statement includes tax credits awarded under the Natural Heritage Preservation Tax Credit Act. The tax credits are not reflected in the total amount allocated to projects.

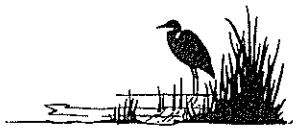
A. Fish Hatchery and Stocking Projects		$16,006,219.06
B. Fish Habitat Preservation, Development & Improvement		41,962,415.28
Reservoir Construction or Improvement	5,605,699.00	
Stream Clearance and Improvement	28,543,077.09	
Stream Flow Maintenance Dams	542,719.86	
Marine Habitat	3,046,619.07	
Fish Screens, Ladders and Weir Projects	4,224,300.26	
C. Fishing Access Projects		53,441,681.40
Coastal and Bay	4,612,013.11	
River and Aqueduct Access	17,582,175.38	
Lake and Reservoir Access	10,494,639.87	
Piers	20,752,853.04	
D. Game Farm Projects		146,894.49
E. Wildlife Habitat Acquisition, Development and Improvement		2,058,230,332.93
Wildlife Areas (General)	414,853,091.24	

Miscellaneous Wildlife Habitat Development	21,751,962.86	
Wildlife Areas/Ecological Reserves, (Threatened, Endangered or Unique Habitat)	738,800,972.11	
Land Conservation Area	12,992,940.18	
Inland Wetlands Conser. Grants & Easements	25,724,296.36	
Riparian Habitat Conser. Grants & Easements	65,135,393.64	
Other Wildlife Habitat Grants	778,971,676.54	
F. Hunting Access Projects		636,898.57
G. Miscellaneous Projects (including leases)		22,123,289.94
H. Special Project Allocations		1,696,372.89
I. Miscellaneous Public Access Projects		39,284,585.15
State Owned	2,338,506.19	
Grants	36,946,078.96	
J. Sales and/or exchanges		533,455.07
K. Natural Heritage Preservation Tax Credit Act (tax credits awarded)		(48,598,734.00)
Statutory plans	(0.00)	
Corridors, wetlands, wildlife habitat, streams and riparian habitat	(6,234,658.00)	
Agricultural lands	(13,775,640.07)	
Water and water rights	(0.00)	
State and local parks, open space and archaeological resources	(28,588,435.93)	
Total Allocated to Projects		$2,234,062,144.78

ATTACHMENT 2

VOLLMAR CONSULTING
2003/2004 BOTANICAL SURVEY REPORT

VOLLMAR CONSULTING



NATURAL RESOURCE
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CENTENNIAL SPECIFIC PLAN PROJECT SITE

2003/2004 BOTANICAL SURVEY REPORT

LANDSCAPE SETTING
SPECIAL-STATUS PLANT SURVEYS
PERENNIAL BUNCHGRASS COMMUNITY STUDY

Prepared for:

Impact Sciences, Inc.
3256 Penryn Road, Suite 220
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Contact: Keith Babcock
916/652-6300

Prepared by:

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December 3, 2004

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1.0 INTRODUCTION

This report presents the methods and results of botanical studies conducted by Vollmar Consulting during spring and summer of 2003 and 2004 on the Centennial Specific Plan project site. The studies were conducted to provide baseline information for assessing potential impacts of the proposed project to special-status plants and sensitive plant communities. The studies included special-status plant surveys, an ecological study of the perennial bunchgrass community predominant in the study area, and a detailed review of regional and site landscape features. These landscape features (especially geology, soils, and landscape position) strongly influence the distribution of sensitive botanical resources and their potential habitats in the study area.

The report is divided into the following four sections:

- Section 2.0: Background Information
- Section 3.0: Landscape Setting
- Section 4.0: Special-status Plant Surveys
- Section 5.0: Perennial Bunchgrass Plant Community Study

Section 2.0 provides information on site location, and defines the botanical study area. It also discusses the applicability of study results to project planning and permitting and lists the field staff involved in the studies.

Section 3.0 describes the regional and study area landscape features including geography, topography, geology, soils, habitats, and land use. These features are critical for understanding the distribution of occurrences and potential habitat for sensitive botanical resources throughout the study area as well as the factors influencing plant species diversity and richness. The information presented in this section is referred to throughout the remaining sections.

Section 4.0 presents the methods and results of comprehensive special-status plant surveys conducted in the study area. Surveys were conducted during peak spring and early summer flowering periods. The surveys were conducted to locate occurrences of special-status species and assess their microhabitat requirements. Survey data were used to assess the distribution of potential habitat for targeted species throughout the study area.

Section 5.0 presents the methods and results of an ecological study of the perennial bunchgrass community that occurs over much of the study area. This plant community has a relatively high cover of native perennial bunchgrasses and wildflowers, and a conspicuously low cover of introduced annual grasses. Historically, this community type occurred throughout interior lowland California but was almost entirely replaced by invasive annual grasses introduced during Europeans settlement. The bunchgrass stand on the site is unique in California as an extensive, high quality intact native perennial bunchgrass community. This study assessed the diversity and variation in cover of perennial bunchgrass species, wildflowers, and introduced annual grasses across different landscape positions. The study also compared the bunchgrass community on the site with other known occurrences in the region and across the state. The results can be used to assess potential impacts of the proposed project to this unique native perennial bunchgrass community.

2.0 BACKGROUND INFORMATION

2.1 Project Location

The project site is located east of I-5, adjacent to Highway 138 in NW Los Angeles County, California (Figure 2.1). It is situated in the far southwestern portion of Tejon Ranch, a 270,000-acre cattle ranch in the western Tehachapi Range. The site extends approximately six miles east to west parallel to the Highway 138 corridor and approximately four miles north to south.

2.2 Definition of the Study Area

The study area for this report incorporates approximately 9,542 acres within the larger 11,862-acre project planning area (Figure 2.2). The study area includes the 8,342-acre proposed development envelope plus a 500-foot wide buffer zone incorporating approximately 1,200 acres around the perimeter of the envelope.

2.3 Survey Intensity and Applicability of Results

The surveys conducted for this report were comprehensive in nature but do not represent complete present/absence surveys given the size of the study area and the size of the area surveyed each day by the field crew. However, they were systematic and intensive and it is likely that all special-status plant species present within the study area were detected and that nearly all occurrences of these species were identified and mapped. Two special-status species identified on the site, sylvan microseris (*Microseris sylvatica*) and Tucker oak (*Quercus john-tuckeri*), were quite abundant and high potential habitat areas rather than individual occurrences were mapped. The survey results may be used for specific project planning and permitting. An additional round of peak spring surveys and precise mapping of sylvan microseris and Tucker oak stands would be required to achieve full presence/absence survey results. It is unclear, however, if these additional surveys would be required to obtain project permits.

2.4 Project Personnel

Staff from Vollmar Consulting conducted all project work including background review, field surveys, and reporting. John Vollmar served as project manager, senior field botanist, and principal report author. John Hale and Jon Kelsey served as senior field botanists and Shannon Hickey, Vir McCoy, Gretchen Vos, Jeffrey Congero and Michele Disney served as assistant field botanists for one or both years. John Hale and Gretchen Vos managed species lists and ecological data from special-status plant occurrences. Shannon Hickey and Gretchen Vos assisted with field preparations, GPS set up, and report preparation. John Hale and John Vollmar photographed all special-status plants. John Vollmar and Gretchen Vos conducted statistical analyses of field data. Jake Schweitzer managed all GPS and GIS data and created report figures. Jon Kelsey, Richard Gilligan, and Pauline Alessi provided project logistical support.

Keith Babcock of Impact Sciences provided outside review of the report and coordinated with Tejon Ranch regarding ranch access and safety issues. Psomas Engineers, Forma Engineering, and Tejon Ranch provided background files that Mr. Schweitzer incorporated into report figures.

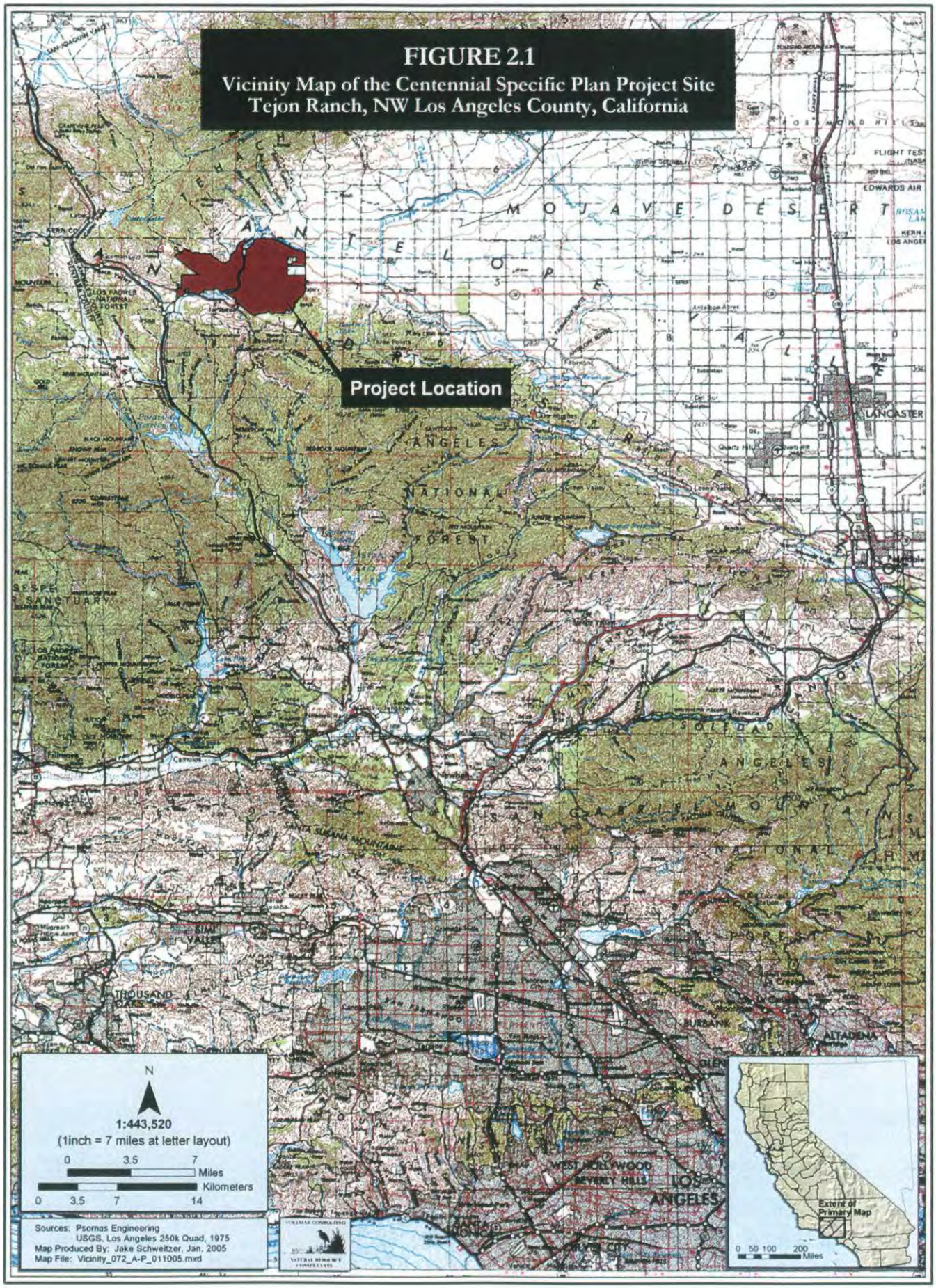
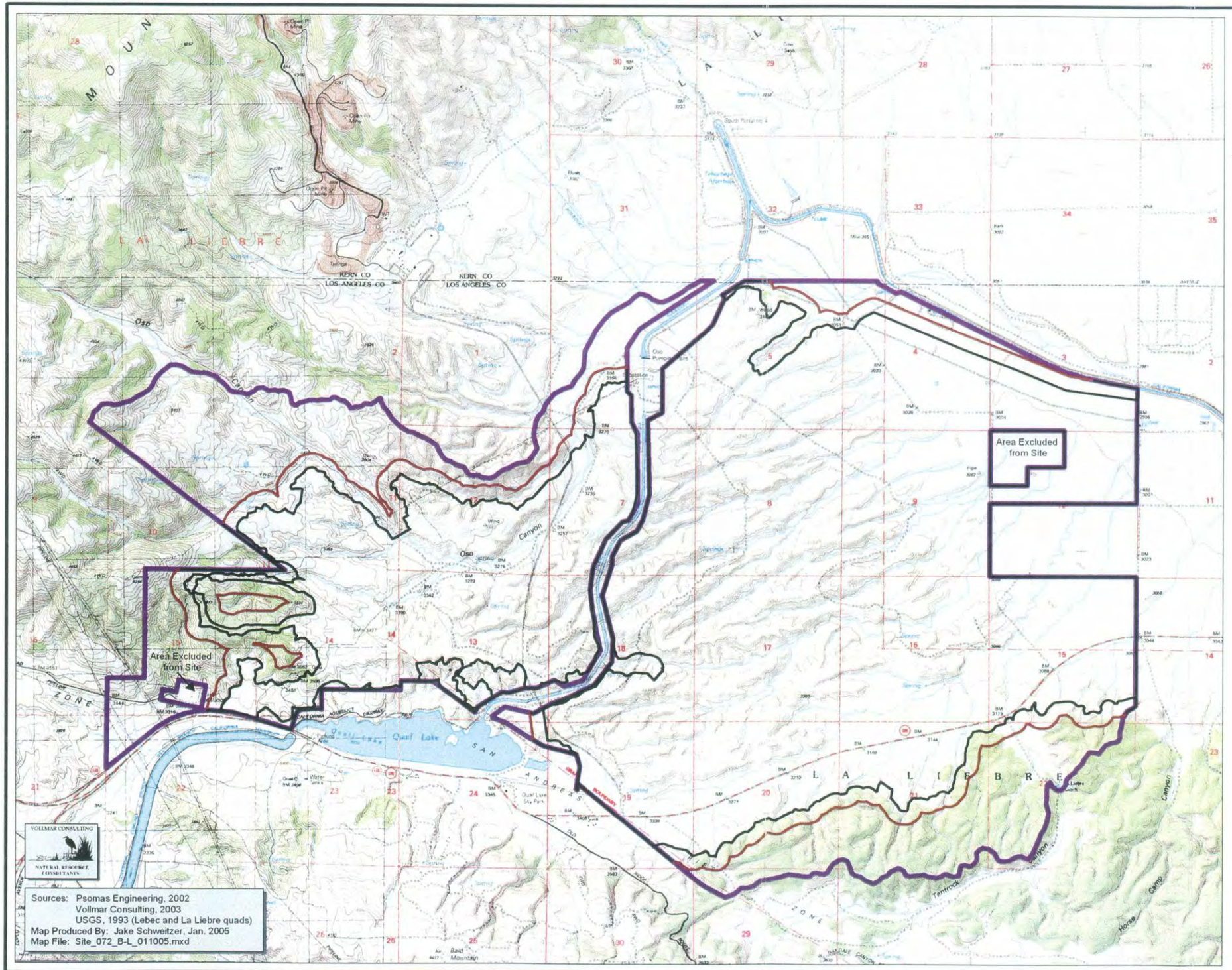


FIGURE 2.1
Vicinity Map of the Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California
Project Location
MOJAVE DESERT
ANTELOPE VALLEY
LANCASTER
EDWARDS AIR
FLIGHT TEST
ANGELES
NATIONAL
FOREST
SESPE
SANCTUARY
SAN GABRIEL MOUNTAINS
SIMI VALLEY
THOUSAND OAKS
BURBANK
ALTADENA
WEST HOLLYWOOD
BEVERLY HILLS
LOS ANGELES
N
1:443,520
(1inch = 7 miles at letter layout)
0 3.5 7
Miles
0 3.5 7 14
Kilometers
Sources: Psomas Engineering
USGS, Los Angeles 250k Quad, 1975
Map Produced By: Jake Schweitzer, Jan. 2005
Map File: Vicinity_072_A-P_011005.mxd
Extent of Primary Map
0 50 100 200
Miles

FIGURE 2.2

Centennial Project Site

Site Map Showing General Planning Area and
2003 and 2004 Botanical Surveys
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Legend

- Impact Area
- 500ft Buffer from Impact Area
- Project Planning Boundary

N
W E
S

40 Acres

1:42,000
(1in = 3,500ft at tabloid layout)

0 875 1,750 Meters

0 1,750 3,500 7,000 Feet

3.0 LANDSCAPE SETTING

3.1 Regional Overview

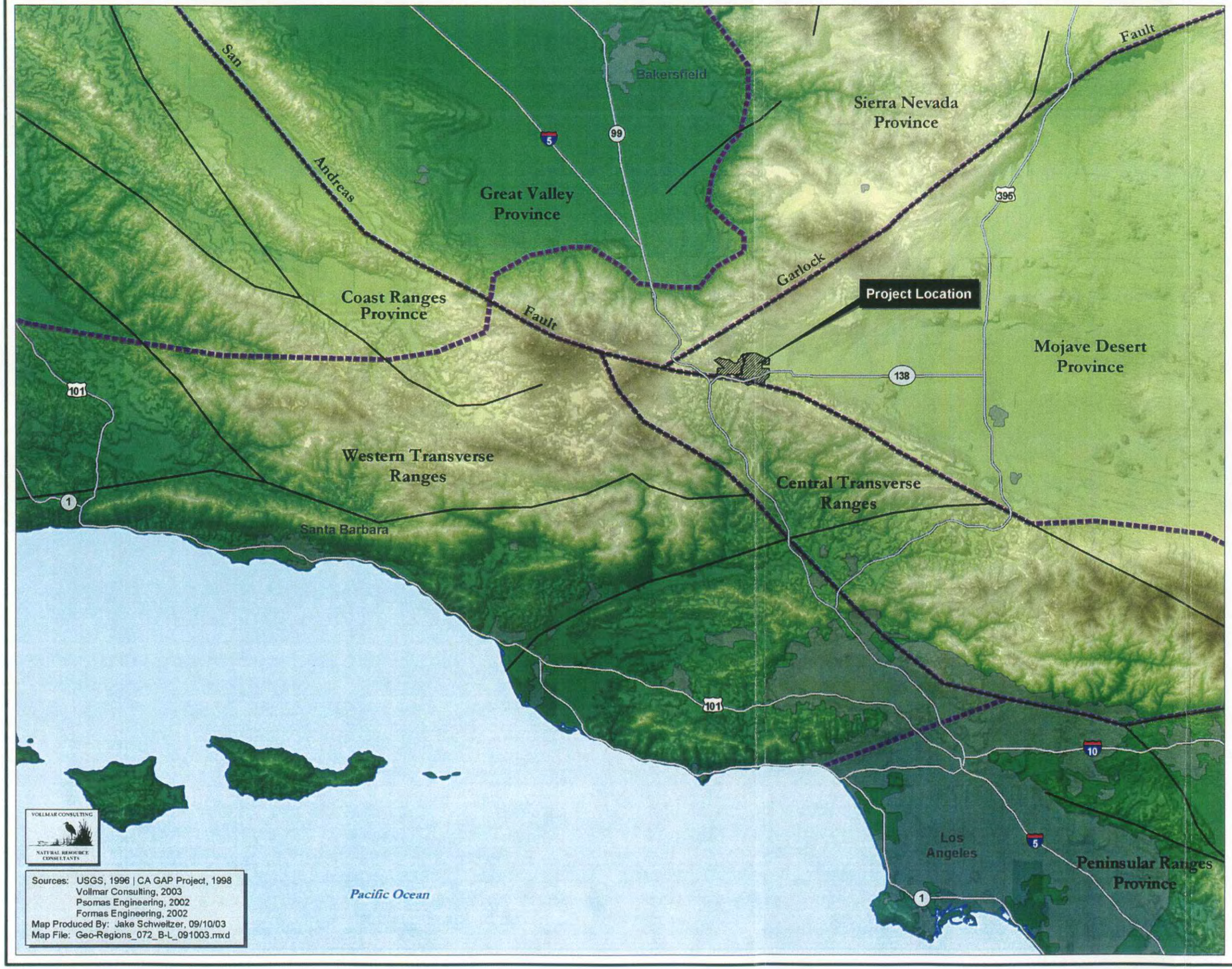
The landforms that occur in and around the study area are the result of more than 300 million years of geologic deposition, uplift, and erosion combined with extensive tectonic activity. The study area is located near the junction of three distinct geographic provinces: the Mojave Desert Province to the east, the Tehachapi Range (southern tip of Sierra Nevada Province) to the north, and the Central Transverse Ranges to the south (Figure 3.1). The boundaries between these provinces are defined by California's two largest faults: the San Andreas Fault, which divides the Mohave Desert Province from the Transverse Ranges; and the Garlock Fault, which divides the Mohave Desert Province from the Tehachapi Range. Each of these provinces has a unique set of geographic, geologic, and tectonic characteristics that have strongly influenced landscape characteristics within the study area. These characteristics, in turn, strongly influence the occurrence and distribution of special-status plants and other sensitive botanical resources.

The study area is situated at the far western tip of the Mohave Desert region. This region is roughly defined by an underlying, semi-triangular geologic feature known as the Mojave Block (Figure 3.1). It begins at the junction of the San Andreas and Garlock Faults near the town of Lebec (approximately seven miles east-northeast of the study area) and expands out a couple hundred miles east towards the Colorado River. Topographically, this block is much lower than the bordering mountains. While the study area may be technically confined to the Mohave Block and the Mohave Desert region, its geology and topography have been strongly influenced by uplift, tectonic movement, and alluvial outwash from the adjacent regions. Much of the study area consists of eroded hills and terraces formed from granitic alluvium washed from the Tehachapis and Transverse Ranges during the last 100,000 years. Granite outcrops associated with the Tehachapis underlie the study area and are exposed in a few areas in the northwest corner. Sedimentary rocks derived from Tertiary Continental Deposits are exposed in the eastern study area. Sedimentary rocks deposited in a shallow marine environment and uplifted by surrounding tectonic forces are exposed in the western study area. Andesitic volcanic rock, associated with the San Andreas Fault, is exposed along the southern edge of the study area (south of Highway 138).

The Tehachapi Range, which lies to the north of the study area, is composed of intrusive granitic rock. This range is considered to be the southernmost tip of the Sierra Nevada granitic batholith. The Garlock Fault, which defines the southern boundary of the range, lies two to three mile north of the study area. There are, however, extensive granitic intrusions south of the fault related to the Tehachapis. As mentioned above, most of the study area is underlain by this granite and there are limited areas of exposed granite bedrock in the northwest corner of the study area. Also, most of the alluvium on the site was derived from weathered granite. Just north of the study area, the granite is capped by a thick layer of limestone. The limestone was originally deposited in a deep marine environment more than 300 million years ago and was subsequently uplifted by the intruding granite. While there is no limestone mapped in the study area, field surveys identified unmapped remnant blocks and exposed strata, and associated limestone-derived soils in scattered areas in the northwestern, eastern and southeastern portions of the study area. Given elevation and proximity, these rocks are likely disjunct blocks that came from the

FIGURE 3.1
Geographic Provinces

Geographic Provinces in the Vicinity of the
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Legend

- Geologic Province Boundary
- Major Fault Line
- Highway
- Project Site Boundary
- Urban Areas

Elevation

~14,400ft.
~4,000ft.
~280ft.



N
W E
S

1:800,000

0 12.5 25 Kilometers

0 12.5 25 Miles

VOLLMAR CONSULTING
NATURAL RESOURCE CONSULTANTS

Sources: USGS, 1996 | CA GAP Project, 1998
Vollmar Consulting, 2003
Psomas Engineering, 2002
Formas Engineering, 2002
Map Produced By: Jake Schweitzer, 09/10/03
Map File: Geo-Regions_072_B-L_091003.mxd

limestone cap to the north. These blocks are situated within sedimentary formations deposited within the last 12 million years. Typical vegetation within the Tehachapi Range in the region of the study area includes intermixed chaparral, oak woodlands, and introduced annual grasslands.

The Transverse Ranges lie just south of the study area. The San Andreas Fault, which defines the northern boundary of the range, runs along Highway 138 east to Quail Lake and then cuts through the hills bordering the highway to the south. The Transverse Ranges were uplifted by compressional forces exerted by a bend in the San Andreas Fault (termed the "Big Bend"). Since the San Andreas Fault lies entirely south of the study area, the steep hills along the southern edge of the study area may be from local compression and thrusting along the northern side of the fault. The geology along these hills consists of uplifted and weathered Continental Deposits (conglomerate, sandstone, shale, and limestone), localized Purple Andesite outcrops, and Recent Alluvium along stream courses and floodplains.

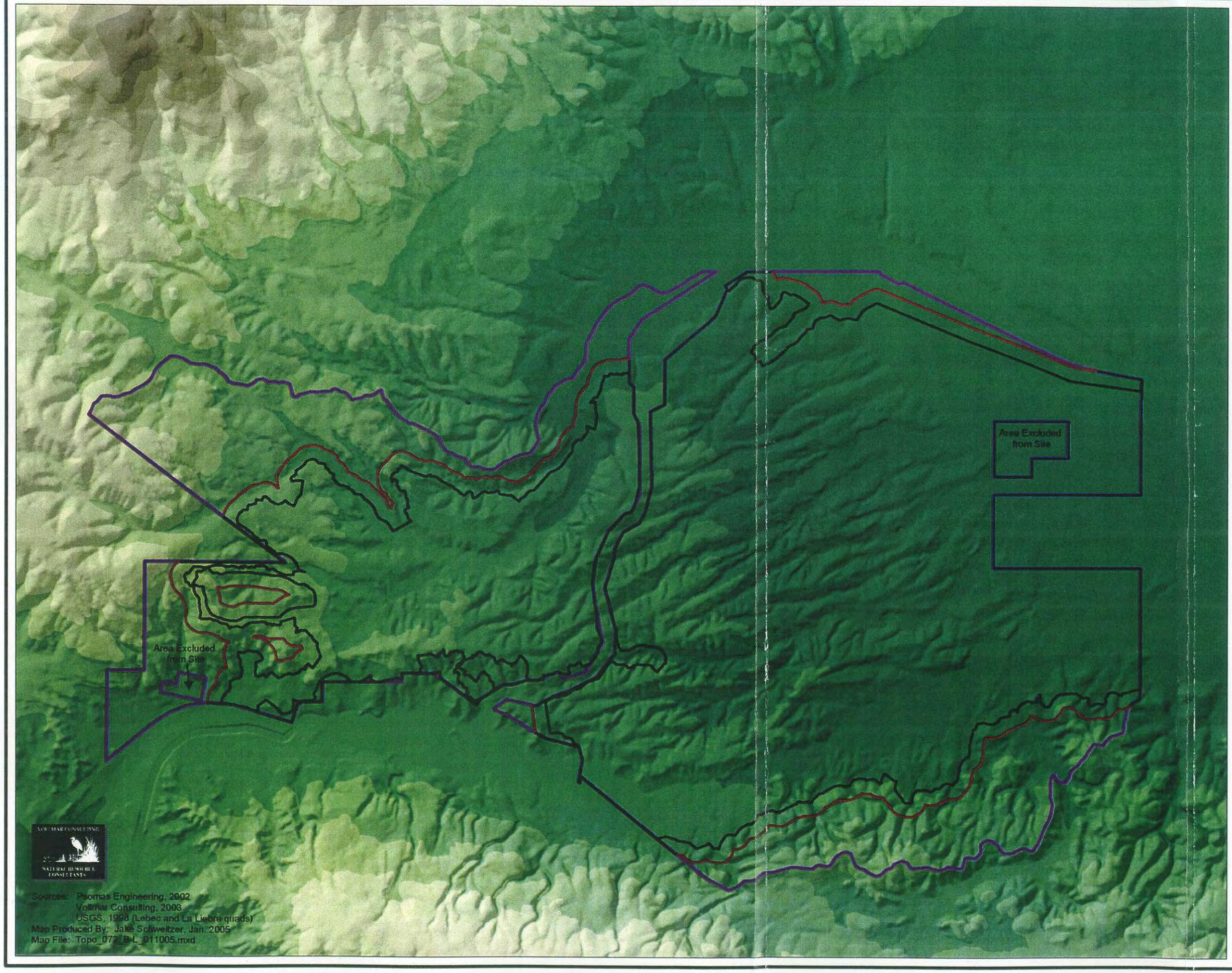
3.2 Topography

The study area incorporates a section of a complex, highly dissected landscape that slopes generally to the east (Figure 3.2) with west-east running ridges, terraces, valleys, and stream courses. Within this topography, there is a distinct set of primary landscape positions including floodplains, low alluvial plains, steep south- and north-facing slopes, elevated terraces, and narrow hilltops and ridges. The richness and diversity of plant species across the site, including special-status plant species and perennial bunchgrasses vary across the study area often in relation to these landscape positions.

Elevation on the site ranges from approximately 1,400 meters (4,600 feet) in the west to approximately 900 meters (2,950 feet) in the east. The highest areas (in the west and along the far southern edge) consist of exposed bedrock and steep, rounded hills cut by stream courses. The broad central section consists of steep to moderately steep rounded hills, generally arranged as parallel ridges running west to east with intervening valleys. There are also raised table-like terraces bordering the larger stream courses. These are part of the geologic formation referred to as Terrace Deposits. The far eastern section consists of a gently sloping alluvial plain, portions of which appear to have been leveled or disked in the past for farming.

FIGURE 3.2
Centennial Topography

Topographic Map of the 2003/2004 Botanical Survey Area
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Legend

- Impact Area
- 500ft Buffer from Impact Area
- Project Planning Boundary

Elevation (NGVD Feet)

- 5,251 - 5,500
- 5,001 - 5,250
- 4,751 - 5,000
- 4,501 - 4,750
- 4,251 - 4,500
- 4,001 - 4,250
- 3,751 - 4,000
- 3,501 - 3,750
- 3,251 - 3,500
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N
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1:42,000
(1in = 3,500ft at tabloid layout)

0 875 1,750 Meters

0 1,750 3,500 7,000 Feet

Sources: Psomas Engineering, 2002
Vollmar Consulting, 2003
USGS, 1958 (Lebec and La Liebre quads)
Map Produced By: Jake Schweitzer, Jan. 2005
Map File: Topo_072_P_L_011005.mxd

3.3 Geology and Soils

Geologic formations and associated soils exert a strong influence on the occurrence and distribution of special-status plants and other sensitive botanical resources in the study area. Information on geology and soils comes from Crowell (1952), Harden (1998), Hill (1976), SCS (1970), Weise (1950), and field observations made by staff from Vollmar Consulting.

Seven distinct geologic formations occur within the study area. Six of these formations are mapped within the study area; the seventh (Limestone Beds) is mapped just north of but not within the study area. However, during field surveys, remnant limestone outcrops and blocks, and associated limestone-derived soils were identified in scattered locations in the northwestern, eastern, and southeastern portions of the study area. Table 3.1 summarizes these formations arranged by geologic age. Figure 3.3 shows the distribution of these formations within and adjacent to the study area. Table 3.2 summarizes the geologic formations and their associated soils. Figure 3.4 shows the mapped distribution of these soils in the study area.

Taken together, the geologic formations provide a rough geologic and geographic history of the region going back more than 300 million years. This history shows a beginning as a deep marine environment; followed by metamorphosis of the sea floor deposits into limestone beds; uplift of these beds by intruding Tehachapi granite; eruption of andesite volcanic flows along the young San Andreas Fault Zone; slow uplift of the area between the Tehachapis and Transverse Ranges (western Mohave Block) creating first a shallow marine or estuarine environment, followed by a mixed continental and lake environment; and, finally, the extensive disgorgement of alluvium (mostly granitic) from the Tehachapis and Transverse Ranges. These geologic formations each have distinct associated soils.

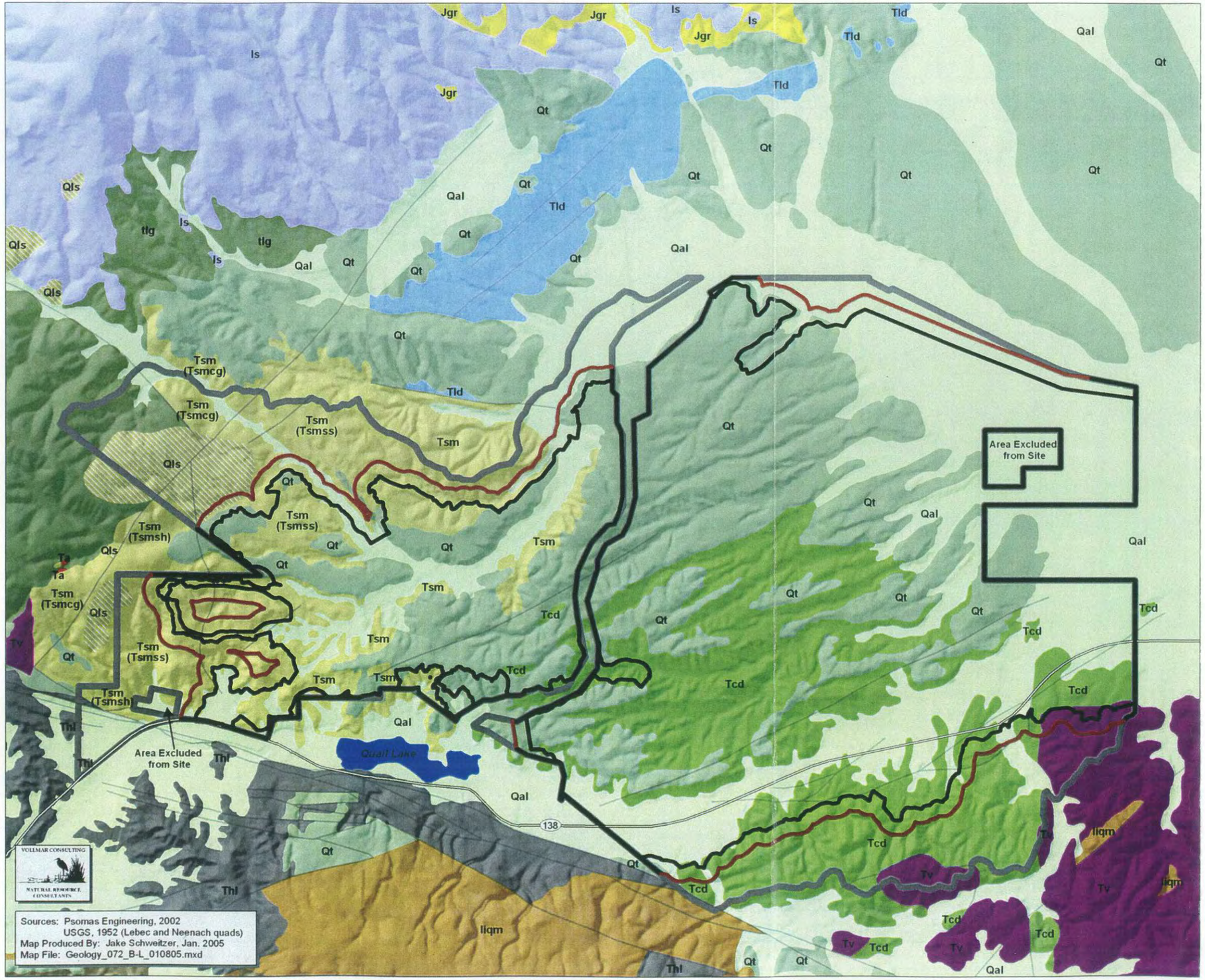
The distribution of special-status plant species and the diversity and abundance of native wildflowers and perennial bunchgrasses as well as introduced annual grasses were found to be strongly influenced by geologic formations and soils. Primary influencing factors include parent material, soil thickness, and texture. Soil pH does not appear to be a primary factor. Soil thickness varies greatly according to landscape position with thin soils along ridges, hill tops, and convex hill slopes and deeper soils along floodplains, alluvial terraces, and concave hill slopes. Soil texture is associated with the type and age of parent material. Most soils on the site are derived from granitic alluvium of the Terrace Deposits and Recent Alluvium. These sandy loam and gravelly loam soils are well-drained. Terrace Deposit soils vary from thin to deep depending on landscape position, with the thinnest soils along ridges and hilltops in the eastern study area, and the deepest soils on the elevated bench-like terraces bordering Oso Canyon. Soils of the Continental Deposits appear similar to those of the Terrace Deposits in the eastern portion of the study area with the distinct difference that the Continental Deposits have inclusions of limestone blocks rock that, upon weathering, creates an unusual friable clay loam soil. Soils of the Santa Margarita Formation tend to be thin and often overlying near-surface sedimentary bedrock. Soils derived from Tejon Lookout Granite are also thin and generally on steep slopes. The most unusual soils in the study area are those derived from limestone and andesite. The limestone-derived soils are silt or clay loams. The andesite-derived soils are sandy loams. Both of these soil types likely have unusual chemistries and available nutrients.

Table 3.1 Geologic formations present within the Centennial Specific Plan Project Site. Information compiled by Vollmar Consulting. Data sources include Crowell (1952), Harden (1998), Hill (1976), SCS (1970), and Weise (1950).

Geologic Formation	Map Codes	Rock Type	Geologic Era	Period/ Epoch	Age	Notes
Limestone Beds	ls	Recrystallized Limestone (Metamorphic)	Paleozoic	n/a	300+ my	Oldest rocks in the region; marine beds that have been metamorphosed and uplifted by granitic intrusion. There is a large mapped limestone bed capping the granitic ridge just north of the study area and unmapped disjunct blocks and soils exposed in scattered locations in the northwest of the study area.
Tejon Lookout Granite	tlg	Plutonic (Igneous)	Mesozoic	Jurassic or Cretaceous	195-70 my	Formed from intrusive granitic plutons. The formation underlies most of the study area but is exposed in only a few areas in the northwest corner. It is the predominant formation west of the study area to the San Andreas and Garlock Faults and is the source of most alluvium in the Terrace Deposits and Recent Alluvium.
Purple Andesite	Tv	Volcanic (Igneous)	Cenozoic	Tertiary/ Early Miocene (?)	26-20 my	Consists of massive purple andesite, extruded as thick flows with local dikes. The formation is along the north side of the San Andreas fault. Within the study area, there are exposed outcrops in the southeast (south of Highway 138). Stratigraphically, the formation lies on top of Tejon Lookout Granite and beneath the Santa Margarita Formation.
Santa Margarita Formation	Tsm, Tsmss, Tsmsh, Tsmcg	Marine Sandstone, Shale, and Conglomerate (Sedimentary)	Cenozoic	Tertiary/ Middle Miocene	20-15 my	Consists of interbedded sedimentary rocks deposited in a shallow marine (estuarine?) environment. This formation is mapped along hills and slopes in the southwestern and central-northern regions of the study area.
Continental Deposits	Tcd	Continental Sandstone, Siltstone, and Shale (Sedimentary)	Cenozoic	Tertiary/ Late Miocene	15-12 my	Consists of sedimentary sandstone, siltstone, and shale deposited in a continental environment (fluvial or alluvial) on top of the Santa Margarita Formation. Formation is mapped in the central, eastern and southeastern (south of Highway 138) portions of the study area. It is capped by Terrace Deposits north of Highway 138. There are scattered limestone blocks and associated weathered soils within these deposits.
Terrace Deposits	Qt	Consolidated, undeformed gravels, sands, and silts	Cenozoic	Quaternary/ Late Pleistocene	100,000 to 10,000 yrs	These deposits occur in three distinct landscape positions. In the northeast of the study area, they occur as rounded, eroded hills; in the central western portion of the study area, they occur as elevated, flat-topped benches adjacent to Oso Creek and other larger stream courses; in the western portion of the study area, they form the upper stratum of the narrow fingerlike ridges and are underlain by Continental Deposits. They are composed of poorly sorted, consolidated alluvium derived from the upstream rock (mostly granite).
Recent Alluvium	Qal	Unconsolidated gravels, sands, and silts	Cenozoic	Quaternary/ Recent	10,000 yrs to present	These deposits are widespread in low-lying valleys and floodplains in the study area, especially to the east. They consist of unconsolidated alluvium (mostly granite) deposited along present stream courses.

FIGURE 3.3
Centennial Geology

Geologic Formations in and around the
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Legend

- Impact Area
- 500ft Buffer from Impact Area
- Project Planning Boundary
- Fault Line

Geologic Formation

QUATERNARY
- Recent
  - Qal - Recent alluvium
  - Qls - Landslide
- Pleist
  - Qt - Terrace deposits and older alluvium

TERTIARY
- Pliocene
  - Tld - Lake deposits
  - Thl - White conglomerate sandstone with brown mudstone
  - Tpv - Brown siltstone with buff sandstone
- Miocene
  - Tsm - Santa Margarita formation*
  - Tcd - Continental deposits (conglomerate, sandstone & shale)
  - Tv - Purple andesite
  - Ta - Silicified andesite

JURASSIC OR CRETACEOUS
- Jgr - Granite
- tlg - Tejon Lookout granite
- liqm - Liebre quartz monzonite (gray hornblende biotite quartz monzonite)

PALEOZOIC
- Is - Limestone and marble

Water (Quail Lake)

*Includes subtypes: Tsmsh (chiefly shales), Tsmcg (chiefly conglomerate) and Tsmss (chiefly sandstone)

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1:42,000 (1in = 3,500ft at tabloid layout)

0 875 1,750 Meters

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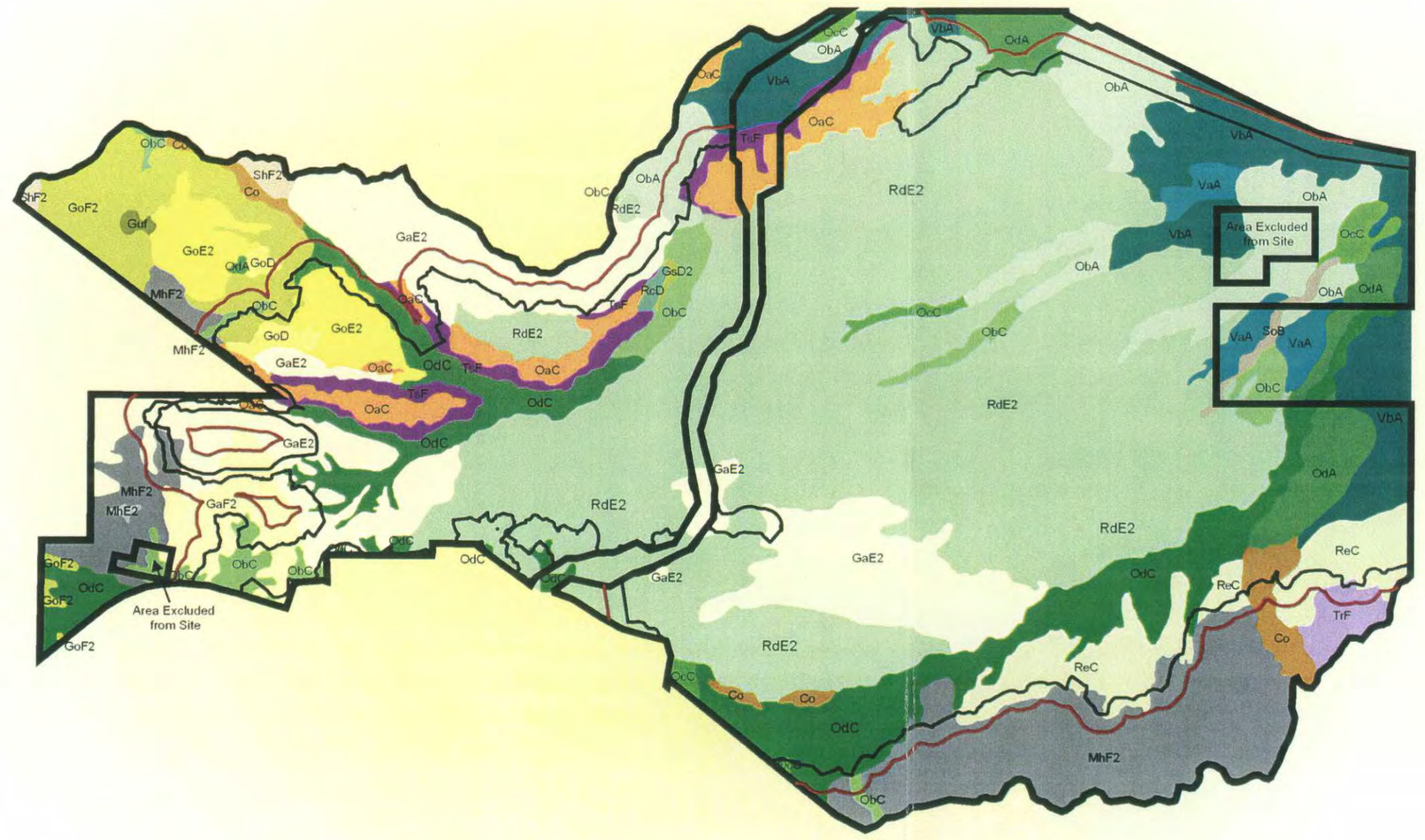
Table 3.2 Soil types and associated geologic formations on or near the Centennial Specific Plan Project Site. Information compiled by Vollmar Consulting. Data sources include Crowell (1952), NRCS (1969), SCS (1970), and Weise (1950).

Geologic Formation/Soil Series	Code	Soil Type	Parent Material
Limestone Beds			
Ayar	AyD	Ayar clay loam, 5-15% slopes	Calcareous lacustrine deposits
Lebec	LeF	Lebec rocky loam, 15-30% slopes	Limestone
Tejon Lookout Granite			
Sheridan	ShF2	Sheridan sandy loam, 30-50% slopes	Granite
Andesite Flows			
Temescal	TrF	Temescal-Rock land complex, 30-50% slopes	Purple andesite
Santa Margarita Formation (SMF) and Continental Deposits (CD)			
Gaviota (SMF and CD)	GaE2	Gaviota rocky loam, 15-30%	Hard sandstone
Gaviota (SMF)	GaF2	Gaviota rocky loam, 30-50%	Hard sandstone
Millsholm (SMF)	MhE2	Millsholm rocky loam, 15-30% slopes	Hard shale/fine-grained sandstone
Millsholm (SMF and CD)	MhF2	Millsholm rocky loam, 30-50% slopes	Hard shale/fine-grained sandstone
Terrace Deposits (TD) and Continental Deposits (CD)			
Gorman (TD)	GoD	Gorman sandy loam, 9-15% slopes	Old granitic alluvium
Gorman (TD)	GoE2	Gorman sandy loam, 15-30% slopes	Old granitic alluvium
Gorman (TD)	GoF2	Gorman sandy loam, 30-50% slopes	Old granitic alluvium
Gorman Gullied Land (TD)	GuF	Soils cut by gullies (within Gorman soils)	Old granitic alluvium
Oakdale (TD)	OaC	Oakdale sandy loam, 2-9% slopes	Old granitic alluvium
Oakdale Terrace Escarpments (TD)	TsF	Terrace escarpments (bordering Oakdale terraces)	Old granitic alluvium
Ramona (TD)	RcD	Ramona coarse sandy loam, 9-15% slopes	Old granitic alluvium
Ramona (TD and CD)	RdE2	Ramona sandy loam, 9-30% slopes	Old granitic alluvium
Ramona (CD)	ReC	Ramona gravelly loam, 2-9% slopes	Old granitic alluvium
Recent Alluvium			
Chino	Co	Chino loam, nearly level	Mixed alluvium, mostly granitic
Greenfield	GsD2	Greenfield sandy loam, 9-15% slopes, eroded	Granitic alluvium
Oak Glen	ObA	Oak Glen sandy loam, 0-2% slopes	Granitic alluvium
Oak Glen	ObC	Oak Glen sandy loam, 2-9% slopes	Granitic alluvium
Oak Glen	OcC	Oak Glen gravelly sandy loam, 2-9% slopes	Granitic alluvium
Oak Glen	OdA	Oak Glen loam, 0-2% slopes	Granitic alluvium
Oak Glen	OdC	Oak Glen loam, 2-9% slopes	Granitic alluvium
Soboba	SoB	Soboba cobbly sandy loam, 2-5% slopes	Granitic alluvium
Vernalis	VaA	Vernalis sandy loam, 0-2% slopes	Mixed alluvium, mostly granitic
Vernalis	VbA	Vernalis loam, 0-2% slopes	Mixed alluvium, mostly granitic

FIGURE 3.4
Centennial Soils

Mapped Soils within the Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Sources: Psomas Engineering, USGS, Vollmar Consulting
Map Produced By: Jake Schweitzer, Jan. 2005
Map File: Soils_072_B-L_011005.mxd

Legend

- Impact Area
- 500ft Buffer from Impact Area
- Project Planning Boundary

Soils

Tejon Lookout Granite
- ShF2--Sheridan

Andesite Flows
- TrF--Temescal

Santa Margarita Formation (SMF) and Continental Deposits (CD)
- GaE2--Gaviota (SMF and CD)
- GaF2--Gaviota (SMF)
- MhE2--Millsholm (SMF)
- MhF2--Millsholm (SMF and CD)

Terrace Deposits (TD) and Continental Deposits (CD)
- GoD--Gorman (TD)
- GoE2--Gorman (TD)
- GoF2--Gorman (TD)
- Guf--Gorman Gullied Land (TD)
- OaC--Oakdale (TD)
- RcD--Ramona (TD)
- RdE2--Ramona (TD and CD)
- ReC--Ramona (CD)
- TsF--Oakdale Terrace Escarpments (TD)

Recent Alluvium
- Co--Chino
- GsD2--Greenfield
- ObA--Oak Glen
- ObC--Oak Glen
- OdA--Oak Glen
- OdC--Oak Glen
- SoB--Soboba
- VaA--Vernalis
- VbA--Vernalis

40 Acres

1:42,000
(1in = 3,500ft at tabloid layout)

0 875 1,750 Meters

0 1,750 3,500 7,000 Feet

3.4 Plant Communities

Several plant communities are present in the study area. The predominant community is a combined perennial bunchgrass community/wildflower field. Additional plant community types include non-native annual grasslands and a number of oak woodland and chaparral communities. There are also limited stands of riparian woodlands, scattered freshwater marsh and alkali meadow. Although the study area occurs at the edge of the Mojave Desert region, it does not support desert (Mohavean) scrub vegetation. This is most likely related to the raised elevation and higher rainfall of the study area and its proximity to bordering ranges. Desert scrub begins to appear a mile or so east of the study area.

3.4.1 Perennial Bunchgrass Community/Wildflower Field

Native perennial bunchgrass community/wildflower field, (referred to as a "perennial bunchgrass plant community" in this report), is one of the dominant plant communities in the study area. It occurs on the weathered ridges and terraces in the central and southeastern portions of the study area primarily on Tertiary Continental Deposits and Quaternary Terrace Deposits. These ridges and terraces begin approximately a mile and half west of the aqueduct and extend east to the transition with the flat, alluvial plain and also occur south of Highway 138 on the low hills at the base of the Transverse Ranges. Perennial bunchgrasses stands occur sporadically in other portions of the study area, particularly on the Santa Margarita Formation, but they are generally smaller and are often intruded by introduced annual grasses. Perennial bunchgrasses are generally absent from floodplains, the disturbed alluvial plains to the far east, and granitic formations.

This plant community is characterized by a relatively high cover of perennial bunchgrass species (typically greater than 20%), a conspicuously low cover of non-native annual grasses, and prominent open spaces between the individual bunchgrass clumps that support a showy, diverse array of native wildflowers during favorable rain years. Four perennial bunchgrass species occur in the study area as a common component of the bunchgrass community. These include nodding needlegrass (*Nasella cernua*), one-sided bluegrass (*Poa secunda* ssp. *secunda*), desert needlegrass (*Acnatherum speciosum)*, and big squirreltail (*Elymus multisetus*). Two other native perennial bunchgrasses, small-flowered melic grass (*Melica imperfecta*) and giant wild rye (*Leymus condensatus*), occur on the site but neither is a significant component of the perennial bunchgrass community. Small-flowered melic grass occurs primarily on rocky substrates in the southeastern and western portions of the study area. Giant wild rye occurs in a few scattered areas near seeps and along small drainages. Native wildflowers were especially conspicuous during the 2003 field season which had higher than average rainfall including late spring rains which extended the growing season. During this season, more than 70 species of native wildflowers were identified within the area occupied by the perennial bunchgrass community.

This plant community was identified during 2003 surveys as an herbaceous community, and the 2003 report describes the community as "dominated by a mix of native and non-native forbs and native perennial bunchgrasses." The perennial bunchgrass component appeared sub-dominant to the wildflower component during 2003 surveys because of the extraordinary 2003 spring wildflower display related to the above average 2002/2003 rainfall. Our continued plant

community study, following the below average rainfall of 2003/2004, however, demonstrated that this community is indeed dominated by perennial bunchgrass species with a conspicuous wildflower component and an unusual lack of introduced annual grass species. Quite frankly, we have rarely seen extensive intact perennial bunchgrass stands of this nature, and it required a second year, with the wildflower component absent, to recognize the habitat as a perennial bunchgrass community.

Section 5.0 presents the methods and results of an ecological study of the perennial bunchgrass community that occurs over much of the study area. This plant community has a relatively high cover of native perennial bunchgrasses and wildflowers, and a conspicuously low cover of introduced annual grasses. Historically, this community type occurred throughout interior lowland California but was almost entirely replaced by invasive annual grasses introduced during Europeans settlement. This study assessed the diversity and variation in cover of perennial bunchgrass species, wildflowers, and introduced annual grasses across different landscape positions. The study also compared the bunchgrass community on the site with other known occurrences in the region and across the state. The results can be used to assess potential impacts of the proposed project to this unique native perennial bunchgrass community.

Historically, the perennial bunchgrass community type occurred throughout much of interior lowland California. It is generally agreed that this community was once common on nearly all well-drained upland sites throughout this area. However, the community has been almost entirely out-competed and replaced by invasive annual grasses introduced during Europeans settlement (Heady, 1995). It is estimated that less than 1% of the original bunchgrass community remains. The remaining stands are generally small (less than 100 acres), isolated in widely scattered areas throughout the state, and often intruded by introduced annual grasses. Given its dramatic decline, the perennial bunchgrass community is considered a sensitive plant community type in California (and other western states). The State of California also considers areas with conspicuous native wildflower displays to be a sensitive plant community called a wildflower field (Holland, 1986; CNDDB, 2004).

The perennial bunchgrass community on the site occupies roughly 5,500 acres within the entire 9,542-acre study area. The occurrence of such a large, intact stand is unusual and significant from both a regional and statewide perspective. Its ecological value is further enhanced by the co-occurrence of four different bunchgrass species, the conspicuously low cover of introduced annual grasses, and the strong and diverse association of native wildflowers. Section 5.0 provides a thorough assessment of this plant community regarding habitat preferences, distribution and variations in species composition and cover within the study area, regional landscape factors causing the local occurrence of this community, and comparisons with other known perennial grassland stands in the region and statewide.

3.4.2 Introduced Annual Grasslands

Non-native annual grassland is dominant in certain portions of the study area including the hills in the northwestern and western portions of the study area, on disturbed alluvial plains in the far eastern portion of the study area, and along the flood plains and lower slope positions between the ridges in the central study area. The annual grasses typically dominate on the relatively

deeper soils associated with these landscape positions. Non-native annual grasslands also occur in a mosaic pattern within the oak woodland and chaparral communities that occur on the hills in the west and south, and in the far northwestern portions of the study area. The annual grassland community is dominated by a mix of exotic annual grass species. It also includes a low to moderate cover of native and exotic forbs (wildflowers). Common species in this plant community include slender oat grass *(Avena barbata),* red brome *(Bromus madritensis ssp. rubens)*, ripgut brome (*Bromus diandrus)* and redstem filaree (*Erodium cicutarium).*

3.4.3 Oak Woodlands

Five different oak species occur on the site including (in order of abundance) blue oak (*Quercus douglasii*), Tucker oak (*Quercus john-tuckeri*), valley oak (*Quercus lobata*), canyon live oak (*Quercus chrysolepis*), and interior live oak (*Quercus wislizenii* var. *frutescens*). Coast live oak (*Quercus agrifolia*), mistakenly reported from the site by a previous consultant, does not occur. Blue oak and Tucker oak woodland occurs throughout most of the higher hills in the northwest, southwest, and southeast portions of the site. These two oak woodlands are intermixed in some areas. Valley oak woodland occurs in scattered areas on floodplains along the larger stream courses in the study area. Many of the valley oaks are very large and mature. Individual trees and small stands of canyon live oak occur in scattered areas along protected, steep north- and east- facing slopes in the far western study area. One interior live oak was found on a sandstone hillside in the southwest of the study area.

3.4.4 Chaparral

Scrub and chaparral habitats occur on steeper, often rocky slopes and outcrops in the southern and western portions of the study area. In general, it is difficult to categorize these according to a specific plant community. Since the study area is located near the intersection of three distinct geographic provinces (Mojave Desert, Tehachapi Range, and Transverse Ranges), many of the scrub and chaparral communities on the site have a mix of species from more than one plant community type as defined by Holland (1986). Represented communities include Mojave Mixed Woody Scrub, Big Sagebrush Scrub, Rabbitbrush Scrub, and Semi-Desert Chaparral. Rabbitbrush Scrub and Big Sagebrush Scrub occur as distinct communities in scattered areas on the low-lying alluvial plains in the eastern portion of the study area.

3.4.5 Other Plant Community Types

There are other minor plant communities present in the study area. Alkali Meadow occurs in a low-lying area northeast of the intersection of Highway 138 and Cement Plant Road. This area may be an old borrow site. There are also local stands of Southern Cottonwood-Willow Riparian Forest along the two largest stream courses on the site, and Coastal and Valley Freshwater Marsh in a few scattered areas along these streams and in a few spring-fed stock ponds.

3.5 Land Use

Ranching and hunting are the primary land uses within the study area. Development is limited to unpaved ranch roads, fencing, stock ponds, a few electrical transmissions lines, and some

buildings used as hunting cabins. The far eastern end of the study area appears to have been leveled and disked in the past for farming. While excluded from the actual study area, the California Aqueduct and several paved roads (including Highway 138 and access roads to the aqueduct and a cement plant located just north of the study area) traverse the study area. Surrounding lands are used primarily for ranching and hunting though there are some farmed parcels and rural residences. Quail Lake is located along the southern edge of the study area and there is an electrical substation just southwest of the study area.

4.0 SPECIAL-STATUS PLANT SURVEYS

4.1 Introduction

This section of the report summarizes the methods and results of special-status plant surveys conducted during spring and summer 2003 and 2004 throughout the study area. The purpose of the surveys was to identify occurrences of special-status species. In addition, the surveys assessed the specific microhabitat requirements of targeted special-status species through review of available site information (as summarized in Section 3.0 above), field visits to known locations in the project vicinity, and site field observations. This assessment was used to interpret the extent of potential habitat for targeted species across the study area.

The surveys conducted for this report were comprehensive in nature but do not represent complete present/absence surveys given the size of the study area and the size of the area surveyed each day by the field crew. However, they were systematic and intensive and it is likely that all special-status plant species present within the study area were detected and that nearly all occurrences of these species were identified and mapped. Two special-status species identified on the site, sylvan microseris (*Microseris sylvatica*) and Tucker oak (*Quercus john-tuckeri*), were quite abundant and high potential habitat areas rather than individual occurrences were mapped.

The survey results may be used for specific project planning and permitting. An additional round of peak spring surveys and precise mapping of sylvan microseris and Tucker oak stands would be required to achieve full presence/absence survey results. It is unclear, however, if these additional surveys would be required to obtain project permits.

4.2 Methods

4.2.1 Background Review

Prior to the 2003 field surveys, the project team gathered and reviewed available botanical information and developed an annotated list of special-status plants known to occur, or with potential to occur, in the study area. The list was modified for the 2004 surveys according to new information obtained during the 2003 surveys. Sources used to develop this information included California Native Plant Society's (CNPS) Inventory of Rare and Endangered Vascular Plants of California (CNPS 2001), California Department of Fish and Game's (CDFG) California Natural Diversity Data Base (CNDDB 2003), A Flora of Kern County, California (Twisselman, 1967), a list previously developed for the study area by Impact Sciences, Inc., and discussions with Maynard Moe, an expert botanist familiar with the region (Moe 2003).

For the purposes of this report, special-status species include:

- species listed or proposed for listing by the federal government as threatened or endangered under the Federal Endangered Species Act (ESA) (50 CFR 17.12) and federal species of concern;
- species listed or proposed for listing by the State of California as rare, threatened, or endangered under the California Endangered Species Act (CESA) (14 Cal. Adm. Code 670.5) and state species of special concern;
- species identified in California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (CNPS 2001) as rare, threatened, or endangered in California (Lists 1 and 2), or on the review or watch lists (Lists 3 and 4, respectively);
- species that meet the definition of rare, threatened, or endangered under the California Environmental Quality Act (CEQA).

Table 4.1 is an annotated list of the special-status identified as known or with potential to occur in the study area.

The project team also gathered and reviewed information on the study area landscape features including geology, geomorphology and topography. Sources of information included geologic maps and books, and soils surveys pertaining to the region (Crowell (1952), Harden (1998), Hill (1976) and SCS (1970), as well as books or reports discussing the regional landscape setting and habitats (Twisselman, 1976; Holland, 1986). Impact Sciences, Inc. also provided the team with an aerial photo and topographic map of the study area. Mr. Schweitzer, the project GIS technician, developed a digital topographic map of the study area using a digital elevation model (DEM).

4.2.2 Field Surveys

The field survey teams consisted of two senior botanists and two to three assistant botanists. During the 2003 surveys, John Vollmar and John Hale served as senior botanists, and Vir McCoy, Michele Disney, and Shannon Hickey served as assistant botanists. During the 2004 surveys John Vollmar and Jon Kelsey served as senior botanists and Shannon Hickey, Gretchen Vos and Vir McCoy served as assistant botanists. Surveys were conducted by two teams working different areas. Each team consisted of one senior botanist and one or two assistant botanists. During surveys, each botanist worked independently. However, all botanists carried field radios so that any questions pertaining to plant taxonomy or other issues could be immediately addressed in the field by the senior botanist on the team. ATVs were used to access the study area and to conduct the reconnaissance-level surveys. More intensive surveys were conducted on foot in areas with potential to support special-status species or areas which could not be accessed by ATVs.

Prior to conducting site surveys, the team conducted regional status surveys of known special-status species occurrences to become familiar with microhabitats, plant associates, and current phenology. Status surveys were conducted in the adjacent interior Coast Ranges, around Fort Tejon, along the low foothills and plains bordering the southern San Joaquin Valley to the south and east, in the hills east of the study area, and in the western Antelope Valley surrounding hills.

Table 4.1. Special-status plant species known to occur in the general region of the Centennial Specific Plan Project Site, Tejon Ranch, northwestern Los Angeles County.[1] Prepared March 2004 by Vollmar Consulting (Berkeley, CA).

SCIENTIFIC NAME/ COMMON NAME[2]	STATUS[3]	HABITAT/RANGE/ELEVATION	REGIONAL OCCURRENCE	BLOOM PERIOD
Chorizanthe spinosa Mojave spineflower	CNPS 4	Chenopod scrub, Joshua tree woodland, Mohavean scrub; known only from Kern, Los Angeles, and San Bernadino Counties; 6-1300 meters.	No records in the project vicinity prior to survey.	Apr-Jul
Eriophyllum lanatum var. *hallii* Fort Tejon wooly sunflower	CNPS 1B	Slopes in chaparral, oak woodland; known only from Kern and Santa Barbara Counties; 1065-1500 meters.	Known from a few sites north of the study area in the canyon west of Fort Tejon State Park and on Tejon Ranch east of I-5.	May-Jul
Erodium macrophyllum Round-leaved filaree	CNPS 2	Friable clay soils in valley and foothill grassland, oak woodland; known from scattered locations throughout the central and southern Coast Ranges, Great Valley, and Sierra Foothills; 15-1200 meters.	Known from three sites in a localized area just north of the study area on Tejon Ranch; reported by Twisselman (1967) along the northern foothills of the Tehachapi Mtns and along the NW side of Antelope Valley.	Mar-May
Eschscholzia lemmonii ssp. *kernensis* Tejon poppy	CNPS 1B	Heavy clay soils in valley and foothill grassland, chenopod scrub; known only from Kern County in the hills south of Bakersfield and the Tejon Pass region; 160-1000 meters.	Known from Comanche Point (hills along the SE edge of the San Joaquin Valley) and in the canyon west of Fort Tejon State Park.	Mar-May
Githopsis tenella Delicate bluecup	CNPS 1B	Mesic sites in chaparral, woodland habitats; known only from Kern and Tulare Counties in the Sierra Nevada and Tehachapi Mountains, and (possibly) Monterey County; 1100-1900 meters.	Reported by Twisselman along Purdy Ridge in the Tehachapi Mountains several miles NE of the study area.	May-Jun
Layia leucopappa Comanche Point layia	CNPS 1B	Vernally wet, usually whitish clay soils (small flats on slopes) in valley and foothill grassland, chenopod scrub; known only from Kern County near the Comanche Hills and Tejon Hills (Twisselman, 1967); 100-350 meters.	Known from Comanche Point and the Tejon Hills several miles NE of the study area.	Mar-Apr
Microseris sylvatica Sylvan microseris	CNPS 4	Thin, gravelly soils in valley and foothill grassland, woodland, Great Basin scrub; known from scattered locations throughout the central and southern Coast Ranges and the Sierra Nevada foothills; 45-1500 meters.	No records in the project vicinity prior to this survey.	Mar-Jun
Monardella linoides ssp. *oblonga* Flax-like monardella	CNPS 1B	Montane coniferous forest, pinyon/juniper woodland; known only from mountainous areas in Kern, Tulare and Venture Counties; 900-2470 meters.	Known occurrence a few miles NW of the study area below Chuchupate Campground, south of Fort Tejon State Park.	Jun-Aug
Navarretia setiloba Piute Mountains navarretia	CNPS 1B	Clay or gravelly loam soils in oak woodland, pinyon/juniper woodland, valley and foothill grassland; known from fewer than ten sites in the SW Tehachapi Mountains (Kern and Tulare Counties); 305-2100 meters.	Reported by Twisselman from Grasshopper flat, in the Tehachapi foothills bordering the San Joaquin Valley, several miles north of the study area.	Apr-Jul
Opuntia basilaris var. *treleasei* Bakersfield cactus	CE/FT CNPS 1B	Sandy or gravelly soils on alluvial benches and fans along the south and SE edge of the San Joaquin Valley in valley and foothill grassland, chenopod scrub, oak woodland; known only from Kern County; 120-550 meters.	Known from the base of the Tehachapis just west of I-5 (several miles NW of the study area) and from Comanche Point (several miles NE of the study area).	May

SCIENTIFIC NAME/ COMMON NAME[2]	STATUS[3]	HABITAT/RANGE/ELEVATION	REGIONAL OCCURRENCE	BLOOM PERIOD
Quercus john-tuckeri Tucker oak	CNPS 4	Arid oak woodlands, pinyon/juniper woodlands, chaparral and slopes on desert borders. Known to occur on the east slope of the Tehachapis, the northern slope of the Western Transverse Range, the northern slope of the San Gabriel Mountains, and the interior South Coast Range; 900 – 2,000 meters.	Reported by Twisselman in Kern County from the San Emgdio and Temblor ranges, southwest to the north flank of Mt. Abel, and occasionally northeast through the Piute Mountains to Erskine Canyon. Also on the arid slopes in the northeastern Tehachapi Mountains in the Cache Peak, Weldon Peak and upper Pine Tree Canyon.	Mar-May
Perideridia pringlei Adobe yampah	CNPS 4	Often on clay or serpentine soils in chaparral, woodland, coastal scrub, and pinyon/juniper woodland; known from the central and southern Coast Ranges and the southern Sierra foothills; 300-1,800 meters.	Known from Kern and Los Angeles Counties but not previously reported in the immediate vicinity of the project site.	Apr-June
Syntrichopappus lemmonii Lemmon's syntrichopappus	CNPS 4	Sandy and gravelly slopes in chaparral and Joshua tree woodlands, on the SW border of Mojave Desert and adjoining slopes of the San Gabriel, San Jacinto and San Bernardino Mountains. Also in Monterey County; 900-1500 meters.	Known from Los Angeles, San Bernardino and Monterey Counties but not previously reported in the immediate vicinity of the project site.	Apr-May
Thermopsis macrophylla var. *argentata* Silvery false lupine	CNPS 1B	Slopes in woodland, valley and foothill grassland, lower coniferous forest; Known from widely scattered locations in California (southern Coast Range, Tehachapis, northern Sierra Nevada, southern Cascades); 900-1960 meters; synonymous with *Thermopsis californica* var. *argentata* (CNPS 2001).	Known from occurrences just north of the study area near the Cement Plant and several miles to the north, east of Tejon Lake.	Apr-Jul

1. Sources of information include California Department of Fish and Game's California Natural Diversity Data Base (CNDDB 2001), California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (CNPS 2001), A Flora of Kern County (Twisselman, 1967), The Jepson Manual (Hickman, 1993), A California Flora (1968), special-status species lists and technical reports previously prepared for the site by Impact Sciences, Inc. (Oakland, CA), and discussions with knowledgable experts.
2. Scientific nomenclature from Hickman (1993); common names from CNPS (2001).
3. Federal Status: FT = Federal Threatened; State Status: CE = California Endangered; CT = State Threatened; CNPS 1B = plants rare, threatened or endangered over entire range; CNPS 2 = plants rare, threatened or endangered in California but more common elsewhere; CNPS 4 = watch list of plants that are uncommon but not currently rare, threatened or endangered

The teams conducted two rounds of surveys each year, the first during the peak spring flowering period and the second during the late spring flowering period. Surveys covered the entire survey area during each round. During the 2003 surveys, the first round was conducted April 1-11, and the second round was conducted June 23-27. During 2004, the first round was conducted April 15-24, and the second was conducted June 10-13.

Survey intensity (number of acres surveyed per person per day) differed within a given area, according to terrain and accessibility, and between years as the 2004 surveys were intended to augment 2003 survey data. Table 4.2 summarizes survey intensity by survey area and year.

Table 4.2. Comparison of survey intensities during the 2003 and 2004 botanical surveys on the Centennial Specific Plan Project Site, Tejon Ranch, Los Angeles County, California.

Centennial Project Survey Areas	Survey Intensity (Acres Surveyed/Person/Day)			
	2003 Peak Spring Surveys	2003 Late Spring Surveys	2004 Peak Spring Surveys	2004 Late Spring Surveys
Eastern Area (flat-moderate)	320 acres	640 acres	640 acres	640 acres
Western Area (steep or rocky)	160 acres	320 acres	640 acres	640 acres

At the beginning of each survey day, each team identified a targeted survey area. Team members then communicated during the course of the day, dividing the survey area into smaller blocks and conducting focused surveys. After a particular block was surveyed, it was marked off on a field map. In this way, the team could track survey progress and avoid missing or resurveying areas.

Surveys were floristic in nature whereby all plants encountered were identified to species (or subspecies/variety as appropriate). During surveys, each botanist used a notebook to record all species observed. Species that could not be readily identified in the field were collected and identified in the evening using botanical field manuals. During the 2003 surveys, John Hale kept a master list of all species observed, adding any new species identified at the end of each field day. During 2004, Gretchen Vos maintained and updated the master species list.

Each occurrence of a special-status species identified during the surveys was assigned a unique number. The boundary of each occurrence was mapped using a professional GPS unit with meter accuracy (GeoXT). Ecological data were collected following the form from the California Natural Diversity Data Base. Voucher specimens were collected for each of the special-status species found in the study area. Pictures were also taken of all special-status species except Lemmon's syntrichopappus (*Syntrichopappus lemmonii*) and Tucker Oak (*Quercus john-tuckeri*).

4.2.3 Mapping and Analysis

GPS field data were downloaded into a GIS data base for mapping and analysis. All data were differentially corrected to improve accuracy. These data were then used to create maps showing distribution of mapped special-status plant occurrences in relation to study area features including topography, plant communities, and geology.

4.3 Results

Seven special-status plant species were identified within the study area:

- Mojave spineflower (*Chorizanthe spinosa*)
- Round-leaved filaree (*Erodium macrophyllum*)
- Sylvan microseris (*Microseris sylvatica*)
- Piute Mountains navarretia (*Navarretia setiloba)*
- Adobe yampah (*Perideridia pringlei*)
- Tucker oak (*Quercus john-tuckeri)*
- Lemmon's syntrichopappus (*Syntrichopappus lemmonii*)

The occurrence, distribution, and microhabitats for each of these species are discussed below. Table 4.3 summarizes the number of occurrences and area of each species stratified by impact and non-impact areas within the project site. Figures 4.1, 4.2, 4.3, 4.4a and 4.4b show the occurrences of each species in relation to site geography (USGS topographic map), aerial photography, and geology, respectively. Appendix B provides photographs of five of the seven special-status species. Photos of Lemmon's syntrichopappus (*Syntrichopappus lemmonii*) and Tucker oak (*Quercus john-tuckeri)* are not included.

4.3.1 Overview of Plant Diversity in the Study Area

A total of 255 plant taxa were identified in the study area (see list in Appendix 4-B). Of these, 222 (87%) were natives and 33 (13%) were non-natives. The perennial bunchgrass plant community, which dominates in the central and southeastern portions of the project site, supports a diverse mix of native wildflowers and perennial bunchgrasses. There is also a strong cover of filaree (*Erodium cicutarium*), a common non-native rangeland forb. Overall, the study area is relatively free of invasive or noxious weeds, except in the low-lying alluvial plains in the far eastern study area. Past farming on portions of these plains degraded the habitat and facilitated invasion by non-native weeds such as tansy mustard (*Descurania sophia*) and summer mustard (*Hirshfeldia incana*). The woodland and chaparral communities in the western and southern study area contribute important unique elements to the plant diversity in the study area, as do the alkali meadow, riparian and freshwater marsh communities.

Table 4.3 Summary of special-status plant occurrences identified during 2003 and 2004 botanical surveys conducted by Vollmar Consulting on the Centennial Specific Plan Project Site, Tejon Ranch, Los Angeles County.

	Total Study Area							Inside Impact Areas		Inside Impact Buffer		Outside Impact, Inside Project Planning		Outside Project Planning Boundary	
Species[1]	Total Number of Occurrences[2]	Number of Occurrences[2] Identified in 2003	Number of Occurrences[2] Identified in 2004	Total Acreage	Max. Occurrence Size (Acres)	Min. Occurrence Size (Acres)	Average Occurrence Size (Acres)	Number of Occurrences[2]	Total Acreage	Number of Occurrences[2]	Total Acreage	Number of Occurrences[2]	Total Acreage	Number of Occurrences[2]	Total Acreage
CHSP	19	10	9	0.62	0.29	.001	0.03	20	0.62	0	0.0	0	0.0	0	0.0
ERMA	46	32	14	46.92	12.9	.004	1.02	38	25.76	6	5.76	5	9.15	6	6.24
MISY[3]	N/A	N/A	N/A	4,458	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NASE	3	0	3	1.79	1.55	.038	0.60	0	0.0	3	0.83	1	0.97	0	0.0
PEPR	1	0	1	0.02	0.02	0.02	0.02	1	0.02	0	0.0	0	0.0	0	0.0
QUJO[3]	N/A	N/A	N/A	1,420	N/A	N/A	N/A	N/A	73	N/A	399	N/A	948	N/A	N/A
SYLE	1	0	1	0.013	.013	.013	.013	0	0.0	1	.013	0	0.0	0	0.0
All Species				5,927											

Notes:[1] CHSP = *Chorizanthe spinosa;* ERMA = *Erodium macrophyllum;* MISY = *Microseris sylvatica;* NASE = *Navarretia setiloba;* PEPR = *Perideridia pringlei;* QUJO = *Quercus john-tuckeri;* and SYLE = *Syntrichopappus lemmonii.* [2]Note that the total number of occurrences may be less than the number of occurrences shown in the other columns. This is due to the fact that some occurrences crossed the boundaries between impact and non-impact areas and were counted in two different areas. [3]The total number of *occurrences* for *Microseris sylvatica* and *Quercus john-tuckeri* were not calculated, as numerous occurrences of both species were located over extensive areas in the study area.

4.3.2 Special-Status Plants

4.3.2.1 Mojave Spineflower *(Chorizanthe spinosa)*

Listing Status: CNPS List 4; no state or federal status

Mojave spineflower is a prostrate to ascending annual forb in the buckwheat family (Polygonaceae). It has small white flowers surrounded by spine-tipped bracts (see photographs in Appendix 4-A). It typically occurs in chenopod scrub, Joshua tree woodland, Mohavean scrub habitats well east of the study area. It is known only from Kern, Los Angeles, and San Bernardino Counties and, prior to these surveys, was not known from the vicinity of the study area. It is a CNPS List 4 species (watch list) and has no state or federal listing status.

A total of nineteen occurrences of Mojave spineflower were located in the study area. The 2003 surveys identified ten locations, in two separate clusters, along alluvial slopes near the central

southern edge of the study area. Nine additional occurrences, in four clusters, were identified during the 2004 surveys. These additional occurrences were all located either adjacent to the previous 2003 occurrences or within the same localized habitat. (Figures 4.1 and 4.2).

The microhabitat occupied by the species is highly specialized. First, the occurrences were situated along two finger-like corridors of Recent Alluvium bordered by much older Continental Deposits which included limestone blocks and, further up the hill slope to the south, a large andesite outcrop (Figures 4.3 and 4.4a). Due to this complex geologic setting, the soils in and around the Mojave spineflower locations were unique, consisting in large part of mixed andesitic and limestone alluvium. Together, these two types of alluvium undoubtedly create a soil with a unique chemistry and texture.

Second, all mapped locations were within eroded soil barrens. In these barrens, the top one to two inches of soil had been stripped away through erosion, leaving a very thin mineral soil as the top horizon. These barrens occurred in scattered locations along the Recent Alluvium surface. Most of these barrens were colonized by a dense stand of Mohave spineflower. Subdominant associated species within the barrens included California goldfields (*Lasthenia californica)*, red brome *(Bromus madritensis* ssp. *rubens)*, one-sided bluestem *(Poa secunda* ssp. *seconda)*, vinegar weed (*Trichostemma lanceolatum)*, and turkey mullein (*Eremocarpus setigerus)*. The surrounding hillsides supported the perennial bunchgrass plant community described elsewhere in this report.

Given the highly specialized microhabitat conditions associated with the Mojave spineflower occurrences, especially its association with mixed andesite and limestone alluvia, it is assumed this species would only occur along the southern edge of the study area (south of Highway 138), immediately below an exposed andesite outcrop. No occurrences of the species were found elsewhere in this localized area even though there are extensive andesite outcrops to the east. The species is not expected to occur elsewhere in the study area (i.e. north of Highway 138) due to a lack of suitable habitat.

4.3.2.2 Round-leaved Filaree (*Erodium macrophyllum*)

Listing Status: CNPS List 2; no state or federal listing status

Round-leaved filaree is a low-growing annual or biennial forb in the geranium family (Geraniaceae). It has reniform (kidney-shaped) leaves and inconspicuous white to pink-tinged flowers (see photographs in Appendix 4-A). The species is uncommon but widely distributed throughout the central and southern Coast Ranges, southern Sierra Nevada, and Great Valley regions of California. Round-leaved filaree is a CNPS List 2 species, meaning it is rare in California but more common elsewhere. It has no state or federal listing status.

The surveys identified a total of forty-six occurrences of round-leaved filaree. Thirty-two occurrences were found during 2003 surveys. Fourteen additional occurrences were identified during 2004 surveys. The additional 2004 occurrences were located near the 2003 occurrences on the slopes and flats below the hills south of Highway 138. All occurrences are mapped on Figures 4.1 and 4.2. Population size among occurrences ranged from small occurrences covering

less than forty square feet and supporting fewer than 20 plants to large occurrences covering several acres and supporting several thousand plants. Most occurrences were found along the low hills and slopes south of Highway 138. The remaining occurrences were located in a localized area on the dissected terraces north of Highway 138 and east of the California Aqueduct. During 2003 surveys several additional occurrences were also found outside of the study area, just north of the study area in upper Oso Canyon and east of the cement plant. The eight occurrences east of upper Oso Canyon were mapped and are shown on the report figures.

The distribution of round-leaved filaree is strongly influenced by site geology (Figures 4.3 and 4.4a). Round-leaved filaree is typically associated with friable clay loam soils. At the beginning of the 2003 surveys, it seemed unlikely this species would be found in the study area since none of the associated geologic formations weather into clay soils except perhaps for shale of the Santa Margarita Formation. However, once the surveys began, unmapped limestone outcrops and soils were found in scattered, isolated locations across in the central and southeastern portions of the study area. Also, limestone outcrops and limestone-derived soils were found in the steep hills in the northwest study area along upper Oso Canyon. The soils derived from these limestone deposits are unusual friable clay loam soils that were found to provide suitable habitat for round-leaved filaree. All occurrences of this species within the study area were directly associated with these soils as evidenced by the presence of limestone fragments in the soils and, in some cases, nearby limestone outcrops. The limestone apparently comes from two different sources. The limestone in the northwestern of the study area, mapped as Terrace Deposits, likely comes from remnant blocks or buried layers associated with the Limestone Beds capping the ridges to the north of the study area. The limestone in the central and southeastern portions of the study area come from either remnant limestone blocks deposited as part of the alluvium within Continental Deposits or from lake-deposited calcareous rock integral to the Continental Deposits. Though not mapped within the study area, there is a geologic stratum closely associated with the Continental Deposits called Lake Deposits. One component of these Lake Deposits is 'marl', a sedimentary rock type derived from mixed clay and microcrystalline limestone. Significantly, this rock weathers into a friable clay loam.

Interestingly, in an area south of Highway 138, round-leaved filaree alternated with Mojave spineflower across alternating geologic surfaces. Round-leaved filaree was on mapped Continental Deposits while Mojave spineflower was mapped on intervening fingers of Recent Alluvium composed of mixed andesite and limestone alluvia (discussed above).

From a topographic perspective, round-leaved filaree typically occurs on moderate to steep slopes on a variety of aspects. The apparent strong association of round-leaved filaree with moderate to steep slopes appears to be related more to the location of the limestone soils, rather than any specific preference for these slopes. There did not appear to be any unique hydrologic conditions other than the fact that clay soils retain more water and remain moister longer than the surrounding granite- and sedimentary-derived soils.

Most occurrences of the species were located in annual grassland inclusions within the perennial bunchgrass plant community. A few were in openings within blue oak or Tucker oak woodlands. All occurrences had a unique suite of plant associates, many of which were also exclusively found on limestone-derived soils. Common associates included lanceolate

monolopia (*Monolopia lanceolata)*, ciliate phacelia (*Phacelia ciliata)*, peppergrass (*Lepidium nitidum)*, miner's lettuce (*Claytonia perfoliata)*, blue dicks (*Dichelostemma capitata)*, and tidytips (*Layia platyglossa)*. One occurrence had common lomatium (*Lomatium utriculatum)* as a dominant associate. The associates proved very useful in finding occurrences of round-leaved filaree. Lanceolate monolopia is a unique, neon-yellow color that can be distinguished at a great distance. Many of the initial occurrences of round-leaved filaree were located by standing on a tall hill overlooking the study area and picking out occurrences of monolopia. Each of these sites was then visited, many of which were found to support round-leaved filaree. Though not as striking, tidytips also had a characteristic cream color which could also be distinguished at a distance. It is important to note that not all sites with limestone-derived soils supported round-leaved filaree even though many of its typical plant associates were present.

Potential habitat for round-leaved filaree within the study area is restricted to areas supporting limestone-derived friable clay loam soils. These soils occur sporadically along steep slopes on areas mapped as Terrace Deposits in the northwestern corner of the study area and in scattered areas on Continental Deposits along the slopes in the southern portion of the study area (south of Highway 138) and in a few widely scattered locations in the eastern portion of the study area (north of Highway 138 and east of the aqueduct). While the surveys conducted for this study found nearly all the occurrences in the study area, there are undoubtedly some additional occurrences that were not found given the scattered, sometimes random distribution of the limestone-derived soils. Nonetheless, all additional occurrences should be restricted to those geologic formations with associated limestone (i.e. northwestern Terrace Deposits and all Continental Deposits). The species is not expected to occur within the Andesite, Tejon Lookout Granite, Santa Margarita, central or eastern Terrace Deposits, or Recent Alluvium Formations.

4.3.2.3 Sylvan Microseris (*Microseris sylvatica*)

Listing Status: CNPS List 4; no state or federal status

Sylvan microseris is an erect annual herb in the sunflower family (Asteraceae). It has a basal leaf cluster and pale yellow flowers that nod in bud (see photographs in Appendix 4-A). The species is uncommon but widely distributed in California through the central and southern Coast Ranges and the Sierra Nevada foothills. Prior to the survey, it was unclear if it occurred in Los Angeles County (CNPS 2001). It is a CNPS List 4 species, a watch list of species that are uncommon but not presently rare, threatened, or endangered.

Numerous (500+) occurrences of sylvan microseris were found in the study area during the 2003 surveys. Additional occurrences were located during 2004 surveys. Given this abundance and large population size, individual occurrences were not mapped. Instead, areas where sylvan microseris is likely to occur are mapped as large polygons in the study area. The area totals approximately 4,458 acres. With regards to geologic preferences and distribution, the large majority of occurrences were on soils associated with Continental Deposits and Terrace Deposits in the central and southeastern portions of the study area, in the same area supporting the perennial bunchgrass community. It did not generally occur on the bench-like Terrace Deposits, bordering Oso Creek and was uncommon on the mapped Terrace Deposits in the northwest portion of the study area. The species was conspicuously absent from intervening floodplains

composed of Recent Alluvium. It was also absent from volcanic- and limestone-derived soils and was uncommon on soils of the Santa Margarita and Tejon Lookout Granite Formations.

In those areas where the species occurred, it exhibited clear geomorphic preferences. While it occurred sporadically in a variety of landscape positions, it was by far most common on thin, well-drained gravelly or coarse sandy loam and clay loam soils on the upper north sides of ridges and hills, and on slopes and flats immediately bordering ephemeral drainages. The species was often particularly abundant on the triangular bench just above and between the confluence of small drainages.

Nearly all occurrences were located within the perennial bunchgrass plant community. A few were in areas bordered by blue oak woodland (south of Highway 138). There were no obvious unique plant associates. Some typical dominant associates included cheatgrass (*Bromus tectorum)*, soft chess (*Bromus hordeaceus)*, ripgut brome (*Bromus diandrus)*, turkey mullein (*Eremocarpus setigerus)*, redstem filaree (*Erodium cicutarium)*, and whitetip clover (*Trifolium albopurpureum* var. *albopurpureum).*

Since sylvan microseris occurs sporadically within a variety of landscape positions, all areas within the central and southeastern portions of the study area that are mapped as Continental Deposits and Terrace Deposits should be regarded as providing good potential habitat for the species (Figure 4.1 and 4.2). The perennial bunchgrass plant community and open oak woodland habitat within areas mapped as Santa Margarita Formation and Terrace Deposits (excluding the bench-like deposits bordering Oso Creek) in the western portion of the study area also provide moderate potential habitat. Areas mapped as Recent Alluvium, Andesite, and Tejon Lookout granite provide low to no potential habitat.

4.3.2.4 Piute Mountains Navarretia (*Navarretia setiloba*)

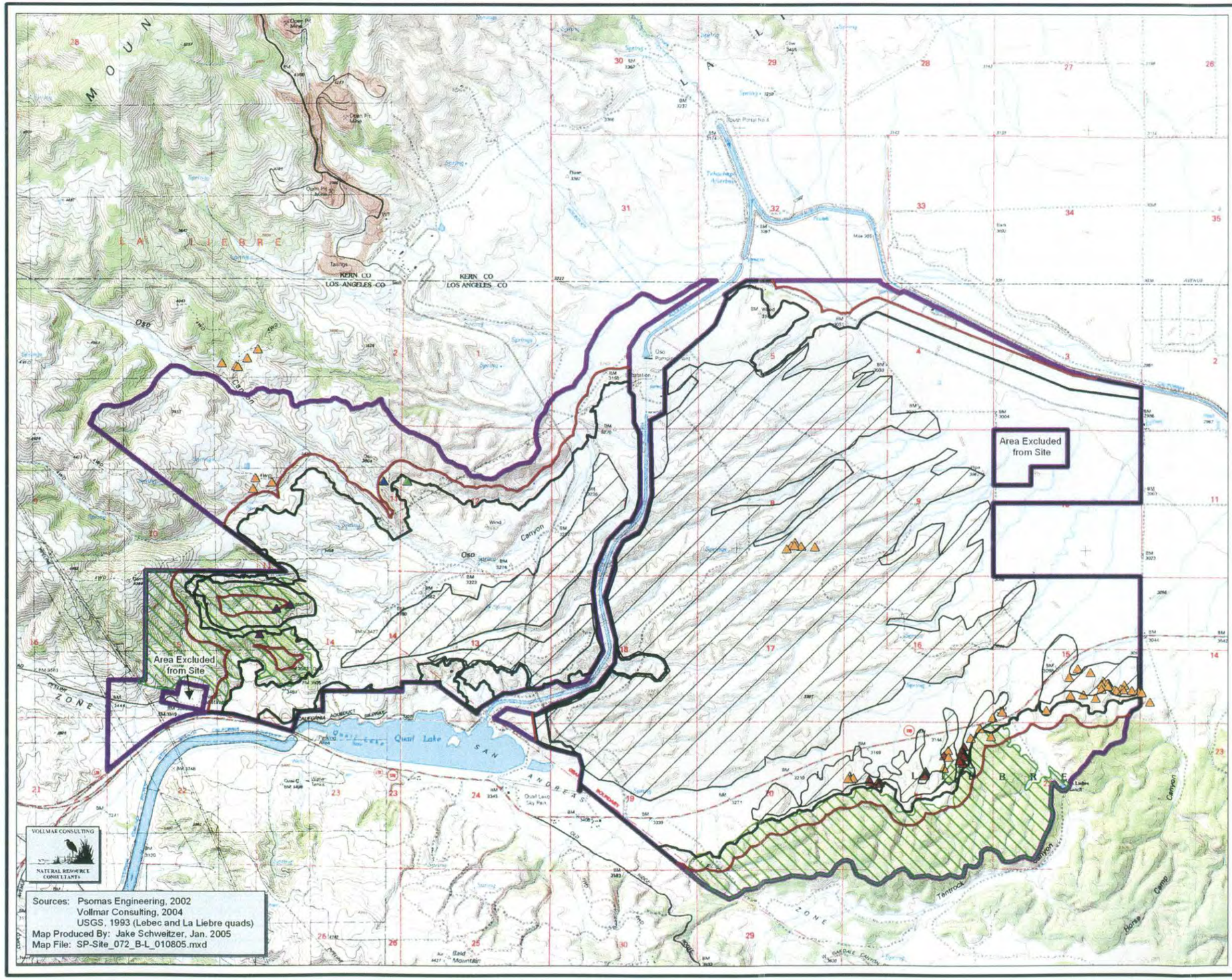
Listing Status: CNPS 1B; no state or federal status

Piute Mountains navarretia is a low-growing annual forb in the phlox family (Polemoniaceae). It has narrow, clustered, spine-tipped leaves, and blue-purple and white flowers in clustered heads (Appendix B). It is distinguished from the more common *Navarretia pubescens* by having flowering bracts widened above the middle and a white rather than purple flower throat.

Piute Mountains navarretia is a rare local endemic restricted to the far southern Sierra Nevada mountains and Tehachapi Ranges in Tulare and Kern Counties. The species occurs on heavy clay and gravelly loam soils in woodland and valley and foothill grassland habitats. Prior to these surveys, it was known from fewer than ten occurrences statewide, and, according to CNPS (2004), many historical occurrences have been searched for without success. The species had not been identified in the study area prior to these surveys. The nearest known occurrence was from Grasshopper Flat, about six miles north of Tejon Lake in the northern Tehachapi foothills. A total of 39 occurrences were located a few miles north of the study area on the Tejon Mountain Village Project Site during 2003 and 2004 surveys conducted by Vollmar Consulting. In all of those occurrences, Piute Mountain navarretia was found to be strictly associated with limestone-derived clay loam soils, and occurred within annual grassland or open oak woodland habitats.

FIGURE 4.1
Centennial Special-status Plant Occurrences

Special-status Plant Occurrences in Relation to
Local Geography, 2003 Botanical Surveys
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Legend

- Impact Area
- 500ft Buffer from Impact Area
- Project Planning Boundary
- Medium to High potential Habitat for Sylvan Microseris *(Microseris sylvatica)*
- Medium to High potential Habitat for Tucker Oak *(Quercus john-tuckeri)*

Locations of Special-status Plant Occurrences

- Occurrence of Mojave Spineflower *(Chorizanthe spinosa)*
- Occurrence of Round-leaved Filaree *(Erodium macrophyllum)*
- Occurrence of Piute Mountains navarretia *(Navarretia setiloba)*
- Occurrence of Adobe yampah *(Perideridia pringlei)*
- Occurrence of Lemmon's syntrichopappus *(Syntrichopappus lemmonii)*

N
W E
S

40 Acres

1:42,000
(1in = 3,500ft at tabloid layout)

0 875 1,750 Meters

0 1,750 3,500 7,000 Feet

FIGURE 4.2
Special Status Plants and Aerial Photography

Special-status Plant Occurrences in Relation to
Aerial Photography, Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California

No photography available

Area Excluded from Site

Area Excluded from Site

No photography available

Legend

- Impact Area
- 500ft Buffer from Impact Area
- Project Planning Boundary
- Medium to High Potential Habitat for Sylvan Microseris *(Microseris sylvatica)*
- Medium to High potential Habitat for Tucker Oak *(Quercus john-tuckeri)*

Locations of Special-status Plant Occurrences

- Occurrence of Mojave Spineflower *(Chorizanthe spinosa)*
- Occurrence of Round-leaved Filaree *(Erodium macrophyllum)*
- Occurrence of Piute Mountains navarretia *(Navarretia setiloba)*
- Occurrence of Adobe yampah *(Perideridia pringlei)*
- Occurrence of Lemmon's syntrichopappus *(Syntrichopappus lemmonii)*

N
W E
S

40 Acres

1:42,000
(1in = 3,500ft at tabloid layout)

0 875 1,750 Meters

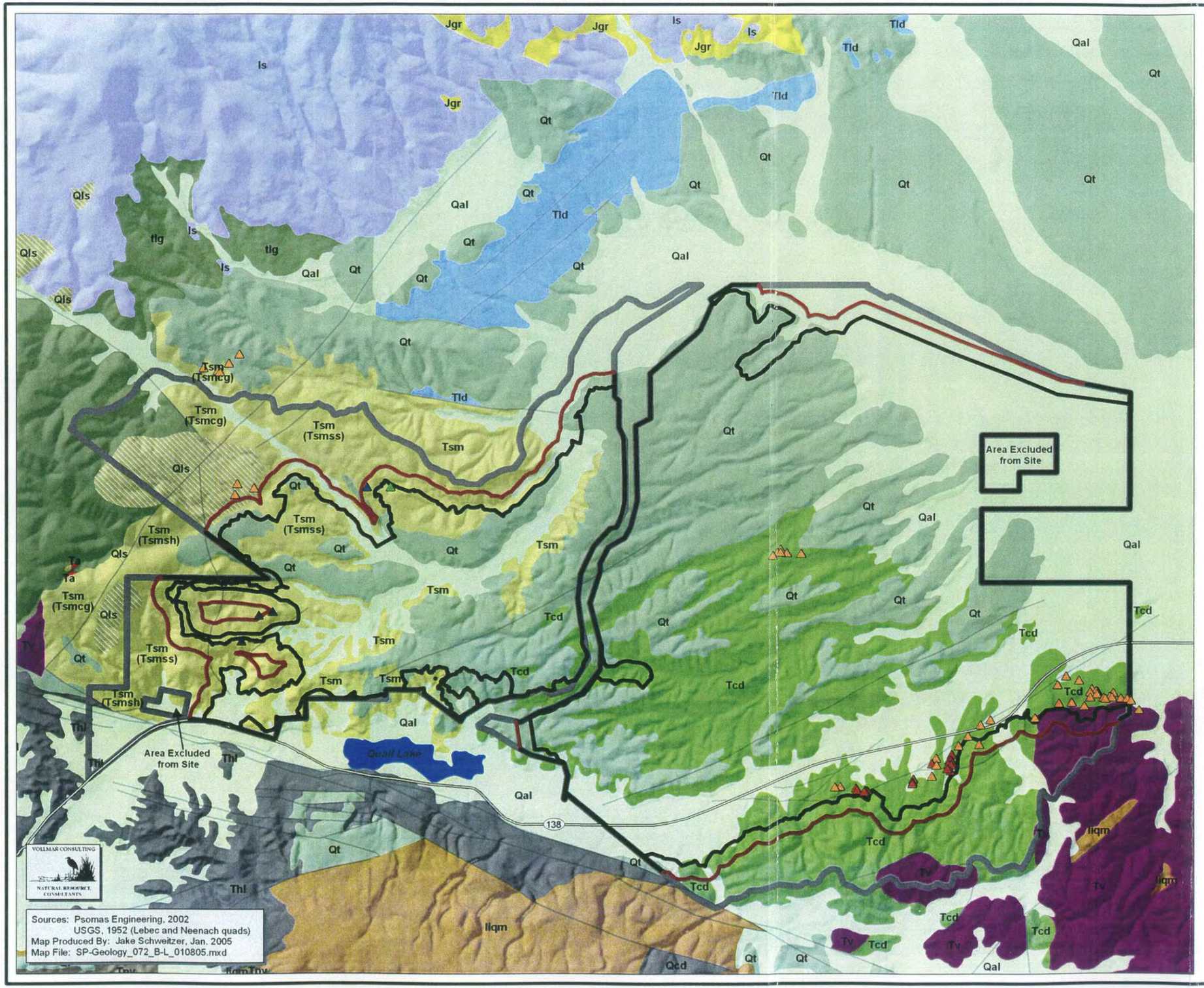
0 1,750 3,500 7,000 Feet

VOLLMAR CONSULTING
NATURAL RESOURCE CONSULTANTS

Sources: Psomas Engineering, 2002
Vollmar Consulting, 2003 & 2004
USGS, 1993 (Lebec and La Liebre quads)
Map Produced By: Jake Schweitzer, Jan. 2005
Map File: SP-Photo_072_B-L_011005.mxd

FIGURE 4.3
Special-status Plant Occurrences and Geology

Special-status Plant Occurences in Relation to Geology
2003 and 2004 Botanical Surveys
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Legend

Locations of Special-status Plant Occurrences

- Occurrence of Mojave Spineflower *(Chorizanthe spinosa)*
- Occurrence of Round-leaved Filaree *(Erodium macrophyllum)*
- Occurrence of Piute Mountains navarretia *(Navarretia setiloba)*
- Occurrence of Adobe yampah *(Perideridia pringlei)*
- Occurrence of Lemmon's syntrichopappus *(Syntrichopappus lemmonii)*

- Impact Area
- 500ft Buffer from Impact Area
- Project Planning Boundary
- Fault Line

Geologic Formation

QUATERNARY — Recent
- Qal - Recent alluvium
- Qls - Landslide

QUATERNARY — Pleist
- Qt - Terrace deposits and older alluvium

TERTIARY — Pliocene
- Tld - Lake deposits
- Thl - White conglomerate sandstone with brown mudstone
- Tpv - Brown siltstone with buff sandstone

TERTIARY — Miocene
- Tsm - Santa Margarita formation*
- Tcd - Continental deposits (conglomerate, sandstone & shale)
- Tv - Purple andesite
- Ta - Silicified andesite

JURASSIC OR CRETACEOUS
- Jgr - Granite
- tlg - Tejon Lookout granite
- liqm - Liebre quartz monzonite (gray hornblende biotite quartz monzonite)

PALEOZOIC
- Is - Limestone and marble

- Water (Quail Lake)

*Includes subtypes: Tsmsh (chiefly shales), Tsmcg (chiefly conglomerate) and Tsmss (chiefly sandstone)

N W E S

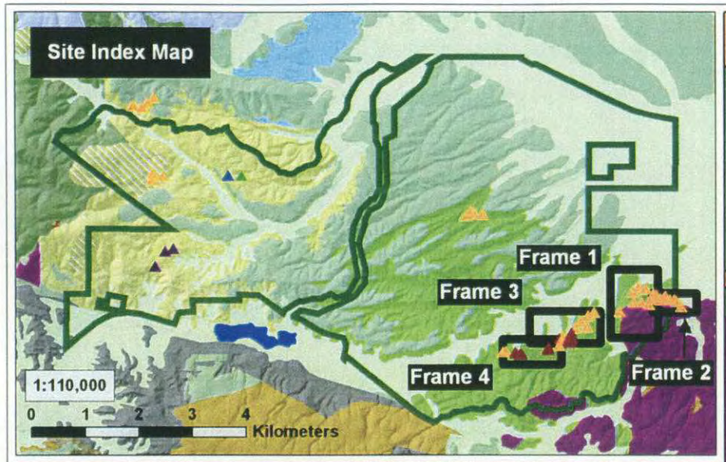
1:42,000 (1in = 3,500ft at tabloid layout)

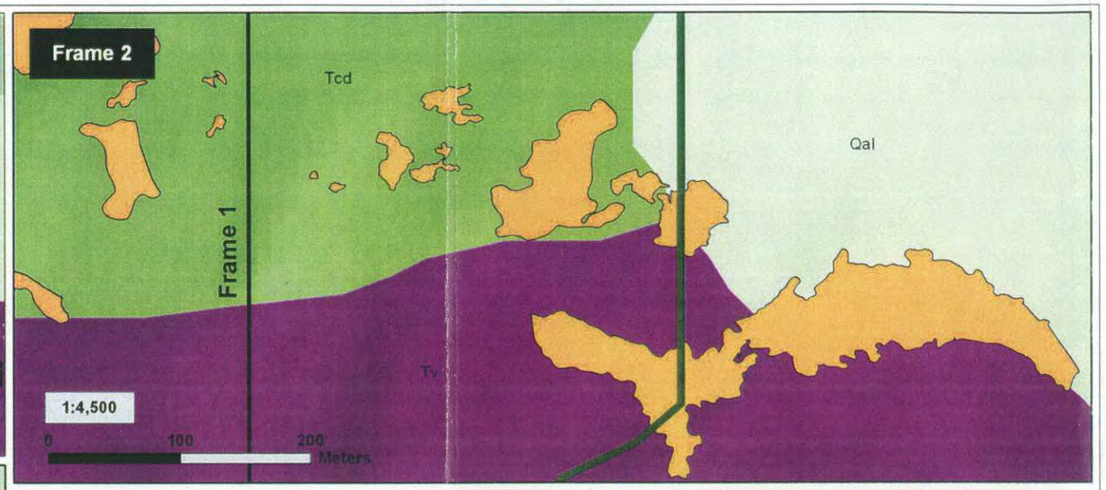
0 875 1,750 Meters

0 1,750 3,500 7,000 Feet

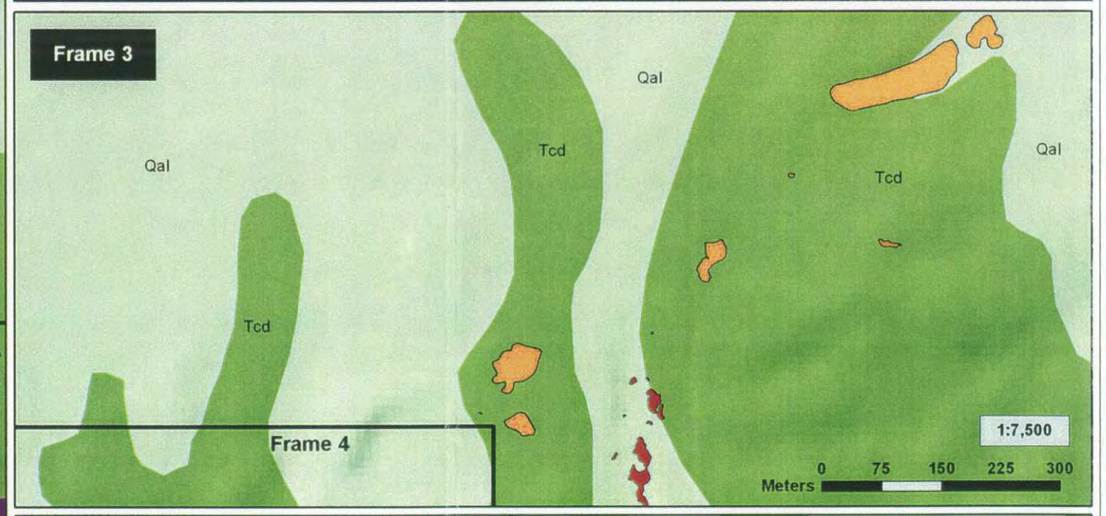
FIGURE 4.4a
Special-status Plants and Geology Eastern Map

Special-status Plant Occurences in Relation to Geology
2003 and 2004 Botanical Surveys
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California











Sources: Vollmar Consulting, 2003 & 2004
Psomas Engineering, 2002
USGS, 1952 (Lebec and Neenach quads)
Map Produced By: Jake Schweitzer, Jan. 2005
Map File: SP-Geo-E_072_B-L_010805.mxd

Legend

Project Planning Boundary

Locations of Special-status Plant Occurrences

- Occurrence of Mojave Spineflower *(Chorizanthe spinosa)*
- Occurrence of Round-leaved Filaree *(Erodium macrophyllum)*
- Occurrence of Piute Mountains navarretia *(Navarretia setiloba)*
- Occurrence of Adobe yampah *(Perideridia pringlei)*
- Occurrence of Lemmon's syntrichopappus *(Syntrichopappus lemmonii)*

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- ls - Limestone and marble

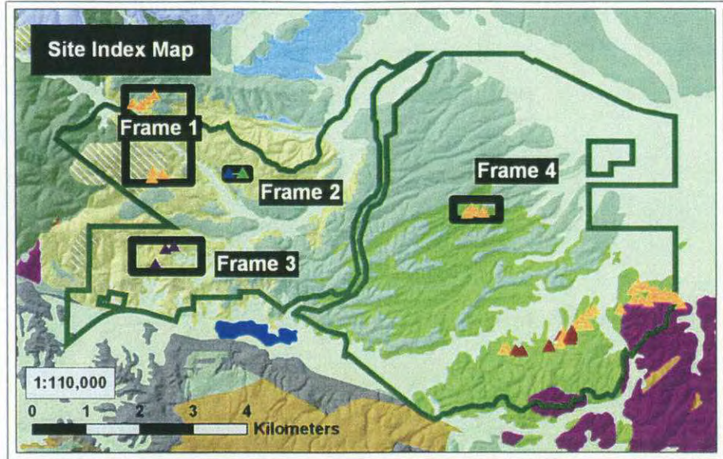
- Water (Quail Lake)

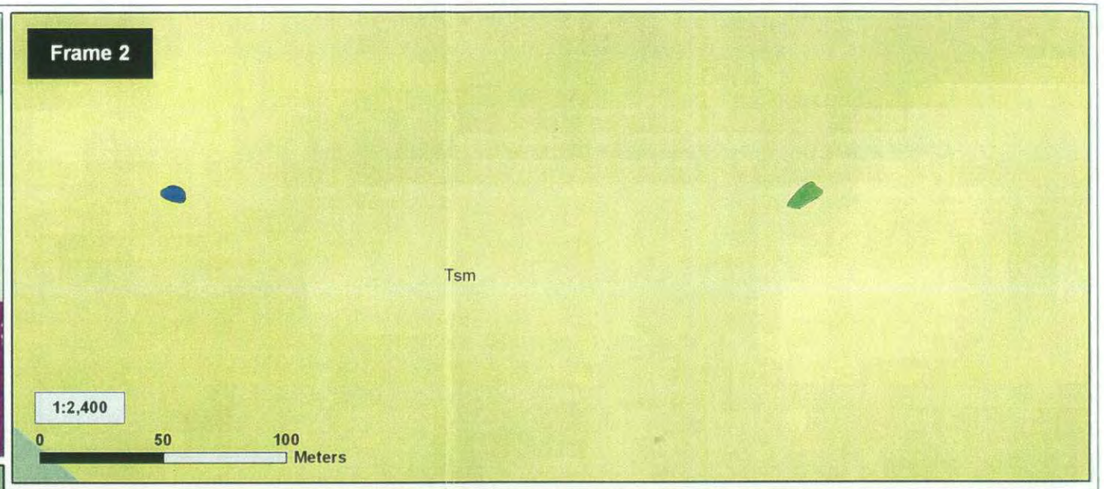
*Includes subtypes: Tsmsh (chiefly shales), Tsmcg (chiefly conglomerate) and Tsmss (chiefly sandstone)

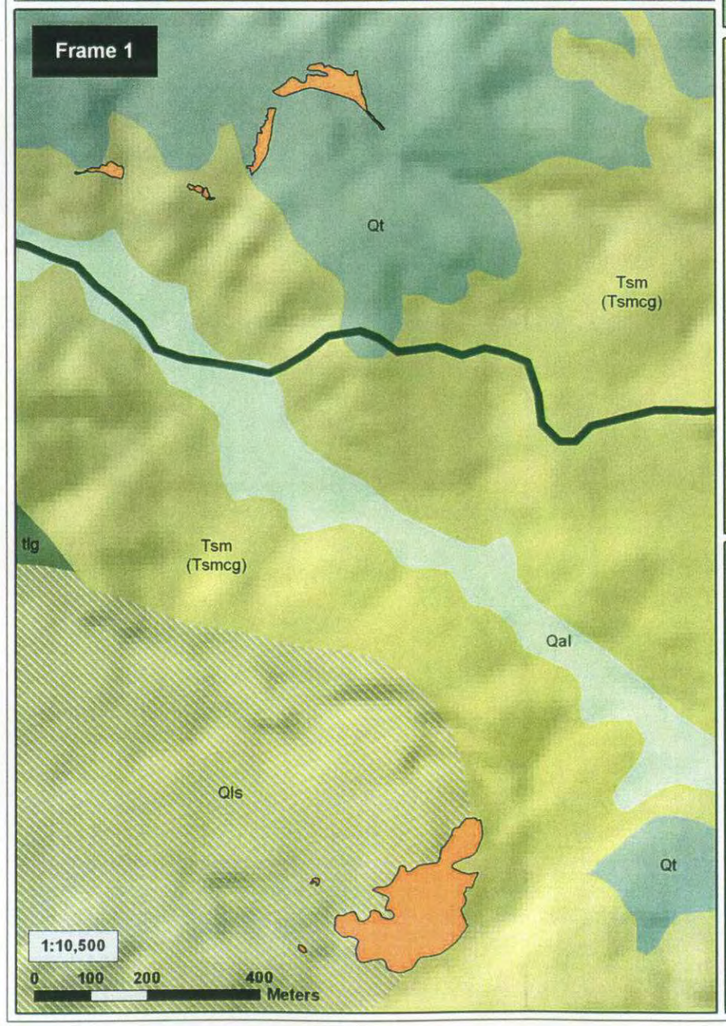
N W E S

FIGURE 4.4b
Special-status Plants and Geology Western Map

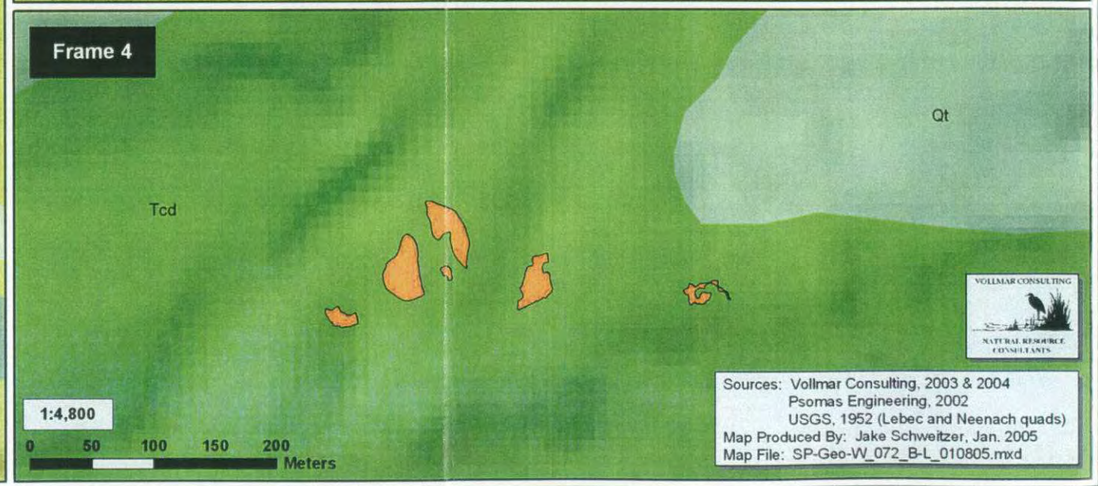
Special-status Plant Occurences in Relation to Geology
2003 and 2004 Botanical Surveys
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California











Legend

- Project Planning Boundary

Locations of Special-status Plant Occurrences

- Occurrence of Mojave Spineflower *(Chorizanthe spinosa)*
- Occurrence of Round-leaved Filaree *(Erodium macrophyllum)*
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PALEOZOIC
- ls - Limestone and marble

- Water (Quail Lake)

*Includes subtypes: Tsmsh (chiefly shales), Tsmcg (chiefly conglomerate) and Tsmss (chiefly sandstone)



Three occurrences of Piute Mountains navarretia were located and mapped in the study area during 2004 surveys. The species was not found in the study area during the 2003 surveys. These occurrences represent the only known occurrences in Los Angeles County and the southernmost known occurrences. These occurrences were all found in the hills in the far western region of the study area. The first occurrence was located on a west-facing upper slope in a mixed perennial bunchgrass/introduced annual grassland community and supported approximately 15,000 plants in a 1.5-acre area. The second occurrence was located approximately 800 feet south-southwest of the first occurrence, on a southeast-facing slope in an annual grassland opening within a juniper-scrub oak woodland, and supported approximately 5000 plants scattered over a 0.20-acre area. A third smaller occurrence was located approximately 400 feet northeast of the initial occurrence near the top of a west-facing slope in an open mixed oak woodland-annual grassland, and supported approximately 100 plants in a 0.04-acre area. All three occurrences were situated on heavy clay loam and sandy clay loam soils apparently derived from the weathering of Santa Margarita Formation shales. Dominant associated species included one-sided bluestem (*Poa secunda ssp. secunda),* cheatgrass *(Bromus tectorum),* red brome (*Bromus madritensis ssp. rubens*), redstem filaree (*Erodium cicutarium)* and peppergrass (*Lepidium nitidum*).

The three occurrences were found to be exclusively associated with areas that had been rooted by pigs. In all three occurrences, the populations were strictly limited to the boundaries of soils recently disturbed from pig rooting. Intensive surveys of the areas immediately surrounding the disturbed areas found no additional individuals.

It is difficult to characterize potential habitat for Piute Mountains navarretia in the study area due to the small number of identified occurrences and the fact that all occurrences were associated with pig-disturbed soils. Some information can be derived from the 39 occurrences identified on the nearby Tejon Mountain Village Project Site. All of these occurrences were found to be strictly associated with limestone-derived clay loam soils in grasslands and/or open oak woodlands. In contrast, the three occurrences in this study area were not found on limestone-derived clay soils but were found on clay soils apparently derived from weathered shales.

Given the common occurrence on soils with a high clay content, potential habitat for Piute Mountains navarretia in the study area includes all areas with heavy clay soils whether derived from limestone, shale, or some other rock type. These soils occur sporadically along steep slopes in the northwestern corner of the study area, in scattered areas on Santa Margarita Formation in the southwestern portion of the study area, and in the few scattered areas where limestone-derived soils occur in the central and southeastern portions of the study area. The species is not expected to occur within the Andesite, Tejon Lookout Granite, central or eastern Terrace Deposits, or Recent Alluvium Formations.

4.3.2.5 Adobe Yampah (*Perideridia pringlei*)

Listing Status: CNPS List 4; no state or federal status

Adobe yampah is a 40-70 centimeter tall perennial herb in the carrot family (Apiaceae). It has a tuberous edible root, elongate, pinnately-divided leaves, and an open umbellate flowering head

with small, white flowers (Appendix B). The species occurs in scattered areas in the southern Sierra Nevada foothills, central Coast Ranges, and Western Transverse Ranges. While this species is known from sporadic occurrences in Kern and Northern Los Angeles Counties, it was not previously known in the immediate vicinity of the study area. It occurs in chaparral, woodland, and coastal scrub habitats. Adobe yampah is a CNPS List 4 species, a watch list of species that are uncommon but not presently rare, threatened, or endangered.

One occurrence of adobe yampah was identified during the 2004 surveys on an open north-facing slope in the western portion of the study area. The species was not identified in the study area during the 2003 surveys. The occurrence consisted of a small cluster of approximately 16 plants. The site was located on sandy to gravelly loam soils in a perennial bunchgrass plant community. The habitat is a dry, moderately steep slope with bare soil and low total vegetation cover, and is above an intermittent streambed and adjacent to annual grassland habitat. The site occurs on thin soils derived from sandstones of the Santa Margarita Formation. Dominant species at this site included one-sided bluestem grass (*Poa secunda ssp. secunda*), redstem filaree (*Erodium cicutarium*) and common lomatium (*Lomatium utriculatum).*

It is difficult to characterize potential habitat for adobe yampah based on only a single occurrence. Potential habitat for the species in the study area can be more accurately assessed by analyzing the ten occurrences located by Vollmar Consulting in 2003 and 2004 on the Tejon Mountain Village Project site a few miles north of this study area. The majority of these occurrences were located on gravelly, limestone-derived soils, although two occurrences were found on granitic soils. All ten occurrences were located within openings in oak woodlands or associated annual grasslands.

Based on assessments of the ten Tejon Mountain Village Project Site occurrences and the single occurrence in the study area, the best potential habitat for adobe yampah in the study area appears to be within grassland openings and open oak woodlands on slopes with gravelly loam soils. Areas where the species may occur include the steep slopes in the northwestern corner of the study area, the hills in the western portion of the study area, on north-facing slopes of the Santa Margarita Formation, and on the hills in the southeastern portion of the study area.

4.3.2.6 Tucker Oak *(Quercus john-tuckeri)*

Listing Status: CNPS List 4; no state or federal status

Tucker oak is an evergreen shrub or small tree, typically less than 7 meters tall, in the oak family (Fagaceae). Tucker oak can range from a scrubby six-foot tall shrub to a 20 to 30-foot tall tree with a single large trunk. It has finely hairy twigs and small leaves with irregularly spine-toothed margins and "fuzzy" lower surfaces. It occurs in chaparral, lower montane and pinyon and juniper habitats, and is known to hybridize with scrub oak (*Quercus berberidifolia*), blue oak (*Quercus douglasii*) and valley oak (*Quercus lobata*).

Formerly, California populations of what is now known as Tucker oak (*Quercus john-tuckeri*) were included with the species Sonoran scrub oak (*Quercus turbinella),* an oak that occurs in the Sonoran and Chihuahua deserts of the western United States. These California populations were

named *Quercus turbinella* ssp. *californica.* Differences in leaf and acorn characteristics distinguished the California populations from other populations. It was subsequently determined that these differences were substantial enough that the California populations should be considered a separate species called Tucker oak (*Quercus john-tuckeri*), named after John Tucker, a professor of botany from U.C. Davis. CNPS' Inventory of Rare and Endangered Plans of California (2004) still use *Quercus turbinella* as the primary name for the taxon but recognizes *Quercus john-tuckeri* as a synonym for the California population. The Jepson Manual names the taxon as *Quercus john-tuckeri* and this is the name that will be used in this report.

Tucker Oak is CNPS List 4 species, a watch list of species that are uncommon but not presently rare, threatened, or endangered. List 4 species occur either with limited distribution or infrequently throughout a broader area in California, and as such are not eligible for state listing. Nevertheless, CNPS strongly recommends that List 4 species be evaluated for consideration during CEQA documentation. Tucker Oak is classified as a List 4 species based on its disjunct distribution and limited range. The species occurs on the north slope of the San Gabriel Mountains, on the north slope of the Western Transverse Ranges and east slope of the Tehachapis, and then again on the interior South Coast Ranges. The Tucker Oak population within the study area occurs at the northeastern edge of the species range and therefore warrants careful management considerations.

Numerous Tucker oaks were found over large areas of the study area during the 2003 and 2004 surveys. Given the abundance and large population size, individual occurrences were not mapped. Instead, areas where Tucker oaks are likely to occur were mapped as large polygons. These areas total approximately 1,420 acres. Tucker oaks were found in two general regions in the study area. First, numerous Tucker oaks were found scattered in the hills in the southwestern region of the study area in open mixed oak woodland and chaparral habitat. It was typically found on moderate to steep slopes, on various aspects, growing with blue oak (*Quercus douglasii*), valley oak (*Quercus lobata*), bigberry manzanita (*Arctostaphylos glauca*) and red brome (*Bromus madritensis* ssp. *rubens*). A second population was found in oak woodland and chaparral habitat along the southeast edge of the study area, in the hills south of highway 138. In this second occurrence, the Tucker oaks were found on more open slopes growing as homogeneous woodland stands with a grassland understory or in mixed stands other tree and shrub species such as blue oak, California juniper (*Juniperus californica*), and Bigelow's coreopsis (*Coreopsis bigelovii*).

With regards to geologic preferences and distribution, the Tucker oak population in the western portion of the study area occurred on sandy to gravelly soils derived from weathered sandstone, shale and/or conglomerate of the Santa Margarita Formation. In the southeast region, it occurred on gravelly soils derived from Purple Andesite and Continental Deposits. It did not occur on the Continental Deposits and Terrace Deposits of the terrace tops and ridgelines in the central region of the study area nor on the Disturbed Alluvial Plains. It was also generally absent from the hills in the northwestern and northern portions of the study area where blue oak was the dominant species.

All of the oak woodlands on hill slopes in the southeastern and southwestern regions of the study area should be regarded as providing good potential habitat for Tucker oak.

4.3.2.7 Lemmon's Syntrichopappus (*Syntrichopappus lemmonii*)

Listing Status: CNPS List 4; no state or federal status

Lemmon's syntrichopappus is a small (2-10 cm tall) erect annual in the sunflower family (Asteraceae). It has alternate, simple leaves and solitary heads with tiny petals that are white with pink veins above and pinkish-purple below. The species is uncommon and occurs on sandy to gravelly slopes in chaparral and Joshua tree woodlands, on the southwest border of the Mojave Desert and adjoining slopes of the San Gabriel, San Jacinto and San Bernardino Mountains. It is known to occur in Los Angeles, San Bernardino and Monterey Counties, but prior to the surveys was not located in the vicinity of the study area. It is a CNPS List 4 species, a watch list of species that are uncommon but not presently rare, threatened, or endangered.

During 2004 surveys, one occurrence of Lemmon's syntrichopappus was located on an open, moderately steep northwest-facing slope in the north-central region of the study area. The site was located in a sparsely vegetated, mixed plant community dominated by non-native annual grasses, perennial bunchgrasses and native forbs, with prominent areas of bare soil and exposed sandstone bedrock. The site occurs on the Santa Margarita Formation on thin, eroding sandy to gravelly soils. The occurrence consists of approximately 30 plants scattered over a total area of approximately 450 square feet. Dominant associated species include one-sided bluestem (*Poa secunda* ssp. *secunda*), rock phacelia (*Phacelia egena*), mountain violet *(Viola purpurea* ssp. *quercetorum*), red brome (*Bromus madritensis* ssp. *rubens*), common lomatium (*Lomatium utriculatum*), and blue dicks (*Dichelostemma capitatum* ssp. *capitatum*).

Within this occurrence, Lemmon's syntrichopappus plants were typically located within a short distance of mountain violet. While mountain violet is certainly not a rare plant, it did occur infrequently in the study area. Lemmon's syntrichopappus and mountain violet appear to prefer similar soil types and/or other environmental conditions. Their association appears to be significant and mountain violet, when it occurs on similarly open sandy soils, can be used as an indicator for high potential habitat for Lemmon's syntrichopappus.

It is difficult to characterize potential habitat for Lemmon's syntrichopappus based on one occurrence in the study area. Based on this single occurrence, potential habitat appears to include north- and northwest-facing slopes with thin sandy soils over bedrock in open mixed annual or perennial grassland and forb communities. It may be that this species prefers the thin eroding soils derived from the marine sandstones of the Santa Margarita Formation. As such, all similar north- and northwest-facing slopes on Santa Margarita Formation should be considered as potential habitat for this species. This formation occurs in the north-central and southwestern regions of the study area.

Lemmon's syntrichopappus is a tiny ephemeral early-blooming annual (the plants located during 2004 surveys were typically less than 4 centimeters tall). Considering its tiny size, early

blooming time, and the low 2004 rainfall year, it is likely that there are additional occurrences in the study area in areas with potential habitat.

4.3.2.8 Other Special-status Plants

Seven other special-status plant species were identified as potentially occurring in the study area. The listing status, habitat, and other pertinent information for each of these species are summarized in Table 4.1 above. None of these species was found in the study area. Their potential for occurrence is discussed below.

Two species, Tejon poppy (*Eschscholtzia lemmonii* ssp. *kernensis*) [CNPS List 1B], and Comanche Point layia (*Layia leucopappa*) [CNPS List 1B], are associated with heavy clay soils and are found on the north side of the Tehachapi Mountains. Tejon poppy is also reported from the canyon west of Fort Tejon State Park. The best potential habitat for these species in the study area is the limestone-derived friable clay loam soils discussed at length above. Also, there were a few small areas with clay soils that appeared to be derived from shale of the Santa Margarita Formation. Given the importance of clay soils for round-leaved filaree and Piute Hills navarretia, these soils were carefully surveyed wherever they occurred throughout the survey area. Yet, neither of these other species was found. During status surveys, the survey team visited the purported location for Tejon poppy west of Fort Tejon State Park. Tejon poppy was not found but a similar species, foothill poppy (*Eschscholtzia caespitosa*), was found in the same location. As such, it may be that this foothill poppy was misidentified as Tejon poppy in this location. Since the study area is several miles outside the known range of Tejon poppy and Comanche Point layia, and since neither species was found during intensive surveys of potentially suitable soils, it is concluded that neither species is likely to occur in the study area.

Fort Tejon woolly sunflower (*Eriophyllum lanatum* var. *hallii*) [CNPS List 1B] is known from nineteen sites located a few miles north of the study area. One of the nineteen sites is located west of Fort Tejon State Park on a steep, south-facing shaded hillside within annual grassland habitat. Surrounding areas support a mosaic of grassland, oak woodland, and scrub habitats. Prior to these surveys, this site and one additional site located on the Tejon Ranch were the only known occurrences of this species in the vicinity of the study area. Eighteen of the nineteen Fort Tejon woolly sunflower sites occur on the Tejon Ranch, seventeen of which were located by Vollmar Consulting during 2003 and 2004 surveys of the Tejon Mountain Village Project Site. Two of these sites are situated along the rocky/gravelly upper edge of north-facing road cuts along unpaved ranch roads. Surrounding habitat is a mosaic of oak woodlands, annual grasslands, and chaparral. The remaining sixteen sites are all located on steep, north-facing hillsides within or adjacent to dense or moderately open oak woodlands-with mosaic stands of valley oak, black oak and shin oak. Canopy cover varied from dense to moderate. The typical understory was annual grasslands. With regards to substrate, the Fort Tejon woolly sunflower appears to prefer soils derived from metamorphic rock in areas mapped as brown hornfels or mixed hornfels and limestone. Given the known locations and habitat preferences of this species in the Tejon Mountain Village Project Site, the best potential habitat for Fort Tejon woolly sunflower is along the steep, north-facing hills with oak woodland and chaparral/scrub habitats in the western, northwestern, and southern portions of the study area. These areas were carefully

surveyed but the species was not found though a similar species, golden yarrow (*Eriophyllum confertiflorum* var. *confertiflorum*) was found.

Delicate blue cups (*Githopsis tenella*) [CNPS List 1B] is known from a high ridge (Purdy Ridge, approximately 1,600 meters (5,250 feet) in elevation) several miles northeast of the study area. This is the only known occurrence in the general region of the study area. This ridge, which was visited during status surveys, supports an isolated stands of white fir (*Abies concolor*) within a copse of canyon live oak. There were no habitats remotely like this within the study area and so it is concluded that there is no potential habitat for the species.

Flax-like monardella (*Monardella linoides* ssp. *oblonga*) [CNPS List 1B] is reported to occur in montane coniferous forest and pinyon/juniper woodland (CNPS 2001). There is a known occurrence below Chuchupate campground (south of Fort Tejon State Park). This site, which was visited during the status surveys, is situated on a rocky, north-facing slope with thin soils. The surrounding habitat is chaparral dominated by big-berry manzanita (*Arctostaphylos glauca*) and California flannelbush (*Fremontodendron californicum* ssp. *californicum*). Kennedy's mariposa lily (*Calochortus kennedyi* ssp. *kennedyi*) was found growing near the species. Chaparral dominated by big-berry manzanita occurs in scattered areas in the southwestern portion of the study area. These chaparral stands, which were thoroughly surveyed during 2003 and 2004, occur at a lower elevation and feel more arid than that found in association with the flax-like monardella. In addition, California flannelbush was not found in this habitat nor anywhere within the study area. Kennedy's mariposa lily was located in the far southeast region of the study area (south of Highway 138) in a mixed juniper woodland-perennial bunchgrass community. The two small populations were found growing in thin andesite soils. Given these conditions, it is concluded that flax-like monardella is unlikely to occur in the study area.

Bakersfield cactus (*Opuntia basilaris* var. *treleasei*) [State Endangered; Federal Threatened; CNPS List 1B] is endemic to the alluvial benches and fans along the southern and southeastern edges of the San Joaquin Valley. Known occurrences of the species west of I-5 and at Comanche Point were visited during the status surveys. Given its restricted distribution and particular microhabitat, it is concluded that there is no potential habitat for this species in the study area. The surveys did identify beavertail cactus (*Opuntia basilaris* var. *basilaris*), a closely related 'cousin', near the southern edge of the study area.

Silvery false lupine (*Thermopsis macrophylla* var. *argentata*) [CNPS List 1B] is known to occur on slopes in woodland, valley and foothill grassland, and lower coniferous forest habitats. It was found by Vollmar Consulting in numerous locations a few miles north of the study area during 2003 and 2004 surveys of the Tejon Mountain Village Project Site. Surveys conducted by previous consultants also reported the species in scattered locations in the vicinity of the cement plant just north of the study area. On the Tejon Mountain Village Project Site, silvery false lupine was often found on alluvial slopes below the uplifted limestone cap described earlier in this report. Given this association, it is not surprising the species was found in the vicinity of the cement plant (which is situated just below this cap to the south). However, no occurrences of this species were observed during field surveys either in the study area or around the cement plant. Nonetheless, potential habitat for this species is considered to occur within the study area

along the steep slopes bordering upper Oso Canyon, especially areas below limestone outcrops or limestone-derived soils.

4.4 Summary

Seven special-status plant species were identified within the study area including Mojave spineflower, round-leaved filaree, sylvan microseris, Piute Mountains navarretia, adobe yampah, Tucker oak and Lemmon's syntrichopappus. The occurrence and distribution of known and potential habitat for these special-status plants within the study area can best be understood by considering the underlying geologic and geomorphic landscape preferences of each species.

The nineteen occurrences of Mojave spineflower all occur on unusual soil barrens within the perennial bunchgrass community located south of Highway 138. This species appears to prefer the mixed andesite and limestone alluvial soils that are unique to this region of the study area.

The forty-six occurrences of round-leaved filaree scattered in the southeastern, eastern, and northwestern portions of the study area all occur on the limestone-derived friable clay soils. In the northwest, these soils are derived from weathering of underlying limestone bed rock or disjunct blocks from the nearby limestone cap. In the east and southeast, these soils appear to be derived from isolated, remnant weathered limestone blocks emplaced along with other alluvium as part of the Continental Deposit formation.

The large majority of sylvan microseris occurrences were found on the thin, well-drained gravelly or coarse sandy loam soils associated with Continental Deposits and Terrace Deposits in the central and southeastern portions of the study area. Within this area, the species was most commonly found on upper north-facing slopes and along the thin, well-drained gravelly soils bordering small, ephemeral drainages. The species generally did not occur on the bench-like Terrace Deposits bordering Oso Creek and was uncommon on the mapped Terrace Deposits in the northwest portion of the study area. The species was conspicuously absent from intervening floodplains of Recent Alluvium. It was also absent from volcanic- and limestone-derived soils and was uncommon on soils of the Santa Margarita and Tejon Lookout Granite Formations.

The three occurrences of Piute Mountains navarretia are located on upper slopes of sandy-clay loam soils associated with the Santa Margarita Formation in the southwest portion of the study area. These soils appear to be derived from weathered shales. In the study area, the species was strictly associated with areas disturbed by pig rooting. Given that these pigs are non-native species and the disturbance they cause began only with their introduction, it is unclear where, if at all, the species would have historically occurred. Piute Mountains navarretia is a very rare species, known from fewer than 20 occurrences primarily in the northern Tehachapi Range. The occurrences in the study area are the only known occurrences in Los Angeles County and are the southernmost known occurrences of the species.

The one occurrence of Adobe yampah in the study area was located on sandy to gravelly soils derived from sandstones of the Santa Margarita formation. It is difficult to summarize the environmental preferences of this species based on one occurrence. The ten occurrences located north of the study area, on the Tejon Mountain Village Project Site, however, provide additional

evidence of this species habitat preferences. In the ten occurrences on that project site, eight of the locations were found on limestone-derived clay loam soils, and two were located on more gravelly-textured granitic soils. Given these occurrences along with the one occurrence on sandstone-derived soils in the study area, it appears this species is not endemic to any particular soil or geologic type. Rather, it is restricted to certain geomorphic positions, particularly, north- and northwest-facing slopes with gravelly, well-drained soils.

The two large populations of Tucker oaks were found in the study area on hilly areas in the southwest and southeast regions of the study area. The population in the southwest occurred on thin, sandy soils derived from Santa Margarita Formation. The population in the southeast occurred on gravelly soils derived from Purple Andesite and Continental Deposits. Given the diversity of substrates, it appears that the dry, hilly conditions are more important for this species than the specific geologic formation. Interestingly, the species was generally absent from the hilly areas in the northwestern and northern portions of the study area. Blue oak was the dominant instead. This may be due to local differences in climate or soil conditions.
The one occurrence of Lemmon's syntrichopappus in the study area was located on thin, steep, northwest-facing sandy soils derived from the Santa Margarita Formation. There were areas of exposed soils and bedrock in the immediate vicinity of the occurrence. This occurrence was tucked in a canyon on a slope somewhat protected from the sun. There were few other places like this in the study area and this likely accounts for the overall rarity of the species in the study area.

APPENDIX 4-A

PHOTOGRAPHS OF SPECIAL-STATUS PLANT SPECIES IDENTIFIED IN THE STUDY AREA



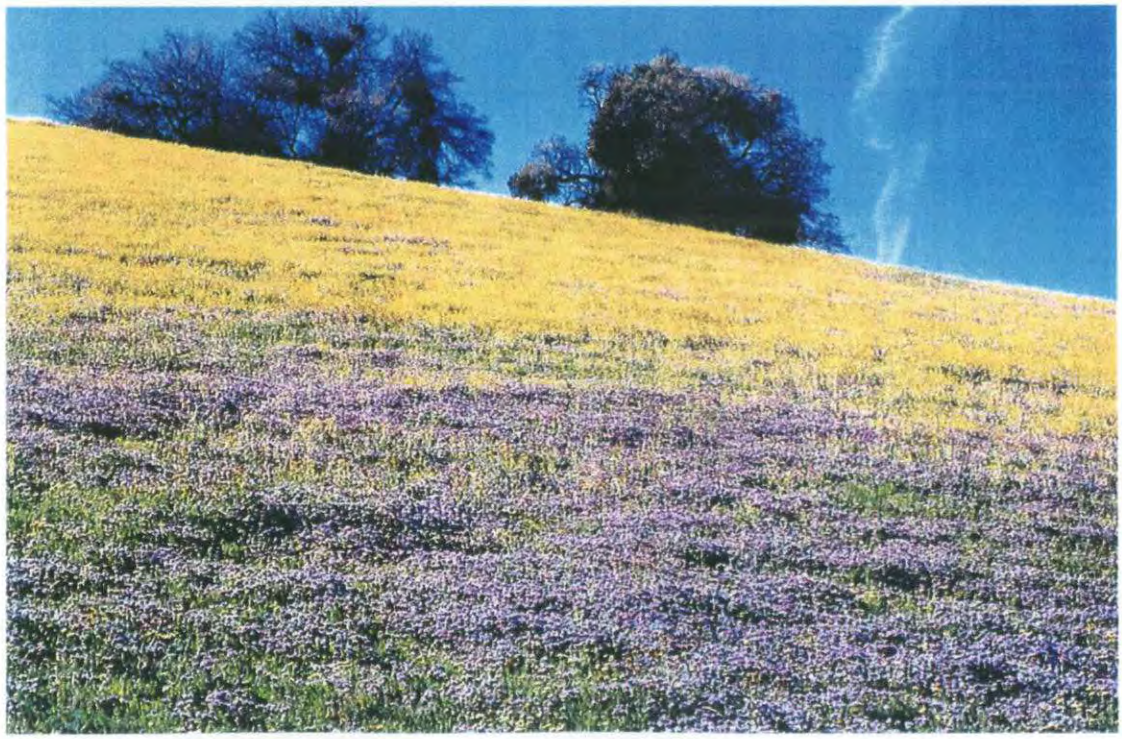
Mojave Spineflower (*Chorizanthe spinosa*) [Photo Credit: John Hale]



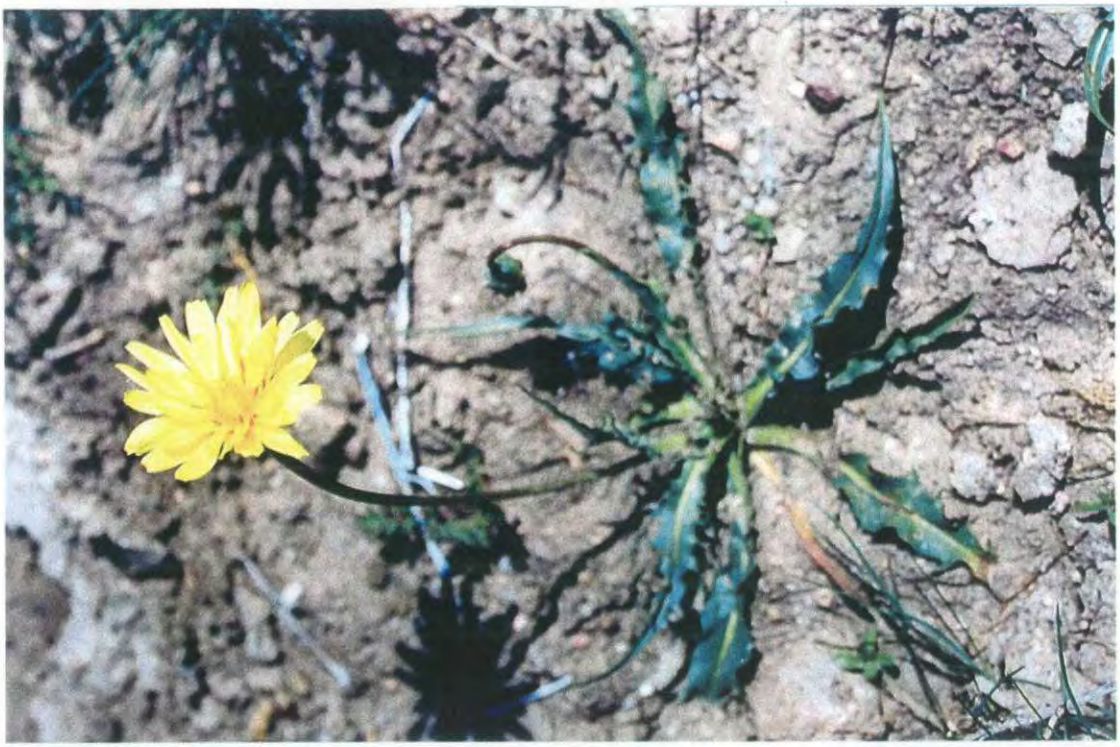
Habitat for Mojave Spineflower [Photo Credit: John Hale]



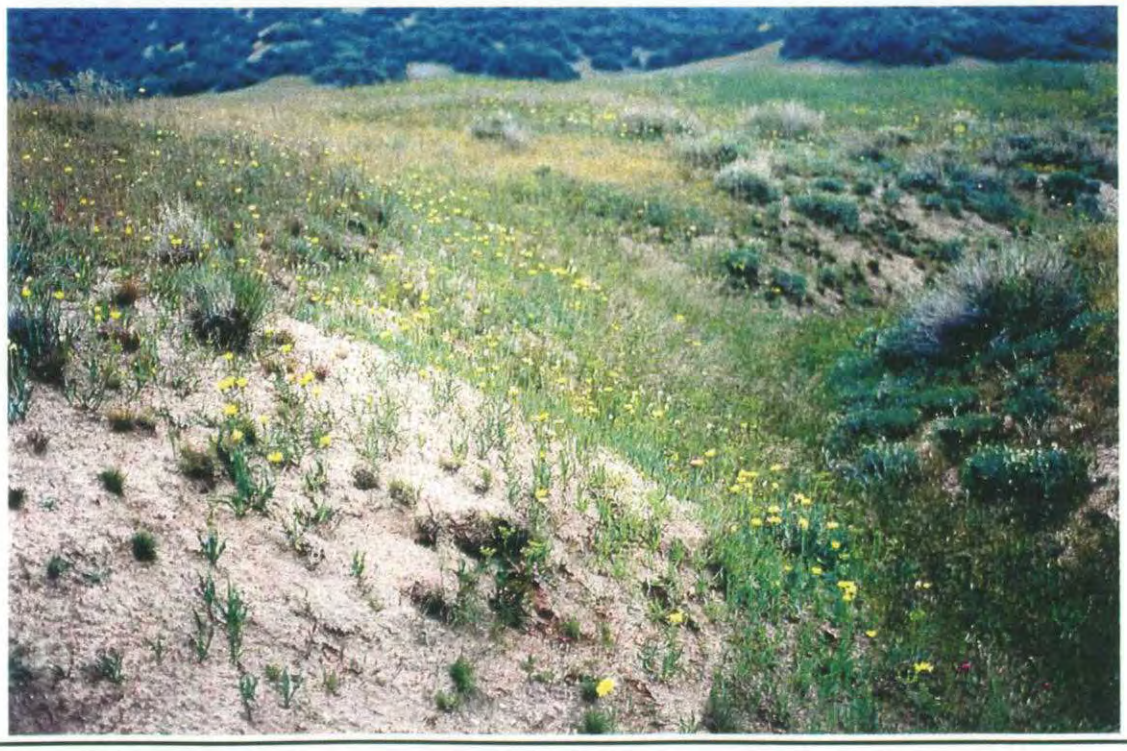
Round-leaved Filaree (*Erodium macrophyllum*) [Photo Credit: John Hale]



Habitat for Round-leaved Filaree [Photo Credit: John Hale]



Sylvan Microseris (*Microseris sylvatica*) [Photo Credit: John Hale]



Habitat for Sylvan Microseris [Photo Credit: John Hale]



Piute Mountains Navarretia (*Navarretia setiloba*) [Photo Credit: John Hale]



Habitat for Piute Mountains Navarretia [Photo Credit: John Hale]



Adobe Yampah (*Perideridia pringlei*) [Photo Credit: John Hale]



Habitat for Adobe Yampah [Photo Credit: John Hale]

APPENDIX 4-B

LIST OF ALL PLANT SPECIES IDENTIFIED IN THE STUDY AREA

Appendix 4-B. List of plant species observed on the Centennial Specific Plan Project Site during surveys conducted by Vollmar Consulting during spring and summer 2003. Scientific nomenclature corresponds to the Jepson Manual (Hickman, 1993). Asterisk (*) indicates non-native species; plus sign (+) indicates special-status species.

	FAMILY/Scientific Name	FAMILY/Common Name
	AMARANTHACEAE	AMARANTH FAMILY
*	*Amaranthus albus*	Tumbleweed
*	*Amaranthus retroflexus*	Red-root amaranthus
	APIACEAE	CELERY FAMILY
	Bowlesia incana	Hoary bowlesia
	Lomatium utriculatum	Common lomatium
+	*Perideridia pringlei*	Adobe yampah
	ASCLEPIADACEAE	MILKWEED FAMILY
	Asclepias californica	California milkweed
	Asclepias erosa	Desert milkweed
	Asclepias fascicularis	Narrow-leaved milkweed
	ASTERACEAE	SUNFLOWER FAMILY
	Achillea millefolium	California white yarrow
	Achyrachaena mollis	Blow wives
	Agoseris heterophylla	Mountain dandelion
	Agoseris retrorsa	Retrorse mountain dandelion
	Ambrosia acanthicarpa	Annual bur-sage
	Anaphalis margaritacea	Pearly everlasting
	Ancistrocarphus filagineus	Wooly fishhooks
	Artemisia douglasiana	Mugwort
	Artemisia tridentata ssp. tridentata	Big sagebrush
	Baccharis salicifolia	Mule fat
	Balsamorhiza deltoidea	Deltoid balsamroot
	Cirsium sp.	Thistle
*	*Centaurea solstitialis*	Yellow star-thistle
	Chaenactis glabriuscula var. glabriuscula	Common yellow chaenactis
	Chaenactis xantiana	Mojave pincushion
	Chrysothamnus nauseosus	Rabbitbrush
	Conyza canadensis var. canadensis	Western horseweed
	Coreopsis bigelovii	Bigelow's coreopsis
	Ericameria linearifolia	Narrowleaf goldenbush
	Erigeron breweri var. covillei	Brewer's daisy
	Eriophyllum confertiflorum var. confertiflorum	Golden yarrow
	Eriophyllum pringlei	Pringle's wooly sunflower
	Euthamia occidentalis	Western goldenrod
	Filago californica	California fluffweed
	Grindelia camporum var. camporum	Valley gumplant
	Helianthus annuus	Western sunflower
	Heterotheca grandiflora	Telegraph weed
	Heterothca sessiflora var. echioides	Golden aster
	Isocoma acradenia	Alkali goldenbush

	FAMILY/Scientific Name	FAMILY/Common Name
	Iva axillaris ssp. robusta	Poverty weed
*	*Lactuca serriola*	Prickly wild lettuce
	Lasthenia californica	California goldfields
	Layia glandulosa ssp. glandulosa	White layia
	Layia pentachaeta ssp. albida	White sierra layia
	Layia platyglossa	Tidy tips
	Lessingia lemmonii var. piersonii	Cudweed aster
	Macaeranthera canascens	Hoary aster
	Malacothrix californica	California cliff-aster
	Malacothrix coulteri	Snakeheads
+	*Microseris sylvatica*	Woodland microseris
	Monolopia lanceolata	Lanceolate monolopia
	Psilocarphus brevissimus var. brevissimus	Dwarf woolly-heads
	Senecio breweri	Brewer's butterweed
	Senecio flaccidus var. douglasii	Bush groundsel
	Solidago californica	California goldenrod
	Stephanomeria exigua ssp. coronaria	Wreath stephanomeria
	Stephanomeria virgata ssp. pleurocarpa	Wand stephanomeria
	Syntrichopappus fremontii	Fremont's syntrichopappus
+	*Syntrichopappus lemmonii*	Lemmon's syntrichopappus
	Uropappus lindleyi	Silver puffs
*	*Xanthium strumarium*	Cocklebur
	AZOLLACEAE	MOSQUITO FERN FAMILY
	Azolla filiculoides	Mosquito fern
	BORAGINACEAE	BORAGE FAMILY
	Amsinckia menziesii var. intermedia	Common fiddlenck
	Amsinckia menziesii var. menziesii	Menzies' fiddleneck
	Amsinckia tessellata var. gloriosa	Devil's lettuce
	Amsinckia tessellata var. tessellata	Devil's lettuce
	Cryptantha sp.	Cryptantha
	Heliotropium curassavicum	Wild heliotrope
	Pectocarya linearis ssp. ferocula	Slender pectocarya
	Pectocarya pennicillata	Hair-tufted pectocarya
	Pectocarya setosa	Setose pectocarya
	Plagiobothrys fulvus	Common popcornflower
	Plagiobothrys nothofulvus	Rusty popcornflower
	BRASSICAEAE	MUSTARD FAMILY
	Arabis pulchra var. pulchra	Rockcress
*	*Brassica nigra*	Black mustard
	Caulanthus coulteri	Coulter's jewelflower
*	*Descurainia sophia*	Tansy mustard
	Guillenia lasiophylla	California mustard
	Guillenia lemmonii	Lemmon's guillenia
*	*Hirschfeldia incana*	Summer mustard
*	*Lepidium latifolium*	Broad-leaved pepper- grass
	Lepidium nitidum	Common pepper-grass

	FAMILY/Scientific Name	FAMILY/Common Name
	Rorippa nasturtium-aquaticum	Water-cress
*	*Sisymbrium altissimum*	Tumble mustard
	Thysanocarpus curvipes	Lace pod
	Thysanocarpus laciniatus	Slender lace pod
	Tropidocarpum gracile	Twisted slender tropidocarpum
	CACTACEAE	CACTUS FAMILY
	Opuntia basilaris var. basilaris	Beavertail cactus
	CAPPARACEAE	CAPER FAMILY
	Isomeris arborea	Bladderpod
	CAPRIFOLIACEAE	HONEYSUCKLE FAMILY
	Sambucus mexicana	Blue elderberry
	Symphoricarpos rotundifolius var. parishii	Mountain snowberry
	CHENOPODIACEAE	GOOSE-FOOT FAMILY
*	*Chenopodium album*	White goosefoot
	CONVOLVULACEAE	MORNING-GLORY FAMILY
	Calystegia occidentalis ssp. fulcrata	Wild morning-glory
	Cressa truxillensis	Alkali weed
	CUCURBITACEAE	CUCUMBER FAMILY
	Cucurbita foetidissima	Stinking gourd
	Marah fabaceus	Man-root
	CUPRESSACEAE	CYPRESS FAMILY
	Juniperus californica	California juniper
	CUSCUTACEAE	DODDER FAMILY
	Cuscuta californica	California dodder
	CYPERACEAE	SEDGE FAMILY
	Carex sp.	Sedge
	Eleocharis macrostachya	Common spike-rush
	Scirpus acutus var. occidentalis	Viscid tule
	EPHEDRACEAE	EPHEDRA FAMILY
	Ephedra viridis	Green Mormon tea
	ERICACEAE	HEATH FAMILY
	Arctostaphylos glauca	Bigberry manzanita
	EUPHORBIACEAE	SPURGE FAMILY
	Chamaesyce albomarginata	Rattlesnake spurge
	Eremocarpus setigerus	Dove weed
	FABACEAE	PEA FAMILY
	Astragalus didymocarpus var. didymocarpus	Locoweed
	Astragalus douglasii var. douglasii	Douglas' locoweed
	Astragalus purshii var. tinctus	Pursh's dyed milk-vetch
	Lotus humistratus	Short-podded lotus
	Lotus scoparius	Deerweed
	Lotus strigosus var. strigosus	Strigose lotus
	Lotus wrangelianus	Wrangel's lotus
	Lupinus bicolor	Bicolored lupine
	Lupinus excubitus var. austromontanus	Interior bush lupine
	Lupinus formosus var. formosus	Summer bush lupine

	FAMILY/Scientific Name	FAMILY/Common Name
*	*Lupinus microcarpus var. densiflorus*	White-worled lupine
*	*Lupinus microcarpus var. microcarpus*	Chick lupine
*	*Medicago polymorpha*	Bur-clover
*	*Melilotus indica*	Yellow sweetclover
	Pediomelum californicum	California Indian beard
	Robinia pseudoacacia	Black locust
	Trifolium albopurpureum var. albopurpureum	Whitetip clover
	Trifolium gracilentum var. gracilentum	Pin-point clover
	Trifolium wildenovii	Tomcat clover
	Vicia americana ssp. americana	American vetch
*	*Vicia benghalensis*	Mediterranean vetch
	Vicia hassei	Vetch
	FAGACEAE	BEECH FAMILY
	Quercus chrysolepis	Canyon live or golden-cup oak
	Quercus douglasii	Blue oak
+	*Quercus john-tuckeri*	Tucker oak
	Quercus lobata	Valley oak
	Quercus wislizenii var. frutescens	Interior live oak
	GERANIACEAE	GERANIUM FAMILY
*	*Erodium botrys*	Long-beaked filaree
*	*Erodium cicutarium*	Redstem filaree
+	*Erodium macrophyllum*	Large-leaved erodium
	GROSSULARIACEAE	GOOSEBERRY FAMILY
	Ribes quercetorum	Oak gooseberry
	HYDROPHYLLACEAE	WATERLEAF FAMILY
	Emmenanthe penduliflora var. penduliflora	Yellow whispering-bells
	Eriodictyon crassifolium var. nigrescens	Black thickleaf yerba santa
	Nemophila menziesii ssp. menziesii	Baby blue-eyes
	Phacelia ciliata	Ciliate phacelia
	Phacelia egena	Rock phacelia
	Phacelia fremontii	Fremont's phacelia
	Phacelia tanacetifolia	Tansy-leaved phacelia
	Pholistoma membranaceum	White fiesta flower
	JUNCACEAE	RUSH FAMILY
	Juncus balticus	Baltic rush
	Juncus bufonius var. bufonius	Common toad rush
	Juncus effusus var. pacificus	Bog rush
	Juncus mexicanus	Mexican rush
	Juncus xiphioides	Iris-leaved rush
	LAMIACAEAE	MINT FAMILY
*	*Marrubium vulgare*	White horehound
	Salvia carduacea	Thistle sage
	Salvia columbariae	Chia
	Stachys albens	White hedge nettle
	Stachys bullata	California hedge nettle
	Trichostemma lanceolatum	Vinegar weed

	FAMILY/Scientific Name	FAMILY/Common Name
	LILIACEAE	LILY FAMILY
	Allium fimbriatum var. fimbriatum	onion
	Allium lacunosum ssp. davisiae	onion
	Bloomeria crocea	Common goldenstar
	Calochortus kennedyi ssp. kennedyi	Kennedy mariposa lilly
	Dichelostemma capitatum ssp. capitatum	Blue dicks
	Muilla maritima	Common muilla
	Triteleia hyacinthina	White triteleia
	Yucca whipplei	Our lord's candle
	LOASACEAE	LOASA FAMILY
	Mentzelia albicaulis	White-stemmed stickleaf
	LYTHRACEAE	LOOSESTRIFE FAMILY
	Lythrum californicum	California loosestrife
	MALVACEAE	MALLOW FAMILY
	Sidalcea malvaeflora ssp. sparsifolia	Checker bloom
	NYCTAGINACEAE	FOUR O'CLOCK FAMILY
	Mirablis californica	Wishbone bush
	ONAGRACEAE	EVENING PRIMROSE FAMILY
	Camissonia campestris ssp. campestris	Sun cups
	Clarkia purpurea ssp. quadrivulneris	Purple clarkia
	Epilobium canum	California fuschia
	Oenothera californica ssp. californica	White evening primrose
	Oenothera deltoides ssp. cognata	Dune evening primrose
	PAPAVERACEAE	POPPY FAMILY
	Argemone munita	Prickly poppy
	Eschscholzia californica	California poppy
	Platystemon californicus	Cream cups
	PINACEAE	PINE FAMILY
	Pinus sabiniana	Foothill pine
	POACEAE	GRASS FAMILY
	Acnatherum speciosum	Showy needlegrass
*	*Avena barbata*	Slender wild oat
*	*Bromus diandrus*	Ripgut grass
*	*Bromus hordeaceus*	Soft chess
*	*Bromus madritensis ssp. rubens*	Red brome
*	*Bromus tectorum*	Cheat grass
*	*Cynodon dactylon*	Bermuda grass
	Deschampsia danthonioides	Annual hairgrass
	Distichlis spicata	Coastal saltgrass
	Elymus multisetus	Big squirreltail
	Hordeum brachyantherum ssp. brachyantherum	Meadow barley
*	*Hordeum murinum ssp. leporinum*	Hare barley
	Leymus condensatus	Giant wild rye
	Leymus triticoides	Alkali rye-grass
	Melica imperfecta	Coast or small-flowered melic grass
	Muhlenbergia rigens	Deer grass

	FAMILY/Scientific Name	FAMILY/Common Name
	Nassella cernua	Nodding needlegrass
*	*Poa annua*	Annual bluegrass
	Poa bulbosa	Fruiting bluegrass
	Poa secunda ssp. secunda	One-sided bluegrass
*	*Polypogon monspeliensis*	Rabbitsfoot grass
*	*Schismus barbatus*	Bearded Mediterranean grass
*	*Secale cereale*	Cultivated rye
	Vulpia bromoides	Six-weeks fescue
	Vulpia microstachys var. microstachys	Fescue
	Vulpia microstachys var. pauciflora	Few-flowered fescue
	POLEMONIACEAE	PHLOX FAMILY
	Gilia aliquanta ssp. aliquanta	Gilia
	Gilia breccarium ssp. breccarium	Gilia
	Gilia capitata ssp. abrotanifolia	Gilia
	Gilia tricolor var. diffusa	Gilia
	Gilia tricolor var. tricolor	Gilia
	Linanthus bigelovii	Bigelow's linanthus
	Linanthus dichotomus	Evening snow
	Linanthus liniflorus	Flax-flowered linanthus
	Linanthus parryae	Parry's linanthus
	Linanthus parviflorus	Common linanthus
+	*Navarretia setiloba*	Piute mountain navarretia
	Phlox gracilis	Slender phlox
	POLYGONACEAE	BUCKWHEAT FAMILY
+	*Chorizanthe spinosa*	Mojave spineflower
	Chorizanthe xanti	Xantus' spineflower
	Eriogonum baileyi var. *baileyi*	Bailey's buckwheat
	Eriogonum elongatum var. *elongatum*	Long-stemmed buckwheat
	Eriogonum fasciculatum ssp. *polifolium*	Hoary California buckwheat
	Eriogonum nudum var. *westonii*	Weston's barestem buckwheat
	Eriogonum roseum	Wand buckwheat
	Eriogonum viridescens	Slender buckwheat
*	*Polygonum arenastrum*	Common knotweed
*	*Rumex crispus*	Curly dock
	Rumex hymenosepalus	Wild rhubarb
	Rumex salicifolius var. salcifolius	Willow dock
	PORTULACACEAE	PURSLANE FAMILY
	Calandrinia ciliata	Redmaids
	Claytonia exigua ssp. *exigua*	Little miner's lettuce
	Claytonia parvifolia ssp. *parviflora*	Small-flowered miner's lettuce
	Claytonia perfoliata ssp. *perfoliata*	Miner's lettuce
	ROSACEAE	ROSE FAMILY
	Adenostoma fasciculatum	Chamise
	RUBIACEAE	BEDSTRAW FAMILY
	Galium andrewsii ssp.andrewsii	Needle bedstraw
	Galium angustifolium ssp. angustifolium	Narrow-leaved bedstraw

	FAMILY/Scientific Name	**FAMILY/Common Name**
	Galium aparine	Catchweed bedstraw
	SALICACEAE	WILLOW FAMILY
	Populus fremontii	Fremont cottonwood
	Salix exigua	Sandbar willow
	Salix gooddingii	Gooding's black willow
	Salix laevigata	Red willow
	Salix lasiolepis	Arroyo willow
	SAURURACEAE	LIZARD-TAIL FAMILY
	Anemopsis californica	Yerba mansa
	SCROPHULARIACEAE	SNAPDRAGON FAMILY
	Castilleja affinis var. *affinis*	Coastal paintbrush
	Castilleja exserta ssp. *exserta*	Purple owl's-clover
	Collinsia bartisaefolia var. *davidsonii*	Collinsia
	Keckiella breviflora var. *breviflora*	Small-flowered keckiella
	Keckiella ternata var. *septontrionalis*	Blue-stemmed keckiella
	Mimulus fremontii	Fremont's monkeyflower
	Mimulus guttatus	Common streamside monkeyflower
	Penstemon centranthifolius	Scarlet bugler
	Penstemon heterophyllus var. *heterophyllus*	Penstemon
	Veronica anagallis-aquatica	Common speedwell
	SOLANCAEAE	NIGHTSHADE FAMILY
	Datura wrightii	Jimson weed
	Nicotiana quadrivalvis	Indian tobacco
	TAMARICACEAE	TAMARISK
*	*Tamarix parviflora*	Small-flowered salt cedar
	VIOLACEAE	VIOLET FAMILY
	Viola purpurea ssp. *quercetorum*	Mountain violet
	VISCACEAE	MISTLETOE FAMILY
	Phoradendron villosum	Oak mistletoe

5.0 PERENNIAL BUNCHGRASS PLANT COMMUNITY STUDY

5.1 Introduction

This section of the report summarizes the methods and results of an ecological study of the sensitive perennial bunchgrass plant community that dominates the broad central and southeastern regions of the study area. This plant community is characterized by a high cover of native perennial bunchgrasses and wildflowers, and a conspicuously low cover of introduced annual grasses. Historically, this community type is thought to have occurred throughout much of interior lowland California but has been almost entirely replaced by invasive annual grasses introduced during Europeans settlement (Heady, 1995; Keeley, 1990). While individuals and small clusters of bunchgrasses occur sporadically throughout California's annual grasslands, there are currently no more than a couple of dozen moderate- to high-quality perennial bunchgrass community stands documented in California, most of which are smaller than 300 acres in total area (Barry, 1972). Given its extreme rarity and endangerment, the perennial bunchgrass community is considered a sensitive habitat by the State of California. Table 5.1 summarizes the current perennial bunchgrass community sites known to occur in California.

This plant community was identified during 2003 surveys as an herbaceous community, and was described in the 2003 report as "dominated by a mix of native and non-native forbs and native perennial bunchgrasses." The perennial bunchgrass component of the community appeared sub-dominant to the wildflower component in 2003 because of the favorable rains of 2002/2003 and the subsequent showy 2003 spring wildflower display. Our continued plant community study during the below average rainfall of 2003/2004, however, demonstrated that this community is indeed dominated by perennial bunchgrass species with a conspicuous wildflower component, and an unusual lack of introduced annual grass species. Quite frankly, we have rarely seen extensive intact perennial bunchgrass stands of this nature, and it required a second year, with the wildflower component absent, to recognize the habitat as a perennial bunchgrass community.

The perennial bunchgrass community on the site is unique in California for its total size and quality. It incorporates approximately 5,500 continuous acres distributed across a distinct geomorphic feature consisting of a series of weathered ridges and terraces formed from old and very old alluvium. The stand has minimal intrusion of introduced annual grasses and a high richness of bunchgrass species. Six different species occur within the stand. Four of these are either dominant or subdominant and form a complex matrix with semi-predictable distribution patterns across the ridges and terraces based on landscape position. During favorable rain years, such as 2002/2003, the community supports a diverse, showy array of more than 70 native wildflower species. These species were also found to be highly stratified by landscape position.

This study was conducted to determine the overall distribution of the bunchgrass community within the study area and to assess its habitat quality across different landscape positions (i.e. floodplains, hill slopes, ridge tops, etc.). The study also compares the perennial bunchgrass stand on the site with other known stands in the region and across the state based on a review of available literature and reconnaissance-level site visits to known occurrences. The results of this study can be used to assess relative potential impacts of the proposed project to the perennial

bunchgrass community in different regions of the study area and locally on specific landscape features, and to develop approaches for avoiding or minimizing these impacts.

This section begins with a landscape and habitat characteristics associated with the bunchgrass community. A full discussion of the perennial bunchgrass plant community study then follows with a description of the methods, results, and discussion. Statistical tables of data analyses are provided in appendices.

Table 5.1 Statewide perennial bunchgrass plant communities in California (Barry, 1972, Dremann, 2003, and Vollmar and Vos, pers. comm., 2004)

County	Location	Acres	Quality
Colusa	Salt Creek Canyon	200	Good
Lassen	Lynn's Prairie	2,500	Excellent
Los Angeles	Hungry Valley State Vehicular Recreation Area	3,000	Fair
Los Angeles	**Centennial Specific Plan Project Site**	**5,500**	**Excellent**
Los Angeles	Terrace Deposits Northeast of Centennial Specific Plan Project Site	3,000 – 4,000	Good - Excellent
Kern	Wind Wolves Preserve	300	Fair
San Luis Obispo	Cal. State Poly College	300	Excellent
San Luis Obispo	Montana de Oro State Park	<50	Fair
San Luis Obispo	Camp San Luis Obispo Military Reserve	Unknown	Unknown
San Luis Obispo/Monterey	Camp Roberts Military Reserve	1,500 – 2,000	Fair - Excellent
San Luis Obispo	Carrizo Plain National Monument	Unknown	Fair
Solano	Dozier North & South	1,000	Excellent
Solano	Leutholz Ranch & Rio Vista Jct.	150	Fair
Sonoma	Bennett Mtn./Annadel State Park	550	Fair

5.2 Background Landscape and Plant Community Information

5.2.1 Landscape Setting

5.2.1.1 Regional Geography

The study area, and its associated bunchgrass community, is situated at the junction of three major geographic provinces: the Mojave Desert Province to the east, the Western Transverse Ranges to the west, and the Sierra Nevada Province (the Tehachapi Range) to the north (see Figure 3.1). The boundaries between these provinces are defined by California's two largest faults: the San Andreas Fault, which divides the Mohave Desert Province from the Transverse Ranges; and the Garlock Fault, which divides the Mohave Desert Province from the Tehachapi Range. The study area technically resides on the far western tip of the Mojave Desert Province but is directly bordered by the foothills of the Tehachapi Ranges to the north and northeast, and the foothills of the Western Transverse Ranges to the south and southwest. Each of these provinces has a unique set of geographical, tectonic, geological, and biological characteristics that strongly influence landscape and plant community characteristics within the study area including the occurrence, quality, and diversity of the perennial bunchgrass community.

5.2.1.2 Climate

The junction of the Tehachapi Ranges and Western Transverse Ranges creates a 'notch' just west of the study area that has several effects on the local climate. High winds are common across the study area throughout the year due to channeling of coastal winds through the notch. These winds undoubtedly cause accelerated erosion and drying of exposed ridge top soils. This notch also appears to influence the local rainfall levels and associated plant communities across a gradient that extends from a few miles west of the study area to a few miles east of the study area. Though rainfall data were not obtained for this report, the drop in rainfall across the site from west to east is apparent in the change in plant communities. Just west of the study area, the dominant plant communities are introduced annual grasslands, oak woodlands, and chaparral. Within the central study area, the dominant habitat is perennial bunchgrass community and annual grasslands. Less than a mile east of the study area, the dominant habitat is desert scrub. The rainfall gradient across the study area is more gradual than in regions north and south of the study area that are blocked by tall mountains of the Tehachapi and Western Transverse Ranges. These areas have a more dramatic rainshadow effect and, typically, a more abrupt transition from mountain forest and scrub communities to desert scrub communities. The more gradual rainfall gradient across the study area region, and the specific rainfall patterns within the study area, appear to be significant factors influencing the presence and quality of the perennial bunchgrass community within the study area.

5.2.1.3 Geology and Geomorphology

The geologic formations within and adjacent to the study area provide a rough geologic and geographic history of the region going back more than 300 million years (see full discussion in Section 3.0). This history shows a beginning as a deep marine environment; followed by metamorphosis of the sea floor deposits into limestone beds; uplift of these beds by intruding

Tehachapi granite; eruption of andesite volcanic flows along the young San Andreas Fault Zone; slow uplift of the area between the Tehachapis and Transverse Ranges (western Mohave Block) creating first a shallow marine or estuarine environment, followed by a mixed continental and lake environment; and, finally, the extensive disgorgement of alluvium (mostly granitic) from the Tehachapis and Transverse Ranges. These geologic formations each have distinct landscape characteristics and soils that strongly influence the diversity and abundance of plant species.

The predominant geologic formations in the broad central and southeastern regions of the study area include 12 million year old Continental Deposits and 100,000 to one million year old Terrace Deposits (see Figure 3.3, Table 3.1). The perennial bunchgrass community occurs primarily on these formations. Together, these formations form a distinct, unified geomorphic feature that includes a series of generally west to east oriented ridges and intervening drainages and associated alluvial terraces. The terrain and orientation of the ridges creates a natural set of distinct landscape positions within the perennial bunchgrass community including alluvial plains, floodplains, south-facing slopes, ridge tops, north-facing slopes, and terrace tops. Limestone soils are also included as an additional landscape position since the associated plant species on these soils are so distinct. These landscape positions have differences in slope, aspect, soils, and disturbance that strongly influence plant species richness and cover. Soils on the ridge tops and upper slopes are thin, excessively drained gravelly and coarse sandy loams. Soils on the intervening floodplains, lower hill slopes, and terrace tops have a similar texture but are deeper.

5.2.1.4 Regional Flora

Each of the three geologic provinces in the region has distinct floristic characteristics due to differences in geology, climate, and other factors. The immediate region of the study area is located where the floras of these three provinces merge. It is also a region where the floras of the mountains of southern and northern California merge, and, to a lesser degree, the floras of the coastal regions and the Great Central Valley. This merging of different floras is evident in the large number of native wildflower species present in the study area. The richness of perennial bunchgrass species, with six species present, is due to the merging of desert, southwest, and interior lowland California bunchgrass species.

5.2.2 Perennial Bunchgrass Characteristics

5.2.2.1 General Community Description

The perennial bunchgrass community is characterized by a relatively high cover of native perennial bunchgrasses and wildflowers, and a conspicuously low cover of introduced annual grasses. A total of six bunchgrass species occur in the study area. Foothill needlegrass (*Nasella cernua*) and one-sided bluegrass (*Poa secunda* ssp. *secunda*) are the dominant species within the bunchgrass community. Big squirreltail (*Elymus multisetus*) and desert needlegrass (*Achnatherum speciosum*) are sub-dominants. Two other bunchgrass species, small-flowered melic grass (*Melica imperfecta*) and giant wild rye (*Leymus condensatus*), occur sporadically on the site but neither is a significant component of the perennial bunchgrass community. The native sod-forming grass creeping wildrye (*Leymus triticoides*) occurs on low-lying floodplains.

Common native wildflowers within the perennial bunchgrass community include devil's lettuce (*Amsinckia tessellata* var. *tessellata*), purple owl's-clover (*Castilleja exserta* ssp. *exserta*), California poppy (*Eschscholzia californica*), California goldfields (*Lasthenia californica*), common lomatium (*Lomatium utriculatum*), miniature lupine (*Lupinus bicolor*), California cliff-aster (*Malacothrix californica*), rusty popcornflower (*Plagiobothrys nothofulvus*), white-tip clover (*Trifolium albopurpureum* var. *albopurpureum*), pin-point clover (*Trifolium gracilentum* var. *gracilentum*), and silver puffs (*Uropappus lindleyi*). More than 60 other wildflower species also occur within the community (see plant list in Appendix 4-B). During early to mid spring, there are showy displays of these native wildflowers. In late spring and early summer, the wildflowers decline and perennial bunchgrasses become more prominent.

There are only a limited number of non-native forbs within the bunchgrass community. Red-stem filaree (*Erodium cicutarium*) is the only dominant. There are stands of non-native annual grassland intermixed within the bunchgrass community. Common species include red brome (*Bromus madritensis* ssp. *rubens*), cheatgrass (*Bromus tectorum*), ripgut (*Bromus diandrus*), soft chess (*Bromus hordeaceus*), and wild oats (*Avena fatua*). These grasslands typically dominate only in areas with deeper, accumulated soils such as floodplains and lower hill slopes.

5.2.2.2 Description of Perennial Bunchgrass Species

Four perennial bunchgrass species occur as either dominants or sub-dominants within the perennial bunchgrass community. The general distribution and habitat characteristics of these species are described below.

Nodding Needlegrass (*Nasella cernua*)

Nodding needlegrass historically occurred as a common to dominant species in drier bunchgrass communities in the Transverse Ranges, Peninsular Ranges, and South Coast Ranges in southwestern California, and the northern Baja Peninsula in Mexico. It also occurred in isolated pockets further north in the interior North Coast Ranges. It occurs in more arid climates than the more northern purple needlegrass (*Nasella pulchra*), typically in areas with less than 12 to 14 inches of annual rainfall. The decline of the species is due to competition with non-native annual grasses. The species currently occurs only sporadically, typically as scattered individuals or small stands within non-native annual grasslands. Large, dense stands such as that found in the study area are very rare. There have been efforts to list the species due to its current rarity and endangerment (Dremann, 2004).

Within the study area, nodding needlegrass is a dominant on upper southern slopes, ridge tops, and terrace tops on Continental Deposits and Terrace Deposits in the central and southeastern regions of the study area. Nodding needlegrass is considered a "climax" grassland species and large clumps were occasionally observed in the study area.

One-sided Bluegrass (*Poa secunda* ssp. *secunda*)

One-sided bluegrass is a widespread species, ranging from Alaska through California to northwestern Mexico and east to the Rocky Mountains. It also occurs in South America. The species is a common component of bunchgrass communities in the western United States. Like

other bunchgrass species, one-sided bluegrass has experienced significant declines due to competition with invasive annual grasses. While the species remains more common than nodding needlegrass, it typically occurs now as scattered individuals or isolated stands within introduced annual grasslands. Large dense stands such as that found in the study area are uncommon.

Within the study area, one-sided bluegrass is a dominant on northern slopes, ridge tops, and terrace tops on Continental Deposits and Terrace Deposits in the central and southeastern regions of the study area. Isolated stands also occur on north slopes within areas mapped as Santa Margarita Formation in the southwest and north central regions of the study area.

Big Squirreltail (*Elymus multisetus*)

Big squirreltail grass is also a widespread bunchgrass species, ranging from Washington through California and east to the Rocky Mountains. More locally, it occurs occasionally to commonly in the foothills of Kern County as a component of grassland and oak woodland communities, where it is typically found on open rocky or sandy soils. Little information is available on the historic or current status of the species in terms of abundance and decline.

Within the study area, big squirrel tail occurs in scattered clusters primarily on upper slopes and terrace tops on Continental Deposits and Terrace Deposits in the central and southeastern regions of the study area. Big squirreltail grass is considered a "colonizer" grassland species.

Desert Needlegrass (*Achnatherum speciosum*)

Desert needlegrass is a robust desert or arid climate species, restricted to areas with low annual rainfall. It is fairly widespread, extending from the lower slopes of the Tehachapi Mountains east to Colorado and south to Arizona and Northern Mexico. It also occurs in South America. It typically occurs on coarse-textured soils, often on alluvial fans. Desert needlegrass occurs in a variety of desert habitat types including the desert scrub habitat that begins just east of the study area. Its occurrence in the study area within a strict perennial bunchgrass community is unusual and represents the westernmost range limit of the species in the region. This species apparently has not experienced the same dramatic declines as nodding needle grass and purple needle grass since it grows in areas with less competition from introduced annual grasses. Cheatgrass (*Bromus tectorum*), an introduced annual grass common in arid regions of the west, is of concern as a competitor (Rafferty and Young 2002).

Within the study area, desert needlegrass occurs on thinner, more sandy and droughty soils, primarily on ridge tops and upper slopes on Continental Deposits and Terrace Deposits in the central and southeastern regions of the study area. Desert Needlegrass is considered a "climax" grassland species and large clumps were common in the study area.

5.2.2.3 Plant Community Classification

The two most commonly used classification systems for California's terrestrial plant communities are Holland's *Preliminary Descriptions of the Terrestrial Natural Communities of California* (1986) and Sawyer and Keeler-Wolf's *A Manual of California Vegetation* (1995).

These two classification systems follow different approaches. Holland identifies different plant communities based on a common set of landscape characteristics and associated plant species. Sawyer and Keeler-Wolf identify vegetation series dominated by one or more specific plant species. The Holland classification system is used as a reference for plant communities for this report given its broader, more ecologically-based approach to classification.

The perennial bunchgrass community in the study area is a composite of three different herbaceous Holland plant community types. Valley Needlegrass Grassland, One-sided Bluegrass Grassland, and Wildflower Fields. These three community types occur together primarily on thin soils along ridges, upper hill slopes, and terrace tops. Two other community types are interspersed within the bunchgrass community. Non-native Annual Grassland occurs primarily in areas with deeper, accumulated soils on lower south-facing slopes and on floodplains. Valley Wildrye Grassland occurs primarily on seasonally moist floodplains and lower north-facing slopes. Table 5.2 summarizes these community types and also compares them to Sawyer and Keeler-Wolf vegetation series for reference.

Valley Needlegrass Grassland, One-sided Bluegrass Grassland, and Wildflower Fields are all identified as "sensitive" plant communities by the State of California based on statewide rarity and continuing decline. Occurrences of these communities are included in the CDFG's Natural Diversity Data Base (CNDDB 2004). Valley Wildrye Grassland is not a sensitive plant community. Non-native Annual Grassland is an introduced plant community.

Table 5.2. Individual plant community types within the perennial bunchgrass community on the Centennial Specific Plan Project Site.

Holland Plant Community	Description	CDFG Status	Related Sawyer and Keeler-Wolf Series
Valley Needlegrass Grassland	A native grassland dominated by perennial, tussock-forming purple needlegrass (*Nasella pulchra*) in northern and central California and nodding needlegrass in southern California; native and introduced annuals occur between the perennials, often exceeding the bunchgrass cover. One-sided blue grass is often a component of this community. Formerly extensive around Sacramento, San Joaquin, Salinas Valley, and the Los Angeles Basin but now much reduced.	Sensitive Plant Community	Foothill Needlegrass Series
One-sided Bluegrass Grassland (also Pine Bluegrass Grassland)	A native grassland dominated by one-sided bluegrass with high cover and constancy of several native forbs. Often on toe slopes, protected slopes, and clay flats. Occurs at lower elevations primarily along the inner South Coast Ranges.	Sensitive Plant Community	One-sided Bluegrass Series
Wildflower Field	An amorphous grab bag of herb-dominated types noted for conspicuous annual wildflower displays; dominance varies from site to site and from year to year at a particular site. Usually on fairly poor sites (droughty, low in nutrients) with reduced competition from annual grasses. Associated habitats include grasslands and oak woodlands.	Sensitive Plant Community	No related series.
Valley Wildrye Grassland	A dense prairie sod dominated by creeping wildrye. Occurs on low-lying, moist sites, often adjacent to riparian habitat or freshwater marsh. Scattered widely throughout the Central Valley, other interior valleys and the surrounding lower foothills.	No Status	Creeping ryegrass series
Non-native Grassland	A dense to sparse cover of primarily introduced annual grasses. Often with numerous associated species of showy, native wildflowers, especially in years of favorable rainfall.	No Status	California annual grassland series

5.3 Methods

Field data were collected during the 2003 and 2004 field seasons. The 2003 surveys focused on determining the general distribution of the perennial bunchgrass community within the study area and its relative habitat quality on different landforms and landscape positions. The 2004 surveys focused on clarifying the local, distribution patterns of bunchgrass community and non-native annual grasslands within areas identified from the 2003 survey data as high potential habitat for bunchgrass community. The methods for each year are summarized separately below. Field data was collected using standard vegetation community sampling metholdogy (Mueller-Dombois, and Ellenberg, 1974).

5.3.1 2003 Field Surveys

During 2003, field sampling was conducted within seven different dominant landscape positions present in the study area. During earlier surveys, John Vollmar, senior botanist for the study, had noted apparent differences in plant species diversity and richness among these landscape positions especially relating to cover and richness of native versus non-native grasses and forbs versus bunchgrasses. The sampled landscape positions included:

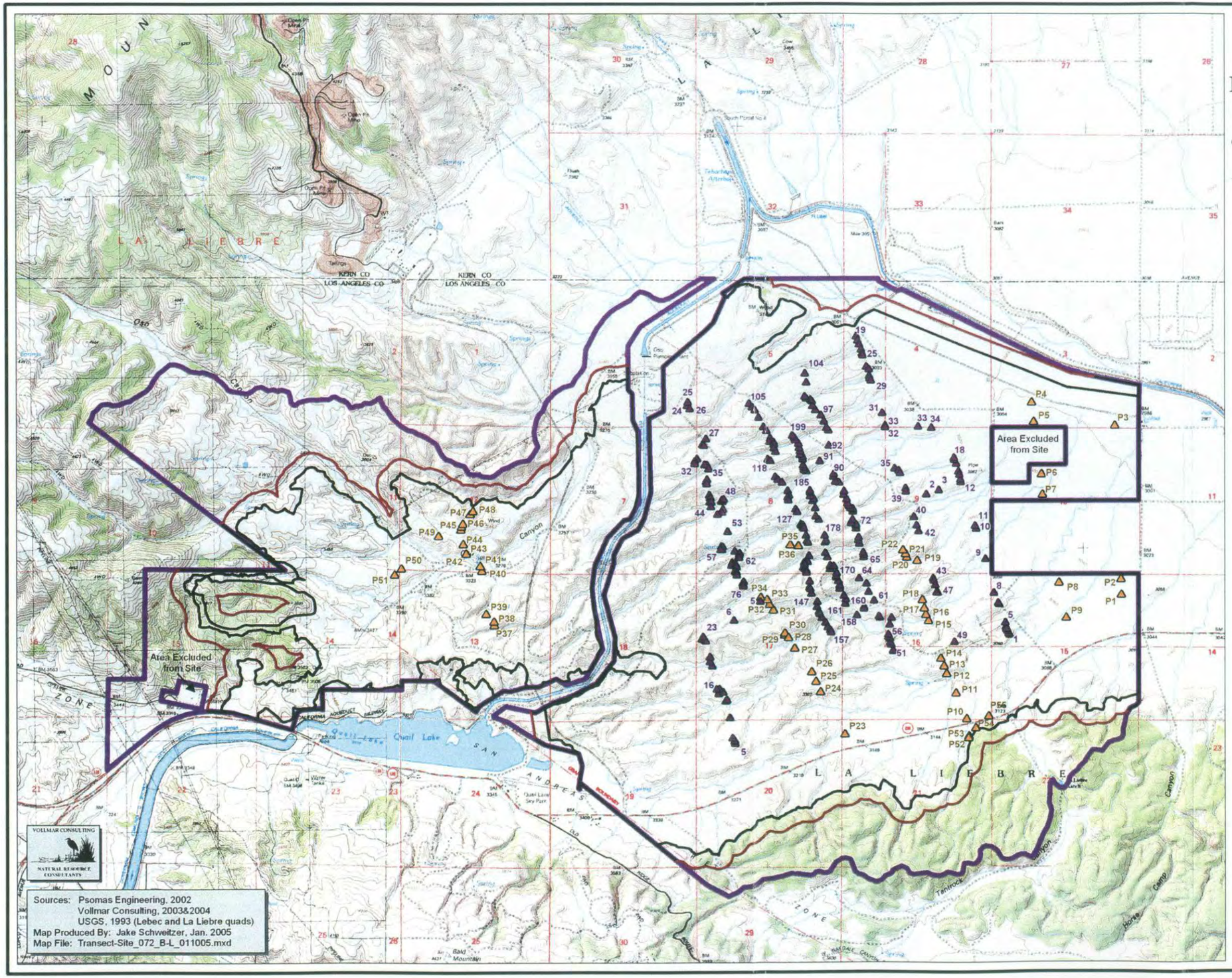
- Disturbed Alluvial Plains
- Floodplains
- South-facing Slopes
- Ridge Tops
- North-facing Slopes
- Terrace Tops
- Limestone Soils

Field work was conducted April 28-29, 2003 by John Vollmar and John Hale. Sampling was conducted within fifty-five 10 x 3 meter plots placed along ten transects traversing the study area (Figure 5.1). Plots locations were stratified by landscape position. Actual plot locations were randomized by selecting a point while walking along the transect and then pacing fifty steps along the transect to the plot location. Two types of data were collected within each plot. First, all plant species within the entire plot were recorded. Then, three one-meter square quadrats were placed along the center line of the plot (one in the center and one at each end) and the absolute cover of each species present within each quadrat was recorded. Together, these data provided information on species richness and cover. Table 5.3 summarizes the number of plots per landscape position.

John Vollmar and Michael Weiler entered all field data into a spreadsheet, performed basic analyses, and prepared the report. Data were separated by landscape position. Within each position, plant species were separated by plant type including native forbs, native annual grasses, native perennial bunchgrasses, native perennial sod grasses, native shrubs, non-native forbs, and non-native annual grasses. Relative cover values were calculated from absolute cover. Basic statistics were generated using statistical software (MiniTab Version 13) for each landscape position and plant type within each position. Descriptive statistics and Mann-Whitney significance tests were generated for each landscape position by plant type.

FIGURE 5.1
Plant Community Sampling Plots in Relation to Site Geography

Locations of 2003 & 2004 Perennial Bunchgrass Plant Community Sampling Plots in Relation to Site Geography
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Legend

- 2003 Perennial Bunchgrass Community Sampling Plot (including ID number)
- 2004 Perennial Bunchgrass Community Sampling Plot (including ID number)
- Impact Area
- 500ft Buffer from Impact Area
- Project Planning Boundary

VOLLMAR CONSULTING
NATURAL RESOURCE CONSULTANTS

Sources: Psomas Engineering, 2002
Vollmar Consulting, 2003&2004
USGS, 1993 (Lebec and La Liebre quads)
Map Produced By: Jake Schweitzer, Jan. 2005
Map File: Transect-Site_072_B-L_011005.mxd

N
W E
S

40 Acres

1:42,000
(1in = 3,500ft at tabloid layout)

0 875 1,750 Meters

0 1,750 3,500 7,000 Feet

Table 5.3 Number of plots per landscape position sampled in the perennial bunchgrass plant community study conducted in 2003 and 2004 by Vollmar Consulting, Centennial Specific Plan Project Site, Los Angeles County, California

Landscape Position	Number of Plots, 2003	Number of Plots, 2004
Disturbed Alluvial Plain	9	0
Floodplains	9	20
North-facing Slopes (Mid-slope)	9	N/A
North-Facing, Lower, Concave Slopes	N/A	26
North-Facing, Lower, Convex Slopes	N/A	19
North-Facing, Upper, Concave Slopes	N/A	23
North-Facing, Upper, Convex Slopes	N/A	36
Ridge tops	8	56
Terrace Tops	4	0
South-Facing Slopes (Mid-slope)	9	N/A
South-Facing, Upper, Convex Slopes	N/A	33
South-Facing, Upper, Concave Slopes	N/A	18
South-Facing, Lower, Convex Slopes	N/A	16
South-Facing, Lower, Concave Slopes	N/A	31
Limestone Soils	6	0
Total Number of Plots:	**55**	**278**

5.3.2 2004 Field Surveys

Field sampling in 2004 was restricted to the weathered ridge system in the central-eastern region of the study area. This landform was identified from the 2003 field data as supporting high-quality perennial bunchgrass community. The 2004 field surveys continued the study of species distribution across landscape positions but further stratified the landscape positions and focused primarily on the distribution of perennial bunchgrasses versus non-native annual grasses to better describe the quality of the bunchgrass community, more precisely map its local distribution within identified habitat, and compare its quality to other known bunchgrass stands in the state.

Ten landscape positions were surveyed in 2004. Two of the 2003 landscape positions (disturbed alluvial plains and limestone soils) were not surveyed in 2004. Also, the north- and south-facing slopes were further stratified by slope position (upper and lower) and topography (convex and concave) to assess plant species distribution in relation to microtopography. Thus, the following ten landscape positions were surveyed:

- Floodplains
- North-Facing, Lower, Concave Slopes
- North-Facing, Lower, Convex Slopes
- North-Facing, Upper, Concave Slopes
- North-Facing, Upper, Convex Slopes
- Ridge tops
- South-Facing, Lower, Concave Slopes
- South-Facing, Lower, Convex Slopes
- South-Facing, Upper, Concave Slopes
- South-Facing, Upper, Convex Slopes

Disturbed alluvial plains were not included since the 2003 data clearly showed that bunchgrass species do not occur on this landform. Limestone soils were not included since these soils occur in a few localized areas mostly outside of the 2004 study region.

Field sampling was conducted on June 17, 2004 by John Vollmar, Gretchen Vos, Jeffrey Congero, and Ayzik Solomeshch. Sampling was conducted along parallel transects laid out perpendicular to the ridgelines (roughly north to south) and separated by 300 meters. Transect locations were loaded into a professional GPS unit (Trimble GeoXT) which was used to navigate along transects. Data were collected within 278 10 x 3 meter plots placed in targeted landscape positions along the transects. Surveyors placed plots in these positions as they were encountered along a transect. In some cases, surveyors moved laterally away from transects to establish plots in under-represented positions (especially for upper concave and lower convex slope positions). Table 5.3 summarizes the number of plots per landscape position. Table 5.15, in Appendix 5, summarizes transects, plots, and landscape positions. Environmental and floristic data were collected within each plot. Environmental data included landscape position, aspect, percent slope, slope position, microtopography, soil condition and parent material. Floristic data included relative percent cover for individual perennial bunchgrass and annual grass species, combined forbs, and bare ground. Transects and plot locations are shown on Figure 5.1.

Upon completion of the sampling, Gretchen Vos entered all field data into a spreadsheet and performed basic statistical analyses. Data were separated by landscape position for each perennial and annual grass species, combined forb species, and bare ground. Basic statistics were generated using statistical software (MiniTab Version 13). Descriptive statistics and Mann-Whitney significance tests were generated for each landscape position by individual grass species, combined forb species, and bare ground.

Mean cover values were used to assess and describe the distribution of individual and combined bunchgrass species and introduced annual grasses within the study site. The threshold for determining dominance of combined perennial bunchgrasses versus annual grasses was 20% relative cover. For individual bunchgrass species, high potential habitat for nodding needle grass and one-sided bluegrass included landscape positions with >10% mean cover values for these species. These species are common with relatively continuous distributions across the landscape. High potential habitat for big squirreltail and desert needlegrass included landscape positions with >1% mean cover values for these species. These species are less common than the other two species and have highly clustered distributions across the landscape. [Standardized criteria for determining thresholds of cover dominance in grassland communities are not well established in the literature. The relative cover thresholds are based on conservative estimates based on field observations].

Soil samples were randomly collected at 100 of the 278 plots in all ten landscape positions. Table 5.16 in Appendix 5 lists the soil sample plot locations. Soil samples were collected from the top horizon (upper 6") from one location in each plot. Forty-six of the 100 samples, stratified by landscape position, were sent to a lab for analysis. Soils were analyzed for percent organic matter, major and minor cations, cation exchange capacity and pH. Mean values were calculated for percent organic matter, cation exchange capacity, and pH for each landscape position. Basic statistics were generated using statistical software (MiniTab Version 13).

5.4 Results

The field surveys conducted in 2003 and 2004 served different goals. As described above, the 2003 surveys focused on determining the general distribution and relative habitat quality of the perennial bunchgrass community throughout the study area while the 2004 surveys focused on clarifying the local distribution patterns of bunchgrasses, forbs and non-native annual grasses within mapped high-quality perennial bunchgrass habitat. Given these different goals and associated data collection methods, results for the two years are presented separately below. The interpretation of these results is integrated in the Discussion section.

5.4.1 2003 Field Surveys

Table 5.4 lists all plant species recorded in sampled plots. Species are separated by plant type (i.e. native forbs, native perennial bunchgrass, etc.). The abundance of each species within each landscape position is noted as either dominant (>10% mean cover), subdominant (2-10% mean cover), or uncommon (<2% mean cover). Table 5.5 summarizes the means for species richness, absolute cover, and relative cover by plant type and landscape position. The means for bare soil by landscape position are also included with the absolute cover values. Appendix 5 includes five tables (Table 5.9-5.13) summarizing descriptive statistics and Mann-Whitney tests for significance for richness, relative plant cover, and bare soil cover. Most of differences were found to be very significant (0.01 confidence level) to significant (0.05 confidence level).

Mean native richness and cover was high on south-facing slopes, ridge tops, north-facing slopes, and limestone soils and low on disturbed alluvial plains and floodplains. Terrace tops were mixed with a high mean cover of native species but a low mean richness.

Mean non-native richness and cover values were generally the inverse of the native values, with high non-native values recorded on disturbed alluvial plains and floodplains and low values recorded on south-facing slopes, ridge tops, north-facing slopes, and terrace tops. Limestone soils had a low cover of non-native plants but a high number of species due to the presence of a several non-native annual grass species in most plots. Most of the non-native cover on south-facing slopes, ridge tops, north-facing slopes, and terrace tops came from one species, red-stem filaree. Among native species, mean richness and cover of native wildflowers were both high on south- facing slopes and limestone soils and low on disturbed alluvial plains and floodplains.

Ridge tops and north-facing slopes had high wildflower richness but moderate relative cover. Terrace tops had low wildflower richness and moderate relative cover. Mean richness and cover of native perennial bunchgrasses were high on ridge top, north-facing slopes, and terrace tops, low to moderate on south-facing slopes and limestone soils, and very low on floodplains. No perennial bunchgrasses were recorded on disturbed alluvial plains.

Interestingly, the richness and cover of native bunchgrasses was inversely correlated with the richness and cover of native wildflowers on most landscape positions. This is most likely due to competition for space. On all landscape positions except disturbed alluvial plains and floodplains, the combined relative cover of native wildflowers and bunchgrasses was around 50-60%. Where the cover of native wildflowers was highest (south-facing slopes and limestone

soils), the cover of native bunchgrasses was lowest; where the cover of native wildflowers was lowest (ridge tops and north-facing slopes), the cover of native bunchgrasses was highest. Where the cover of native wildflowers was moderate (terrace tops), the cover of native bunchgrasses was also moderate. These correlations did not occur on disturbed alluvial plains and floodplains. Native bunchgrasses were generally absent on these surfaces and native wildflowers had a low cover and richness.

Non-native annual grasses had the highest richness on limestone soils and floodplains, moderate richness on disturbed alluvial plains and south-facing slopes, and lowest richness on ridge tops, north-facing slopes and terrace tops. The highest relative cover was recorded on south-facing slopes, moderate covers were recorded on floodplains and limestone soils, and low covers were recorded on disturbed alluvial plains, ridge tops, north-facing slopes, and terrace tops.

Perennial sod grass (i.e. creeping wildrye) was only recorded on floodplains. Native annual grasses and native shrubs were each recorded on five of the seven landscape positions but in such low cover values that no conclusions can be made.

The cover of bare soil varied greatly among the landscape positions. The cover values were directly associated with soil depth on the various landscape positions. The thin, weathered ridge top soils had the highest mean cover of bare soil. Adjacent south-facing and north-facing slopes were moderately bare. These surfaces are weathered like the ridge tops but accumulate some deeper soils more amenable to plant growth, especially when the slopes are concave. Disturbed alluvial plains, terrace tops, and limestone soils all had moderately low mean covers of bare soils. All of these landscape positions have flat to gentle sloping surface with well-developed soils and fairly dense plant growth. Floodplains had the lowest mean cover of bare soil. Floodplains have the deepest soils in the study area and support dense plant growth.

5.4.2 2004 Field Surveys

Table 5.6 lists the mean relative covers across different landscape positions for individual and combined perennial bunchgrass species, combined annual grass species, combined forb species and bare ground. Numbers in the table are color-coded to show high, moderate, and low cover values for each species or plant group. These cover classes were used to develop perennial bunchgrass and annual grass distribution maps. Appendix A includes three tables (Tables 5.16 – 5.18) that summarize descriptive statistics and Mann-Whitney tests for significance of the mean values. Table 5.7 shows the frequency of occurrence of the four perennial bunchgrass species within sampled plots across different landscape positions. This table demonstrates the broad distributions of nodding needlegrass and one-sided bluegrass versus the more clustered distributions of big squirreltail and especially desert needlegrass. Table 5.8 presents mean data on soil characteristics at different landscape positions based on lab analysis of soil samples.

Mean cover values for combined perennial bunchgrass species and introduced annual grasses followed similar patterns as for the 2003 data, with the highest covers of perennial bunchgrasses on ridge tops and upper slopes and the highest covers of annual grasses on lower slope and floodplain positions. However, increased stratification of landscape positions on the north-facing and south-facing slopes revealed a more intricate and exquisite distribution pattern

between these two competing groups of plants. Table 5.6 shows the inverse relationship between mean cover values for these two groups across the landscape gradient from a floodplain, up and over a ridge top from north to south, and back down to a floodplain. The abundance of each group was inversely correlated at each landscape position. Where the perennial bunchgrass cover was highest, the annual grass cover was the lowest and vice versa. Furthermore, these cover values roughly followed a normal curve across the landscape gradient from floodplain to floodplain. This normal inverse relationship is clearly shown in Graph 5.1.

The four perennial bunchgrass species also showed normal abundance curves across sequential landscape positions though each species had a unique distribution pattern. These different patterns are shown by color-coding in Table 5.6 and graphically in Graph 5.2. Nodding needlegrass is most abundant on ridge tops and upper south-facing convex slopes, while one-sided bluegrass is most abundant on upper and lower north-facing slopes (convex and concave) with moderate abundance on ridge tops. Big squirreltail, a sub-dominant species with a clustered distribution, is most abundant on north-facing upper slopes and lower convex slopes. Desert needlegrass, also a sub-dominant species with a highly clustered distribution, is most abundant on ridge tops and north-facing upper convex slopes.

The soils across the different landscape positions change from thin, gravelly exposed soils on ridge tops to deeper accumulated loamy soils on lower slopes and floodplains. The results from the soil sample analyses were less significant than results from floristic data (Table 5.8). Mean percent organic matter was marginally higher on floodplains and lower slope positions. This is expected since these are accumulation zones. Cation exchange capacity (CEC) is a measurement of a soil's capacity to hold exchangeable cations (i.e. nutrients important for plant growth) such as potassium, magnesium, calcium, sodium, and hydrogen. CEC is directly related to soil texture and percent organic matter. Clay soils typically have a higher CEC, and soils with high organic matter content also have a higher CEC. Coarse textured soils typically have lower CEC. A low CEC value is 10 and under. A high CEC value is typically greater than 40. The recorded mean CEC values at all landscape positions is considered low. The mean CEC was generally highest in the floodplain and lower slope positions and lowest in the upper slope positions. The mean CEC for ridge tops, however, did not follow this trend and was significantly higher than for the adjacent upper slopes. Mean soil pH values ranged from 7.42 to 7.62, all within the slightly alkaline range. The elevated pH values are likely related to low levels of calcium from limestone incorporated in the alluvial parent material.

Table 5.4 Plant species identified during spring 2003 perennial bunchgrass plant community sampling conducted by Vollmar Consulting on the Centennial Specific Plan Project Site, Los Angeles County, California. D = Dominant (>10% mean cover); S = Subdominant (2-10% mean cover); U = Uncommon (<2% mean cover).

Scientific Name	Acronym	Disturbed Alluvial Plain	Floodplain	S-Facing Slope	Ridge Top	N-Facing Slope	Terrace Tops	Limestone Soils
Native Forbs								
Achyrachaena mollis	ACMO			U				U
Agoseris heterophylla	AGHE			U	U	U		
Agoseris retrorsa	AGRE	U				U		
Amsinckia menziesii var. intermedia	AMMEI	U	U					
Amsinckia menziesii var. menziesii	AMMEM		U					
Amsinckia tessellata var. tessellata	AMTET	S	S	U	U	S	D	S
Ancistrocaphus filagineus	ANFI							U
Asclepias californica	ASCA			U				
Asclepias sp.	ASSP			U				
Astragalus didymocarpus var. didymocarpus	ASDID							S
Astragalus douglasii var. douglasii	ASDOD		U					
Astragalus purshii var. tinctus	ASPUT				U		U	
Astragalus sp.	ASSP					U		
Balsamorhiza deltoidea	BADE					U		
Calandrinia ciliata	CACI			U	U	U		
Calochortus sp.	CASP							U
Calystegia occidentalis ssp. fulcrata	CAOCF			U	S	U		
Camissonia campestris ssp. campestris	CACAC	U			U	U		
Castilleja exserta ssp. exserta	CAEXE	U	U	U	U	U	U	U
Chaenactis glabriuscula var. glabriuscula	CHGLG			S	U			
Chaenactis xantiana	CHXA	U		U	U	U		
Chamaesyce albomarginata	CHAL	U		S	U		U	
Claytonia perfoliata ssp. perfoliata	CLPEP					U		U
Collinsia bartisaefolia var. davidsonii	COBAD					U		
Cryptantha sp.	CRSP			U	U	U	U	
Dichelostemma capitatum ssp. capitatum	DICAC			U	U	U	U	U
Eremocarpus setigerus	ERSE		U	U	U	U	U	
Eriogonum sp.	ERSP	U		U	U	U		
Erodium macrophyllum	ERMA							S
Eschscholzia californica	ESCA	U		S	U	U	U	
Gilia aliquanta ssp. aliquanta	GIALA			U		U		
Gilia breccarium ssp. breccarium	GIBRB	U				U		
Guillenia lemmonii	GULE							U
Helianthus annuus	HEAN							U
Lasthenia californica	LACA	U	U	S	S	U		U
Layia platyglossa	LAPL							D
Lepidium nitidum	LENI			U	U	U		S
Linanthus dichotomus	LIDI			U	U	U		
Linanthus liniflorus	LILI		U	U	U		U	
Linanthus sp.	LISP	U	U		U		U	
Lomatium utriculatum	LOUT	U	U	U	U	S	U	S
Lotus wrangelianus	LOWR			U				U
Lupinus bicolor	LUBI	S	D	S	U	S	D	
Lupinus excubitus var. austromontanus	LUEXA				U	U		
Lupinus formosus var. formosus	LUFOF	U				U		
Macaranthera canescens	MACA1	U		S	U	U	U	
Macaranthera sp?	MACA3				U			
Malacothrix californica	MACA2	U	U	U	U			

Scientific Name	Acronym	Disturbed Alluvial Plain	Floodplain	S-Facing Slope	Ridge Top	N-Facing Slope	Terrace Tops	Limestone Soils
Malacothrix sp.	MASP					U		
Marah fabaceus	MAFA	U						
Mentzelia albicaulis	MEAL	U			U	U		
Microseris sylvatica	MISY			U	U	U		
Monolopia lanceolata	MOLA							D
Pectocarya linearis ssp. ferocula	PELIF	S			U	U		
Pectocarya setosa	PESE			U				
Phacelia ciliata	PHCI							D
Phlox gracilis	PHGR		U					
Plagiobothrys nothofulvus	PLNO		U	U		U	U	
Plagiobothrys sp.	PLSP		U			U		
Platystemon californicus	PLCA		U					
Sidalcea malvaeflora ssp. sparsifolia	SIMAS		U			U		
Thysanocarpus curvipes	THCU					U		
Trifolium albopurpureum var. albopurpureum	TRALA		U	U	U	U		
Trifolium gracilentum var. gracilentum	TRGRG		S	S		U	U	
Trifolium wildenovii	TRWI		U					
Yellow woolly comp	UNCO1				U			
Unknown composite	UNCO3					U		
Unknown composite	UNCO4							U
Unknown forb	UNFO1				U			
Uropappus lindleyi	URLI	U	U	U	U		U	
Vicia sp.	VISP							U
Native Annual Grasses								
Vulpia microstachys var. microstachys	VUMIM	U	U	U		U		U
Native Perennial Bunch Grasses								
Elymus multisetus	ELMU					U		
Nassella pulchra	NAPU			U	U	U	U	U
Poa secunda ssp. secunda	POSES		U	U	D	D	D	S
Native Perennial Sod Grasses								
Leymus triticoides	LETR		U					
Native Shrubs								
Chrysothamnus nauseosus	CHNA	S			U			U
Chrysothamnus-like shrub?	UNCO2			U	U	U		
Isocoma acradenia	ISAC			U	U	U		
Non-Native Forbs								
Erodium cicutarium	ERCI	D	D	D	D	D	D	D
Descurainia sophia	DESO	U	U					
Hirschfeldia incana	HIIN	U		U	U			U
Lupinus microcarpus var. microcarpus	LUMIM	U						S
Vicia benghalensis	VIBE				U	U	U	
Non-Native Annual Grasses								
Avena fatua	AVFA	U	U	S	U			U
Bromus diandrus	BRDI		U					
Bromus hordeaceus	BRHO		U	U				S
Bromus madritensis ssp. rubens	BRMAR	U	S	S	U	U	S	S
Bromus tectorum	BRTE	U	S	U	U	U	U	U
Hordeum murinum ssp. leporinum	HOMUL		S					U
Secale cereale	SECE	U		U				

Table 5.5 Mean values from 2003 plant community sampling for plant species richness, absolute cover, and relative cover. Centennial Specific Plan Project Site, Los Angeles County, California.

SPECIES RICHNESS

Landscape Position	Native Forbs	Native Annual Grasses	Native Perennial Bunch Grasses	Native Perennial Sod Grasses	Native Shrubs	TOTAL NATIVE PLANTS	Non-Native Forbs	Non-Native Annual Grasses	TOTAL NON-NATIVE PLANTS	TOTAL ALL PLANTS
Disturbed Alluvial Plain	5.44	0.44	0.00	0.00	0.22	**6.11**	2.44	2.22	**4.67**	**10.78**
Flood Plain	7.00	0.89	0.33	0.11	0.00	**8.33**	1.11	3.00	**4.11**	**12.44**
S-Facing Slope	10.56	0.22	1.33	0.00	0.22	**12.33**	1.22	2.11	**3.33**	**15.67**
Ridge Top	10.50	0.00	1.88	0.00	0.50	**12.88**	1.38	1.38	**2.75**	**15.63**
N-Facing Slope	12.11	0.11	1.78	0.00	0.22	**14.22**	1.22	1.56	**2.78**	**17.00**
Terrace Top	6.00	0.00	1.80	0.00	0.00	**7.80**	1.20	1.20	**2.40**	**10.20**
Limestone Soils	10.67	0.33	1.00	0.00	0.33	**12.33**	2.00	3.67	**5.67**	**18.00**

ABSOLUTE PLANT COVER AND BARE SOIL

Landscape Position	Native Forbs	Native Annual Grasses	Native Perennial Bunch Grasses	Native Perennial Sod Grasses	Native Shrubs	TOTAL NATIVE PLANTS	Non-Native Forbs	Non-Native Annual Grasses	TOTAL NON-NATIVE PLANTS	TOTAL ALL PLANTS	BARE SOIL
Disturbed Alluvial Plain	11.00	0.30	0.00	0.00	2.04	**13.33**	79.67	2.70	**82.37**	**95.70**	**8.67**
Flood Plain	22.56	0.96	0.78	0.93	0.00	**25.22**	76.63	10.30	**86.93**	**112.15**	**3.15**
S-Facing Slope	38.22	0.07	3.00	0.00	0.37	**41.67**	31.63	14.44	**46.07**	**87.74**	**28.44**
Ridge Top	14.75	0.00	13.42	0.00	1.04	**29.21**	21.54	1.38	**22.92**	**52.54**	**50.42**
N-Facing Slope	22.41	0.11	15.81	0.00	0.56	**38.89**	34.00	3.22	**37.22**	**76.11**	**26.67**
Terrace Top	38.33	0.00	16.47	0.00	0.00	**54.80**	43.67	6.33	**50.00**	**104.80**	**10.13**
Limestone Soils	56.17	0.06	2.00	0.00	0.28	**58.50**	23.72	8.83	**32.56**	**91.06**	**12.00**

RELATIVE PLANT COVER

Landscape Position	Native Forbs	Native Annual Grasses	Native Perennial Bunch Grasses	Native Perennial Sod Grasses	Native Shrubs	TOTAL NATIVE PLANTS	Non-Native Forbs	Non-Native Annual Grasses	TOTAL NON-NATIVE PLANTS	TOTAL ALL PLANTS
Disturbed Alluvial Plain	11.49	0.31	0.00	0.00	2.13	**13.93**	83.25	2.83	**86.07**	**100.00**
Flood Plain	20.12	0.86	0.69	0.83	0.00	**22.49**	68.33	9.18	**77.51**	**100.00**
S-Facing Slope	43.56	0.08	3.42	0.00	0.42	**47.49**	36.05	16.46	**52.51**	**100.00**
Ridge Top	28.07	0.00	25.54	0.00	1.98	**55.60**	41.00	2.62	**43.62**	**100.00**
N-Facing Slope	29.44	0.15	20.77	0.00	0.73	**51.10**	44.67	4.23	**48.90**	**100.00**
Terrace Top	36.57	0.00	15.72	0.00	0.00	**52.29**	41.67	6.04	**47.71**	**100.00**
Limestone Soils	61.68	0.06	2.20	0.00	0.31	**64.24**	26.05	9.70	**35.76**	**100.00**

Table 5.6 Comparison of mean relative cover of individual and combined perennial bunchgrasses, combined non-native annual grasses, combined forb species, and bare soil. 2004 field surveys, Centennial Specific Plan Project Site, Los Angeles County, California.

	Mean Relative Cover[1]						
Landscape Position	ACSP[2]	ELMU[2]	NACE[2]	POSES[2]	Total Bunchgrasses	Total Non-Native Annual Grasses	Bare Ground
Floodplain	0.00	0.10	0.10	2.25	2.45	32.70	20.20
North-facing Lower Concave Slopes	0.00	0.15	1.35	17.62	19.08	23.73	20.00
North-facing Lower Convex Slopes	0.53	2.21	2.37	17.89	23.00	15.74	28.42
North-facing Upper Concave Slopes	0.57	3.00	4.00	21.74	29.30	10.35	30.48
North-facing Upper Convex Slopes	2.36	2.33	5.64	22.97	33.31	6.28	32.64
Ridge tops	1.63	0.96	17.71	12.02	32.32	4.07	40.63
South-facing Upper Convex Slopes	0.03	0.18	16.97	3.73	20.91	12.33	33.64
South-facing Upper Concave Slopes	0.06	0.11	8.11	1.39	9.67	27.56	25.83
South-facing Lower Convex Slopes	0.00	0.81	6.56	0.44	7.81	33.75	20.13
South-facing Lower Concave Slopes	0.03	0.03	4.19	0.71	4.97	31.16	22.32

1. Color-coding:

ACSP and ELMU: Dark Purple = high cover, clustered distribution (>1%)
Med. Purple = moderate cover, clustered distribution (0.3-1%)
Light Purple = low cover, clustered distribution (<0.5%)
NACE and POSES: Dark Blue = high cover, broad distribution (>10%)
Med. Blue = moderate cover, broad distribution (5-10%)
Light Blue = low cover, broad distribution (<5%)
NACE and POSES: Dark Blue = high cover, broad distribution (>10%)
Med. Blue = moderate cover, broad distribution (5-10%)
Light Blue = low cover, broad distribution (<5%)
Total Grasses: Dark Green = high cover, broad distribution (>20%)
Med. Green = moderate cover, broad distribution (10-20%)
Light Green = low cover, broad distribution (<10%)
Bare ground: Dark Tan = high bare ground (>30%)
Med. Tan = moderate bare ground (10-30%)

2. ACSP = *Achnatherum speciosum;* ELMU = *Elymus multisetus*; NACE = *Nasella cernua*; POSES = *Poa secunda* ssp. *secunda*

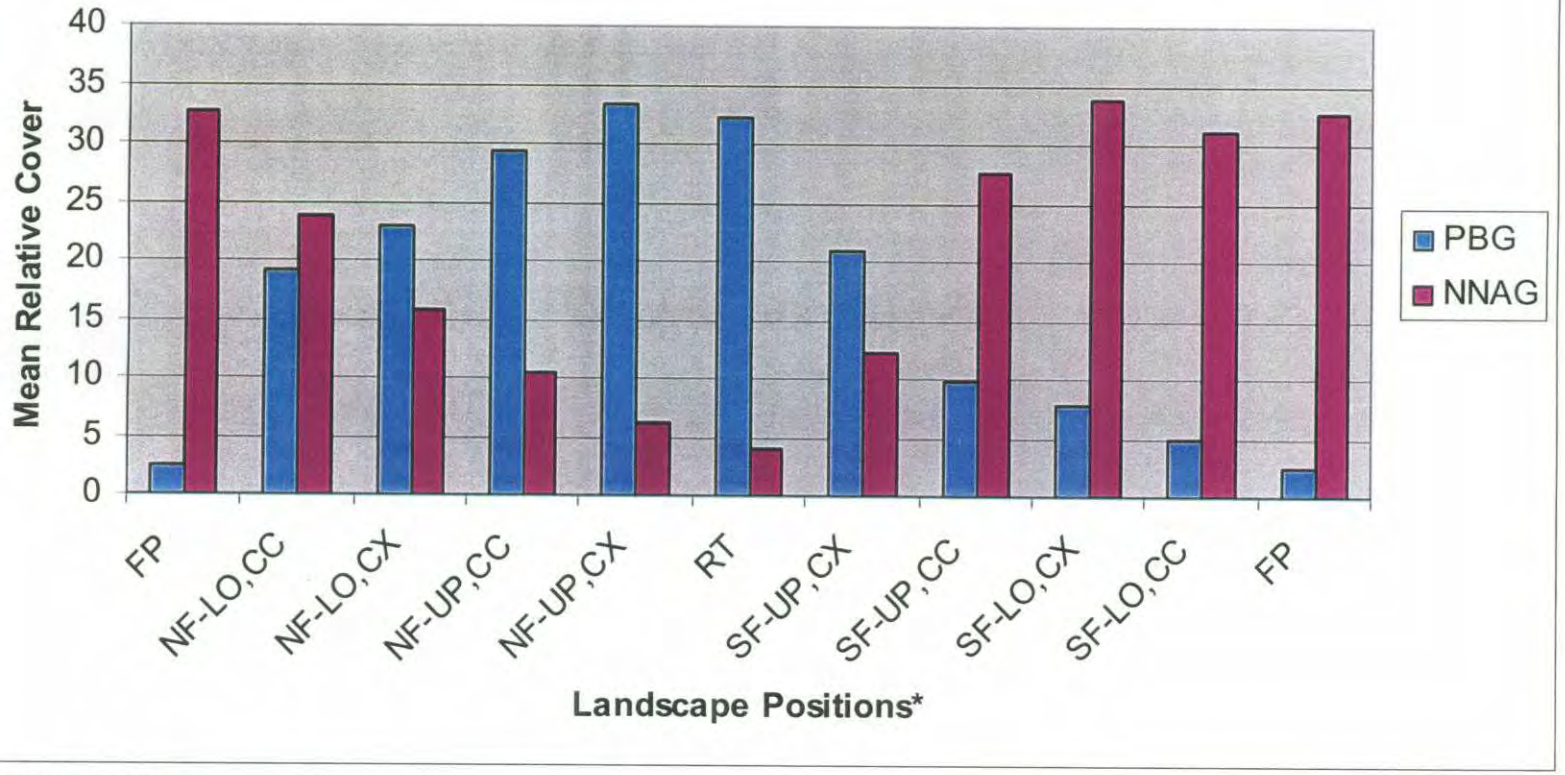
Table 5.7 Frequency of occurrence of individual perennial bunchgrass species within sampled plots at different landscape positions. Centennial Specific Plan Project Site, Los Angeles County, California.

Landscape Position	Total Number of Plots	Frequency of Occurrence by Species							
		Nodding Needlegrass (*Nasella cernua*)		One-sided Bluegrass (*Poa secunda* ssp. *secunda*)		Big Squirreltail (*Elymus multisetus*)		Desert Needlegrass (*Achnatherum speciosum*)	
		Number of Plots	Frequency (% of plots)	Number of Plots	Frequency (% of plots)	Number of Plots	Frequency (% of plots)	Number of Plots	Frequency (% of plots)
Floodplains	20	1	5.00%	7	35.00%	1	5.00%	0	0.00
North-Facing, Lower, Concave Slopes	26	8	30.77%	24	92.31%	3	11.54%	0	0.00
North-Facing, Lower, Convex Slopes	19	8	42.11%	18	94.74%	8	42.11%	2	10.53%
North-Facing, Upper, Concave Slopes	23	16	69.57%	22	95.65%	12	52.17%	2	8.70%
North-Facing, Upper, Convex Slopes	36	29	80.56%	36	100.00%	21	58.33%	6	16.67%
Ridge tops	56	55	98.21%	53	94.64%	10	17.86%	10	17.86%
South-Facing, Upper, Convex Slopes	33	32	96.97%	29	87.88%	1	3.03%	1	3.03%
South-Facing, Upper, Concave Slopes	18	15	83.33%	6	33.33%	1	5.56%	1	5.56%
South-Facing, Lower, Convex Slopes	16	11	68.75%	2	12.50%	0	0.00	0	0.00
South-Facing, Lower, Concave Slopes	31	18	58.06%	5	16.13%	1	3.23%	1	3.23%
All Landscape Positions	278	193	69.42%	202	72.66%	58	20.86%	23	8.27%

Table 5.8 Summary of soil characteristics (percent organic matter, total cation exchange capacity (CEC), and pH) at different landscape positions, conducted by Vollmar Consulting, Spring, 2004 Centennial Specific Plan Project Site, Los Angeles County, California.

Landscape Position	Sample Size (N)	Soil Chemical and Physical Properties		
		Mean % OM	Mean Total CEC (meq/100g)	Mean Soil pH
Floodplains	5	2.90	9.72	7.42
North-facing Lower Concave Slopes	6	2.58	9.78	7.57
North-facing Lower Convex Slopes	3	2.77	8.97	7.57
North-facing Upper Concave Slopes	4	1.90	5.55	7.48
North-facing Upper Convex Slopes	5	1.98	7.44	7.48
Ridge tops	5	2.12	10.44	7.62
South-facing Upper Convex Slopes	5	2.14	7.62	7.48
South-facing Upper Concave Slopes	5	2.54	8.16	7.46
South-facing Lower Convex Slopes	3	2.30	8.87	7.50
South-facing Lower Concave Slopes	5	2.22	9.64	7.60

Graph 5.1 Comparison of Mean Relative Cover Values of Perennial Bunchgrasses (PBG) and Non-native Annual Grasses (NNAG) across Different Landscape Positions (2004, Centennial Specific Plan Project Site)



Landscape Position Codes:

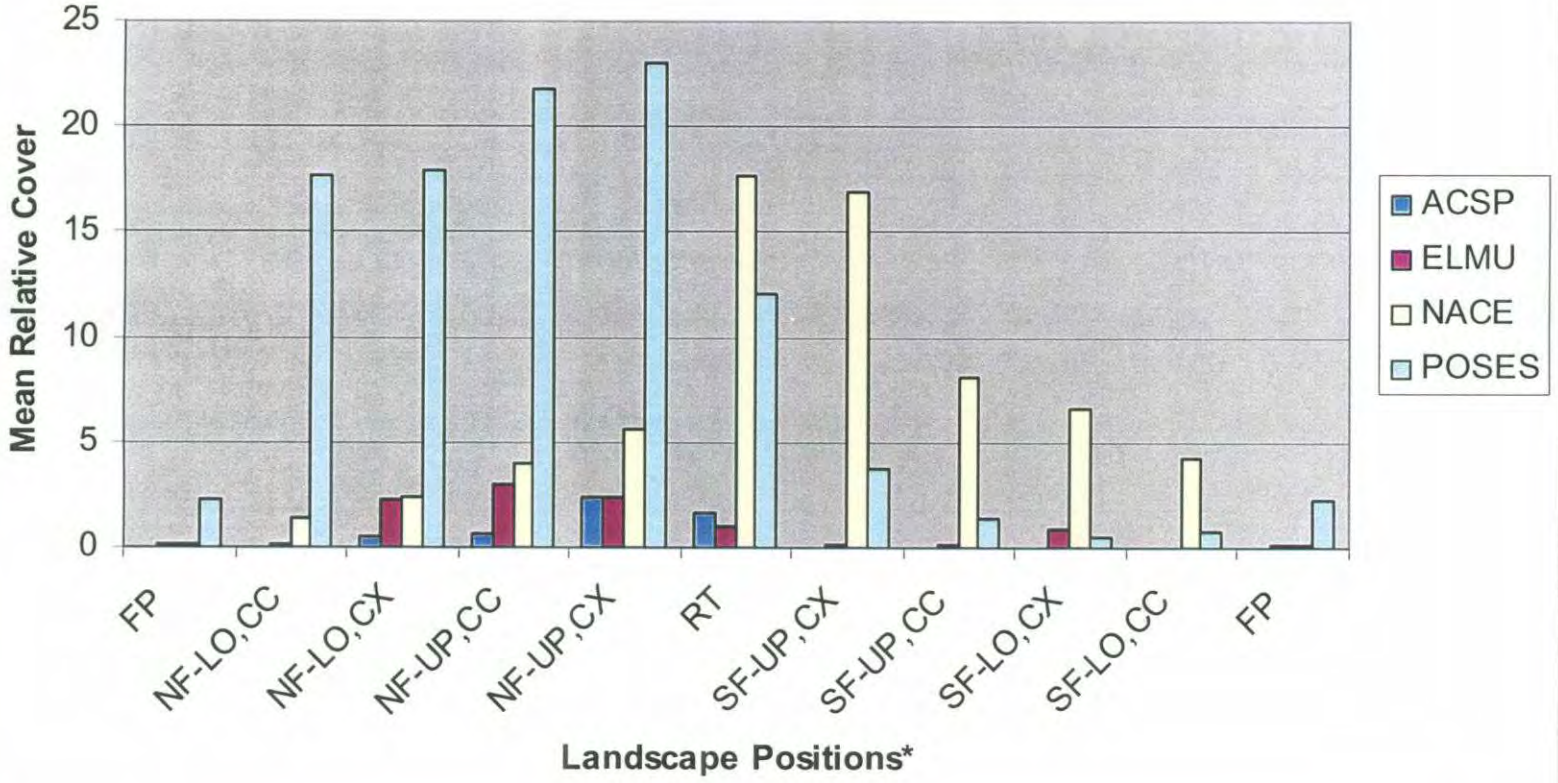
FP = Floodplain

NF-LO,CC = North-facing Lower Concave Slope
NF-LOCX = North-facing Lower Convex Slope
NF-UP,CC = North-facing Upper Concave Slope
NF-UP,CX = North-facing Upper Convex Slope

RT = Ridge top

SF-UP,CX= South-facing Upper Convex Slope
SF-UP,CC = South-facing Upper Concave Slope
SF-LO,CX= South-facing Lower Convex Slope
SF-LO,CC = South-facing Lower Concave Slope

Graph 5.2 Comparison of Mean Relative Cover Values of Four Perennial Bunchgrass Species across Different Landscape Positions (2004, Centennial Specific Plan Project Site)



Landscape Position Codes:

FP = Floodplain

NF-LO,CC = North-facing Lower Concave Slope
NF-LOCX = North-facing Lower Convex Slope
NF-UP,CC = North-facing Upper Concave Slope
NF-UP,CX = North-facing Upper Convex Slope

RT = Ridge top

SF-UP,CX= South-facing Upper Convex Slope
SF-UP,CC = South-facing Upper Concave Slope
SF-LO,CX= South-facing Lower Convex Slope
SF-LO,CC = South-facing Lower Concave Slope

5.5 DISCUSSION

5.5.1 Study Area Distribution of the Perennial Bunchgrass Community

The perennial bunchgrass community is primarily restricted to two geologic formations within the study area: the 12-million year old Continental Deposits and the 100,000 to one million year old Terrace Deposits. Together, these formations form a cohesive, recognizable geomorphic feature within the broad central and southeastern regions of the study area (Figure 5.2). This feature consists of west to east trending ridges, deeply cut intervening drainages, and associated remnant alluvial fans and terraces. The flat terrace tops are remnants of a former alluvial surface that covered the local region. During the past 100,000 years, this surface has been steadily eroding, revealing the underlying Continental Deposits and resulting in the current topography.

There are scattered bunchgrass stands in other regions of the study area, especially one-sided bluegrass on Santa Margarita Formation in the southwestern region of the study area. However, these stands are small in total area and isolated within surrounding annual grasslands. Certain formations including Recent Alluvium (existing floodplains and recent alluvial plains), all the granitic formations, and Purple Andesite have little to no occurrence of perennial bunchgrasses.

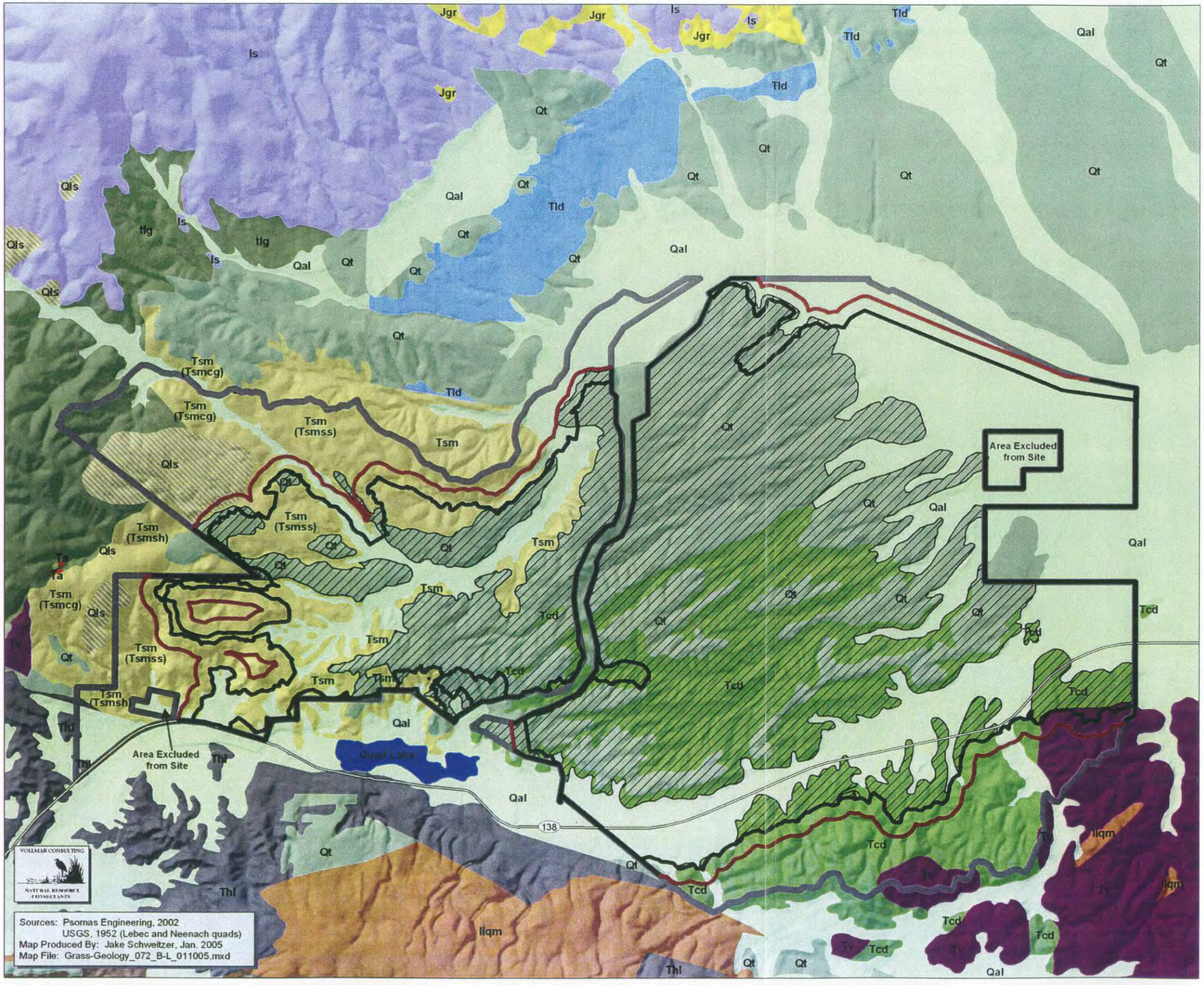
5.5.2 Local Distribution of the Perennial Bunchgrass Community

The perennial bunchgrass community has a distinct local distribution pattern within the ridges and terraces. The highest quality stands (those with a dominant cover of bunchgrasses and native wildflowers and a low cover of non-native annual grasses) are concentrated in areas with thinner, eroded soils including ridge tops, terrace tops, upper slopes, and lower convex slopes (especially north-facing). Other landscape positions with deeper, accumulated soils, including floodplains, lower slopes, and upper concave slopes tend to be dominated by non-native annual grasses with a low to very low bunchgrass cover. The abundance of bunchgrasses follows a roughly normal curve across the landscape gradient (e.g. from one floodplain, up and over a ridge top and back down to another floodplain). The abundance of annual grasses is inversely related to this gradient and to the abundance of bunchgrasses. This inverse relationship, clearly shown in Graph 5.1, appears to be due to a combination of competitive exclusion by annual grasses in areas with deeper soils and the inability of the annual grasses to survive and compete on thinner more exposed soils.

Within the community, each of the four individual bunchgrass species also has a distinct local distribution pattern related to aspect and slope position. Like the perennial bunchgrasses as a whole, the distribution and abundance of each species follows a roughly normal curve. However, each species has a different center of abundance and span across the landscape gradient as shown in Graph 5.2. Nodding needlegrass and one-sided bluegrass, the two dominant bunchgrass species, are centered on different aspects, with the former preferring more exposed, south-facing slopes and ridge tops, and the latter preferring north-facing slopes. These species overlap considerably along the ridge tops. The lower slope distributions of these species appear to be limited by competition with non-native annual grasses. Big squirreltail and desert needlegrass, both sub-dominant species, have considerable overlap in their distributions; desert

FIGURE 5.2
Centennial Perennial Bunchgrass Community and Geology

Distribution of High Quality Perennial Bunchgrass Plant Community in Relation to Geologic Formations
Centennial Specific Plan Project Site
Tejon Ranch, NW Los Angeles County, California



Legend

- High Quality Perennial Bunchgrass Plant Community (~5,507 acres)*
- Project Planning Boundary
- Impact Area
- 500ft Buffer from Impact Area

*Typically occurs on ridgetops and upper slopes; see Graph 5.2

Geologic Formation

QUATERNARY
- Recent
  - Qal - Recent alluvium
  - Qls - Landslide
- Pleist.
  - Qt - Terrace deposits and older alluvium
  - Tld - Lake deposits

TERTIARY
- Pliocene
  - Thl - White conglomerate sandstone with brown mudstone
  - Tpv - Brown siltstone with buff sandstone
- Miocene
  - Tsm - Santa Margarita formation**
  - Tcd - Continental deposits (conglomerate, sandstone & shale)
  - Tv - Purple andesite
  - Ta - Silicified andesite

JURASSIC OR CRETACEOUS
- Jgr - Granite
- tlg - Tejon Lookout granite
- liqm - Liebre quartz monzonite (gray hornblende biotite quartz monzonite)

PALEOZOIC
- Is - Limestone and marble

Water (Quail Lake)

**Includes subtypes: Tsmsh (chiefly shales), Tsmcg (chiefly conglomerate) and Tsmss (chiefly sandstone)

N W E S

1:42,000 (1in = 3,500ft at tabloid layout)

0 875 1,750 Meters

0 1,750 3,500 7,000 Feet

needlegrass is most abundant on ridge tops and north-facing convex slopes, and big squirreltail is most abundant on north-facing upper slopes and lower convex slopes. Both species have distinctly clustered distributions within their areas of abundance that appear to minimize competitive exclusion.

Areas with high cover of perennial bunchgrasses also had a high percentage of bare ground, as shown especially in the 2003 survey data. The current paradigm of the historic bunchgrass community theorizes that the open areas between bunchgrass clumps were occupied by a diverse array of native annual wildflowers and grasses (Heady, 1995). During favorable rain years, these wildflowers are thought to have provided a showy display. Indeed, this very pattern was observed during the 2003 field season. Heavy winter rains and prolonged spring rains produced a very showy bloom that, according to locals, only occurs once every five to ten years. The profusion of wildflowers included more than 70 native species within the perennial bunchgrass community, including many unusual or uncommon species. Sylvan microseris, a special-status species, was among these. Like the bunchgrasses, many of these wildflowers had landscape-specific distribution patterns with certain species occurring exclusively or primarily on south slopes, and others occurring exclusively or primarily on north slopes. Also like the bunchgrasses, the ridge tops and upper slopes tended to be mixing zones for species from the different slopes.

5.5.3 Environmental Factors Influencing the Regional Occurrence and Local Distribution of the Perennial Bunchgrass Community

The extreme statewide rarity of such a large, continuous perennial bunchgrass stand begs the questions as to why this stand occurs in this particular region. Information gathered during this study indicates it is due to a unique combination of environmental factors related primarily to regional geography, local climate, and geology.

As described earlier, the study area is situated just east of the junction of the Tehachapi Ranges and Western Transverse Ranges. This junction, located where the San Andreas Fault cuts through the two mountain ranges, creates a topographic 'notch' that strongly influences local climatic. High winds are common in this area throughout the year. These winds undoubtedly accelerate drying of the exposed ridge top and upper slope soils, creating harsh conditions for annual grasses. In summer 2003, John Vollmar observed that some ridge areas were heavily wind blown and nearly devoid of vegetation except for perennial bunchgrass clumps. With regards to precipitation, there is a rainfall gradient across the study area as evidenced by the local transition in plant communities from oak woodlands and chaparral west of the study area, to perennial and annual grasslands in the center of the study area, to desert scrub less than a mile east of the study area. This gradual transition from mountain to desert plant communities with an intervening grassland community is partly due to the topographic notch, which provides for a more gradual rainfall gradient than regions to the north and south that are blocked by tall mountains. These areas have a more dramatic rainshadow effect and, typically, an abrupt transition from mountain to desert plant communities without intervening interior California grasslands.

The specific transitional rainfall levels within the study area appear to directly influence the presence of the perennial bunchgrass community. The non-native annual grasses require a certain minimum rainfall level and/or seasonal soil moisture to thrive. These rainfall levels are obviously achieved west of the study area where annual grasslands predominate on the open hills between the study area and the I-5 corridor. Within the study area, the annual grasses occur as a dominant community in areas with deeper, accumulated soils such as floodplains and lower concave slopes. These soils have a comparatively higher moisture holding capacity and accumulate and hold enough moisture to sustain annual grasses. On the ridge tops and upper slope, the soils are thinner and coarser with a diminished water holding capacity. In these areas, the annual grasses apparently cannot survive as a dominant community. There is, however, enough seasonal precipitation and soil moisture to sustain perennial bunchgrasses and associated native wildflowers. East of the study area, the precipitation levels gradually drop as the habitat transitions to a desert scrub community with desert needlegrass as the only associated bunchgrass. Apparently, the lower annual rainfall levels and/or seasonal rainfall patterns are insufficient to sustain the other three bunchgrass species. The non-native annual grasses are also generally absent except for cheat grass.

The local geology and associated soils appear to be critical factors influencing the presence of the perennial bunchgrass community though it is unclear why. The bunchgrass community is primarily restricted to two geologic formations, Continental Deposits and Terrace Deposits. While these formations differ in age by more than 10 million years, they both have similar geologic and soil characteristics. Both are formed from mixed alluvium with the same broad range of parent materials including granite, sandstone, shale, limestone and perhaps andesite. Both have characteristically thin, coarse, weathered soils. Both are slightly alkaline due to the presence of calcium from limestone. The elevated pH is probably unlike the nearby granitic soils, which are typically slightly acidic. While identical rainfall levels fall on other adjacent formations, they do not, for whatever reason, support dominant stands of perennial bunchgrasses. This may be related to differences in moisture holding capacity, nutrient balance, soil texture, soil pH or other soil characteristic or combination of characteristics.

Historic and ongoing land use may also be a contributing factor. The region of the study area has been continuously owned and grazed by the Tejon Ranch for more than 150 years. Many of the remnant perennial bunchgrass stands in California are on large, intact ranches and military installations that have had long-term consistent ownership and management. As such, the presence and quality of this stand may be attributed in part to the long-term management approaches and stewardship by Tejon Ranch. The current grazing practices do not appear to be having a negative impact on the perennial bunchgrass community. There was ample evidence of cattle foraging on the bunchgrasses, in some cases down to the ground. However, there was also ample evidence of regeneration and recruitment within the community based the presence of differently sized individual grass clumps.

5.5.4 Comparison with Other Known Perennial Bunchgrass Stands

Historically, the perennial bunchgrass plant community is thought to have occurred throughout interior lowland California. Nearly all of the original perennial bunchgrass community has been altered or replaced by introduced annual grasses and only a couple of dozen remnant patches of

the historic California native perennial grasslands still exist today. The remaining intact perennial bunchgrass stands are scattered across the state in preserves and on privately owned ranchlands and military installations. Most are isolated stands, generally less than 300 acres in total area, and often with a high cover of introduced annual grasses. The largest stands of better quality bunchgrass community are located in Kern and San Luis Obispo counties. Within the local region, perennial bunchgrass stands occur on the Terrace Deposit formations northeast of the study area (Figure 5.2). These flat terraces and adjacent lower hill slopes are dominated by fairly extensive stands of nodding needlegrass and, occasionally, other bunchgrass species. Together, these stands may incorporate a total of 3,000 to 4,000 acres. These stands are notable for their lack of introduced annual grasses but lack the geologic and landscape complexity of the study area stands. As a result, these stands appear to have a lower diversity of wildflowers and a lower richness of bunchgrass species as compared with those in the study area.

Isolated stands of perennial bunchgrasses occur west of the study area region, in the Hungry Valley State Vehicular Recreation Area located west of Gorman, in a few scattered areas in the hills southeast of the study area, scattered along Interstate 5 near Gorman, and in the foothills and terraces of the San Emigdio Mountains south of Maricopa in the southwest corner of Kern County. In all of these areas, stands of nodding needlegrass and/or one-sided bluegrass occur but typically have a moderate to heavy associated cover of introduced annual grasses. These areas also lack the diversity of the perennial bunchgrass and wildflower species that highlight the bunchgrass community in the study area. Most of these areas have three bunchgrass species – nodding needlegrass, one-sided bluegrass, and big squirreltail – but lack desert needlegrass due to higher rainfall levels.

The best comparative example of a relatively large stand of undisturbed perennial bunchgrass community occurs on Camp Roberts at the boundary of San Luis Obispo and Monterey counties in the southern Salinas Valley. Isolated and scattered clumps of nodding needlegrass occur over an estimated 1,500 to 2,000 acres. Some of the clumps also support one-sided bluegrass. Overall, the bunchgrass stands in Camp Roberts lacks the diversity of bunchgrass and wildflower species and the large contiguous stands of uninterrupted perennial bunchgrasses found in the study area. Small areas of perennial bunchgrass stands also occur in the hills of the Carrizo Plain National Monument in southeastern San Luis Obispo County. While some stands of undisturbed perennial grasses (nodding needlegrass and one-sided bluegrass) do occur in the Carrizo Plain, most are dominated or co-dominated by introduced annual grasses. Again, these bunchgrass stands lack the diversity of perennial bunchgrass species, the richness of wildflower species, and the large expanses of uninterrupted bunchgrass community that characterize the unique, high-quality perennial bunchgrass community in the study area. Several smaller relic perennial bunchgrass sites are scattered across the northern region of the Central Valley. These sites are typically small isolated areas, generally less than 300 acres in total area, in preserves and parks and range from fair to excellent quality.

5.6 CONCLUSION

Based on data collected within the study area, a review of available information (Barry, 1972) and discussions with native grassland experts (Dremann, 2004; Barbour, 2004), it is concluded that the perennial bunchgrass community in the study area is unique in California as a large, high

quality interior valley (*Nasella-Poa* dominated) native bunchgrass community. This stand incorporates more than 5,500 semi-continuous acres within the study area, larger by a couple thousand acres than any other known stand. Its high quality is due to the high cover and richness of perennial bunchgrass species, the association of a large, diverse assemblage of showy native wildflower species, the conspicuously low cover of non-native annual grasses, and the general lack of invasive weeds. The topographic variability, with alternating steep north-facing and south-facing slopes, ridge tops, terrace tops, and floodplains, increases the habitat quality by providing diverse and intricate species distribution patterns and associations which can serve as a model for understanding the species dynamics within a currently rare but historically important and widespread plant community. The stand also provides important information on the competitive dynamics between native bunchgrass community and non-native annual grasslands.

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APPENDIX 5

PERENNIAL BUNCHGRASS PLANT COMMUNITY STUDY RESULTS, STATISTICAL TABLES, MANN-WHITNEY SIGNIFICANCE TESTS

Table 5.9 Descriptive statistics for species richness within sampled plots by plant category and landscape position (2003 field data). Perennial Bunchgrass Plant Community Study, Centennial Specific Plan Project Site, Los Angeles, California.

DISTURBED ALLUVIAL PLAINS

Category	N	N*	Mean	SE Mean	StDev	Min	Q1	Med	Q3	Max
Native Forbs	9	0	5.44	1.09	3.28	1	3.00	4.00	8.50	11
Native Annual Grasses	9	0	0.44	0.18	0.53	0	0.00	0.00	1.00	1
Native Perennial Bunch Grasses	9	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Perennial Sod Grasses	9	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Shrubs	9	0	0.22	0.15	0.44	0	0.00	0.00	0.50	1
TOTAL NATIVE PLANTS	**9**	**0**	**6.11**	**1.27**	**3.82**	**1**	**3**	**5**	**10**	**12**
Non-Native Forbs	9	0	2.44	0.18	0.53	2	2	2	3	3
Non-Native Annual Grasses	9	0	2.22	0.40	1.20	0	1.50	2.00	3.00	4
TOTAL NON-NATIVE PLANTS	**9**	**0**	**4.67**	**0.44**	**1.32**	**2**	**4**	**5**	**6**	**6**
TOTAL ALL PLANTS	**9**	**0**	**10.78**	**1.42**	**4.27**	**3**	**8**	**10**	**15**	**16**

FLOODPLAINS

Category	N	N*	Mean	SE Mean	StDev	Min	Q1	Med	Q3	Max
Native Forbs	9	0	7.00	0.53	1.58	5	6.00	7.00	8.00	10
Native Annual Grasses	9	0	0.89	0.26	0.78	0	0.00	1.00	1.50	2
Native Perennial Bunch Grasses	9	0	0.33	0.17	0.50	0	0.00	0.00	1.00	1
Native Perennial Sod Grasses	9	0	0.11	0.11	0.33	0	0.00	0.00	0.00	1
Native Shrubs	9	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
TOTAL NATIVE PLANTS	**9**	**0**	**8.33**	**0.60**	**1.80**	**5**	**7**	**9**	**9.5**	**11**
Non-Native Forbs	9	0	1.11	0.11	0.33	1	1	1	1	2
Non-Native Annual Grasses	9	0	3.00	0.37	1.12	2	2.00	3.00	4.00	5
TOTAL NON-NATIVE PLANTS	**9**	**0**	**4.11**	**0.35**	**1.05**	**3**	**3**	**4**	**5**	**6**
TOTAL ALL PLANTS	**9**	**0**	**12.44**	**0.73**	**2.19**	**9**	**10.5**	**12**	**14.5**	**15**

SOUTH-FACING SLOPES

Category	N	N*	Mean	SE Mean	StDev	Min	Q1	Med	Q3	Max
Native Forbs	9	0	10.56	0.93	2.80	6	8.00	11.00	13.00	14
Native Annual Grasses	9	0	0.22	0.15	0.44	0	0.00	0.00	0.50	1
Native Perennial Bunch Grasses	9	0	1.33	0.17	0.50	1	1.00	1.00	2.00	2
Native Perennial Sod Grasses	9	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Shrubs	9	0	0.22	0.15	0.44	0	0.00	0.00	0.50	1
TOTAL NATIVE PLANTS	**9**	**0**	**12.33**	**1.00**	**3.00**	**7**	**10**	**13**	**15**	**16**
Non-Native Forbs	9	0	1.22	0.15	0.44	1	1	1	1.5	2
Non-Native Annual Grasses	9	0	2.11	0.35	1.05	1	1.00	2.00	3.00	4
TOTAL NON-NATIVE PLANTS	**9**	**0**	**3.33**	**0.47**	**1.41**	**2**	**2**	**3**	**4.5**	**6**
TOTAL ALL PLANTS	**9**	**0**	**15.67**	**0.99**	**2.96**	**12**	**12.5**	**16**	**18.5**	**19**

RIDGE TOPS

Category	N	N*	Mean	SE Mean	StDev	Min	Q1	Med	Q3	Max
Native Forbs	8	0	10.50	1.21	3.42	5	7.00	11.50	12.75	15
Native Annual Grasses	8	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Perennial Bunch Grasses	8	0	1.88	0.23	0.64	1	1.25	2.00	2.00	3
Native Perennial Sod Grasses	8	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Shrubs	8	0	0.50	0.27	0.76	0	0.00	0.00	1.00	2
TOTAL NATIVE PLANTS	**8**	**0**	**12.88**	**1.04**	**2.95**	**8**	**10**	**14**	**14**	**17**
Non-Native Forbs	8	0	1.38	0.26	0.74	1	1	1	1.75	3
Non-Native Annual Grasses	8	0	1.38	0.26	0.74	1	1	1	1.75	3
TOTAL NON-NATIVE PLANTS	**8**	**0**	**2.75**	**0.31**	**0.89**	**2**	**2**	**2.5**	**3.75**	**4**
TOTAL ALL PLANTS	**8**	**0**	**15.63**	**1.18**	**3.34**	**10**	**12.25**	**16.5**	**18**	**19**

NORTH-FACING SLOPES

Category	N	N*	Mean	SE Mean	StDev	Min	Q1	Med	Q3	Max
Native Forbs	9	0	12.11	0.99	2.98	8	9.50	12.00	14.50	17
Native Annual Grasses	9	0	0.11	0.11	0.33	0	0.00	0.00	0.00	1
Native Perennial Bunch Grasses	9	0	1.78	0.15	0.44	1	1.50	2.00	2.00	2
Native Perennial Sod Grasses	9	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Shrubs	9	0	0.22	0.15	0.44	0	0.00	0.00	0.50	1
TOTAL NATIVE PLANTS	**9**	**0**	**14.22**	**1.16**	**3.49**	**9**	**11**	**14**	**17.5**	**19**
Non-Native Forbs	9	0	1.22	0.15	0.44	1	1	1	1.5	2
Non-Native Annual Grasses	9	0	1.56	0.18	0.53	1	1.00	2.00	2.00	2
TOTAL NON-NATIVE PLANTS	**9**	**0**	**2.78**	**0.22**	**0.67**	**2**	**2**	**3**	**3**	**4**
TOTAL ALL PLANTS	**9**	**0**	**17.00**	**1.28**	**3.84**	**11**	**14**	**17**	**20**	**23**

TERRACE TOPS

Category	N	N*	Mean	SE Mean	StDev	Min	Q1	Med	Q3	Max
Native Forbs	5	0	6.00	0.78	1.73	5	5.00	5.00	7.50	9
Native Annual Grasses	5	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Perennial Bunch Grasses	5	0	1.80	0.20	0.45	1	1.50	2.00	2.00	2
Native Perennial Sod Grasses	5	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Shrubs	5	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
TOTAL NATIVE PLANTS	**5**	**0**	**7.80**	**0.80**	**1.79**	**7**	**7**	**7**	**9**	**11**
Non-Native Forbs	5	0	1.20	0.20	0.45	1	1	1	1.5	2
Non-Native Annual Grasses	5	0	1.20	0.20	0.45	1	1	1	1.5	2
TOTAL NON-NATIVE PLANTS	**5**	**0**	**2.40**	**0.25**	**0.55**	**2**	**2**	**2**	**3**	**3**
TOTAL ALL PLANTS	**5**	**0**	**10.20**	**0.74**	**1.64**	**9**	**9**	**10**	**11.5**	**13**

LIMESTONE SOILS

Category	N	N*	Mean	SE Mean	StDev	Min	Q1	Med	Q3	Max
Native Forbs	6	0	10.67	0.62	1.51	9	9.00	11.00	11.50	13
Native Annual Grasses	6	0	0.33	0.21	0.52	0	0.00	0.00	1.00	1
Native Perennial Bunch Grasses	6	0	1.00	0.26	0.63	0	0.75	1.00	1.25	2
Native Perennial Sod Grasses	6	0	0.00	0.00	0.00	0	0.00	0.00	0.00	0
Native Shrubs	6	0	0.33	0.21	0.52	0	0.00	0.00	1.00	1
TOTAL NATIVE PLANTS	**6**	**0**	**12.33**	**0.62**	**1.51**	**10**	**10.75**	**13**	**13.25**	**14**
Non-Native Forbs	6	0	2.00	0.26	0.63	1	1.75	2	2.25	3
Non-Native Annual Grasses	6	0	3.67	0.42	1.03	2	2.75	4.00	4.25	5
TOTAL NON-NATIVE PLANTS	**6**	**0**	**5.67**	**0.49**	**1.21**	**4**	**4.75**	**5.5**	**7**	**7**
TOTAL ALL PLANTS	**6**	**0**	**18.00**	**1.00**	**2.45**	**15**	**15**	**19**	**20**	**20**

Table 5.10 Descriptive statistics for relative plant cover within sampled plots by plant category and landscape position (2003 field data). Perennial Bunchgrass Plant Community Study, Centennial Specific Plan Project Site, Los Angeles County, California.

DISTURBED ALLUVIAL PLAINS

Categnry	N	N*	Mean	SE Mean	St Dev	Min	Q1	Med	Q3	Max
Native Forbs	27	0	11.51	2.74	14.26	0.00	2.02	5.94	13.51	56.00
Native Annual Grasses	27	0	0.31	0.09	0.49	0.00	0.00	0.00	0.98	1.33
Native Perennial Bunch Grasses	27	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Perennial Sod Grasses	27	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Shrubs	27	0	1.92	0.96	4.98	0.00	0.00	0.00	0.00	19.05
TOTAL NATIVE PLANTS	**27**	**0**	**13.74**	**3.08**	**16.01**	**0.00**	**2.13**	**8.00**	**20.95**	**57.33**
Non-Native Forbs	27	0	83.38	3.07	15.93	41.33	77.14	89.55	94.06	100.00
Non-Native Annual Grasses	27	0	2.88	0.58	2.99	0.00	1.00	2.02	5.26	12.50
TOTAL NON-NATIVE PLANTS	**27**	**0**	**86.26**	**3.08**	**16.01**	**42.67**	**79.05**	**92.00**	**97.87**	**100.00**

FLOODPLAINS

Category	N	N*	Mean	SE Mean	St Dev	Min	Q1	Med	Q3	Max
Native Forbs	27	0	20.72	2.58	13.42	5.56	10.81	14.81	29.09	54.08
Native Annual Grasses	27	0	0.83	0.30	1.54	0.00	0.00	0.00	0.83	5.45
Native Perennial Bunch Grasses	27	0	0.64	0.33	1.70	0.00	0.00	0.00	0.00	7.75
Native Perennial Sod Grasses	27	0	0.74	0.48	2.50	0.00	0.00	0.00	0.00	12.00
Native Shrubs	27	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL NATIVE PLANTS	**27**	**0**	**22.63**	**2.62**	**13.62**	**9.35**	**12.00**	**16.67**	**34.55**	**54.08**
Non-Native Forbs	27	0	67.58	3.32	17.23	13.70	59.41	73.17	83.33	87.39
Non-Native Annual Grasses	27	0	9.49	2.42	12.56	0.00	1.82	5.43	8.41	47.01
TOTAL NON-NATIVE PLANTS	**27**	**0**	**77.07**	**2.62**	**13.62**	**45.92**	**65.45**	**83.33**	**88.00**	**90.65**

SOUTH-FACING SLOPES

Category	N	N*	Mean	SE Mean	St Dev	Min	Q1	Med	Q3	Max
Native Forbs	27	0	42.32	3.40	17.65	13.04	28.57	44.55	56.84	76.52
Native Annual Grasses	27	0	0.08	0.08	0.41	0.00	0.00	0.00	0.00	2.13
Native Perennial Bunch Grasses	27	0	4.48	1.38	7.15	0.00	0.00	0.00	7.25	26.67
Native Perennial Sod Grasses	27	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Shrubs	27	0	0.53	0.53	2.75	0.00	0.00	0.00	0.00	14.29
TOTAL NATIVE PLANTS	**27**	**0**	**47.30**	**3.77**	**19.60**	**13.04**	**35.00**	**45.45**	**61.29**	**90.41**
Non-Native Forbs	27	0	35.34	4.50	23.38	6.17	10.53	34.48	50.51	81.63
Non-Native Annual Grasses	27	0	17.35	4.01	20.84	0.00	1.90	5.94	30.43	79.71
TOTAL NON-NATIVE PLANTS	**27**	**0**	**52.70**	**3.77**	**19.60**	**9.59**	**38.71**	**54.55**	**65.00**	**86.96**

RIDGE TOPS

Category	N	N*	Mean	SE Mean	St Dev	Min	Q1	Med	Q3	Max
Native Forbs	24	0	25.69	4.08	19.97	2.04	9.10	21.70	41.42	80.19
Native Annual Grasses	24	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Perennial Bunch Grasses	24	0	32.54	5.06	24.80	0.00	8.00	37.35	54.97	75.00
Native Perennial Sod Grasses	24	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Shrubs	24	0	1.16	1.16	5.67	0.00	0.00	0.00	0.00	27.78
TOTAL NATIVE PLANTS	**24**	**0**	**59.39**	**4.89**	**23.97**	**19.05**	**39.82**	**60.67**	**79.20**	**97.78**
Non-Native Forbs	24	0	37.01	4.86	23.82	0.00	17.70	34.90	59.63	79.37
Non-Native Annual Grasses	24	0	2.56	0.39	1.02	0.00	1.10	2.18	4.59	5.68
TOTAL NON-NATIVE PLANTS	**24**	**0**	**39.57**	**4.87**	**23.86**	**2.22**	**20.80**	**36.04**	**60.18**	**80.95**

NORTH-FACING SLOPES

Category	N	N*	Mean	SE Mean	St Dev	Min	Q1	Med	Q3	Max
Native Forbs	27	0	29.94	1.96	10.18	7.27	21.74	29.58	38.57	45.00
Native Annual Grasses	27	0	0.16	0.10	0.51	0.00	0.00	0.00	0.00	2.38
Native Perennial Bunch Grasses	27	0	22.37	2.81	14.59	0.00	10.53	23.53	28.57	59.32
Native Perennial Sod Grasses	27	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Shrubs	27	0	0.96	0.71	3.68	0.00	0.00	0.00	0.00	17.54
TOTAL NATIVE PLANTS	**27**	**0**	**53.42**	**3.20**	**16.61**	**20.91**	**38.83**	**59.26**	**70.18**	**78.33**
Non-Native Forbs	27	0	42.62	2.81	14.61	21.67	28.57	36.59	70.18	78.33
Non-Native Annual Grasses	27	0	3.96	0.67	3.47	0.00	1.32	2.91	5.88	11.76
TOTAL NON-NATIVE PLANTS	**27**	**0**	**46.58**	**3.20**	**16.61**	**21.67**	**29.82**	**40.74**	**61.17**	**79.09**

TERRACE TOPS

Category	N	N*	Mean	SE Mean	St Dev	Min	Q1	Med	Q3	Max
Native Forbs	15	0	35.29	8.32	32.21	4.17	8.40	22.22	67.48	91.74
Native Annual Grasses	15	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Perennial Bunch Grasses	15	0	16.09	3.41	13.19	1.71	5.00	16.48	20.83	53.76
Native Perennial Sod Grasses	15	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Shrubs	15	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
TOTAL NATIVE PLANTS	**15**	**0**	**51.38**	**6.86**	**26.56**	**14.08**	**25.00**	**50.00**	**71.54**	**96.33**
Non-Native Forbs	15	0	42.93	6.37	24.67	0.00	25.64	44.44	57.69	84.51
Non-Native Annual Grasses	15	0	5.69	1.84	7.13	0.00	1.50	2.08	5.56	22.90
TOTAL NON-NATIVE PLANTS	**15**	**0**	**48.62**	**6.86**	**26.56**	**3.67**	**28.46**	**50.00**	**75.00**	**85.92**

LIMESTONE SOILS

Category	N	N*	Mean	SE Mean	St Dev	Min	Q1	Med	Q3	Max
Native Forbs	18	0	64.18	5.34	22.67	20.17	47.12	69.83	81.43	94.64
Native Annual Grasses	18	0	0.07	0.07	0.28	0.00	0.00	0.00	0.00	1.18
Native Perennial Bunch Grasses	18	0	2.24	0.75	3.18	0.00	0.00	0.46	4.17	11.11
Native Perennial Sod Grasses	18	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Native Shrubs	18	0	0.35	0.23	0.97	0.00	0.00	0.00	0.00	3.77
TOTAL NATIVE PLANTS	**18**	**0**	**66.84**	**5.58**	**23.69**	**20.17**	**47.85**	**74.84**	**83.82**	**100.00**
Non-Native Forbs	18	0	23.19	4.53	19.23	0.00	7.88	14.68	43.94	58.82
Non-Native Annual Grasses	18	0	9.97	1.92	8.15	0.00	3.93	7.33	17.39	27.36
TOTAL NON-NATIVE PLANTS	**18**	**0**	**33.16**	**5.58**	**23.69**	**0.00**	**16.18**	**25.16**	**52.15**	**79.83**

Table 5.11 Descriptive statistics for bare soil cover within sampled plots by landscape position (2003 field data). Perennial Bunchgrass Plant Community Study, Centennial Specific Plan Project Site, Los Angeles County, California.

Category	N	N*	Mean	SE Mean	StDev	Min	Q1	Med	Q3	Max
Disturbed Alluvial Plains	27	0	8.67	1.11	5.67	1.00	5.00	10.00	15.00	20.00
Floodplains	27	0	3.15	0.54	2.82	0.00	1.00	2.00	5.00	10.00
South-facing Slopes	27	0	28.44	4.07	21.15	1.00	10.00	25.00	50.00	70.00
Ridge Tops	24	0	50.42	3.62	17.75	10.00	36.25	50.00	60.00	80.00
North-facing Slopes	27	0	26.67	2.85	14.81	5.00	15.00	25.00	40.00	50.00
Terrace Tops	15	0	10.13	3.19	12.34	1.00	1.00	3.00	15.00	40.00
Limestone Soils	18	0	12.00	3.12	13.22	1.00	5.00	5.00	15.00	50.00

Table 5.12 Mann-Whitney tests for plant number (2003 field data). Bold = signif. difference (<0.05); bold italic = mod. signif. difference (<0.10). DAP = Disturbed Alluvial Plain; FP = Floodplain; SFS = South-facing Slopes; RT = Ridge Tops; NFS = North-facing Slopes; TT = Terrace Tops; LS = Limestone Soils. Perennial Bunchgrass Plant Community Study, Centennial Specific Plan Project Site, Los Angeles County, CA.

Native Forbs							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	0.216	**0.007**	**0.011**	**0.002**	0.505	**0.010**
FP		0	**0.013**	***0.054***	**0.002**	0.162	**0.006**
SFS			0	1.000	0.453	**0.011**	0.906
RT				0	0.471	**0.034**	0.747
NFS					0	**0.006**	0.346
TT						0	**0.014**
LS							0
Native Perennial Bunchgrasses							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	0.377	**0.000**	**0.001**	**0.000**	**0.003**	**0.011**
FP		0	**0.006**	**0.002**	**0.001**	**0.006**	***0.088***
SFS			0	0.124	0.122	0.182	0.409
RT				0	0.847	0.942	***0.053***
NFS					0	1.000	**0.045**
TT						0	**0.083**
LS							0
All Native Plants							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	0.233	**0.005**	**0.005**	**0.002**	0.351	**0.006**
FP		0	**0.009**	**0.011**	**0.002**	0.463	**0.004**
SFS			0	0.923	0.310	**0.028**	0.814
RT				0	0.387	**0.010**	0.366
NFS					0	**0.008**	0.216
TT						0	**0.018**
LS							0
Non-native Forbs							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	**0.001**	**0.002**	**0.012**	**0.002**	**0.009**	0.263
FP		0	0.724	0.630	0.724	0.842	**0.022**
SFS			0	0.885	1.000	1.000	**0.045**
RT				0	0.885	0.884	0.121
NFS					0	1.000	**0.045**
TT						0	***0.083***
LS							0
Non-native Annual Grasses							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	0.289	0.757	0.112	0.145	***0.096***	**0.045**
FP		0	0.133	**0.006**	**0.008**	**0.008**	0.289
SFS			0	0.149	0.310	0.125	**0.029**
RT				0	0.441	0.884	**0.006**
NFS					0	0.317	**0.005**
TT						0	**0.011**
LS							0
All Non-native Plants							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	0.289	***0.070***	**0.011**	**0.006**	**0.014**	0.216
FP		0	0.171	**0.024**	**0.013**	**0.011**	**0.039**
SFS			0	0.471	0.566	0.257	**0.016**
RT				0	0.885	0.608	**0.004**
NFS					0	0.386	**0.002**
TT						0	**0.008**
LS							0

Table 5.13 Mann-Whitney tests for relative plant cover (2003 field data). Bold = signif. difference (<0.05); bold italic = mod. significant difference (<0.10). DAP = Disturbed Alluvial Plain; FP = Floodplain; SFS = South-facing Slopes; RT = Ridge Tops; NFS = North-facing Slopes; TT = Terrace Tops; LS = Limestone Soils. Perennial Plant Community Study, Centennial Specific Plan Project Site, Los Angeles County, CA.

Native Forbs							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	**0.000**	**0.000**	**0.002**	**0.000**	**0.002**	**0.000**
FP		0	**0.000**	0.624	**0.003**	0.813	**0.000**
SFS			0	**0.002**	0.006	0.189	**0.002**
RT				0	0.146	0.613	**0.000**
NFS					0	0.637	**0.000**
TT						0	**0.012**
LS							0
Native Perennial Bunchgrasses							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	0.333	**0.008**	**0.000**	**0.000**	**0.000**	**0.007**
FP		0	***0.053***	**0.000**	**0.000**	**0.000**	***0.066***
SFS			0	**0.000**	**0.000**	**0.000**	0.817
RT				0	0.238	***0.081***	**0.000**
NFS					0	0.106	**0.000**
TT						0	**0.000**
LS							0
All Native Plants							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	**0.001**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
FP		0	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
SFS			0	***0.070***	0.201	0.713	**0.007**
RT				0	0.299	0.306	0.322
NFS					0	0.684	**0.019**
TT						0	***0.083***
LS							0
Non-native Forbs							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
FP		0	**0.000**	**0.000**	**0.000**	**0.002**	**0.000**
SFS			0	0.828	0.139	0.319	***0.093***
RT				0	0.299	0.444	**0.034**
NFS					0	0.969	**0.001**
TT						0	**0.030**
LS							0
Non-native Annual Grasses							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	**0.017**	**0.004**	0.806	0.183	0.306	**0.001**
FP		0	0.337	**0.011**	0.130	0.227	0.303
SFS			0	**0.004**	0.022	***0.062***	0.746
RT				0	0.199	0.634	**0.000**
NFS					0	0.927	**0.009**
TT						0	***0.055***
LS							**0**
All Non-native Plants							
	DAP	FP	SFS	RT	NFS	TT	LS
DAP	0	**0.001**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
FP		0	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
SFS			0	**0.044**	0.201	0.713	**0.007**
RT				0	0.227	0.254	0.374
NFS					0	0.684	**0.019**
TT						0	***0.083***
LS							0

Table 5.14 Summary of 2003 plots sampled for the perennial bunchgrass plant community study. Centennial Specific Plan Project Site, Los Angeles County, California.

Transect Number	Plot Number	Landscape Position
T1	P1	Disturbed Alluvial Plain
T1	P2	Disturbed Alluvial Plain
T1	P3	Disturbed Alluvial Plain
T2	P4	Disturbed Alluvial Plain
T2	P5	Disturbed Alluvial Plain
T2	P6	Disturbed Alluvial Plain
T2	P7	Disturbed Alluvial Plain
T2	P8	Disturbed Alluvial Plain
T2	P9	Disturbed Alluvial Plain
T3	P10	Floodplain
T3	P11	Floodplain
T3	P12	South-facing Slope
T3	P13	Ridge Top
T3	P14	North-facing Slope
T3	P15	Floodplain
T3	P16	South-facing Slope
T3	P17	Terrace Top
T3	P18	North-facing Slope
T3	P19	Floodplain
T3	P20	South-facing Slope
T3	P21	Ridge Top
T3	P22	North-facing Slope
T6	P23	Floodplain
T6	P24	South-facing Slope
T6	P25	Ridge Top
T6	P26	North-facing Slope
T6	P27	Floodplain
T6	P28	South-facing Slope
T6	P29	Ridge Top
T6	P30	North-facing Slope
T6	P31	Floodplain
T6	P32	South-facing Slope
T6	P33	Ridge Top
T6	P34	North-facing Slope
T7	P35	Limestone Soils
T7	P36	Limestone Soils
T8	P37	South-facing Slope
T8	P38	Ridge Top
T8	P39	North-facing Slope
T8	P40	Floodplain
T8	P41	Floodplain
T8	P42	South-facing Slope
T8	P43	Terrace Top
T8	P44	South-facing Slope
T8	P45	Ridge Top
T8	P46	North-facing Slope
T8	P47	Ridge Top
T8	P48	North-facing Slope
T9	P49	Terrace Top
T10	P50	Terrace Top
T10	P51	Terrace Top
T4	P52	Limestone Soils
T4	P53	Limestone Soils
T4	P54	Limestone Soils
T5	P55	Limestone Soils

Table 5.15 Summary of 2004 plots sampled for the perennial bunchgrass plant community study. Centennial Specific Plan Project Site, Los Angeles County, California.

Transect Number	Plot Number	Landscape Position
T1	P1	Ridgetop
T1	P2	North-facing, Upper, Convex Slopes
T1	P3	North-facing, Lower, Concave Slopes
T1	P4	South-facing, Lower, Concave Slopes
T1	P5	South-facing, Upper, Convex Slopes
T1	P6	Ridgetop
T1	P7	North-facing, Upper, Convex Slopes
T1	P8	North-facing, Lower, Concave Slopes
T1	P9	Floodplain
T1	P10	South-facing, Lower, Concave Slopes
T1	P11	South-facing, Upper, Convex Slopes
T1	P12	Ridgetop
T1	P13	North-facing, Upper, Concave Slopes
T1	P14	North-facing, Upper, Convex Slopes
T1	P15	North-facing, Lower Convex Slopes
T1	P16	Floodplain
T1	P17	South-facing, Lower, Concave Slopes
T1	P18	South-facing, Upper, Convex Slopes
T3	P1	Ridgetop
T3	P2	South-facing, Upper, Convex Slopes
T3	P3	South-facing, Lower, Concave Slopes
T3	P4	Floodplain
T3	P5	North-facing, Lower, Concave Slopes
T3	P6	North-facing, Upper, Convex Slopes
T3	P7	Ridgetop
T3	P8	South-facing, Upper, Convex Slopes
T3	P9	South-facing, Lower, Concave Slopes
T3	P10	North-facing, Lower, Concave Slopes
T3	P11	North-facing, Upper, Concave Slopes
T3	P12	Ridgetop
T3	P13	South-facing, Lower, Concave Slopes
T3	P14	South-facing, Lower, Concave Slopes
T3	P15	Ridgetop
T3	P16	North-facing, Upper, Convex Slopes
T3	P17	North-facing, Upper, Concave Slopes
T3	P18	North-facing, Upper, Concave Slopes
T3	P19	Ridgetop
T3	P20	Ridgetop
T3	P21	South-facing, Upper, Convex Slopes
T3	P22	South-facing, Lower, Convex Slopes
T3	P23	Floodplain
T3	P24	North-facing, Lower, Concave Slopes
T3	P25	North-facing, Upper, Convex Slopes
T3	P26	Ridgetop
T3	P27	South-facing, Upper, Convex Slopes
T3	P28	South-facing, Lower, Concave Slopes
T3	P29	North-facing, Lower, Concave Slopes
T3	P30	North-facing, Upper, Convex Slopes
T3	P31	North-facing, Upper, Concave Slopes
T3	P32	Ridgetop
T5	P1	Ridgetop
T5	P2	North-facing, Upper, Convex Slopes
T5	P3	North-facing, Lower, Concave Slopes
T5	P4	South-facing, Lower, Convex Slopes

Transect Number	Plot Number	Landscape Position
T5	P5	South-facing, Upper, Convex Slopes
T5	P6	Ridgetop
T5	P7	North-facing, Upper, Convex Slopes
T5	P8	Floodplain
T5	P9	South-facing, Lower, Concave Slopes
T5	P10	South-facing, Upper, Convex Slopes
T5	P11	Ridgetop
T5	P12	North-facing, Upper, Concave Slopes
T5	P13	North-facing, Lower Convex Slopes
T5	P14	South-facing, Lower, Convex Slopes
T5	P15	South-facing, Upper, Convex Slopes
T5	P16	Ridgetop
T5	P17	North-facing, Upper, Convex Slopes
T5	P18	North-facing, Lower, Concave Slopes
T5	P19	South-facing, Lower, Convex Slopes
T5	P20	South-facing, Upper, Concave Slopes
T5	P21	Ridgetop
T5	P22	North-facing, Upper, Concave Slopes
T5	P23	North-facing, Lower Convex Slopes
T5	P24	South-facing, Lower, Concave Slopes
T5	P25	Ridgetop
T5	P26	South-facing, Upper, Convex Slopes
T5	P27	North-facing, Upper, Concave Slopes
T5	P28	Ridgetop
T5	P29	North-facing, Upper, Convex Slopes
T5	P30	North-facing, Lower, Concave Slopes
T5	P31	South-facing, Lower, Convex Slopes
T5	P32	South-facing, Upper, Convex Slopes
T5	P33	Ridgetop
T5	P34	North-facing, Upper, Convex Slopes
T5	P35	North-facing, Lower, Concave Slopes
T5	P36	Floodplain
T5	P37	South-facing, Lower, Concave Slopes
T5	P38	South-facing, Upper, Convex Slopes
T5	P39	Ridgetop
T5	P40	North-facing, Upper, Convex Slopes
T5	P41	North-facing, Lower, Concave Slopes
T5	P42	Ridgetop
T5	P43	Ridgetop
T5	P44	North-facing, Upper, Convex Slopes
T5	P45	North-facing, Lower, Concave Slopes
T5	P46	South-facing, Lower, Convex Slopes
T5	P47	South-facing, Upper, Convex Slopes
T5	P48	Ridgetop
T5	P49	North-facing, Upper, Concave Slopes
T5	P50	North-facing, Lower Convex Slopes
T5	P51	South-facing, Lower, Convex Slopes
T5	P52	South-facing, Upper, Concave Slopes
T5	P53	Ridgetop
T5	P54	North-facing, Upper, Convex Slopes
T5	P55	North-facing, Lower Convex Slopes
T6	P1	South-facing, Lower, Convex Slopes
T6	P2	Ridgetop
T6	P3	South-facing, Upper, Convex Slopes
T6	P4	North-facing, Upper, Convex Slopes
T6	P5	North-facing, Lower Convex Slopes
T6	P6	South-facing, Lower, Convex Slopes
T6	P7	Ridgetop

Transect Number	Plot Number	Landscape Position
T6	P8	South-facing, Upper, Convex Slopes
T6	P9	North-facing, Upper, Concave Slopes
T6	P10	North-facing, Lower Convex Slopes
T6	P11	Ridgetop
T6	P12	North-facing, Upper, Convex Slopes
T6	P13	South-facing, Lower, Concave Slopes
T6	P14	South-facing, Upper, Convex Slopes
T6	P15	Ridgetop
T6	P16	North-facing, Upper, Concave Slopes
T6	P17	North-facing, Lower Convex Slopes
T6	P18	South-facing, Lower, Concave Slopes
T6	P19	South-facing, Upper, Convex Slopes
T6	P20	Ridgetop
T6	P21	North-facing, Upper, Convex Slopes
T6	P22	North-facing, Upper, Convex Slopes
T6	P23	North-facing, Lower, Concave Slopes
T6	P24	Floodplain
T6	P25	South-facing, Lower, Concave Slopes
T6	P26	South-facing, Upper, Convex Slopes
T6	P27	Ridgetop
T6	P28	North-facing, Upper, Concave Slopes
T6	P29	North-facing, Lower Convex Slopes
T6	P30	South-facing, Upper, Convex Slopes
T6	P31	Ridgetop
T6	P32	North-facing, Upper, Concave Slopes
T6	P33	North-facing, Lower Convex Slopes
T6	P34	Ridgetop
T6	P35	South-facing, Lower, Concave Slopes
T6	P36	South-facing, Upper, Convex Slopes
T6	P37	Ridgetop
T6	P38	North-facing, Upper, Concave Slopes
T6	P39	North-facing, Lower Convex Slopes
T6	P40	South-facing, Lower, Concave Slopes
T6	P41	South-facing, Upper, Convex Slopes
T6	P42	Ridgetop
T7	P1	South-facing, Lower, Convex Slopes
T7	P2	North-facing, Lower Convex Slopes
T7	P3	North-facing, Upper, Concave Slopes
T7	P4	Ridgetop
T7	P5	South-facing, Upper, Convex Slopes
T7	P6	South-facing, Lower, Concave Slopes
T7	P7	North-facing, Lower, Concave Slopes
T7	P8	North-facing, Upper, Concave Slopes
T7	P9	Ridgetop
T7	P10	South-facing, Upper, Convex Slopes
T7	P11	South-facing, Lower, Concave Slopes
T7	P12	North-facing, Lower Convex Slopes
T7	P13	North-facing, Upper, Convex Slopes
T7	P14	Ridgetop
T7	P15	Ridgetop
T7	P16	South-facing, Upper, Convex Slopes
T7	P17	South-facing, Lower, Concave Slopes
T7	P18	Floodplain
T7	P19	North-facing, Lower, Concave Slopes
T7	P20	North-facing, Upper, Concave Slopes
T7	P21	Ridgetop
T7	P22	South-facing, Upper, Convex Slopes
T7	P23	North-facing, Lower, Concave Slopes

Transect Number	Plot Number	Landscape Position
T7	P24	North-facing, Lower Convex Slopes
T7	P25	North-facing, Upper, Convex Slopes
T7	P26	Ridgetop
T7	P27	South-facing, Upper, Concave Slopes
T7	P28	South-facing, Lower, Concave Slopes
T7	P29	North-facing, Upper, Convex Slopes
T7	P30	Ridgetop
T7	P31	South-facing, Upper, Convex Slopes
T7	P32	South-facing, Lower, Concave Slopes
T7	P33	North-facing, Lower Convex Slopes
T7	P34	North-facing, Upper, Convex Slopes
T7	P35	South-facing, Upper, Convex Slopes
T7	P36	South-facing, Lower, Convex Slopes
T7	P37	North-facing, Lower, Concave Slopes
T7	P38	North-facing, Upper, Convex Slopes
T7	P39	Ridgetop
T7	P40	North-facing, Lower, Concave Slopes
T7	P41	North-facing, Upper, Convex Slopes
T7	P42	Ridgetop
T7	P43	South-facing, Upper, Convex Slopes
T7	P44	South-facing, Lower, Concave Slopes
T7	P45	North-facing, Lower, Concave Slopes
T7	P46	North-facing, Lower, Concave Slopes
T7	P47	Ridgetop
T7	P48	South-facing, Upper, Convex Slopes
T7	P49	South-facing, Lower, Concave Slopes
T7	P50	Floodplain
T7	P51	North-facing, Lower Convex Slopes
T7	P52	North-facing, Upper, Concave Slopes
T7	P53	Ridgetop
T9	P1	North-facing, Upper, Concave Slopes
T9	P2	North-facing, Lower, Concave Slopes
T9	P3	Ridgetop
T9	P4	South-facing, Upper, Convex Slopes
T9	P5	North-facing, Lower Convex Slopes
T9	P6	North-facing, Lower, Concave Slopes
T9	P7	North-facing, Upper, Concave Slopes
T9	P8	Ridgetop
T9	P9	South-facing, Upper, Convex Slopes
T9	P10	South-facing, Upper, Convex Slopes
T9	P11	South-facing, Upper, Convex Slopes
T9	P12	South-facing, Lower, Concave Slopes
T9	P13	North-facing, Upper, Convex Slopes
T9	P14	North-facing, Lower, Concave Slopes
T9	P15	Ridgetop
T9	P16	Ridgetop
T9	P17	South-facing, Upper, Convex Slopes
T9	P18	South-facing, Upper, Convex Slopes
T9	P19	South-facing, Lower, Concave Slopes
T9	P20	South-facing, Lower, Convex Slopes
T9	P21	Floodplain
T9	P22	South-facing, Lower, Convex Slopes
T9	P23	South-facing, Lower, Concave Slopes
T9	P24	South-facing, Upper, Convex Slopes
T9	P25	South-facing, Upper, Convex Slopes
T9	P26	Ridgetop
T9	P27	North-facing, Lower Convex Slopes
T9	P28	North-facing, Upper, Convex Slopes

Transect Number	Plot Number	Landscape Position
T9	P29	North-facing, Upper, Concave Slopes
T9	P30	Ridgetop
T9	P31	South-facing, Upper, Convex Slopes
T9	P32	South-facing, Upper, Convex Slopes
T9	P33	South-facing, Lower, Convex Slopes
T9	P34	South-facing, Lower, Concave Slopes
T9	P35	Floodplain
T9	P36	North-facing, Lower, Concave Slopes
T9	P37	North-facing, Upper, Convex Slopes
T9	P38	South-facing, Upper, Convex Slopes
T9	P39	South-facing, Lower, Concave Slopes
T9	P40	Floodplain
T9	P41	North-facing, Lower, Concave Slopes
T9	P42	North-facing, Upper, Convex Slopes
T9	P43	North-facing, Upper, Convex Slopes
T9	P44	Ridgetop
T9	P45	South-facing, Upper, Convex Slopes
T9	P46	South-facing, Lower, Concave Slopes
T9	P47	Floodplain
T9	P48	North-facing, Lower Convex Slopes
T9	P49	North-facing, Upper, Convex Slopes
T9	P50	Ridgetop
T9	P51	North-facing, Upper, Convex Slopes
T9	P52	South-facing, Upper, Convex Slopes
T9	P53	South-facing, Lower, Concave Slopes
T11	P1	Ridgetop
T11	P2	North-facing, Upper, Concave Slopes
T11	P3	North-facing, Upper, Convex Slopes
T11	P4	North-facing, Lower, Concave Slopes
T11	P5	North-facing, Upper, Convex Slopes
T11	P6	South-facing, Lower, Convex Slopes
T11	P7	South-facing, Lower, Concave Slopes
T11	P8	South-facing, Upper, Convex Slopes
T11	P9	South-facing, Upper, Convex Slopes
T11	P10	Ridgetop
T11	P11	North-facing, Upper, Convex Slopes
T11	P12	North-facing, Upper, Concave Slopes
T11	P13	Floodplain
T11	P14	South-facing, Lower, Convex Slopes
T11	P15	South-facing, Upper, Convex Slopes
T11	P16	Ridgetop
T11	P17	South-facing, Upper, Convex Slopes
T11	P18	South-facing, Upper, Convex Slopes
T11	P19	North-facing, Upper, Convex Slopes
N/A	FP1	Floodplain
N/A	FP2	Floodplain
N/A	FP3	Floodplain
N/A	FP4	Floodplain
N/A	FP5	Floodplain
N/A	FP6	Floodplain

Table 5.16 Summary of 2004 soil sample plot locations for the perennial bunchgrass community study. Centennial Specific Plan Project Site, Los Angeles County, California.

Transect Number	Plot Number	Landscape Position
N/A	FP2	Floodplain
T3	P23	Floodplain
T3	P4	Floodplain
T5	P36	Floodplain
T7	P50	Floodplain
T3	P18	North-facing Lower Concave Slope
T3	P29	North-facing Lower Concave Slope
T7	P19	North-facing Lower Concave Slope
T7	P23	North-facing Lower Concave Slope
T7	P40	North-facing Lower Concave Slope
T7	P46	North-facing Lower Concave Slope
T5	P50	North-facing Lower Convex Slope
T7	P24	North-facing Lower Convex Slope
T7	P33	North-facing Lower Convex Slope
T3	P11	North-facing Upper Concave Slope
T3	P31	North-facing Upper Concave Slope
T5	P12	North-facing Upper Concave Slope
T5	P22	North-facing Upper Concave Slope
T3	P30	North-facing Upper Convex Slope
T3	P6	North-facing Upper Convex Slope
T5	P34	North-facing Upper Convex Slope
T5	P54	North-facing Upper Convex Slope
T7	P29	North-facing Upper Convex Slope
T3	P26	Ridge top
T3	P32	Ridge top
T7	P15	Ridge top
T7	P30	Ridge top
T7	P39	Ridge top
T3	P2	South-facing Upper Convex Slope
T3	P21	South-facing Upper Convex Slope
T5	P10	South-facing Upper Convex Slope
T5	P32	South-facing Upper Convex Slope
T5	P38	South-facing Upper Convex Slope
N/A	ACSP4	South-facing Upper Concave Slope
N/A	ACSP21	South-facing Upper Concave Slope
T5	P20	South-facing Upper Concave Slope
T5	P52	South-facing Upper Concave Slope
T7	P27	South-facing Upper Concave Slope
T5	P14	South-facing Lower Convex Slope
T5	P46	South-facing Lower Convex Slope
T7	P36	South-facing Lower Convex Slope
T3	P28	South-facing Lower Concave Slope
T3	P3	South-facing Lower Concave Slope
T7	P17	South-facing Lower Concave Slope
T7	P44	South-facing Lower Concave Slope
T7	P49	South-facing Lower Concave Slope

Table 5.17 Descriptive statistics for relative plant cover and bare soil by landscape position (spring 2004 field data). Perennial Bunch Grass Community Study, Centennial Specific Plan Project Site, Los Angeles County, California.

FLOODPLAIN

Species:	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Acnatherum speciosum	20	0	0	0.00	0.00	0	0	0	0	0
Elymus mutisetus	20	0	0.1	0.10	0.45	0	0	0	0	2
Nasella cernua	20	0	0.1	0.10	0.45	0	0	0	0	2
Poa secunda ssp. secunda	20	0	2.25	1.26	5.66	0	0	2	0	25
Total Perennial Bunch Grasses	20	0	2.45	1.29	5.79	0	0	2	0	25
Leymus triticoides	20	0	6.55	2.15	9.63	0	2	8.75	0	30
Vulpia bromoides	20	0	0	0.00	0.00	0	0	0	0	0
Vulpia microstachys var. microstachys	20	0	0.25	0.25	1.12	0	0	0	0	5
Vulpia myuros var. myuros	20	0	0.25	0.25	1.12	0	0	0	0	5
Avena barbata	20	0	0	0.00	0.00	0	0	0	0	0
Bromus diandrus	20	0	7.4	4.39	19.65	0	0	1.75	0	80
Bromus hordeaceus	20	0	1.3	1.02	4.54	0	0	0	0	20
Bromus madritensis ssp. rubens	20	0	8.35	2.20	9.84	2.75	5	10	0	40
Bromus tectorum	20	0	15.15	3.63	16.22	3.5	10	23.75	1	65
Total Non-Native Annual Grasses	20	0	32.7	5.80	25.95	13.25	25.5	40	1	90
Total Forbs	20	0	37.25	4.27	19.09	15	42.5	50	5	60
Bare Soil	20	0	20.2	3.52	15.72	11.25	15	30	2	65

NORTH SLOPES, LOWER, CONCAVE

Species	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Acnatherum speciosum	26	0	0.00	0.00	0.00	0	0	0	0	0
Elymus mutisetus	26	0	0.15	0.09	0.46	0	0	0	0	2
Nasella cernua	26	0	1.35	0.55	2.80	0	0	2	0	10
Poa secunda ssp. secunda	26	0	17.62	2.31	11.80	5	20	30	0	35
Total Perennial Bunch Grasses	26	0	19.08	2.35	11.98	5.75	20	30	0	37
Leymus triticoides	26	0	5.08	1.70	8.65	0	0	10	0	30
Vulpia bromoides	26	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia microstachys var. microstachys	26	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia myuros var. myuros	26	0	0.19	0.19	0.98	0	0	0	0	5
Avena barbata	26	0	0.08	0.08	0.39	0	0	0	0	2
Bromus diandrus	26	0	0.58	0.58	2.94	0	0	0	0	15
Bromus hordeaceus	26	0	0.62	0.58	2.94	0	0	0	0	15
Bromus madritensis ssp. rubens	26	0	10.54	2.84	14.49	2.75	5	11.25	2	70
Bromus tectorum	26	0	11.73	2.47	12.60	1.75	10	20	0	50
Total Non-Native Annual Grasses	26	0	23.73	4.14	21.09	7.5	15	32.75	2	80
Total Forbs	26	0	32.12	2.06	10.50	28.75	30	40	5	50
Total Bare Soil	26	0	20.00	1.88	9.59	13.75	20	26.25	5	40

NORTH SLOPES, LOWER CONVEX

Species	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Acnatherum speciosum	19	0	0.53	0.36	1.58	0	0	0	0	5

Elymus mutisetus	19	0	2.21	0.93	4.04	0	0	2	0	15
Nasella cernua	19	0	2.37	0.86	3.74	0	0	5	0	10
Poa secunda ssp. secunda	19	0	17.89	2.40	10.45	10	20	30	0	35
Total Perennial Bunch Grasses	19	0	23.00	2.77	12.08	10	30	32	6	40
Leymus triticoides	19	0	2.11	0.96	4.19	0	0	5	0	15
Vulpia bromoides	19	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia microstachys var. microstachys	19	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia myuros var. myuros	19	0	0.00	0.00	0.00	0	0	0	0	0
Avena barbata	19	0	0.00	0.00	0.00	0	0	0	0	0
Bromus diandrus	19	0	0.00	0.00	0.00	0	0	0	0	0
Bromus hordeaceus	19	0	0.58	0.53	2.29	0	0	0	0	10
Bromus madritensis ssp. rubens	19	0	8.53	2.76	12.01	2	5	10	0	50
Bromus tectorum	19	0	6.63	2.41	10.52	0	1	10	0	40
Total Non-Native Annual Grasses	19	0	15.74	3.58	15.58	3	10	20	0	50
Total Forbs	19	0	30.79	2.40	10.44	25	30	40	15	50
Total Bare Soil	19	0	28.42	2.10	9.14	20	30	35	10	45

NORTH SLOPES, UPPER, CONCAVE

Species	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Acnatherum speciosum	23	0	0.57	0.40	1.93	0	0	0	0	8
Elymus mutisetus	23	0	3.00	0.87	4.18	0	1	5	0	15
Nasella cernua	23	0	4.00	1.07	5.13	0	2	5	0	20
Poa secunda ssp. secunda	23	0	21.74	1.95	9.37	20	25	30	0	35
Total Perennial Bunch Grasses	23	0	29.30	2.33	11.19	28	32	35	0	45
Leymus triticoides	23	0	1.30	0.65	3.10	0	0	0	0	10
Vulpia bromoides	23	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia microstachys var. microstachys	23	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia myuros var. myuros	23	0	0.00	0.00	0.00	0	0	0	0	0
Avena barbata	23	0	0.00	0.00	0.00	0	0	0	0	0
Bromus diandrus	23	0	0.00	0.00	0.00	0	0	0	0	0
Bromus hordeaceus	23	0	0.00	0.00	0.00	0	0	0	0	0
Bromus madritensis ssp. rubens	23	0	4.83	1.01	4.86	1	5	5	0	20
Bromus tectorum	23	0	5.52	3.09	14.84	0	1	2	0	70
Total Non-Native Annual Grasses	23	0	10.35	3.26	15.64	2	5	12	0	72
Total Forbs	23	0	28.26	1.82	8.74	25	25	30	15	55
Total Bare Soil	23	0	30.48	2.33	11.16	25	35	40	2	45

NORTH SLOPES, UPPER, CONVEX

Species	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Acnatherum speciosum	36	0	2.36	1.24	7.41	0	0	0	0	40
Elymus mutisetus	36	0	2.33	0.52	3.12	0	1	4.5	0	10
Nasella cernua	36	0	5.64	0.91	5.43	1.25	5	9.25	0	20
Poa secunda ssp. secunda	36	0	22.97	1.51	9.07	16.25	25	30	2	40
Total Perennial Bunch Grasses	36	0	33.31	1.29	7.75	30	35	40	8	45
Leymus triticoides	36	0	0.97	0.52	3.14	0	0	0	0	15
Vulpia bromoides	36	0	0.00	0.00	0.00	0	0	0	0	0

Vulpia microstachys var. microstachys	36	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia myuros var. myuros	36	0	0.00	0.00	0.00	0	0	0	0	0
Avena barbata	36	0	0.03	0.03	0.17	0	0	0	0	1
Bromus diandrus	36	0	0.00	0.00	0.00	0	0	0	0	0
Bromus hordeaceus	36	0	0.14	0.11	0.68	0	0	0	0	4
Bromus madritensis ssp. rubens	36	0	4.86	0.79	4.76	2	5	5	0	20
Bromus tectorum	36	0	1.25	0.33	2.01	0	0.5	2	0	10
Total Non-Native Annual Grasses	36	0	6.28	0.92	5.53	2.25	5	7	1	22
Total Forbs	36	0	27.78	1.62	9.74	20	27.5	35	10	50
Total Bare Soil	36	0	32.64	2.06	12.33	25	35	40	5	50

RIDGE TOP

Species	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Acnatherum speciosum	56	0	1.63	0.60	4.45	0	0	0	0	20
Elymus mutisetus	56	0	0.96	0.30	2.22	0	0	1	0	10
Nasella cernua	56	0	17.71	0.97	7.24	10	20	25	0	30
Poa secunda ssp. secunda	56	0	12.02	1.01	7.60	5	10	18.75	0	35
Total Perennial Bunch Grasses	56	0	32.32	1.20	8.99	30	34.5	40	1	45
Leymus triticoides	56	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia bromoides	56	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia microstachys var. microstachys	56	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia myuros var. myuros	56	0	0.02	0.02	0.13	0	0	0	0	1
Avena barbata	56	0	0.13	0.10	0.72	0	0	0	0	5
Bromus diandrus	56	0	0.00	0.00	0.00	0	0	0	0	0
Bromus hordeaceus	56	0	0.00	0.00	0.00	0	0	0	0	0
Bromus madritensis ssp. rubens	56	0	3.30	0.50	3.74	1	2	5	0	20
Bromus tectorum	56	0	0.63	0.37	2.75	0	0	0	0	20
Total Non-Native Annual Grasses	56	0	4.07	0.69	5.14	1	3	5	0	30
Total Forbs	56	0	22.68	1.22	9.14	15	25	30	0	40
Total Bare Soil	56	0	40.63	1.73	12.97	30	40	50	0	70

SOUTH SLOPES, UPPER, CONVEX

Species	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Acnatherum speciosum	33	0	0.03	0.03	0.17	0	0	0	0	1
Elymus mutisetus	33	0	0.18	0.15	0.88	0	0	0	0	5
Nasella cernua	33	0	16.97	1.34	7.67	12.5	15	20	0	35
Poa secunda ssp. secunda	33	0	3.73	0.99	5.69	0	2	5	0	25
Total Perennial Bunch Grasses	33	0	20.91	1.82	10.46	13.5	20	27	5	45
Leymus triticoides	33	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia bromoides	33	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia microstachys var. microstachys	33	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia myuros var. myuros	33	0	0.00	0.00	0.00	0	0	0	0	0
Avena barbata	33	0	1.00	0.63	3.63	0	0	0	0	20
Bromus diandrus	33	0	0	0	0	0	0	0	0	0
Bromus hordeaceus	33	0	0.06	0.06	0.35	0	0	0	0	2
Bromus madritensis ssp. rubens	33	0	10.97	2.04	11.70	5	5	15	1	60

Acnatherum speciosum	31	0	0.03	0.03	0.18	0	0	0	0	1
Elymus mutisetus	16	0	0.81	0.48	1.94	0	0	0	0	7
Elymus mutisetus	31	0	0.03	0.03	0.18	0	0	0	0	1
Nasella cernua	31	0	4.19	1.03	5.74	0	1	5	0	20
Poa secunda ssp. secunda	31	0	0.71	0.38	2.13	0	0	0	0	10
Total Perennial Bunch Grasses	31	0	4.97	1.13	6.30	0	1	8	0	20
Leymus triticoides	31	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia bromoides	31	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia microstachys var. microstachys	31	0	0.00	0.00	0.00	0	0	0	0	0
Vulpia myuros var. myuros	31	0	0.00	0.00	0.00	0	0	0	0	0
Avena barbata	31	0	2.26	1.07	5.98	0	0	1	0	30
Bromus diandrus	31	0	0.32	0.32	1.80	0	0	0	0	10
Bromus hordeaceus	31	0	0.55	0.49	2.71	0	0	0	0	15
Bromus madritensis ssp. rubens	31	0	17.97	2.77	15.44	8	15	25	1	70
Bromus tectorum	31	0	10.06	2.32	12.91	0	3	20	0	50
Total Non-Native Annual Grasses	31	0	31.16	3.99	22.24	13	25	45	2	85
Total Forbs	31	0	39.84	3.09	17.20	25	40	50	10	70
Total Bare Soil	31	0	22.32	1.98	11.04	15	20	30	2	45

Table 5.18 Descriptive statistics for relative plant cover and bare soil, by plant species (spring 2004 field data). Perennial Bunchgrass Plant Community Study, Centennial Specific Plan Project Site, Los Angeles County, California.

I. Annual Grasses

Slender oat grass (*Avena barbata*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	0.00	0.00	0.00	0	0	0	0	0
North-facing Lower Concave Slope	26	0	0.08	0.08	0.39	0	0	0	0	2
North-facing Lower Convex Slope	19	0	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Concave Slope	23	0	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Convex Slope	36	0	0.03	0.03	0.17	0	0	0	0	1
Ridge top	56	0	0.13	0.10	0.72	0	0	0	0	5
South-facing Upper Convex Slope	33	0	1.00	0.63	3.63	0	0	0	0	20
South-facing Upper Concave Slope	18	0	3.28	1.75	7.43	0	0	2	0	25
South-facing Lower Convex Slope	16	0	3.44	1.42	5.69	0	0	5	0	20
South-facing Lower Concave Slope	31	0	2.26	1.07	5.98	0	0	1	0	30
Ripgut brome (*Bromus diandrus*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	7.40	4.39	19.65	0	0	1.75	0	80
North-facing Lower Concave Slope	26	0	0.58	0.58	2.94	0	0	0	0	15
North-facing Lower Convext Slope	19	0	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Concave Slope	23	0	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Convex Slope	36	0	0.00	0.00	0.00	0	0	0	0	0
Ridge top	56	0	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Convex Slope	33	0	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Concave Slope	18	0	0.00	0.00	0.00	0	0	0	0	0
South-facing Lower Convex Slope	16	0	0.00	0.00	0.00	0	0	0	0	0
South-facing Lower Concave Slope	31	0	0.32	0.32	1.80	0	0	0	0	10
Soft chess (*Bromus hordeaceus*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	1.30	1.02	4.54	0	0	0	0	20
North-facing Lower Concave Slope	26	0	0.62	0.58	2.94	0	0	0	0	15
North-facing Lower Convext Slope	19	0	0.58	0.53	2.29	0	0	0	0	10
North-facing Upper Concave Slope	23	0	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Convex Slope	36	0	0.14	0.11	0.68	0	0	0	0	4
Ridge top	56	0	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Convex Slope	33	0	0.06	0.06	0.35	0	0	0	0	2
South-facing Upper Concave Slope	18	0	0.39	0.29	1.24	0	0	0	0	5
South-facing Lower Convex Slope	16	0	0.31	0.22	0.87	0	0	0	0	3
South-facing Lower Concave Slope	31	0	0.55	0.49	2.71	0	0	0	0	15
Red brome (*Bromus madritensis* ssp. *rubens*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	8.35	2.20	9.84	2.75	5	10	0	40
North-facing Lower Concave Slope	26	0	10.54	2.84	14.49	2.75	5	11.3	2	70
North-facing Lower Convex Slope	19	0	8.53	2.76	12.01	2	5	10	0	50
North-facing Upper Concave Slope	23	0	4.83	1.01	4.86	1	5	5	0	20
North-facing Upper Convex Slope	36	0	4.86	0.79	4.76	2	5	5	0	20
Ridge top	56	0	3.30	0.50	3.74	1	2	5	0	20
South-facing Upper Convex Slope	33	0	10.97	2.04	11.70	5	5	15	1	60
South-facing Upper Concave Slope	18	0	21.17	4.18	17.73	6.5	15	31.3	2	60
South-facing Lower Convex Slope	16	0	21.81	5.83	23.32	3.5	15	36.3	2	70

South-facing Lower Concave Slope	31	0	17.97	2.77	15.44	8	15	25	1	70
Cheat grass (*Bromus tectorum*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	15.15	3.63	16.22	3.5	10	23.8	1	65
North-facing Lower Concave Slope	26	0	11.73	2.47	12.60	1.75	10	20	0	50
North-facing Lower Convext Slope	19	0	6.63	2.41	10.52	0	1	10	0	40
North-facing Upper Concave Slope	23	0	5.52	3.09	14.84	0	1	2	0	70
North-facing Upper Convex Slope	36	0	1.25	0.33	2.01	0	0.5	2	0	10
Ridge top	56	0	0.63	0.37	2.75	0	0	0	0	20
South-facing Upper Convex Slope	33	0	0.30	0.12	0.68	0	0	0	0	2
South-facing Upper Concave Slope	18	0	2.72	1.40	5.94	0	0	2	0	20
South-facing Lower Convex Slope	16	0	8.19	2.67	10.69	0	2	15	0	30
South-facing Lower Concave Slope	31	0	10.06	2.32	12.91	0	3	20	0	50
Six-weeks fescue (*Vulpia bromoides*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Lower Concave Slope	26	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Lower Convext Slope	19	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Concave Slope	23	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Convex Slope	36	0.00	0.00	0.00	0.00	0	0	0	0	0
Ridge top	56	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Convex Slope	33	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Concave Slope	18	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Lower Convex Slope	16	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Lower Concave Slope	31	0.00	0.00	0.00	0.00	0	0	0	0	0
Small-flowered fescue (*Vulpia microstachys* var. *microstachys*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0.00	0.25	0.25	1.12	0	0	0	0	5
North-facing Lower Concave Slope	26	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Lower Convext Slope	19	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Concave Slope	23	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Convex Slope	36	0.00	0.00	0.00	0.00	0	0	0	0	0
Ridge top	56	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Convex Slope	33	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Concave Slope	18	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Lower Convex Slope	16	0.00	0.13	0.13	0.50	0	0	0	0	2
South-facing Lower Concave Slope	31	0.00	0.00	0.00	0.00	0	0	0	0	0
Rat-tail fescue (*Vulpia myuros* var. *myuros*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0.00	0.25	0.25	1.12	0	0	0	0	5
North-facing Lower Concave Slope	26	0.00	0.19	0.19	0.98	0	0	0	0	5
North-facing Lower Convext Slope	19	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Concave Slope	23	0.00	0.00	0.00	0.00	0	0	0	0	0
North-facing Upper Convex Slope	36	0.00	0.00	0.00	0.00	0	0	0	0	0
Ridge top	56	0.00	0.02	0.02	0.13	0	0	0	0	1
South-facing Upper Convex Slope	33	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Concave Slope	18	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Lower Convex Slope	16	0.00	0.00	0.00	0.00	0	0	0	0	0
South-facing Lower Concave Slope	31	0.00	0.00	0.00	0.00	0	0	0	0	0
Total Annual Grasses	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max

Floodplain	20	0.00	32.70	5.80	25.95	13.3	25.5	40	1	90
North-facing Lower Concave Slope	26	0.00	23.73	4.14	21.09	7.5	15	32.8	2	80
North-facing Lower Convext Slope	19	0.00	15.74	3.58	15.58	3	10	20	0	50
North-facing Upper Concave Slope	23	0.00	10.35	3.26	15.64	2	5	12	0	72
North-facing Upper Convex Slope	36	0.00	6.28	0.92	5.53	2.25	5	7	1	22
Ridge top	56	0.00	4.07	0.69	5.14	1	3	5	0	30
South-facing Upper Convex Slope	33	0.00	12.33	2.26	12.96	5	7	17.5	1	65
South-facing Upper Concave Slope	18	0.00	27.56	5.63	23.89	9.75	18.5	50	2	85
South-facing Lower Convex Slpes	16	0	33.75	6.60	26.42	10.5	31.5	63.75	2	77
South-facing LowerConcave Sloes	31	0	31.16	3.99	22.24	13	25	45	2	85

II. Native Perennial Bunchgrasses

Desert Needlegrass (*Acnatherum speciosum)*	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	0.00	0.00	0.00	0	0	0	0	0
North-facing Lower Concave Slope	26	0	0.00	0.00	0.00	0	0	0	0	0
North-facing Lower Convex Slope	19	0	0.53	0.36	1.58	0	0	0	0	5
North-facing Upper Concave Slope	23	0	0.57	0.40	1.93	0	0	0	0	8
North-facing Upper Convex Slope	36	0	2.36	1.24	7.41	0	0	0	0	40
Ridge top	56	0	1.63	0.60	4.45	0	0	0	0	20
South-facing Upper Convex Slope	33	0	0.03	0.03	0.17	0	0	0	0	1
South-facing Upper Concave Slope	18	0	0.06	0.06	0.24	0	0	0	0	1
South-facing Lower Convex Slope	16	0	0.00	0.00	0.00	0	0	0	0	0
South-facing Lower Concave Slope	31	0	0.03	0.03	0.18	0	0	0	0	1
Big squirreltail (*Elymus mutisetus)*	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	0.10	0.10	0.45	0	0	0	0	2
North-facing Lower Concave Slope	26	0	0.15	0.09	0.46	0	0	0	0	2
North-facing Lower Convext Slope	19	0	2.21	0.93	4.04	0	0	2	0	15
North-facing Upper Concave Slope	23	0	3.00	0.87	4.18	0	1	5	0	15
North-facing Upper Convex Slope	36	0	2.33	0.52	3.12	0	1	4.5	0	10
Ridge top	56	0	0.96	0.30	2.22	0	0	1	0	10
South-facing Upper Convex Slope	33	0	0.18	0.15	0.88	0	0	0	0	5
South-facing Upper Concave Slope	18	0	0.11	0.11	0.47	0	0	0	0	2
South-facing Lower Convex Slope	16	0	0.81	0.48	1.94	0	0	0	0	7
South-facing Lower Concave Slope	16	0	0.81	0.48	1.94	0	0	0	0	7
Nodding Needlegrass (*Nasella cernua*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	0.10	0.10	0.45	0	0	0	0	2
North-facing Lower Concave Slope	26	0	1.35	0.55	2.80	0	0	2	0	10
North-facing Lower Convext Slope	19	0	2.37	0.86	3.74	0	0	5	0	10
North-facing Upper Concave Slope	23	0	4.00	1.07	5.13	0	2	5	0	20
North-facing Upper Convex Slope	36	0	5.64	0.91	5.43	1.25	5	9.25	0	20
Ridge top	56	0	17.71	0.97	7.24	10	20	25	0	30
South-facing Upper Convex Slope	33	0	16.97	1.34	7.67	12.5	15	20	0	35
South-facing Upper Concave Slope	18	0	8.11	1.58	6.69	1.75	6.5	15	0	20
South-facing Lower Convex Slope	16	0	6.56	2.38	9.50	0	2	13.8	0	30
South-facing Lower Concave Slope	31	0	4.19	1.03	5.74	0	1	5	0	20

One-sided bluegrass (*Poa secunda* ssp. *secunda*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	2.25	1.26	5.66	0	0	2	0	25
North-facing Lower Concave Slope	26	0	17.62	2.31	11.80	5	20	30	0	35
North-facing Lower Convext Slope	19	0	17.89	2.40	10.45	10	20	30	0	35
North-facing Upper Concave Slope	23	0	21.74	1.95	9.37	20	25	30	0	35
North-facing Upper Convex Slope	36	0	22.97	1.51	9.07	16.3	25	30	2	40
Ridge top	56	0	12.02	1.01	7.60	5	10	18.8	0	35
South-facing Upper Convex Slope	33	0	3.73	0.99	5.69	0	2	5	0	25
South-facing Upper Concave Slope	18	0	1.39	0.66	2.79	0	0	2	0	10
South-facing Lower Convex Slope	16	0	0.44	0.33	1.32	0	0	0	0	5
South-facing Lower Concave Slope	31	0	0.71	0.38	2.13	0	0	0	0	10
Total Perennial Bunchgrasses	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	2.45	1.29	5.79	0	0	2	0	25
North-facing Lower Concave Slope	26	0	19.08	2.35	11.98	5.75	20	30	0	37
North-facing Lower Convext Slope	19	0	23.00	2.77	12.08	10	30	32	6	40
North-facing Upper Concave Slope	23	0	29.30	2.33	11.19	28	32	35	0	45
North-facing Upper Convex Slope	36	0	33.31	1.29	7.75	30	35	40	8	45
Ridge top	56	0	32.32	1.20	8.99	30	34.5	40	1	45
South-facing Upper Convex Slope	33	0	20.91	1.82	10.46	13.5	20	27	5	45
South-facing Upper Concave Slope	18	0	9.67	1.75	7.41	4.75	9	15.5	0	25
South-facing Lower Convex Slope	16	0	7.81	2.66	10.65	1	2	13.75	0	38
South-facing Lower Concave Slope	31	0	4.97	1.13	6.30	0	1	8	0	20

III. Native Sod Grasses

Alkali rye-grass (*Leymus triticoides*)	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	6.55	2.15	9.63	0	2	8.75	0	30
North-facing Lower Concave Slope	26	0	5.08	1.70	8.65	0	0	10	0	30
North-facing Lower Convext Slope	19	0	2.11	0.96	4.19	0	0	5	0	15
North-facing Upper Concave Slope	23	0	1.30	0.65	3.10	0	0	0	0	10
North-facing Upper Convex Slope	36	0	0.97	0.52	3.14	0	0	0	0	15
Ridge top	56	0	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Convex Slope	33	0	0.00	0.00	0.00	0	0	0	0	0
South-facing Upper Concave Slope	18	0	0.28	0.28	1.18	0	0	0	0	5
South-facing Lower Convex Slope	16	0	0.19	0.14	0.54	0	0	0	0	2
South-facing Lower Concave Slope	31	0	0.00	0.00	0.00	0	0	0	0	0

IV. Bare Soil

Bare Soil	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0	20.20	3.52	15.72	11.3	15	30	2	65
North-facing Lower Concave Slope	26	0	20.00	1.88	9.59	13.8	20	26.3	5	40
North-facing Lower Convext Slope	19	0	28.42	2.10	9.14	20	30	35	10	45
North-facing Upper Concave Slope	23	0	30.48	2.33	11.16	25	35	40	2	45
North-facing Upper Convex Slope	36	0	32.64	2.06	12.33	25	35	40	5	50
Ridge top	56	0	40.63	1.73	12.97	30	40	50	0	70
South-facing Upper Convex Slope	33	0	33.64	1.93	11.06	27.5	30	40	10	60
South-facing Upper Concave Slope	18	0	25.83	3.58	15.17	13.8	25	36.3	5	50
South-facing Lower Convex Slope	16	0	20.13	2.16	8.66	15	20	25	2	35
South-facing Lower Concave Slope	31	0	22.32	1.98	11.04	15	20	30	2	45

V. Total Forbs

Total Forbs	N	N*	Mean	SE Mean	St Dev	Q1	Med	Q3	Min	Max
Floodplain	20	0.00	37.25	4.27	19.09	15	42.5	50	5	60
North-facing Lower Concave Slope	26	0.00	32.12	2.06	10.50	28.8	30	40	5	50
North-facing Lower Convext Slope	19	0.00	30.79	2.40	10.44	25	30	40	15	50
North-facing Upper Concave Slope	23	0.00	28.26	1.82	8.74	25	25	30	15	55
North-facing Upper Convex Slope	36	0.00	27.78	1.62	9.74	20	27.5	35	10	50
Ridge top	56	0.00	22.68	1.22	9.14	15	25	30	0	40
South-facing Upper Convex Slope	33	0.00	32.42	1.94	11.12	25	35	40	10	50
South-facing Upper Concave Slope	18	0.00	37.22	3.16	13.42	30	35	45	10	65
South-facing Lower Convex Slope	16	0.00	37.81	4.42	17.70	22.5	37.5	48.8	10	75
South-facing Lower Concave Slope	31	0.00	39.84	3.09	17.20	25	40	50	10	70

Table 5.19 Mann-Whitney test of relative cover of individual perennial bunchgrass species, combined non-native annual grass species, combined forb species, and bare ground, across landscape positions (2004 field data). Perennial Bunchgrass Plant Community Study, Centennial Specific Plan Project Site, Los Angeles County, California. [Bold = significant difference at 0.05 confidence level]

Acnatherum speciosum

	FP	NFLCC	NFLCV	NFUCC	NFUCV	RT	SFUCV	SFUCC	SFLCV	SFLCC
FP		0.875	0.504	0.619	0.185	0.143	0.739	0.970	0.904	0.774
NFLCC			0.366	0.470	0.105	0.075	0.884	0.817	0.752	0.920
NFLCV				0.901	0.497	0.439	0.259	0.563	0.633	0.285
NFUCC					0.374	0.304	0.348	0.684	0.757	0.378
NFUCV						0.957	0.056	0.226	0.277	0.066
RT							0.036	0.179	0.226	**0.044**
SFUCV								0.682	0.619	0.982
SFUCC									0.966	0.717
SFLCV										0.653
SFLCC										

Elymus multisetus

	FP	NFLCC	NFLCV	NFUCC	NFUCV	RT	SFUCV	SFUCC	SFLCV	SFLCC
FP		0.482	**0.0032**	**0.0008**	**0.0002**	**0.044**	0.891	0.970	0.180	0.752
NFLCC			**0.0052**	**0.0008**	**0.0001**	0.103	0.487	0.550	0.419	0.225
NFLCV				0.516	0.461	0.086	**0.0005**	**0.0054**	0.122	**0.0001**
NFUCC					0.877	**0.0127**	**0.0001**	**0.0015**	**0.0398**	**0.0000**
NFUCV						**0.0020**	**0.0000**	**0.0004**	**0.0232**	**0.0000**
RT							**0.0170**	0.062	0.599	**0.0063**
SFUCV								0.962	0.168	0.595
SFUCC									0.218	0.694
SFLCV										0.067
SFLCC										

Nasella cernua

	FP	NFLCC	NFLCV	NFUCC	NFUCV	RT	SFUCV	SFUCC	SFLCV	SFLCC
FP		0.0179	**0.0061**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0001**	**0.0002**
NFLCC			0.459	**0.0050**	**0.0001**	**0.0000**	**0.0000**	**0.0001**	**0.0196**	**0.0378**
NFLCV				0.106	**0.0084**	**0.0000**	**0.0000**	**0.0035**	0.128	0.273
NFUCC					0.173	**0.0000**	**0.0000**	**0.0434**	0.988	0.627
NFUCV						**0.0000**	**0.0000**	0.220	0.428	0.926
RT							0.519	**0.0000**	**0.0001**	**0.0000**
SFUCV								**0.0003**	**0.0006**	**0.0000**
SFUCC									0.249	**0.025**
SFLCV										0.509
SFLCC										

Poa secunda ssp. secunda

	FP	NFLCC	NFLCV	NFUCC	NFUCV	RT	SFUCV	SFUCC	SFLCV	SFLCC
FP		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	0.687	0.890	0.131	0.122
NFLCC			0.954	0.248	0.091	**0.0439**	**0.0000**	**0.0000**	**0.0000**	**0.0000**
NFLCV				0.223	0.095	**0.0274**	**0.0000**	**0.0000**	**0.0000**	**0.0000**
NFUCC					0.662	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**
	FP	NFLCC	NFLCV	NFUCC	NFUCV	RT	SFUCV	SFUCC	SFLCV	SFLCC
NFUCV						**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**
RT							**0.0000**	**0.0000**	**0.0000**	**0.0000**
SFUCV								**0.0446**	**0.0016**	**0.0001**
SFUCC									0.171	0.173
SFLCV										0.758
SFLCC										

Combined Non-Native Annual Grasses

	FP	NFLCC	NFLCV	NFUCC	NFUCV	RT	SFUCV	SFUCC	SFLCV	SFLCC
FP		0.253	0.188	**0.003**	**0.0000**	**0.0000**	**0.0007**	0.464	0.911	1.000
NFLCC			0.163	**0.0022**	**0.0000**	**0.0000**	**0.0195**	0.667	0.2559	0.114

NFLCV			0.196	**0.0437**	**0.0006**	0.675	0.103	**0.0337**	**0.0071**
NFUCC				0.760	**0.0126**	0.113	**0.0024**	**0.0016**	**0.0000**
NFUCV					**0.031**	**0.0113**	**0.0001**	**0.0001**	**0.0000**
RT						**0.0000**	**0.0000**	**0.0000**	**0.0000**
SFUCV							**0.0117**	**0.0044**	**0.0000**
SFUCC								0.490	0.480
SFLCV									0.955
SFLCC									

Combined Forb Species

	FP	NFLCC	NFLCV	NFUCC	NFUCV	RT	SFUCV	SFUCC	SFLCV	SFLCC
FP		0.102	0.140	0.062	**0.248**	**0.0018**	0.120	0.546	0.797	0.831
NFLCC			0.498	0.058	0.071	**0.0002**	0.859	0.230	0.306	0.059
NFLCV				0.388	0.366	**0.0089**	0.526	0.111	0.217	0.059
NFUCC					0.969	**0.0480**	0.092	**0.0081**	0.067	**0.0107**
NFUCV						**0.0266**	0.062	**0.0082**	**0.0432**	**0.0023**
RT							**0.0001**	**0.0000**	**0.0011**	**0.0000**
SFUCV								0.283	0.318	0.067
SFUCC									0.958	0.492
SFLCV										0.628
SFLCC										

Bareground

	FP	NFLCC	NFLCV	NFUCC	NFUCV	RT	SFUCV	SFUCC	SFLCV	SFLCC
FP		0.459	**0.0083**	**0.0038**	**0.009**	**0.0000**	**0.0002**	0.157	0.518	0.219
NFLCC			**0.0071**	**0.0006**	**0.0001**	**0.0000**	**0.0000**	0.227	0.958	0.445
NFLCV				0.305	0.150	**0.0002**	0.117	0.462	**0.0137**	**0.0458**
NFUCC					0.485	**0.0019**	0.566	0.213	**0.0018**	**0.0053**
NFUCV						**0.0085**	0.961	0.089	**0.0008**	**0.0010**
RT							**0.0078**	**0.0006**	**0.0000**	**0.0000**
SFUCV								**0.0479**	**0.0001**	**0.0002**
SFUCC									0.304	0.490
SFLCV										0.525
SFLCC										

Table 5.20 Descriptive statistics for soil pH, cation exchange capacity (CEC), and percent organic matter by landscape position (spring 2004 field data). Perennial Bunchgrass Plant Community Study, Centennial Specific Plan Project, Los Angeles County, California.

Soil pH	N	N*	Mean	SE Mean	StDev	Q1	Med	Q3	Min	Max
Floodplains	5	0	7.42	0.11	0.25	7.20	7.40	7.65	7.20	7.80
North-facing Lower Concave Slopes	6	0	7.57	0.09	0.23	7.35	7.65	7.73	7.20	7.80
North-facing Lower Convex Slopes	3	0	7.57	0.09	0.15	7.40	7.60	7.70	7.40	7.70
North-facing Upper Concave Slopes	4	0	7.48	0.11	0.22	7.25	7.50	7.68	7.20	7.70
North-facing Upper Convex Slopes	5	0	7.48	0.12	0.28	7.20	7.60	7.70	7.10	7.80
Ridge tops	5	0	7.62	0.10	0.23	7.40	7.60	7.85	7.40	7.90
South-facing Upper Convex Slopes	5	0	7.48	0.12	0.28	7.20	7.60	7.70	7.10	7.80
South-facing Upper Concave Slopes	5	0	7.46	0.09	0.19	7.30	7.40	7.65	7.20	7.70
South-facing Lower Convex Slopes	3	0	7.50	0.06	0.10	7.40	7.50	7.60	7.40	7.60
South-facing Lower Concave Slopes	5	0	7.60	0.08	0.19	7.40	7.70	7.75	7.40	7.80

Soil CEC	N	N*	Mean	SE Mean	StDev	Q1	Med	Q3	Min	Max
Floodplains	5	0	9.72	0.77	1.71	8.30	8.90	11.55	8.00	11.80
North-facing Lower Concave Slopes	6	0	9.78	1.04	2.54	7.90	9.05	11.80	7.30	14.20
North-facing Lower Convex Slopes	3	0	8.97	1.31	2.27	6.90	8.60	11.40	6.90	11.40
North-facing Upper Concave Slopes	4	0	5.55	0.76	1.53	4.13	5.55	6.98	4.00	7.10
North-facing Upper Convex Slopes	5	0	7.44	0.21	0.47	7.05	7.50	7.80	6.70	8.00
Ridge tops	5	0	10.44	0.96	2.15	8.60	10.40	12.30	7.40	13.30
South-facing Upper Convex Slopes	5	0	7.62	1.05	2.35	5.55	7.70	9.65	4.30	10.70
South-facing Upper Concave Slopes	5	0	8.16	0.91	2.03	6.55	7.80	9.95	6.00	11.40
South-facing Lower Convex Slopes	3	0	8.87	1.22	2.11	7.10	8.30	11.20	7.10	11.20
South-facing Lower Concave Slopes	5	0	9.64	0.61	1.37	8.65	9.40	10.75	8.20	11.90

Soil Percent Organic Matter	N	N*	Mean	SE Mean	StDev	Q1	Med	Q3	Min	Max
Floodplains	5	0	2.90	0.76	1.71	1.60	2.40	4.45	1.40	5.70
North-facing Lower Concave Slopes	6	0	2.58	0.32	0.79	1.78	2.80	3.20	1.40	3.50
North-facing Lower Convex Slopes	3	0	2.77	0.12	0.21	2.60	2.70	3.00	2.60	3.00
North-facing Upper Concave Slopes	4	0	1.90	0.17	0.34	1.70	1.75	2.25	1.70	2.40
North-facing Upper Convex Slopes	5	0	1.98	0.29	0.65	1.35	2.10	2.55	1.00	2.60
Ridge tops	5	0	2.12	0.18	0.41	1.70	2.20	2.50	1.70	2.60
South-facing Upper Convex Slopes	5	0	2.14	0.29	0.66	1.75	1.90	2.65	1.70	3.30
South-facing Upper Concave Slopes	5	0	2.54	0.38	0.85	1.75	2.40	3.40	1.50	3.50
South-facing Lower Convex Slopes	3	0	2.30	0.21	0.36	2.00	2.20	2.70	2.00	2.70
South-facing Lower Concave Slopes	5	0	2.22	0.19	0.41	1.85	2.20	2.60	1.70	2.80

Response to Comment Letter ADD-F.16
California Native Plant Society
August 17, 2018

Response to Comment ADD-F.16-1:

Thank you for your participation in this public process. These comments are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This introductory comment does not specifically address the Project or the adequacy of the EIR and no further response is required.

Response to Comment ADD-F.16-2:

The Commenter's opinion is noted. As noted by the Commenter, signatories to the 2008 Tejon Ranch Conservation and Land Use Agreement ("Ranch-Wide Agreement" or "RWA") agreed not to oppose four Tejon Ranch development projects, including the Centennial Project, after years of cooperative study and identification of the most appropriate respective locations for preservation and development. Per RWA recitals, "[t]he long-term conservation of Tejon Ranch has been one of the highest priorities" of the signatory organizations, and the agreement "follows many years of scientific analysis of conservation values on Tejon Ranch by Tejon Ranch Company (TRC) and others, including the Resource Organizations. By comprehensively addressing the entire Tejon Ranch, this Agreement avoids fragmentation of many of the environmentally sensitive areas of Tejon Ranch. The conserved lands will be managed in accordance with a comprehensive Ranch-wide Management Plan that will identify the natural resources and conservation values of the conserved lands as well as opportunities to protect, enhance and restore identified resources and values and establish best management practices for continued use of the conserved lands for existing ranch uses." (Final EIR, Appendix 4.7-E, page 2)

Response to Comment ADD-F.16-3:

The size of the Project's proposed Mitigation Preserve was substantially increased following publication of the Draft EIR. As previously explained in response to Comment B.4-63, and as depicted on Final EIR Exhibit 5.7-10, following publication of the Draft EIR, the Project's Off-Site Mitigation Preserve was significantly expanded to add the approximately 16,668-acre "Area 7," which includes approximately 7,877 acres of additional preserved grassland located within the contiguous open space areas of Tejon Ranch.

As this comment notes, and as previously explained in response to Comment B.4-63, portions of the Off-Site Mitigation Preserve are currently subject to conservation easements. Specifically, all or portions of Areas 3, 4, and 5 are subject to conservation easements acquired by the Wildlife Conservation Board (the "WCB Easements"). In addition, as discussed in EIR, portions of Area 7 and Area 1 are subject to two conservation easements totaling approximately 9,765 acres that were granted by the Tejon Ranch Company to the Tejon Ranch Conservancy, as recorded in the Official Records of Kern County as Document

Numbers 214047995 and 214064244 (collectively, for purposes of this response, the "Conservancy Easements").

To the extent this comment suggests that the entire Conservancy Easements area will be used to accommodate the anticipated realignment of the Pacific Crest Trail, the comment is in error. Per the terms of the Conservancy Easements, the easement area must be managed by the Tejon Ranch Conservancy in accordance with the Ranch-wide Management Plan and in a manner consistent with the Conservancy Easements' conservation purpose. However, the Conservancy Easements expressly reserve Tejon Ranch Company's right to grant to the U.S. Forest Service a linear trail easement within the Conservancy Easements area in order to accommodate future realignment of the Pacific Coast Trail. Such trail easement has not yet been granted, though it is anticipated to occur on some future date, as discussed in response to Comment F.4-2.

The County cannot confirm the accuracy of the "GIS exercise" that commenter undertook to prepare the table and maps included in this comment. However, the location of the WCB Easements and Conservancy Easements shown on this comment's various maps appear roughly accurate.

Response to Comment ADD-F.16-4:

To the extent this comment suggests that those portions the Off-Site Mitigation Preserve that are subject to the WCB Easements and Conservancy Easements cannot be used to mitigate Project impacts on biological resources, this comment is in error. Under the Ranch-Wide Agreement, Tejon Ranch lands that cannot be developed based on the private party agreement between Tejon Ranch and the environmental signatories (Sierra Club, Natural Resources Defense County, Audubon Society, Planning and Conservation League, and Endangered Habitats League) are expressly allowed to be used as mitigation for planned development activities, including Centennial. Thus, the Conservancy Easements expressly reserve to Tejon Ranch Company the right to conduct all activities reasonably required to perform any mitigation requirements imposed pursuant to any Project approval. (See Conservancy Easements Section 6(b)(1)(B).) Moreover, as explained in Response to Comment B.4-63, while off-site mitigation lands subject to the WCB Easements are not eligible for preservation mitigation credit, the WCB Easements expressly provide that the easement areas are eligible mitigation lands for enhancement, restoration, and creation of biological resources (see WCB Easement Sections 6(b)(1)(B) and 1(jj); see also Ranch-Wide Agreement Exhibit R, P.2 Bullet 3). These lands are included in the Off-Site Mitigation Preserve because they contain certain biological resources of an equal or greater biological value than those found on the Project site, as detailed in the Mitigation Preserve Review included as Draft EIR Appendix 5.7-C.

With respect to this comment's questions regarding the details of specific enhancement, restoration or creation mitigation that may occur within the Off-Site Mitigation Preserve, as a general matter, mitigation plans are not required to be circulated with the EIR so long as the mitigation measure identifies the criteria the lead agency will apply in determining that the impact will be mitigated. This type of mitigation approach is consistent with CEQA, which

permits the formulation of detailed plans at a future date as long as the mitigation measure includes specified performance standards and identifies a range of feasible measures that may be implemented to achieve the performance standard and meet mitigation commitments.[3363] Please see response to Comment F.8-173, which sets forth a table that summarizes the applicable performance standards, and feasible measures for meeting such standards, for each of the referenced Project mitigation plans. The more detailed text in some of these mitigation measures also remains applicable to the Project. Note that there is no separate "plan" proposed for the biological resources mitigation program as a whole, which consists of all biological resource mitigation measures. Implementation of these biological resource mitigation measures described in response to Comment F.8-173, as well as other mitigation measures, is included in the County's Mitigation Monitoring and Reporting Program (MMRP).

Response to Comment ADD-F.16-5:

The Commenter questions whether WCB is aware that enhancement, restoration or creation mitigation activities may occur within the WCB Easement areas. As discussed in response to Comment ADD-F.16-4, the WCB Easements expressly provide that the easement areas are eligible mitigation lands for enhancement, restoration, and creation of biological resources.

Response to Comment ADD-F.16-6:

Following discussion with the California Department of Fish and Wildlife, the Applicant proposed to add Area 7 to the Off-Site Mitigation Preserve in order ensure that a 2:1 grasslands preservation ratio can be met on those areas of the Mitigation Preserve that are not subject to WCB Easements. Please see response to Comment B.4-63 for additional discussion of this topic. Please see response to Comment ADD-F.16-3 regarding the accuracy of the map referenced in this comment.

Response to Comment ADD-F.16-7:

The Commenter refers to a Project grassland and wildflower study prepared by Vollmar Consulting (Vollmar Consulting 2004). The study is discussed in the Draft EIR on pages 5.7-25, 5.7-26, 5.7-27, 5.7-29, 5.7-40, 5.7-42, 5.7-43, and 5.7-45 and is referred to throughout Section 5.7 as source for plant and grassland information. Additional discussion of the Vollmar Consulting study is provided in Final EIR responses to Comments F.8-118, F.8-119, F.8-120, and F.8-123, and response to Exhibit B of Comment Letter F.8.

Response to Comment ADD-F.16-8:

While the Commenter's anecdotal botanical information about the site and Mitigation Preserve is noted, an extensive regional grassland study comparing the grasslands on the Project site to the Mitigation Preserve was conducted (NRC 2007). Mitigation Areas 6 and 7 were included in this study with a concentration of sampling plots occurring in the eastern end of the northern slopes of the Tehachapi Mountains, around Area 6. Relative native cover and species richness for all grassland plots in these areas were documented to be high (NRC

[3363] CEQA Guidelines § 15126.4(a)(1)(B)

2007). The Commenter notes that they noticed *Stipa speciosa* becomes more dominant as you move eastward through Area 7 and in Area 6; however, as shown on Table 3 of the NRC study, of the ten "most important" species throughout the study region, *Stipa speciosa* is not listed. Furthermore, *Stipa speciosa* is found on the Project site and, therefore, is an appropriate species to include for preservation.

In regard to the dominant bunchgrass species found in the grassland components of the northern mitigation area (including Areas 6 and 7) and the Project site, the NRC study found that the relative frequency (%) of the two most important bunchgrass species *Stipa pulchra* and *Poa secunda*, are as follows: 3.65% for *Stipa pulchra* on the Project site versus 3.79% in the northern mitigation preserve (includes all mitigation areas north of the Project site) and 2.42% for *Poa secunda* on the Project site versus 3.03% in the northern mitigation preserve. The results of the study indicate similar abundance of important grasslands species.

In addition, the Commenter notes the presence of Joshua trees in the eastern portion of Area 7 and in Area 6 as being an indicator of desert influence on the ecology. Although Joshua trees are technically an indicator species for the Mojave Desert, the presence of Joshua trees in the foothills of the Tehachapi Mountains does not mean the ecology is so dissimilar from the Project site that the grassland found in these areas cannot be preserved as mitigation for the site. Two extant populations of Joshua tree occur approximately three miles *southwest* of the Project site, and scattered historical records occur east of 300th street, the closest to the Project site being approximately 3.3 miles away in Neenach, CA (CCH 2018).[3364] Also see response to Comment ADD-F.16-8 above.

Response to Comment ADD-F.16-9:

The Commenter states a personal hypothesis that microclimate patterns occurring on either side of Big Sycamore Canyon results in differing precipitation rates. Regarding a difference in species composition, please see response to Comment ADD-F.16-8 above. Furthermore, microclimate patterns are contingent upon a suite of factors unique to any one location. Areas within the Project site itself would be expected to differ. For example, a north facing slope in upper Aliso Canyon may have a very different microclimate than a southern facing slope or flatland occurring west of the California Aqueduct. There are patches of xeric (very dry) vegetation communities on the site northwest of Quail Lake that support different types of plant species not seen on the remainder of the site. Similarly, the woodland composition on the site shifts from dominated by valley oaks in some areas to dominated by blue oak in other areas. The many grassland studies conducted on the Project site also attest to this variability. However, as described in response to Comment ADD-F.16-8, grassland studies looking at the site and the mitigation lands found that the dominant species of the grasslands on the site are represented in a similar frequency in the Mitigation Preserve inclusive of Area 6 and the eastern portion of Area 7. As such, current available information is appropriate and adequate to support the use of Areas 6 and 7 for grassland mitigation.

[3364] Consortium of California Herbaria (CCH). 2018. Consortium of California Herbaria. Data provided by the participants of the Consortium of California Herbaria for yucca brevifolia. Berkeley, CA: University of California. http://ucjeps.berkeley.edu/consortium/.

Response to Comment ADD-F.16-10:

This comment summarizes all of the comments included in this comment letter. Please see responses to Comments F.16-1 through F.16-9. The County disagrees with this comment's suggestion that Areas 6 and 7 were inappropriately included in the Off-Site Mitigation Preserve for the reasons discussed in responses to Comments F.16-7 through F.16-10. Regarding the quality of the grasslands present on the Project site, please see Draft EIR pages 5.7-42 through 5.7-47. The Commenter's opinion of the Off-Site Mitigation Preserve design is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

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August 17, 2018

Los Angeles County Regional Planning Commission
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012
(213) 974-6411
Submitted via email to: rruiz@planning.lacounty.gov and
sackett@planning.lacounty.gov

Memo re Tejon Ranch Company's Press Release Dated August 7, 2018

Dear Los Angeles County Regional Planning Commission,

I am submitting the attached Tejon Ranch Company (TRC) Press Release from August 7, 2018 (Attachment1_TRCmemo_7Aug18) titled Tejon Ranch Co. Reports Second Quarter and Year-to-Date 2018 Results of Operation for your consideration.

In the press release, TRC details a $0.6 million loss from the TRC/Rock Outlet Center. The TRC/Rock Outlet Center is located at the base of the Grapevine on TRC land in Kern County approximately 23 miles to the north of the Centennial Specific Plan Area. The press release says that this loss is the result of "accelerating amortization of lease intangibles driven by the removal of poor performing tenants. The Company is actively seeking replacement tenants."

We contend that this press release is relevant to the pending RPC decision on the Centennial Specific Plan for two reasons:

1. TRC continues to state that its Centennial Specific Plan will be a mixed-use development including retail and commercial businesses. If TRC is having difficulties keeping its outlet mall occupied and running at a profit how can they contend that there will be future market demand for similar economic opportunities on the nearby Centennial site?

2. The lack of economic stability at the TRC/Rock Outlet Center comes at a time when the United States has experienced an unprecedented 10 years of unabated economic growth (see https://www.bea.gov/news/glance, and many other recent news stories). How does TRC expect there to be a demand for Centennial's commercial/retail development if the Outlet Center cannot even turn a profit on the heel of 10 years of economic growth? What will happen to the market demand for TRC's residential, retail, and commercial developments when the inevitable economic downturn happens?

ADD-F.17-1

TRC's press release from August 7, points to a fact relevant to Centennial: that there simply may not be a market for this type of development in the far northwestern corner of Los Angeles County.

ADD-F.17-1 cont.

Sincerely,



Nicholas Jensen, PhD
Southern California Conservation Analyst
California Native Plant Society
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Press Release

Tejon Ranch Co. Reports Second Quarter and Year-to-Date 2018 Results of Operations

TEJON RANCH, Calif.–(BUSINESS WIRE)–Aug. 7, 2018-- Tejon Ranch Co., or the Company, (NYSE:TRC), a diversified real estate development and agribusiness company, today announced financial results for the three- and six-months ended June 30, 2018.

The Company is in the process of entitling, planning and developing four master planned developments. Three of the developments are mixed-use residential communities and the fourth is a large commercial/industrial center currently under development. When all entitlements are approved, the Company's current and future master planned developments will be home to just under 35,000 housing units and more than 35 million square feet of commercial/industrial space. To date, 15,450 housing units, 750 lodging units and 25.3 million square feet of commercial space have received various levels of approval.

"Despite a few headwinds that affected second-quarter results, Tejon Ranch has a solid financial foundation as we proceed through the development process to unlock asset value in a strategically located, growing region," said Gregory S. Bielli, President and CEO. "We are aggressively moving forward with plans to develop mixed-use residential communities that are tailored to support housing needs and economic development, while at the same time embracing sustainability and conservation. In addition, we continue to execute our development plans within the Tejon Ranch Commerce Center."

Second Quarter Financial Results

Net loss attributable to common stockholders for the second quarter of 2018 was $1.0 million, or a loss per common share of $0.04, compared with a net loss of $0.2 million, or a loss per common share of $0.01, for the second quarter of 2017.

Revenues and other income, including equity in earnings of unconsolidated joint ventures, for the second quarter of 2018 were $6.1 million, a decrease of $1.2 million, or 16%, compared with $7.3 million for the same period in 2017. Factors behind the decrease include:

- Farming revenues decreased approximately $1.0 million as a result of:
  - Almond revenues decreased $0.5 million resulting from the timing of carryover crop sales. The Company sold 86,000 and 177,000 pounds during the quarters ended June 30, 2018 and 2017, respectively
  - Pistachio revenues decreased $0.3 million, resulting from depressed crop yields for the 2017 pistachio crop. The Company sold 38,000 and 148,000 pounds for the quarters ended June 30, 2018 and 2017, respectively.
- Equity in earnings from our unconsolidated joint ventures decreased $0.9 million to $0.7 million as a result of:
  - Our share of the operating results from TA/Petro decreased $0.6 million due to lower fuel margins driven by higher fuel costs that were not offset by a 15% increase in fuel revenues.
  - Our share of the operating results from TRCC/Rock Outlet Center decreased $0.6 million mostly related to accelerating amortization of lease intangibles driven by the removal of poor performing tenants. The Company is actively seeking replacement tenants.
  - The Company saw improvements of $0.4 million from our TRC-MRC 2 joint venture stemming from the absence of non-cash GAAP losses that were prevalent during the prior year.

Year-to-Date Financial Results

Net income attributable to common stockholders for the first six months of 2018 was $0.5 million, or earnings per diluted common share of $0.02, compared with a net loss of $2.1 million, or a loss per common share of $0.10, for the first six months of 2017.

Revenues and other income, including equity in earnings of unconsolidated joint ventures, for the six months of 2018 were $20.0 million, an increase of $6.6 million, or 49%, compared with $13.4 million for the first six months in 2017. Factors behind

ADD-F.17-1 cont.

this increase include:

Moderate drought conditions in Kern County increased water sales opportunities. The Company sold 7,442 acre-feet of water during the first six months of 2018, generating $8.0 million in revenue. Water sales during the six months ended of 2017 totaled 939 acre-feet, generating $1.2 million.

Our share of the operating results from the Company's unconsolidated joint ventures decreased approximately $1.0 million for the same reasons discussed for the quarter end results.

2018 Operational Highlights

In January, the Company obtained approval from Kern County on the first phase of the Farm Village which will serve as the "front door" to Mountain Village. Farm Village will include fresh culinary offerings, artisan markets, boutique lodging, and an array of trails, gardens, and agriculture that will be intertwined to create a unique and relaxing experience while fulfilling the needs of residents of Mountain Village.

During 2018, approval for expansion of the Foreign Trade Zone (FTZ) was granted by the U.S. Department of Commerce. The expanded FTZ now covers all the industrial sites within TRCC, an area totaling 1,094 acres. The FTZ designation allows the user to secure the many benefits and cost reductions associated with streamlined movement of goods in and out of the zone. This FTZ designation is further supplemented by the Economic Development Incentive Policy, or EDIP adopted by the Kern County Board of Supervisors. EDIP is aimed to expand and enhance the County's competitiveness by taking affirmative steps to attract new businesses and to encourage the growth and resilience of existing businesses. The EDIP provides incentives such as tax breaks, building supporting infrastructure, or workforce development.

In March, the Company successfully leased half of a 480,000-square-foot industrial building to Dollar General. The building was constructed in 2017 through a joint venture formed with Majestic Realty Co. The joint venture is currently in negotiations with a prospective tenant for the remaining space.

2018 Outlook:

The Company's capital structure provides a solid foundation for continued investment in ongoing and future projects. As of June 30, 2018, total capital, including debt, was approximately $497.5 million. The Company has cash and securities totaling approximately $80.6 million and $30.0 million available on its line of credit.

The Company will continue to aggressively pursue development, leasing, and investment within Tejon Ranch Commerce Center (TRCC) and in its joint ventures. The Company will also continue to invest in its residential projects, including Mountain Village at Tejon Ranch, advancing the entitlement of Centennial at Tejon Ranch and defending litigation for Grapevine at Tejon Ranch.

During 2018, the Company will continue to invest funds in master project infrastructure, as well as vertical development within its active commercial and industrial development. California is one of the most highly regulated states in which to engage in real estate development and, as such, natural delays, including those resulting from litigation, can be reasonably anticipated. Accordingly, throughout the next few years, the Company expects net income to fluctuate from year-to-year based on commodity prices, production within its farming segment, and the timing of sales of land and the leasing of land within its industrial developments.

The Company believes the variability of its quarterly and annual operating results will continue during 2018 due to the nature of its current farming and real estate activities. It is currently too premature to predict what our crop production will be as it is too early in the growing cycle. The Company is also unable to predict the outcome of ongoing trade discussions with foreign nations nor is the Company able to predict the resulting impact over crop demand or pricing. Increased tariffs from China and India, which are major customers of almonds and pistachios, can make American products non-competitive and push customers to switch to another producing country.

About Tejon Ranch Co.

Tejon Ranch Co. (NYSE: TRC) is a diversified real estate development and agribusiness company, whose principal asset is its 270,000-acre land holding located approximately 60 miles north of Los Angeles and 30 miles south of Bakersfield.

ADD-F.17-1 cont.

More information about Tejon Ranch Co. can be found on our website at (http://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.tejonranch.com&esheet=51848943&newsitemid=20180807005309&lan=en-US&anchor=www.tejonranch.com&index=1&md5=e8fecd3192fbbf9acff15635397a09f6)www.tejonranch.com (http://www.tejonranch.com).

To watch a video overview of Tejon Ranch Co., please visit: http://tejonranch.com/investorvideo/ (http://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Ftejonranch.com%2Finvestorvideo%2F&esheet=51848943&newsitemid=20180807005309&lan=en-US&anchor=http%3A%2F%2Ftejonranch.com%2Finvestorvideo%2F&index=2&md5=e6987fd9493605ea57c2b2a118a8c347).

Forward Looking Statements:

The statements contained herein, which are not historical facts, are forward-looking statements based on economic forecasts, strategic plans and other factors, which by their nature involve risk and uncertainties. In particular, among the factors that could cause actual results to differ materially are the following: business conditions and the general economy, future commodity prices and yields, market forces, the ability to obtain various governmental entitlements and permits, interest rates and other risks inherent in real estate and agriculture businesses. For further information on factors that could affect the Company, the reader should refer to the Company's filings with the Securities and Exchange Commission.

TEJON RANCH CO.
CONSOLIDATED STATEMENTS OF OPERATIONS
(In thousands, except earnings per share)
(Unaudited)

	Three Months Ended June 30,		Six Months Ended June 30,	
	2018	2017	2018	2017
Revenues:				
Real estate - commercial/industrial	$ 2,189	$ 2,083	$ 4,343	$ 4,272
Mineral resources	1,500	1,519	10,631	3,520
Farming	542	1,501	1,737	1,932
Ranch operations	839	860	1,828	1,941
Total revenues from Operations	5,070	5,963	18,539	11,665
Operating Profits:				
Real estate - commercial/industrial	801	181	1,636	627
Real estate - resort/residential	(433)	(500)	(848)	(1,130)
Mineral resources	905	990	5,805	1,667
Farming	(649)	243	(1,292)	(649)
Ranch operations	(509)	(601)	(909)	(1,013)
Income (loss) from Operating Segments	115	313	4,392	(498)
Investment income	346	95	629	198
Other loss, net	(10)	(275)	(24)	(289)
Corporate expense	(2,464)	(2,368)	(5,196)	(5,119)
Loss from operations before equity in earnings of unconsolidated joint ventures	(2,013)	(2,235)	(199)	(5,708)
Equity in earnings of unconsolidated joint ventures, net	652	1,560	819	1,788
(Loss) income before income tax expense	(1,361)	(675)	620	(3,920)
Income tax (benefit) expense	(348)	(472)	178	(1,804)
Net (loss) income	(1,013)	(203)	442	(2,116)
Net loss attributable to non-controlling interest	(16)	(27)	(18)	(38)
Net (loss) income attributable to common stockholders	$ (997)	$ (176)	$ 460	$ (2,078)
Net (loss) income per share attributable to common stockholders, basic	$ (0.04)	$ (0.01)	$ 0.02	$ (0.10)
Net (loss) income per share attributable to common stockholders, diluted	$ (0.04)	$ (0.01)	$ 0.02	$ (0.10)
Weighted average number of shares outstanding:				
Common stock	25,950,851	20,855,112	25,931,940	20,841,627
Common stock equivalents	19,748	22,837	29,198	44,003
Diluted shares outstanding	25,970,599	20,877,949	25,961,138	20,885,630

Non-GAAP Financial Measure

ADD-F.17-1 cont.

This news release includes references to the Company's non-GAAP financial measure "EBITDA." EBITDA represents our share of consolidated net income in accordance with GAAP, before interest, taxes, depreciation, and amortization, plus the allocable portion of EBITDA of unconsolidated joint ventures accounted for under the equity method of accounting based upon economic ownership interest, and all determined on a consistent basis in accordance with GAAP. EBITDA is a non-GAAP financial measure, and is used by us and others as a supplemental measure of performance. We use Adjusted EBITDA to assess the performance of our core operations, for financial and operational decision making, and as a supplemental or additional means of evaluating period-to-period comparisons on a consistent basis. Adjusted EBITDA is calculated as EBITDA, excluding stock compensation expense. We believe Adjusted EBITDA provides investors relevant and useful information because it permits investors to view income from our operations on an unleveraged basis before the effects of taxes, depreciation and amortization, and stock compensation expense. By excluding interest expense and income, EBITDA and Adjusted EBITDA allow investors to measure our performance independent of our capital structure and indebtedness and, therefore, allow for a more meaningful comparison of our performance to that of other companies, both in the real estate industry and in other industries. We believe that excluding charges related to share-based compensation facilitates a comparison of our operations across periods and among other companies without the variances caused by different valuation methodologies, the volatility of the expense (which depends on market forces outside our control), and the assumptions and the variety of award types that a company can use. EBITDA and Adjusted EBITDA have limitations as measures of our performance. EBITDA and Adjusted EBITDA do not reflect our historical cash expenditures or future cash requirements for capital expenditures or contractual commitments. While EBITDA and Adjusted EBITDA are relevant and widely used measures of performance, they do not represent net income or cash flows from operations as defined by GAAP, and they should not be considered as alternatives to those indicators in evaluating performance or liquidity. Further, our computation of EBITDA and Adjusted EBITDA may not be comparable to similar measures reported by other companies.

TEJON RANCH CO.
Non-GAAP Financial Measures
(Unaudited)

	Three Months Ended June 30,		Six Months Ended June 30,	
	2018	2017	2018	2017
Net (loss) income	$ (1,013)	$ (203)	$ 442	$ (2,116)
Net loss attributed to non-controlling interest	(16)	(27)	(18)	(38)
Interest, net:				
Consolidated	(346)	(95)	(629)	(198)
Our share of interest expense from unconsolidated joint ventures	554	428	1,056	832
Total interest, net	208	333	427	634
Income taxes	(348)	(472)	178	(1,804)
Depreciation and amortization:				
Consolidated	1,149	1,132	2,220	2,282
Our share of depreciation and amortization from unconsolidated joint ventures	1,135	1,322	2,053	2,638
Total depreciation and amortization	2,284	2,454	4,273	4,920
EBITDA	1,147	2,139	5,338	1,672
Stock compensation expense	828	883	1,776	1,694
Adjusted EBITDA	$ 1,975	$ 3,022	$ 7,114	$ 3,366

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Source: Tejon Ranch Co.

Tejon Ranch Co.
Allen Lyda, 661-248-3000
Executive Vice President & Chief Financial Officer

ADD-F.17-1 cont.

Response to Comment Letter ADD-F.17
California Native Plant Society
August 17, 2018

Response to Comment ADD-F.17-1:

The Commenter questions the market demand for retail uses at the Centennial project on the basis of a single statement included in an August 7, 2018 press release that summarizes Tejon Ranch Company's (TRC's) second quarter and year-to-date financial results. As an initial matter, the EIR is required to only evaluate the environmental impacts of a project with the project's features as proposed by the lead agency, for example, a project's proposed land uses. See *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1036; *Village Laguna of Laguna Beach, Inc. v. Bd. of Supervisors* (1982) 134 Cal.App.3d 1022, 1030. Further, a project's economic and social effects are not treated as effects on the environment and thus need not be evaluated in the EIR. See CEQA Guidelines §15131(a); *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 10045, 1019. Since this comment does not concern the adequacy of the EIR, no further response is required.

Nevertheless, as the Commenter correctly notes, the cited press release states that TRC's "share of the operating results from TRC/Rock Outlet Center decreased $0.6 million mostly related to accelerating amortization of lease intangibles driven by the removal of poor performing tenants. The Company is seeking replacement tenants." The press release, however, represents a snapshot of a moment in time and does fully reflect the dynamic nature of the retail real estate market. Indeed, the Project Applicant confirms that, following publication of the press release, Kate Spade opened a new retail outlet at TRC/Rock Outlet Center, and that retailer Bath & Body Works will open a new retail outlet at TRC/Rock Outlet Center in Fall 2018.[3365] Thus, the single press release statement cited by the Commenter is not evidence that TRC/Rock Outlet Center represents a "lack of economic stability," "cannot even turn a profit," or cannot attract retail tenants, as this comment inaccurately claims. In fact, the full press release itself demonstrates that, for the six months ending on June 20, 2018, TRC realized an approximately $1.6 million operating profit from commercial/industrial real estate, which exceeded profits for the same six-month period in 2017 by approximately 62 percent.

As this comment points out, a regional economic downturn may happen in the future. The economy is cyclical and will likely experience periods of expansion and contraction during the life of the Project. However, in the Los Angeles County region, as of fourth quarter 2017, the vacancy rate for retail space has fallen 1.1 percent since 2013 to 3.7 percent and the average asking rents have increased 25 percent since 2013.[3366] The Commenter provides no evidence that the Project will not benefit from this positive trend in the near term or that it cannot adapt to temporary market contractions that may occur over the course of the

[3365] Keith, N. 2018 (August 24). Personal communication. Telephone correspondence between N. Keith (Tejon Ranch Company) and A. McCoy (Psomas) regarding retail outlets at TRC/Rock Outlet.

[3366] NAI Captial. 2018. Los Angeles Retail Construction Report. NAI Capital. http://www2.naicapital.com/Portals/35/docs/4Q17_LA_Retail_Construction_Report.pdf.

Project's multi-decade life span. In any case, as discussed above, CEQA does not require the EIR to evaluate the Project's potential economic effects.

G. Individuals

CENTENNIAL

at TEJON RANCH

Dear Jodie Sackett,

Scientists warn that we're in the middle of a climate crisis. Because transportation is the single largest driver of carbon pollution in California, new development located far from existing cities has disproportionately large climate impacts. Centennial exemplifies poor, outdated land-use planning on an unprecedented scale. This isolated new city would lock in at least 75,000 new vehicle trips per day with an average trip length of over 45 miles.

If you're committed to a sustainable future for L.A., then you need to say no to Centennial.

L.A.'s wildlands are rapidly diminishing. Ninety-nine percent of California's native grasslands are already gone forever, paved over by similar sprawl development. The Centennial project site contains the last, largest and best native grassland and wildflower fields left in California. Rare wildlife such as California condors, bald eagles, kit foxes and pronghorn also will be harmed if Centennial is built.

It's your job to protect our communities and natural resources, not sell them out to developers.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, urban, affordable housing. Centennial is a poster child of 20th-century sprawl development that exacerbates threats to our population through increasing greenhouse gas production and climate change, air pollution and a deteriorating quality of life.

ADD-G.49-1

The proposed site is in "high" and "very high" fire hazard severity zones. And it's directly on top of California's two major earthquake faults. The area was rated by the U.S. Geological Survey as having the highest level of earthquake hazard.

The county and its taxpayers will be on the hook for millions to provide basic public and emergency services to this remote area.

Instead of allowing isolated sprawl development on irreplaceable grasslands in an area at extremely high risk for fires and earthquakes, L.A. should focus on creating safe housing and economic opportunities in or near existing cities.

Please say no to Centennial: It's the wrong vision for L.A.

Sincerely,

Response to Comment Letter ADD-G.49
Form Letter 6
Various Dates

Response to Comment ADD-G.49-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-6 to this document. The response to this form letter, including as individualized by some commenters, is as follows.

This comment's stated opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. With regard to the topics raised in this letter, please see Final EIR, responses to Comment A.3-3, A.3-4, A.3-5, A.3-7, B.4-20, B.4-21, B.4-22, B.4-23, F.2-2, F.2-5, F.3-29, F.3A-46, F.8-20, F.8- 95, F.8-128 to F.8-131, F.8-189, F.8-204, G.31-1, H.21-1, and J.1-6. Since this comment does not raise any specific concerns regarding the adequacy of the EIR, no further response is required. Please also see response to Comment ADD-G.52-1, for a response to Brian Esquivel's specific comments.

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July 6, 2018

Via Electronic Mail

Los Angeles County Regional Planning Commission
c/o Ms. Rosie O. Ruiz
320 West Temple Street, 13th Floor, Room 1350
Los Angeles, California 90012
rruiz@planning.lacounty.gov

Re: Centennial Project Final Environmental Impact Report

Dear Commissioners:

As a pediatrician and emeritus professor of public health at the University of California, and former top environmental health leader in the United States during my time at CDC, I urge that communities must be designed and built in ways that optimize the health of all. In the past, too many places have been built in ways that put the health and well-being of our communities as an afterthought, the primary focus being RoI --Return on Investment, mere financial return. Too many housing developments are, in essence, "mandatory driving communities", where one third of our citizens are put at an extreme disadvantage—the one third of us who do not drive, in large part because we are too old, too young, too poor, or disabled. ADD-G.50-1

Building far from workplaces and urban areas not only impacts the natural world, building in car-dependent ways generates a *pernicious RoI*: accelerating epidemics of inactivity, pre-diabetes, diabetes, obesity, asthma, isolation and depression. And long commutes erode family time and opportunities to socialize and for healthy recreation. ADD-G.50-2

When I lecture and visit community meetings, I always ask the following question: "What is the most difficult part of your day?" Invariably, the answer is "my commute". To build a community that requires working people to drive more than 30 minutes or more to work each way is abusive to health and to all ages. The proposed Centennial project would consume almost 6,000 acres of irreplaceable habitat and redirect tens of thousands of people to homes more than 30 to 60 miles away from existing ADD-G.50-3

cities. It is a step in the wrong direction—we should be building housing much closer to city centers, places of work, and public transit. Not only would a project like Centennial increase air pollution by putting more cars on already congested roads, it would isolate people as they spend even more time in their cars commuting to jobs, groceries, and recreation far from their homes. Potential residents would have increased stress levels from long car commutes while living in isolation with no time to exercise or spend time with their families or in their communities[1,2].

ADD-G.50-3 cont.

Approving Centennial instead of investing in quality urban growth will have negative public health and economic outcomes. This project would create 75,000 new vehicle trips a day, with an average length of 45 miles per trip. Putting more people in cars on the road is a health and safety hazard. Automobile crashes are the leading cause of death among young people, and they cause more than 3.4 million nonfatal injuries each year, which costs an estimated $200 billion annually.[3] In addition, the US spends 18-19% of its money on medical care – anything we can do to reduce chronic diseases like obesity and asthma would lead to less spending.

ADD-G.50-4

Instead of digging a deeper hole for our health and the environment with projects like Centennial, we can use design strategies that offer the potential to decrease air pollution, protect our water sources, increase physical activity, control injuries, and improve mental health and social capital. Thoughtful urban design is a powerful tool to improve human health while minimizing our impacts on the planet.

ADD-G.50-5

I urge the Commission to reject projects like this. Promote growth that provides healthy lifestyles for everyone. As my colleagues and I said in our book, *Urban Sprawl and Public Health: Designing, Planning, and Building for Healthy Communitie*[3], "At its best, Smart Growth is like a medicine that treats a multitude of diseases – protecting respiratory health, improving cardiovascular health, preventing cancer, avoiding traumatic injuries and fatalities, controlling depression and anxiety, improving well-being." We owe it to our children and our grandchildren to take care of our environment and our health. We must provide them a world that is as healthful, beautiful, and biodiverse as the one we have been given.

ADD-G.50-6

These statements are my own and do not represent University of California policy.

Sincerely,



Richard J. Jackson, MD, MPH, FAAP
Emeritus Professor of Environmental Health Sciences
Former Director, CDC National Center for Environmental Health
Member, National Academy of Medicine (IOM)

---

1 Ewing, R., Schmid, T., Killingsworth, R., Zlot, A., & Raudenbush, S. (2008). Relationship between urban sprawl and physical activity, obesity, and morbidity. In *Urban Ecology* (pp. 567-582). Springer, Boston, MA.

2 Leyden, K. M. (2003). Social capital and the built environment: the importance of walkable neighborhoods. *American journal of public health*, *93*(9), 1546-1551.z

3 Frumkin, H., Frank, L., & Jackson, R. J. (2004). Urban sprawl and public health: Designing, planning, and building for healthy communities. Island Press.

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Building the Evidence—U.S. Approaches

Relationship Between Urban Sprawl and Physical Activity, Obesity, and Morbidity

Reid Ewing, Tom Schmid, Richard Killingsworth, Amy Zlot, Stephen Raudenbush

Abstract

Purpose. *To determine the relationship between urban sprawl, health, and health-related behaviors.*

Design. *Cross-sectional analysis using hierarchical modeling to relate characteristics of individuals and places to levels of physical activity, obesity, body mass index (BMI), hypertension, diabetes, and coronary heart disease.*

Setting. *U.S. counties (448) and metropolitan areas (83).*

Subjects. *Adults ($n = 206,992$) from pooled 1998, 1999, and 2000 Behavioral Risk Factor Surveillance System (BRFSS).*

Measures. *Sprawl indices, derived with principal components analysis from census and other data, served as independent variables. Self-reported behavior and health status from BRFSS served as dependent variables.*

Results. *After controlling for demographic and behavioral covariates, the county sprawl index had small but significant associations with minutes walked ($p = .004$), obesity ($p < .001$), BMI ($p = .005$), and hypertension ($p = .018$). Residents of sprawling counties were likely to walk less during leisure time, weigh more, and have greater prevalence of hypertension than residents of compact counties. At the metropolitan level, sprawl was similarly associated with minutes walked ($p = .04$) but not with the other variables.*

Conclusion. *This ecologic study reveals that urban form could be significantly associated with some forms of physical activity and some health outcomes. More research is needed to refine measures of urban form, improve measures of physical activity, and control for other individual and environmental influences on physical activity, obesity, and related health outcomes. (Am J Health Promot 2003;18[1]:47–57.)*

Key Words: Physical Activity, Urban Design, Sprawl, Obesity, Prevention Research

Reid Ewing completed this work while with the Bloustein School of Planning and Public Policy, Rutgers University, New Brunswick, New Jersey. He is currently with the National Center for Smart Growth, University of Maryland, College Park, Maryland. Tom Schmid is from the Centers for Disease Control and Prevention, NCCDPHP, DNPA, Physical Activity and Health Branch. Richard Killingsworth is with Active Living By Design, University of North Carolina, Chapel Hill, North Carolina. Amy Zlot is with the Centers for Disease Control and Prevention, NCCDPHP, OIIRM, Atlanta, Georgia. Stephen Raudenbush is with the Department of Education, Department of Statistics, and Survey Research Center, University of Michigan, Ann Arbor.

Send reprint requests to Dr. Reid Ewing, University of Maryland, National Center for Smart Growth, Preinkert Field House, College Park, MD 20742; (301)405-6788 (tel).

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INTRODUCTION

The links between physical activity and health outcomes are well established. At the time of the Surgeon General's *Report on Physical Activity and Health* in 1996, hundreds of research studies were amassed providing evidence of these links.[1] Physical inactivity contributes to increased risk of many chronic diseases and conditions, including obesity, hypertension, non–insulin-dependent diabetes, colon cancer, osteoarthritis, osteoporosis, and coronary heart disease. Despite the health benefits of physical activity, 74% of U.S. adults do not get enough physical activity to meet public health recommendations and about one in four U.S. adults remains completely inactive during their leisure time.[2,3]

One consequence of physical inactivity—obesity—has reached epidemic proportions across age, race/ethnic, and socioeconomic groups.[4,5] Recent data from the National Health and Nutrition Examination Survey (NHANES) found that 64.5% of the U.S. adult population is overweight and almost one in three is obese (30.5%).[6] Excess weight and physical inactivity are reported to account for over 300,000 premature deaths each year, second only to tobacco-related deaths among preventable causes of death.[7,8]

There is growing interest in how physical inactivity, obesity, and related chronic health problems are affected by environmental factors. Public health researchers are expanding their horizons, moving beyond individual models of behavior to more inclusive ecologic models that recognize the importance of both physical

and social environments as determinants of health.[9–14] For physical activity researchers, this interest is relatively new. A review published in 1998 found only seven such studies.[14] Since then, several studies have researched environmental determinants of physical activity.[15–19] One such study found that urban and suburban residents living in homes built before 1946 (a proxy for older neighborhoods) were more likely to walk long distances with some frequency than those living in newer homes.[17] This result was attributed to the greater likelihood of sidewalks, denser interconnected streets, and a mix of business and residential uses in older neighborhoods.

Urban planning and transportation researchers are also expanding their horizons, giving increased attention to how their fields affect human behavior and health.[20] In the past decade, more than 50 studies have related aspects of the built environment to travel for utilitarian purposes.[21] Utilitarian travel is travel not for its own sake but, rather, to engage in activities at the trip end, such as going to work, shopping, or school. It is distinct from leisure time physical activity such as walking for exercise, an end in itself. Several recent studies have focused on the relationship between the built environment and the choice of travel mode (e.g., driving a car, taking a bus, or walking).[22–29] Walking for utilitarian purposes is consistently found to be more prevalent in dense, mixed-use neighborhoods when compared to lower density, exclusively residential neighborhoods.[30] For example, a study of two pairs of neighborhoods in the San Francisco Bay Area concluded that walking trips to commercial areas were more frequent in the older neighborhoods with nearby stores and grid-like street networks than in the newer more homogeneous neighborhoods.[29]

The quantity and quality of such studies, although based on cross-sectional and case study designs, are increasing and some of these studies are now being reviewed as part of the evidence base for the *Guide for Community Preventive Services*. Developed by public health experts, this guide will recognize the importance of community design in promoting leisure time physical activity.[31]

The study reported in this paper measured urban form at the county and metropolitan levels. Urban form at these levels is often characterized as more or less "sprawling." *Poor accessibility* is the common denominator of urban sprawl—nothing is within easy walking distance of anything else.[32] Although variously defined by others, we consider sprawl to be any environment characterized by (1) a population widely dispersed in low-density residential development; (2) rigid separation of homes, shops, and workplaces; (3) a lack of distinct, thriving activity centers, such as strong downtowns or suburban town centers; and (4) a network of roads marked by large block size and poor access from one place to another. Compact development is the antithesis of sprawl, keeping complementary uses close to one another.

Our working hypotheses, based on the planning and public health literature, were that residents of sprawling places would (1) walk less, (2) weigh more, and (3) have higher prevalence of health problems linked to physical inactivity than those living in more compact places. These hypotheses were tested using data from the Behavioral Risk Factor Surveillance System (BRFSS) for 1998 to 2000.

METHODS

Design

The research design in this study was cross-sectional and ecologic. The degree of sprawl within counties or metropolitan areas was related to levels of physical activity, obesity, body mass index (BMI), hypertension, diabetes, and coronary heart disease (CHD) for BRFSS respondents from these particular counties or metropolitan areas. Hierarchical linear and nonlinear modeling (HLM) methods were used to control for covariates, such as age, race/ethnicity, and education, at the individual level while examining the effects of sprawl at the population level.

Behavioral and health status variables extracted from BRFSS are listed in Table 1. All data are self-reported. A condition was assumed to exist if a health care practitioner had told the respondent that he or she had the condition.

Three leisure time physical activity variables served as dependent or outcome variables: *any physical activity*, reporting any amount of leisure time physical activity over the past month; *recommended physical activity*, getting the recommended levels of physical activity in the past month; and *minutes walked*, total minutes of walking as leisure time physical activity in the past month. A person was considered to have met the physical activity recommendations if she or he reported ≥30 minutes of moderate-level physical activity on ≥5 days of the week or if he or she reported ≥20 minutes of vigorous activity on ≥3 days of the week. Walking was emphasized because of its documented relationship to urban form and its dominance as a leisure time activity (reported with almost six times the frequency of the next most common leisure time activity, gardening).

Two weight-related measures were included as outcome variables: *BMI* and *obesity*. BMI was defined as weight in kilograms divided by height in meters squared (kg/m^2) and obesity was defined as a BMI of ≥30.0.

Three health status variables were also modeled: *hypertension*, *diabetes*, and *coronary heart disease* (CHD). These three were selected for their known relationships to inactivity and obesity.

Unless otherwise noted, gender, race/ethnicity, education, age, smoking status, and fruit and vegetable consumption were included in models as individual-level covariates. The reference groups for sociodemographic variables were females, white non-Hispanics, college graduates, and persons aged 18 to 30 years. Race/ethnicity, for example, was represented by three dummy variables (1 if yes, 0 otherwise): black non-Hispanic, Hispanic, and Asian or other race. In this case, white non-Hispanics were the reference group (for other covariates, see Table 2).

A *metropolitan sprawl index*, developed for Smart Growth America (SGA), was used in this study to mea-

Table 1

Sample Sizes (n), Means, and Standard Deviations (SD) for Health Behavior and Health Status Variables, 1998 to 2000*

	n for County Models With All Covariates (N = 206,992)†	n for Metropolitan Models With All Covariates (N = 175,609)	Means (SD) for County Models	Means (SD) for Metropolitan Models
Any physical activity‡	149,835	126,893	0.730 (0.444)	0.733 (0.442)
Recommended physical activity§	135,344	115,006	0.268 (0.443)	0.273 (0.445)
Minutes walked‖	147,305	124,764	247.8 (493.3)	251.2 (499.6)
Body mass index (BMI, kg/m^2)	137,263‡‡	116,779‡‡	26.06 (5.15)	26.03 (5.15)
Obesity¶	137,409‡‡	116,913‡‡	0.181 (0.385)	0.181 (0.385)
Hypertension#	85,465	68,927	0.239 (0.426)	0.235 (0.424)
Diabetes**	142,685‡‡	121,292‡‡	0.056 (0.230)	0.055 (0.228)
Coronary heart disease††	40,651	31,563	0.042 (0.201)	0.041 (0.197)

* For exact wording of Behavioral Risk Factor Surveillance System (BRFSS) questions and to see how calculated variables were determined, go to http://www.cdc.gov/brfss/calcvars.htm.
† N, initial sample before any BRFSS variables entered.
‡ Reported any leisure time physical activity in the last month.
§ Met recommended level of physical activity in the last month: Recommended amount is 30 minutes of moderately intense physical activity at least 5 days per week and/or 20 minutes of vigorously intense physical activity at least 3 days per week.
‖ Minutes walked for leisure during last month.
¶ BMI ≥ 30.
# Ever been told had hypertension.
** Ever been told had diabetes.
†† Ever been told had coronary heart disease.
‡‡ Includes fruit and vegetable consumption as a covariate, which reduced sample size.

Table 2

Sociodemographic and Behavioral Covariates From BRFSS Surveys*

Gender	Male (dichotomous)
Age	Ages 18 to 29, 30 to 44, 45 to 64, 65 to 74, 75+ (categorical)
Race/ethnicity	White non-Hispanic, black non-Hispanic, Hispanic, other race (categorical)
Education	College graduate, some college, high school graduate, less than high school (categorical)
Smoking	Currently smoke (dichotomous)
Diet	Fruit or vegetable consumption three or more times per day (dichotomous)

* For exact wording of Behavioral Risk Factor Surveillance System (BRFSS) questions and to see how calculated variables were determined, go to http://www.cdc.gov/brfss/calcvars.htm.

sure urban form at the metropolitan level. The metropolitan sprawl index is a linear combination of 22 land use and street network variables. A simpler *county sprawl index* was used to measure urban form at the county level. It is a linear combination of six variables from the larger set, these six being available for counties, whereas many of the larger set are available only for metropolitan areas. The derivation of these indices is described in the "Measures" section.

Sample

BRFSS surveys for 1998, 1999, and 2000 provided data on leisure time physical activity levels, BMI and obesity, hypertension, diabetes, and CHD.[33] Our samples consisted of 206,992 respondents from 448 counties and 175,609 respondents from 83 metropolitan areas for the pooled 1998, 1999, and 2000 BRFSS surveys. These respondents were selected from the larger BRFSS samples because they had known places of residence for which urban sprawl indices were available. Hence, it was possible to link urban sprawl indices directly to health data for all respondents. Data for 3 years were pooled to increase the statistical power of the analysis.

Metropolitan areas, as defined by the U.S. Office of Management and Budget, consist of one or more counties having a high degree of economic and social integration with one another. Our sample of respondents was smaller at the metropolitan than county level because metropolitan sprawl indices were available only for the largest metropolitan areas (500,000 population or more) with complete urban form datasets (all 22 variables that make up the metropolitan sprawl index). The sample of respondents at the county level included residents of counties that are part of smaller metropolitan areas, metropolitan areas with only partial datasets (although always with all six variables that make up the county sprawl index), or both.

As illustrated in Table 1, actual sample sizes varied among BRFSS

outcome measures because of missing responses and exclusion of certain questions in certain years. For instance, physical activity data were collected by all states in 1998 and 2000 but only by certain states in 1999. Although diabetes data were gathered by all states for all 3 years, many cases were lost because fruit and vegetable consumption was included as an explanatory variable in the diabetes analysis. Fruit and vegetable consumption data were collected by all states in 1998 and 2000 but by only a small subset of states in 1999.

Sample sizes for individual counties ranged from 6 to 6429, with 353 counties having samples of 50 or more. Sample sizes were more than adequate to support stable and powerful statistical analysis. HLM uses the method of maximum likelihood to optimally combine information from different samples. In this study, counties with small samples contributed less information to the estimation of parameters than counties with large samples. Because maximum likelihood took into account the information from each county and because the number of counties in this study was large (n = 448), counties with small samples were not problematic from a statistical standpoint.[34–36]

Measures

BRFSS is a population-based, random digit–dialed telephone survey administered to U.S. civilian noninstitutionalized adults aged ≥18 years. For the years under study, BRFSS collected data from 150,000 to 185,000 respondents in the 50 states and the District of Columbia. Surveys consisted of a core module of questions asked annually, a rotating core asked every other year, and optional modules asked at states' discretion. A recent review found high reliability and validity for demographic questions (e.g., age, sex, race) and moderate to high reliability and validity for behavioral and health status questions (e.g., hypertension, diabetes, level of physical activity, weight, BMI, fruit and vegetable consumption).[37] Further information on specific questions and how variables were calculated can be found at http://www.cdc.gov/brfss/index.htm.

Smart Growth America's *metropolitan sprawl index*, used in this study to represent urban form at the metropolitan level, is the most comprehensive representation of sprawl for metropolitan areas yet developed. Technical details, including operational definitions, are available in the full technical report at the SGA web site (www.smartgrowthamerica.org).

To construct the index, 83 metropolitan areas in the United States with a total population of more than 150 million people in 2000, over half the U.S. population, were rated in four urban form dimensions. For each dimension, a composite factor was extracted from several observed variables via principal components analysis.

- *Residential density* was defined in terms of gross and net densities and proportions of population living at different densities; seven variables made up the metropolitan density factor.
- *Land use mix* was defined in terms of the degree to which land uses are mixed and balanced within subareas of the region; six variables made up this factor.
- *Degree of centering* was defined as the extent to which development is focused on the region's core and regional subcenters; six variables made up this factor.
- *Street accessibility* was defined in terms of the length and size of blocks; three variables made up this factor.

The four factors were combined into an overall index by summing them and then adjusting for the size of the metropolitan area. The four were given equal weight in the overall index. Scores were then converted to a scale with a mean of 100 and standard deviation of 25. The bigger the value of the index, the more compact the metropolitan region. The smaller the value, the more sprawling the metropolitan region. A few metropolitan regions are compact in all dimensions; New York, New York; San Francisco, California; Boston, Massachusetts; and Portland, Oregon rank near the top in overall score. Others near the top, despite one factor score below average, include Jersey City, New Jersey; Providence, Rhode Island; Honolulu, Hawaii; and Omaha, Nebraska. A few regions sprawl badly in all dimensions. These include Atlanta, Georgia; Raleigh-Durham and Greensboro–Winston-Salem–High Point, North Carolina; and Riverside-San Bernardino, California. They rank at or near the bottom in overall score.

In an earlier study, the metropolitan sprawl index was found to have good explanatory power. The index explained a significant proportion of the variance across metropolitan areas in percent walking or taking transit to work, average vehicle ownership, vehicle miles traveled per capita, traffic fatality rates, and ground-level ozone concentration.[38]

In order to examine the effects of urban form at a finer geographic scale, we developed a *county sprawl index* using a process similar to that used to develop the *metropolitan sprawl index*. The county is the smallest geographic unit that can be matched to BRFSS data. The index was estimated for 448 metropolitan counties or statistically equivalent entities (e.g., independent towns and cities). These counties comprised the 101 most populous metropolitan statistical areas, consolidated metropolitan statistical areas, and New England county metropolitan areas in the United States as of the 1990 census, the latest year for which metropolitan boundaries were defined as this study began. Nonmetropolitan counties and metropolitan counties in smaller metropolitan areas were excluded from the sample. More than 183 million Americans, nearly two thirds of the U.S. population, lived in these 448 counties in 2000.

Although sprawl has the four characteristics noted above, only two of these could be measured at the county level: low residential density and poor street accessibility. Six variables became part of the county sprawl index (as shown in Table 3). We used U.S. Census data[39] to derive three population density measures for each county: (1) gross population density (persons per square mile); (2) percentage of the county popula-

Table 3

County Sprawl Index Variables and Factor Loadings

Observed Variable	Factor Loading*
Gross population density in persons per square mile	0.846
% of population living at densities <1500 persons per square mile	−0.698
% of population living at densities >12,500 persons per square mile	0.846
County population divided by the amount of urban land in square miles	0.849
Average block size in square miles	−0.698
% of blocks 1/100 of a square mile or less in size (about 500 feet on a side, a traditional urban block)	0.821

* Correlation with county sprawl index.

tion living at low suburban densities, specifically, densities between 101 and 1499 persons per square mile, corresponding to less than one housing unit per acre; and (3) percentage of the county population living at moderate to high urban densities, specifically, more than 12,500 persons per square mile, corresponding to about eight housing units per acre, the lower limit of density needed to support mass transit. When deriving these county population density measures, we excluded census tracts with fewer than 100 inhabitants per square mile (corresponding to rural areas, desert tracts, and other undeveloped lands) located within the county, because we were only concerned about sprawl in developed areas where the vast majority of residents live. A fourth density variable, the net density in urban areas, was derived from estimated urban land area for each county from the Natural Resources Inventory of the U.S. Department of Agriculture.[40]

Data reflecting street accessibility for each county were obtained from the U.S. Census, based on information concerning block size.[41] A census block is defined as a statistical area bounded on all sides by streets, roads, streams, railroad tracks, or geopolitical boundary lines, in most cases. A traditional urban neighborhood is composed of intersecting bounding roads that form a grid, with houses built on the four sides of the block, facing these roads. Therefore, the length of each side of that block, and therefore its block size, is relatively small. By contrast, a contemporary suburban neighborhood does not make connections between adjacent cul-de-sacs or loop roads. Instead, local streets only connect with the road at the subdivision entrance, which is on one side of the block boundary. Thus, the length of a side of this block is quite large, and the block itself often encloses multiple subdivisions to form a superblock a half mile or more on a side. Large block sizes indicate a relative paucity of street connections and alternate routes.

For each county, we calculated (1) average block size and (2) percentage of blocks with areas less than 1/100 square mile, the size of a typical traditional urban block bounded by sides just over 500 feet in length. Tracts with blocks larger than 1 square mile were excluded from these calculations because they were likely to be in rural or other undeveloped areas.

The six variables were combined into one factor representing degree of sprawl within the county. This was accomplished via principal components analysis. The principal component selected to represent sprawl was the one capturing the largest share of common variance among the six variables (i.e., the one on which the observed variables loaded most heavily; see Table 3). This one component explained almost two thirds of the variance in the dataset (63.4%). Because this component captured the majority of the combined variance of these variables, no subsequent components were considered.

To derive a county sprawl index, we transformed the principal component, which had a mean of 0 and standard deviation of 1, to a scale with a mean of 100 and standard deviation of 25. This transformation produced a more familiar metric (like an IQ scale) and ensured that all values would be positive, thereby enhancing our ability to test nonlinear relationships.

The bigger the value of the index, the more compact the county. The smaller the value, the more sprawling the county. Scores ranged from a high of 352 to a low of 63. At the most compact end of the scale were four New York City boroughs—Manhattan, Brooklyn, The Bronx, and Queens; San Francisco County, California; Hudson County (Jersey City), New Jersey; Philadelphia County, Pennsylvania; and Suffolk County (Boston), Massachusetts. At the most sprawling end of the scale were outlying counties of metropolitan areas in the Southeast and Midwest, such as Goochland County in the Richmond, Virginia, metropolitan area and Geauga County in the Cleveland, Ohio, metropolitan area. The county sprawl index is positively skewed. Most counties clustered around intermediate levels of sprawl. In the United States, few counties approach the densities of New York or San Francisco counties. (A complete list of counties and their respective "sprawl" scores is available on request.)

Analysis

In this cross-sectional, ecologic study, relationships between urban sprawl and leisure time physical activity levels, BMI and obesity, hypertension, diabetes, and CHD were estimated with HLM 5 (Hierarchical Linear and Nonlinear Modeling) software.[42] Many BRFSS respondents share characteristics of a given place, which tends to produce a dependence among respondents, violating the independence assumption of ordinary least squares (OLS) regression. Standard errors of regression coefficients associated with place characteristics based on OLS will consequently be underestimated. Moreover, OLS regression coefficient estimates will be inefficient. Hierarchical (multilevel) modeling overcomes these limitations, accounting for the dependence among respon-

dents residing in a given place and producing more accurate standard error estimates.[43]

The hierarchical models estimated in this study can be characterized as pairs of linked statistical models. At the first level, respondent health status or behavior were modeled within each place as a function of respondent characteristics plus a random error. Thus, each place had a place-specific regression equation that described the association between respondent characteristics and respondent health status or behavior within that place. At the second level, the place-specific intercept and coefficients were conceived as outcomes and were modeled in terms of place characteristics plus random effects.

In some HLM models, only the place-specific intercepts vary across places, and all of the place-specific regression coefficients are invariant across places. These are often termed "random intercept" models to denote that only the intercept randomly varies. In other HLM models, the place-specific regression coefficients randomly vary as well. These are often termed "random coefficient" models.

In this study, all models initially assumed the random intercept form. Only the intercept term in the place-specific model was allowed to vary, and all place-specific coefficients were taken as fixed. Then this assumption was relaxed, and coefficients were allowed to vary as a function of place characteristics, effectively permitting interactions between place and respondent characteristics.

Interactions between place and respondent characteristics were seldom significant and never sufficiently large to appreciably affect the relationships between place characteristics and outcome variables. Hence, the only results reported are for random intercept models.

Linear models were estimated for continuous outcome variables such as minutes of walking per month. Nonlinear models were estimated for the binary outcomes such as meeting or failing to meet recommended physical activity levels; specifically, the log-odds of the outcome was equated to a linear function of the explanatory variables.

Using HLM software, we were able to apply BRFSS final weights to observations, thereby partially accounting for different probabilities of sample selection and survey response. However, we were unable to account for the complex cluster and stratified sample survey designs used by state health departments when conducting the health surveys on which this study relies. This capability lies beyond the current HLM software.[a]

RESULTS

County-level Analysis

Physical Activity Outcomes. As has been found in previous research, the likelihood of engaging in any leisure time physical activity in the past month was greater for males than females and for white non-Hispanics than other races/ethnicities. The likelihood declined with age and increased with educational attainment (see Table 4 for regression coefficients, *t*-ratios, and significance levels).

The likelihood of engaging in recommended levels of physical activity in the past month followed a similar pattern, with one exception. Those age 65 or older were more likely to meet recommended levels than were younger adults because of the greater amount of leisure time walking they do.

The amount of leisure time walking was greater for females than males and increased with age up to 75 years. Education was positively associated with minutes of walking and being physically active in general.

Controlling for these covariates, the likelihood of reporting any leisure time physical activity was not significantly related to the county index ($t = 1.01$, $p = .313$). The likelihood of getting recommended levels of physical activity was related to the county index, but just short of the traditional .05 probability level ($t = 1.94$, $p = .052$). The number of minutes walked varied directly with the county index, with residents of more compact places reporting more leisure time walking than residents of more sprawling places. The difference was not large but was statistically significant ($t = 2.95$, $p = .004$).

All else being equal, residents of a county one standard deviation (25 units) above the mean county index would be expected to walk for leisure 14 minutes more each month compared to residents of a county one standard deviation below the mean (i.e., 50 units × 0.275 minutes per unit). Comparing the extremes (New York County with an index of 352 and Geauga County with an index of 63), New York residents would be expected to walk for leisure 79 minutes more each month.

Weight-related Outcomes. BMI was higher for males than females; increased with age up to middle age (45 to 64 years), and then declined; was higher for blacks and Hispanics than for whites and lower for other races (primarily Asian); was higher for the less educated relative to the college educated; was lower for smokers than nonsmokers; and was lower for those who consume three or more servings of fruits and vegetables daily (Table 5).

After controlling for these covariates, the county index was related to BMI in the expected direction and at a highly significant level ($t = -2.84$, $p = .005$). Residents of a more compact county, one standard deviation above the mean county index, would be expected to have BMIs 0.17 kg/m^2 lower than residents of a more sprawling county, one standard deviation below the mean (i.e., 50 × −.00344). Again, comparing the extremes, New York residents would have BMIs almost 1 kg/m^2 less than their counterparts in Geauga County. For the BRFSS sample mean BMI (26.1 kg/m^2), this translates into 6.3 fewer pounds of body weight.

The binary variable obesity was also modeled and had a highly significant relationship to the county index ($t = 4.24$, $p < .001$). The odds of being obese in a more compact county, one standard deviation above the mean county index, were 0.90

[a] To account for the complexities of the BRFSS sample survey design, the package of choice is SUDAAN. However, SUDAAN software is not capable of multilevel modeling, a significant shortcoming in a study of this sort.

Table 4

Relationship Between Individual Characteristics, County Sprawl Index, and Leisure Time Physical Activity, 1998 to 2000 (With Coefficients, *t*-ratios, and Significance Levels)

	Any Physical Activity			Recommended Physical Activity			Minutes Walked		
	Coefficient	*t*	*p*	Coefficient	*t*	*p*	Coefficient	*t*	*p*
Male	0.246	12.1	<0.001	0.087	4.44	<0.001	−82.5	−22.1	<0.001
Age 30 to 44	−0.396	−14.7	<0.001	−0.228	−8.17	<0.001	39.4	7.95	<0.001
Age 45 to 64	−0.596	−17.5	<0.001	−0.159	−5.68	<0.001	102.2	14.9	<0.001
Age 65 to 74	−0.639	−13.6	<0.001	0.054	1.38	0.167	139.7	16.4	<0.001
Age 75+	−1.067	−26.7	<0.001	0.187	4.78	<0.001	74.1	6.65	<0.001
Black non-Hispanic	−0.322	−10.9	<0.001	−0.176	−4.96	<0.001	4.24	0.62	0.537
Hispanic	−0.625	−14.7	<0.001	−0.217	−6.15	<0.001	−27.6	−3.58	0.001
Other race	−0.553	−9.43	<0.001	−0.276	−4.49	<0.001	−37.8	−3.26	0.001
Some college	−0.417	−13.3	<0.001	−0.226	−10.3	<0.001	−8.33	−1.66	0.097
High school graduate	−0.854	−31.8	<0.001	−0.525	−21.1	<0.001	−19.8	−3.74	<0.001
Less than high school	−1.353	−39.6	<0.001	−0.946	−20.9	<0.001	−65.3	−9.24	<0.001
Currently smoke	−0.357	−15.7	<0.001	−0.273	−11.0	<0.001	−5.65	−1.16	0.245
County sprawl index	0.000552	1.01	0.313	0.000872	1.94	0.052	0.275	2.95	0.004

Table 5

Relationship Between Individual Characteristics, County Sprawl Index, and Weight, 1998 to 2000 (With Coefficients, *t*-ratios, and Significance Levels)

	Body Mass Index			Obesity		
	Coefficient	*t*	*p*	Coefficient	*t*	*p*
Male	1.190	22.4	<0.001	0.0535	2.07	0.038
Age 30 to 44	1.696	27.7	<0.001	0.578	16.0	<0.001
Age 45 to 64	2.547	43.0	<0.001	0.852	24.2	<0.001
Age 65 to 74	1.995	23.5	<0.001	0.574	12.3	<0.001
Age 75+	0.517	6.29	<0.001	0.0542	0.98	0.327
Black non-Hispanic	1.604	20.1	<0.001	0.563	17.5	<0.001
Hispanic	0.744	8.71	<0.001	0.308	6.45	<0.001
Other race	−1.075	−10.2	<0.001	−0.448	−7.32	<0.001
Some college	0.818	14.7	<0.001	0.397	13.7	<0.001
High school graduate	1.102	17.9	<0.001	0.520	17.0	<0.001
Less than high school	1.693	19.7	<0.001	0.758	17.4	<0.001
Currently smoke	−0.985	−16.6	<0.001	−0.381	−11.4	<0.001
Fruit/vegetable consumption	−0.327	−7.54	<0.001	−0.154	−5.94	<0.001
County sprawl index	−0.00344	−2.84	0.005	−0.00212	−4.24	<0.001

times the odds in a more sprawling county, one standard deviation below the mean index (95% CI, 0.86 to 0.95). Table 6 reports odds ratios and confidence intervals for all binary outcome variables.

Morbidity Outcomes. Males were more likely to report having diabetes and coronary heart disease than were females. The probability of having these conditions, as well as hypertension, generally increased with age. The probability of having hypertension and diabetes generally decreased with educational attainment. Probabilities varied with race in more complex ways (Table 7).

The only morbidity outcome statistically linked to sprawling places was hypertension ($t = -2.37$, $p = .018$). The odds of suffering from hypertension in a more compact county, one standard deviation above the mean sprawl index, was 0.94 times the odds in a more sprawling county, one standard deviation below the mean index (95% CI, 0.90 to 0.99). As for diabetes and coronary heart disease, the county index had the expected sign in both equations, but the relationships were not statistically significant.

Direct and Indirect Effects on BMI and Obesity. To explore the mechanisms by which sprawl affects BMI and obesity, additional analyses were conducted that included *minutes walked* as an independent variable in the level-1 equations for both BMI and obesity. We wanted to see whether living in compact counties was independently

Table 6

Odds of Leisure Time Physical Activity, Obesity, and Morbidity One Standard Deviation Above the Mean County Sprawl Index Compared to One Standard Deviation Below, 1998 to 2000

	Odds Ratio (95% Confidence Interval)
Any physical activity	1.028 (0.974–1.084)
Recommended physical activity	1.045 (0.996–1.092)
Obesity	0.899 (0.856–0.945)
Hypertension	0.942 (0.897–0.990)
Diabetes	0.971 (0.930–1.014)
Coronary heart disease	0.994 (0.988–1.000)

related to weight, after controlling for the amount of reported leisure time walked. Results are presented in Table 8. Both variables—minutes walked and county index—were significantly (and independently) associated with BMI. BMI declined as leisure time walking increased at the individual level, and BMI declined as the county index increased at the population level. The same pattern applied to the binary variable obesity.

Thus, sprawl appears to have direct relationships to BMI and obesity, plus indirect relationships through the number of minutes walked, which varies with the county sprawl index. A portion of the overall sprawl-weight relationship is mediated through the amount of time people spend walking for leisure. The direct effect is much stronger. A 25-unit increase in the county index (1 SD) is associated directly with a .085 kg/m^2 (25 × .00338) decrease in BMI. The same 25-unit increase is associated indirectly with only a .001 kg/m^2 (25 × 0.275 × .000128) decrease in BMI through its effect on leisure time walking.

Metropolitan-level Analysis

We also examined relationships between sprawl at the metropolitan level and health and health-related behaviors (see Table 9). The metropolitan sprawl index proved significantly related to only one outcome variable, *minutes walked* as a leisure time activity (t = 2.09, p = .04). Model coefficients for the county and metropolitan sprawl indices can be compared because they were standardized on the same basis, with means of 100 and standard deviations of 25. In most cases, the county index was more strongly associated with outcomes than was the metropolitan index.

DISCUSSION

This ecologic study reveals that urban form could be significantly associated with some forms of physical activity and with some health outcomes. After controlling for demographic and behavioral covariates, the county sprawl index had small but significant associations with minutes walked (p = .004), obesity (p < .001), BMI (p = .005), and hypertension (p = .018). Those living in sprawling counties were likely to walk less, weigh more, and have greater prevalence of hypertension than those living in compact counties. At the metropolitan level, sprawl was similarly associated with minutes walked (p = .04) but not with the other variables.

Although the magnitude of the effects observed in this study are small, they do provide added support for the hypothesis that urban form affects health and health-related behaviors. Furthermore, as Geoffrey Rose has pointed out, even a small shift in

Table 7

Relationship Between Individual Characteristics, County Sprawl Index, and Morbidity, 1998 to 2000 (With Coefficients, *t*-ratios, and Significance Levels)

	Hypertension			Diabetes			Coronary Heart Disease		
	Coefficient	*t*	*p*	Coefficient	*t*	*p*	Coefficient	*t*	*p*
Male	0.0191	0.74	0.46	0.221	7.32	<0.001	0.0207	13.1	<0.001
Age 30 to 44	0.689	16.8	<0.001	1.064	12.8	<0.001	0.0164	10.4	<0.001
Age 45 to 64	1.778	44.5	<0.001	2.435	31.7	<0.001	0.0594	31.8	<0.001
Age 65 to 74	2.435	52.2	<0.001	2.958	37.2	<0.001	0.0949	18.3	<0.001
Age 75+	2.456	48.9	<0.001	2.736	34.8	<0.001	0.123	19.8	<0.001
Black non-Hispanic	0.597	15.5	<0.001	0.731	18.5	<0.001	0.0167	−4.19	<0.001
Hispanic	−0.101	−1.10	0.27	0.413	7.38	<0.001	−0.0304	−5.40	<0.001
Other race	0.0203	0.24	0.81	0.284	3.06	0.003	−0.0168	−3.07	0.003
Some college	0.253	7.41	<0.001	0.361	8.33	<0.001	0.0162	7.47	<0.001
High school graduate	0.287	7.73	<0.001	0.383	9.66	<0.001	0.0128	5.93	<0.001
Less than high school	0.427	11.4	<0.001	0.869	18.2	<0.001	0.0680	8.62	<0.001
Currently smoke	−0.0454	−1.51	0.13	−0.232	−5.68	<0.001	−0.00087	−0.43	0.67
Fruit/vegetable consumption	—	—	—	0.0909	2.63	0.009	—	—	—
County sprawl index	−0.00119	−2.37	0.018	−0.00059	−1.32	0.19	−0.00011	−1.82	0.069

the distribution at the population level can have important public health implications.[44]

Heretofore, BRFSS data have not generally been used to examine county- or metropolitan-level relationships. In this study, the consistency of findings with those generally found in previous research on associations between health outcomes and covariates, such as gender, age, and race/ethnicity, provides some assurance that our observations on health and urban form also have validity.

Our finding that relationships are stronger for the county index than for the larger scale metropolitan index is not surprising. Most metropolitan areas consist of multiple counties whose built environments vary significantly between central and outlying counties. The county environment might be more representative of what is actually experienced on a day-to-day basis by residents than is the overall metropolitan environment. By implication, as research shifts from the macroscale (metropolitan and county) to the meso- and microscales (community and neighborhood), we might expect that the explanatory power of environmental variables to predict outcomes will improve.

This study is exploratory and subject to important limitations that call for additional research.

- Because this study is ecologic and cross-sectional in nature, it is premature to imply that sprawl causes obesity, hypertension, or any other health condition. Our study simply indicates that sprawl is associated with certain outcomes. Future research using quasi-experimental designs is needed to tackle the more difficult job of testing for causality.
- As shown in Figure 1, the presumptive relationships between environment (urban form), physical activity, and health are multiple and complex. In particular, leisure time physical activity constitutes only one of four major sources of physical activity, the others being related to occupation, household, and transportation. Greater precision in characterizing physical activity will help disentangle the effects of urban form on health. Recognizing the need to monitor more than just leisure time physical activity, the 2001 BRFSS questions were modified to include transportation-, household-, and work-related physical activity.
- In this study, we were not able to account for the complex nature of the BRFSS sampling design, reinforcing the need for cautious interpretation of these early findings. There is growing interest in using BRFSS at the local level, and CDC is in the process of developing methods to adjust the state-based weights for use at the local level.
- Better measures of walking are needed to improve our ability to trace potential differences that are attributable to urban form. The variable *minutes walked* is based on people who reported walking as one of their top two forms of leisure time activity. It excludes walking as a less frequent form of leisure time activity

Table 8

Relationship of County Sprawl Index and Leisure Time Walking to Body Mass Index (BMI) and Obesity, 1998 to 2000*

	County Index			Minutes Walked		
	Coefficient	*t*	*p*	Coefficient	*t*	*p*
BMI	−0.00338	−2.87	0.005	−0.000128	−2.93	0.004
Obesity	−0.00216	−4.35	<0.001	−0.000061	−2.30	0.022

* Models included gender, age, race, education, smoking status, fruit and vegetable consumption, and minutes of walking for leisure as level-1 covariates.

Table 9

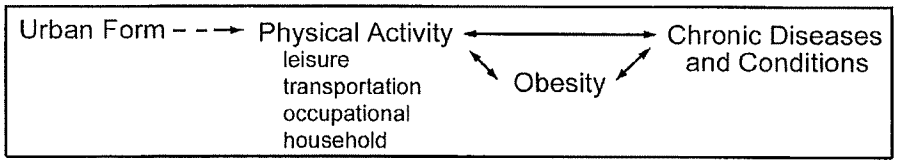
Comparison of Relationships of County and Metropolitan Sprawl Indices to Leisure Time Physical Activity, Obesity, and Morbidity Outcomes, 1998 to 2000*

	County Index			Metropolitan Index		
	Coefficient	*t*	*p*	Coefficient	*t*	*p*
Any physical activity	0.000552	1.01	0.313	0.000760	0.83	0.411
Recommended physical activity	0.000872	1.94	0.052	0.00141	1.49	0.139
Minutes Walked	0.275	2.95	0.004	0.338	2.09	0.040
BMI	−0.00344	−2.84	0.005	−0.00142	−1.03	0.307
Obesity	−0.00212	−4.24	<0.001	−0.000800	−1.02	0.312
Hypertension	−0.00119	−2.37	0.018	−0.000325	−0.49	0.626
Diabetes	−0.000586	−1.32	0.187	−0.000400	−0.60	0.548
Coronary heart disease	−0.000113	−1.82	0.069	na		

* Models included gender, age, race, education, and smoking status as level-1 covariates. Models for body mass index (BMI), obesity, and diabetes also included fruit and vegetable consumption.

Figure 1

Established (Solid) and Speculative (Dashed) Relationships



or walking for other purposes. The new BRFSS questions should help produce more comprehensive measures of walking.

- We recognize that the relationships between sprawl and behavior or weight are probably not completely linear. It might be that certain thresholds or critical levels of "compactness" are needed before community design begins to have a palpable influence on physical activity—increasing density from one or two houses per acre to three or four might not meet the threshold needed for change. Subsequent research will have to explore threshold effects.
- This study relates physical activity and health to the built environment at the county and metropolitan levels, which are large areas compared to the living and working environments of most residents. If environmental effects are felt most strongly at the community or neighborhood level, at least for walking, this study needs to be supplemented with research at a finer geographic scale. Future research will need to use geographic information system (GIS) data to hone in on the specific living and working environments of individuals.
- Because they are not directly measured in either of the sprawl indices, many other environmental variables that might act directly or interact to influence physical activity, such as availability and quality of parks, sidewalks, and bike trails, are not accounted for in this study. Also missing from this analysis are potentially important environmental variables such as climate, topography, and crime. Future research will have to fill this void by specifying more complete outcome models.
- By focusing on physical activity, this study largely ignores the other side of the energy equation—calories consumed as opposed to calories expended. In this study, leisure time walking accounts for only a small portion of the relationship between urban form and BMI. Although we expect other forms of physical activity to fill some of this gap, differing patterns of food consumption must also be explored. Only our fruit and vegetable consumption variable begins to get at that dimension of the problem. Caloric intake could have a spatial component. Future research could, for example, relate the density of fast food restaurants and availability of food choices to diet and obesity.

The growing interest in how policies and the environment serve to encourage or discourage health-related behaviors is attested to by the new focus on these issues in journals such as this one and by new initiatives of governmental and nongovernmental organizations such as the CDC, with its Active Community Environments (ACES) research group, and Robert Wood Johnson Foundation, with its commitment of more than 70 million dollars to promote active living. Over the past several decades, we have engineered much of the physical activity out of our daily lives. Now our task is to understand how opportunities for physical activity can be revived.

SO WHAT: Implications for Health Promotion Practitioners and Researchers

This exploratory study seems to indicate that, after controlling for individual differences, those living in sprawling counties are likely to walk less in their leisure time, weigh more, and have greater prevalence of hypertension than those living in more compact places. Combined with other research from public health and urban planning, there is moderate support for the assertion that urban form can have significant (positive or negative) influences on health and health-related behaviors.

If this assertion holds true, health practitioners can improve public health by advocating for more compact development patterns. Public health researchers can refine their understanding of physical activity, obesity, and morbidity by including urban form variables in their analyses.

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Social Capital and the Built Environment: The Importance of Walkable Neighborhoods

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Objectives. I sought to examine whether pedestrian-oriented, mixed-use neighborhoods encourage enhanced levels of social and community engagement (i.e., social capital).

Methods. The study investigated the relationship between neighborhood design and individual levels of social capital. Data were obtained from a household survey that measured the social capital of citizens living in neighborhoods that ranged from traditional, mixed-use, pedestrian-oriented designs to modern, car-dependent suburban subdivisions in Galway, Ireland.

Results. The analyses indicate that persons living in walkable, mixed-use neighborhoods have higher levels of social capital compared with those living in car-oriented suburbs. Respondents living in walkable neighborhoods were more likely to know their neighbors, participate politically, trust others, and be socially engaged.

Conclusions. Walkable, mixed-use neighborhood designs can encourage the development of social capital. (*Am J Public Health.* 2003;93:1546–1551)

A growing number of researchers agree that social networks and community involvement have positive health consequences. Persons who are socially engaged with others and actively involved in their communities tend to live longer and be healthier physically and mentally.[1–12]

> The more integrated we are with our community, the less likely we are to experience colds, heart attacks, strokes, cancer, depression, and premature death of all sorts. . . . Over the last 20 years more than a dozen large studies . . . have shown that *people who are socially disconnected are between 2 and 5 times more likely to die from all causes, compared with matched individuals who have close ties with family, friends, and the community.*[13(p326–327)]

Social and community ties are key components of a more encompassing concept, *social capital.* Social capital is defined as the social networks and interactions that inspire trust and reciprocity among citizens.[13] Individuals with high levels of social capital tend to be involved politically, to volunteer in their communities, and to get together more frequently with friends and neighbors. They are also more likely to trust or to think kindly of others.[13–15] Social capital has been found to be linked to more than just good health; empirical linkages have been found among social capital, the proper functioning of democracy, the prevention of crime, and enhanced economic development.[13]

An understanding of why some persons and some communities have more social capital than others is important to improving public health. Factors associated with the decline of social capital in recent decades include pressures of time and money on families, long commutes, television usage, and generational change.[13] Many of these factors appear to be related to suburbanization.[16,17]

This study examined whether the built environment (i.e., the way we design and build our communities and neighborhoods) affects the degree to which people are involved in their communities and with each other. The fundamental premise is that some neighborhood designs *enable or encourage* social ties or community connections, whereas others do not. Theoretically, the neighborhood designs (or types) most likely to promote social capital are those that are mixed use and pedestrian oriented. Such neighborhoods (usually labeled "traditional" or "complete" neighborhoods) are typically found in older cities and older rural towns.[18] These neighborhoods are walkable, enabling residents to perform daily activities (e.g., grocery shopping, going to the park, taking children to school) without the use of a car. Many of these neighborhoods have places of worship, a local tavern, a coffee shop, or restaurants within walking distance. Complete or traditional neighborhoods encourage walking; pedestrians are not forced to compete with cars along busy highways or to walk across expansive parking lots.

This traditional or complete neighborhood design can be contrasted with its modern suburban counterpart. Today's version of the neighborhood, the suburban subdivision, contains only houses. Daily needs are not met in the neighborhood or even in town; they are instead fulfilled at large megastores in malls or strip malls located along 4-lane connector roads that are typically clogged with traffic. If residents want to shop, worship, or go to a restaurant, pub, park, or library, they must travel by car. Many contemporary suburban subdivisions do not even have sidewalks: citizens must drive to find a place to exercise or to go for a walk.

Theoretically, pedestrian-oriented, mixed-use neighborhoods are expected to enhance social capital because they enable residents to interact. This interaction can be intentional or accidental. Spontaneous "bumping into" neighbors, brief (seemingly trivial) conversations, or just waving hello can help to encourage a sense of trust and a sense of connection between people and the places they live. These casual contacts can occur at neighborhood corner shops, at local parks, or on the sidewalk. To many residents, such contacts breed a sense of familiarity and predictability that most people find comforting. When summed over time, these individual occurrences have been theorized to be of great importance for fostering "a web of public respect and trust, and a resource in time of personal or neighborhood need."[19(p56)]

In contrast, most contemporary suburban subdivisions do little to enable social interaction. Social interaction is more likely to occur by invitation, not by chance encounter. Life is supposed to take place within the home or in

the backyard.[20] In many suburbs, privacy and the automobile are so highly valued that developers do not even bother to lay sidewalks. Corner stores, taverns, coffee shops, and sometimes schools and parks often are not found in the neighborhood, because zoning ordinances have rendered them illegal within residential areas. Most modern, car-dependent suburbs are not places designed to encourage social interaction.

This study examined the relationship between neighborhood design and social capital. The main hypothesis is that pedestrian-oriented, mixed-use neighborhoods are more likely to encourage social capital than are car-dependent, single-use neighborhoods.

METHODS

To examine the relationship between neighborhood design and social capital, a survey was conducted in and around the city of Galway, located in the Republic of Ireland. Galway's population was estimated at 65 457 in April 2001, with an additional 30 000 people living "in the immediate environs."[21] Galway is the fastest-growing city in Ireland and one of the fastest-growing cities in Europe. It was chosen for this analysis because it has a mix of neighborhood types ranging from the truly mixed-use, pedestrian-oriented variety (built centuries before the automobile) to the contemporary, American-style suburb. Moreover, Galway has no experience with the racism and "white flight" from the city centers that has historically affected American cities and that in many ways continues to distort decisions regarding where to live.

During April and May of 2001, 750 households in Galway and its suburbs were surveyed by mail. The cover letter asked that the survey be completed and returned by 1 adult member (aged 18 years or older) of each selected household. To sample from a variety of neighborhood types, 8 neighborhoods or suburban subdivisions were chosen. In 6 of these neighborhoods (or suburban subdivisions), a survey was delivered to each and every residence. In the other 2, a portion of the subdivision was chosen at random because of the subdivision's size. In this portion or part of the subdivision, all houses received a survey. A total of 279 surveys were returned, for an overall response rate of 37.2%. No follow-up surveys were mailed.

Neighborhood Categories

Galway's neighborhoods were subjectively categorized into 3 ideal types by the researcher before conducting the survey. The neighborhoods selected and surveyed include the following 3 types.

City Center/Near City Center Neighborhoods. The category of "city center/near city center" includes mixed-use, pedestrian-oriented neighborhoods where all daily needs and forms of entertainment are a short walk away. Residents living in these neighborhoods could walk to restaurants, pubs, parks, libraries, department stores, government buildings, post offices, butchers, banks, pharmacies, local schools, theatres, and places of worship without seriously competing with cars.

Older, Mixed-Use Suburbs. Galway has several older suburbs that incorporate some of the more positive aspects of both the traditional city center neighborhood and the quiet suburb. Renmore, for example, has many traditional neighborhood amenities, such as local schools, a few neighborhood corner shops, a centrally located bus line, a church, community center, and playing fields. However, it is much quieter and more predictable than Galway's city center neighborhoods, and the range of places one could access by foot is clearly more limited.

Modern, Automobile-Dependent Suburbs. Galway's recent economic boom has created a demand for new housing that has been met by creating new suburbs. These modern suburbs are car oriented; even local stores have a strip-mall feel about them. With parking lots positioned in front, they seem to suggest that driving is expected. Few places can be accessed by foot, and many of these suburbs do not have sidewalks or parks.

Key Independent Variable: Individual Assessments of Neighborhood Walkability

Categorization of Galway's various neighborhoods ensured that the individuals in the study's sample lived in a range of neighborhood types. In most of the following analysis, however, the assessment of neighborhood "walkability" was made by the respondents, not by the researcher. All survey respondents were asked to rate the degree to which their neighborhoods were pedestrian oriented and mixed use (Figure 1). This question was used to create a variable called "neighborhood walkability," which is an additive index of the 9 places listed in Figure 1. Each respondent was assigned a neighborhood walkability score that could range from 0 (cannot walk to any of the places mentioned) to 9 (can walk to all of them).

A lot of people are very dependent on a car these days to get where they want to go. If you or another family member wanted to which of the following could you walk to without too much trouble? *Tick all you could walk to without too much trouble.*

___1. A local corner shop/newsagent
___2. A church
___3. A park (or pitch)
___4. A local school
___5. A Community Center or Recreation Center
___6. A crèche (or child care facility)
___7. A Chemist (or pharmacy)
___8. A Pub
___9. The place that I work
___10. None of the above. It is hard to really go anywhere without a car.

FIGURE 1—Survey questions used to create the "neighborhood walkability" measure.

Additional independent variables in the multivariate models include controls found to correlate with various aspects of social capital in previous political science and sociological studies.[13,22–25] These measures included age, whether a respondent has children currently living at home ("child in home"), how much television a respondent watches ("watch TV"), whether and to what degree a respondent attends religious services, how long a respondent has lived in his or her current neighborhood ("years in the neighborhood"), education level, and the degree to which a respondent reports being committed to a political party ("party strength").

Dependent Variables: Measures of Social Capital

The survey conducted for this study measured 4 key aspects of social capital: how well residents knew their neighbors, their political participation, their trust or faith in other people, and their social engagement. These dependent variables were measured as described in the following paragraphs.

The variable "know neighbors" was measured with the following question: "Think about the neighborhood or area in which you live. In general, how well do you feel you know your neighbors? (1) Not at all, (2) Just a little, (3) Moderately well, (4) Extremely well."

Political participation was measured as an additive index. The Political Participation Index assessed whether respondents voted in the last general election, whether they had volunteered to work for a political party in the past 5 years, and whether they had contacted an elected official to express their views in the past 6 months. Each of these activities was scored as either 1 (yes) or 0 (no), and scores were added to create the index. Thus, for each respondent, the variable could range from 0 (no participation) to 3 (yes to all 3 items).

The Trust Index measured whether respondents felt that people could be trusted, whether they thought people were fair, and whether they thought most people try to be helpful. Scores on this index could also range from 0 (a complete absence of trust and faith in others) to 3 (respondent feels that people can be trusted, are fair, and are helpful).

Social participation was measured with 4 questions probing the degree to which respondents reported being engaged socially. The first question asked respondents to report how often they got together with friends: "rarely," "occasionally," or "a great deal." The next 3 questions asked respondents to specify the number of times (in the past 2 weeks) they had gone "out to a pub or restaurant with friends"; the number of times they had invited friends into their home "for company, tea, or a meal"; and the number of times they had gone to a friend's home "for company, tea, or a meal." Summing the responses on all 4 items for each respondent yielded an index score reflecting each respondent's degree of social engagement. The mean Social Index score was 7.04, and the standard deviation was 5.41.

Data Analysis

All statistical analyses were performed with Stata, version 7 (Stata Corp, College Station, Tex). The first part of the analysis sought to establish whether the "subjective" categorizations of neighborhood types established by the researcher before the surveys were distributed helped to illustrate some of the differences between walkable and more car-oriented neighborhoods. This was accomplished by examining whether the means of the various aspects of social capital differed statistically (using *t* tests) by neighborhood type.

The heart of the analysis used multivariate ordered logit models to examine the effect of the neighborhood walkability measure on the 4 dependent measures of social capital. Ordered logit was used because of the ordinal nature of the dependent variables. Although all of the dependent measures of social capital can be ranked, the distance between categories cannot be assumed to be equal (as in interval data). In the analysis that follows, the neighborhood walkability measure was scored in 2 ways. In the first set of regressions, neighborhood walkability for each respondent was scored from 0 to 9; in the second set, this variable was recoded to assess the odds of respondents' having high levels of social capital if they assessed their neighborhoods to be highly pedestrian oriented and mixed use (high scores of 7, 8, or 9 were coded as 1, whereas lower scores were coded as 0).

RESULTS

Table 1 illustrates some of the differences between more walkable, mixed-use neighborhoods and those that are car dependent. Shown in the table are the means and corresponding *P* values (based on the *t* tests) of measures related to social capital (note that preinvestigative categorizations of neighborhood types are used). All respondents living in mixed-use, pedestrian-oriented neighborhoods (city center/near city center plus older, mixed-use suburbs) were combined and compared with those living in modern suburbs. Interestingly, neighborhood walkability was statistically significant ($P<.0001$), indicating that respondents' self-assessments of their own neighborhoods coincided with the neighborhood categorizations established by the researcher before administration of the survey. Residents living in neighborhoods categorized as walkable by the researcher perceived their neighborhoods as being more walkable.

Table 1 provides examples of how attitudes and behaviors of residents living in pedestrian-oriented, mixed-use neighborhoods (whether located in older suburbs or in town) differ from those of residents living in car-dependent suburbs. Table 1 displays data demonstrating that in complete or traditional neighborhoods, residents walk more (or at least perceive their neighborhoods to be more walkable), feel more connected to (or part of) their community, are more likely to know their neighbors, are more likely to trust or have faith in other people, are more

TABLE 1—Pedestrian-Oriented, Mixed-Use Neighborhoods vs Modern, Automobile-Dependent Suburbs: Galway, Ireland, 2001

	Comparing Means Using *t* Test		
	Mixed-use, Walkable Neighborhood (n = 163), Mean	Car-Dependent Suburban Neighborhood (n = 109), Mean	*P* Value
Neighborhood walkability	7.35	4.72	.0001
Feel connected to or part of the community	2.94	2.39	.0001
Know neighbors?	2.67	2.22	.0001
Trust Index	2.32	2.09	.0329
Contacting elected officials	0.32	0.17	.0032
Can walk to work	0.51	0.19	.0001

TABLE 2—Multivariate Ordered Logit Models for Social Capital, by Independent Variable: Galway, Ireland, 2001

	Odds Ratio (95% Confidence Interval)			
Independent Variable	Know Neighbors (n = 256)	Political Participation Index (n = 258)	Trust Index (n = 258)	Social Index (n = 258)
Neighborhood walkability	1.28† (1.14, 1.44)	1.14** (1.02, 1.28)	1.15*** (1.04, 1.28)	1.20† (1.09, 1.32)
Age	1.06† (1.03, 1.08)	1.01 (.99, 1.04)	1.02 (0.99, 1.04)	0.95† (0.93, 0.97)
Child in home	2.80† (1.65, 4.75)	1.51 (0.90, 2.53)	1.17 (0.71, 1.91)	0.33† (0.21, 0.53)
Watch TV	0.085 (0.61, 1.17)	0.89 (0.64, 1.23)	0.87 (0.64, 1.18)	0.78* (0.59, 1.04)
Attend religious services	1.20** (1.01, 1.42)	1.14 (0.95, 1.36)	1.03 (0.88, 1.22)	0.97 (0.83, 1.13)
Years in neighborhood	1.03** (1.00,1.05)	1.02 (0.99, 1.04)	0.99 (0.97, 1.02)	0.98* (0.96, 1.00)
Education	0.72 (0.45, 1.17)	1.77** (1.10, 2.83)	0.87 (0.54, 1.39)	1.03 (0.68, 1.57)
Party strength	1.16 (0.88, 1.52)	1.98† (1.50, 2.62)	1.04 (0.80, 1.35)	1.22* (0.96, 1.54)
McKelvey and Zavoina R^2	.44	.19	.07	.26

*P = .10; **P = .05; ***P = .01; †P = .001; 2-tailed test.

likely to contact elected officials to express their concerns, and are more likely to walk to work.

Although suggestive, simple mean comparisons do not control for other factors that might also explain why residents in one neighborhood type demonstrate higher levels of social capital. A multivariate model is needed. Table 2 displays the results of the multivariate ordered logit models examining the impact of neighborhood walkability on various aspects of social capital, after control for other independent variables. The results are clear and consistent: the more places respondents report being able to walk to in their neighborhood, the higher their level of social capital. This relation suggests that walkable, mixed-use neighborhoods are better generators of social capital than are modern, car-dependent suburbs.

The odds ratios (ORs) reported in Table 2 were generated with ordered logit regression. It is important to note that neighborhood walkability scores ranged from 0 to 9 and that the odds ratios must be interpreted with this in mind. A 1-unit increase in neighborhood walkability score is linked with an increase of 1.28 (95% confidence level [CI] = 1.14, 1.44) in the odds that a resident knows his or her neighbors. Therefore, the more walkable a neighborhood (and the more places that can be walked to), the more likely a resident is to know his or her neighbors.

The neighborhood walkability measure was also statistically significant in the equations examining political participation and trust. The higher the neighborhood walkability rating assigned by respondents, the more likely they were to participate politically (OR = 1.14; 95% CI = 1.02, 1.28) and to have trust or faith in others (OR = 1.15; 95% CI = 1.04, 1.28).

The fourth measure of social capital was the Social Index, reflecting the degree to which a respondent reports being socially engaged. The model demonstrated that the more places respondents reported being able to walk to in their neighborhood, the more likely they were to be engaged with others socially (OR = 1.20; 95% CI = 1.09, 1.32). Interestingly, the model also indicated that respondents become less social as they grow older (OR = 0.95; 95% CI = 0.93, 0.97), that people with children living in the home are less social (OR = 0.33; 95% CI = 0.21, 0.53), and that watching TV limits one's social activities (OR = 0.78; 95% CI = 0.59, 1.04).

The neighborhood walkability measure had a statistically significant effect on all of the measures of social capital. No other predictor was consistently significant. Moreover, neighborhood walkability consistently held its own in comparison with the other predictors, often playing a more powerful role. Stata reports a standardized odds ratio (not shown here) based on standard deviational changes in the independent variable.[26] Neighborhood walkability was the most important predictor of the Trust Index, the second most important predictor for the Know Neighbors variable and the Social Index, and a close third for the Political Participation Index.

Table 3 explores the effects had by the most walkable (and most mixed-use) neighborhoods on social capital. Respondents who reported their neighborhoods as being highly walkable and mixed use (7, 8, or 9 on the original neighborhood walkability measure) were compared with those who rank their neighborhoods as less pedestrian oriented and less mixed use, after control for other factors. The results indicated that residents living in high-walkability neighborhoods (many in this category reported walking to work) were likely to score higher on all measures of social capital. The odds ratios ranged from 1.80 to 1.95, and all were statistically significant in the predicted direction.

TABLE 3—Multivariate Ordered Logit Models of Social Capital: Highly Walkable, Mixed-use Designs vs All Others: Galway, Ireland, 2001

	Odds Ratio (95% Confidence Interval)			
	Know Neighbors	Political Participation Index	Trust Index	Social Index
High level of neighborhood walkability or mixed-use design	1.88** (1.14, 3.11)	1.83* (1.10, 3.05)	1.79* (1.10, 2.92)	1.95** (1.25, 3.05)

Note. A high level of neighborhood walkability or mixed-use design was scored 1 if a respondent reported a 7, 8, or 9 on the neighborhood walkability measure and scored 0 otherwise. All other independent control variables were included in the analysis, as in Table 2.
*P = .05; **P = .01; 2-tailed test.

DISCUSSION

This study suggests that the way we design and build our communities and neighborhoods affects social capital and thus physical and mental health. The results indicate that residents living in walkable, mixed-use neighborhoods are more likely to know their neighbors, to participate politically, to trust others, and to be involved socially.

Unfortunately, America's built environment has been moving in a direction that is likely to have a negative effect on social capital. Over the last several decades, buying a home in a neighborhood that resembles the traditional, mixed-use, pedestrian-oriented model has become increasingly difficult. In fact, many Americans have no choice but to live in a modern, car-dependent suburb, because not enough viable, affordable traditional neighborhoods exist; their options are biased toward car-dependent suburban subdivisions, because such environments are what most developers build.[27]

The trend toward building car-dependent subdivisions is not just the fault of the developers. That American communities have become increasingly car oriented and less walkable is also the result of municipal zoning codes and other public policy changes that clearly promote transport by private vehicle, deemphasize public transport, and discourage (or even outlaw) the building of mixed-use, pedestrian-oriented neighborhoods.[18,26] Changing this trend will require political will and a shift in land-use and transportation priorities and policies.[29,30] Public consciousness must also change. Government policy has helped to change the public's view of smoking and of race and gender discrimination; it could help change our concept of the built environment by discouraging sprawl and encouraging the creation of new pedestrian-oriented towns and neighborhoods. Changes in government policy and tax law might also encourage the revitalization of existing traditional neighborhoods.

Of course, before we get to that point, we need to know more about how the built environment affects health and social capital. This study has several limitations. To what degree can the results of this study, which was based on a fairly small Irish city, be generalized? Selection bias also may have affected the results. Social people might be more likely to choose walkable neighborhoods, rather then walkable neighborhoods' encouraging sociability. The models presented in Tables 2 and 3 attempted to statistically control for this possibility by including measures of age and years in the neighborhood. However, the selection bias needs to be untangled; a much larger longitudinal study would be required to do so. In addition, much more must be learned about which architectural aspects of the built environment most affect health and social capital. This study used a measure that allowed respondents to rate the walkability of their own neighborhoods; more information is needed regarding how measures such as block size, density, street widths, and traffic speed affect the perceived walkability of a neighborhood[18–20] and social capital.

Finally, more data must be gathered regarding how the built environment affects health in general.[31] To what extent is our car-dependent, "drive-through" suburban culture discouraging physical activity,[32–34] thus encouraging obesity[35–39] and other associated health problems?[38,39] How does sprawl affect health over the life span? According to the Centers for Disease Control and Prevention, today's built environment is affecting how children travel to school. Instead of walking or biking to school, most children are now driven by bus or private vehicle; the main deterrents to walking or biking are long distances (55%) and traffic danger (40%).[40,41] One must wonder whether the short-sighted planning decisions that lead to so many young people being driven rather than walking will have long-term health consequences. How are the elderly affected? Does car-dependent sprawl contribute to the sort of social isolation that negatively affects the health of seniors? The consequences of not walking and of not interacting with others may have consequences far more negative, for persons of all ages, than we ever imagined. ■

About the Author

Requests for reprints should be sent to Kevin M. Leyden, PhD, Associate Professor, Department of Political Science, West Virginia University, Morgantown, WV 26506-6317 (e-mail: kleyden@wvu.edu).

This article was accepted May 6, 2003.

Acknowledgments

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I thank Chris Curtin, faculty, and staff of the Department of Political Science and Sociology at the National University of Ireland, Galway, for providing valuable assistance and guidance. I also acknowledge the encouragement and advice of Catherine Staunton (National Center for Environmental Health, Centers for Disease Control and Prevention), and Howard Frumkin (Department of Environmental and Occupational Health, Rollins School of Public Health of Emory University). Finally, I thank West Virginia University's Robert Pack (Department of Community Medicine) and Lawrence Grossback (Department of Political Science) for their helpful suggestions.

Human Participant Protection

The protocol for this study was approved by the institutional review board of West Virginia University's Eberly College of Arts & Sciences.

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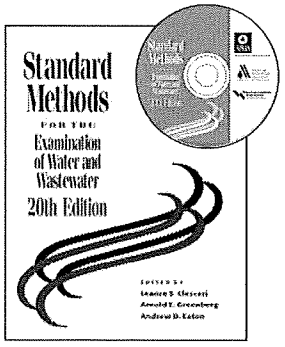

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WW01J7

Response to Comment Letter ADD-G.50
Richard J. Jackson, MD, MPH, FAAP
July 6, 2018

Response to Comment ADD-G.50-1:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not specifically address the adequacy of the EIR, and no further response is required. Nonetheless, the County notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.

Response to Comment ADD-G.50-2:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see response to Comment ADD-G.50-1 for further discussion of Project siting and design to promote public health and meet regional planning goals.

Response to Comment ADD-G.50-3:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see response to Comment ADD-G.50-1 for further discussion of Project siting and design to promote public health and meet regional planning goals. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." Final EIR, Comment D.4-2. Please see response to Comment ADD-G.50-1 for further discussion.

With regard to this comment's concerns regarding increased stress levels related to car commutes, please see Final EIR, response to Comment F.8-15, which details the various mandatory actions that the Project must implement to reduce the number of vehicle trips by Project residents and visitors. For example, MM 10-25 requires that the Project's mandatory Transportation Management Association implement transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

It is further noted that, while commuting may be associated with some adverse health effects, the same is true with regard to inadequate housing supply. As explained in Final EIR, response to Comment F.8-20, California's housing shortage has reached crisis levels.[3367] Between 1980 and 2010, the construction of new housing units in the Los Angeles metro region fell far behind the national average.[3368] During this period, new housing construction grew by 54 percent in the typical U.S. metro area, whereas new housing units in the Los Angeles metro area grew by just 20 percent.[3369] The result has been skyrocketing housing prices. In 1970, California home prices exceeded the national average by 50 percent.[3370] By 1980, the gap had widened to 80 percent.[3371] As of 2015, the average home price in California exceeds the national average by 250 percent.[3372] California rental prices are no better. Today, the average monthly rent in California exceeds the national average by 50 percent.[3373]

Predictably, the impact of the housing crisis has been hardest on the region's most vulnerable populations. Between 1990 and 2012, poverty levels in the SCAG region have increased by 69 percent, with a quarter of all children living in poverty.[3374] In the Los Angeles metro region, approximately 30 percent of the median household's total income is used to pay housing costs, 7 percent more than the national average.[3375] However, the poorest 25 percent of Los Angeles metro area households spend, on average, 67 percent of their income on housing.[3376] As a result, these low-income households are forced to spend less on other essentials. According to Harvard's Joint Center for Housing Studies, low-income households who spend more than 50 percent of their income on housing also spend 39 percent less on food than do households that spend less than 50 percent of income on housing.[3377] To seriously mitigate California's housing shortage and its disproportionate impact on low income households, California must construct 100,000 additional residential units on top of the 100,000 to 140,000 housing units the state is expected to build annually, and these units must be located almost exclusively in California's coastal metro areas, including Los Angeles County.[3378]

Recent research demonstrates that inadequate housing contributes to a variety of adverse health effects, including infectious and chronic disease, injury, impaired childhood development, poor childhood nutrition, adverse mental health impacts, and people of color and people with low income are disproportionately affected by such adverse effects.[3379, 3380,

[3367] California, State of, Legislative Analyst's Office (LAO). 2015. California's High Housing Costs: Causes and Consequences (p. 28). Sacramento, CA: LAO. http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf.
[3368] *Id.,* p. 10
[3369] Ibid.
[3370] *Id.,* p. 12
[3371] *Id.,* p. 3
[3372] *Id.,* p. 7
[3373] *Id.,* p. 12
[3374] SCAG 2015, p. 3.14-13
[3375] LAO 2015, p. 25
[3376] *Id.,* p. 26
[3377] *Id.,* p. 27
[3378] *Id.,* pp. 34, 35
[3379] James Krieger, MD; Donna L. Higgins, PhD. May 2002. Housing and Health: Time Again for Public Health Action. American Journal of Public Health, Vol 92. No. 5.
[3380] Xavier Bonnefoy. 2007. Inadequate Housing and Health: An Overview. International Journal of Environment and Pollution, Vol. 30, Nos. 3/4.

[3381] As discussed in Final EIR, response to Comment F.8-43, the Project would significantly contribute to meeting the State-mandated Regional Housing Needs Assessment housing production goals for the unincorporated areas of the County and thus help reduce adverse health effects associated with the exiting housing crisis.

Response to Comment ADD-G.50-4:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not specifically address the adequacy of the EIR, and no further response is required. Nonetheless, the County notes that the Project has been designed to promote public health, including with regard to pedestrian and driver safety. The Project includes integrated walking and biking facilities to allow for alternative transportation and exercise, and the South Coast Air Quality Management District has found that the Project will protect public health from air pollution, as discussed further in response to Comment ADD-G.50-3. With regard to this comment's concerns regarding the adverse health effects associated with driving, please see response to Comment ADD-G.50-4. This comment assumes that the vehicle trips associated with the Project would not occur but for the Project. This assumption is in error. As explained in Final EIR, response to Comment F.8-20, the Project would accommodate projected regional growth that is going to occur whether or not the Project is constructed. Moreover, as further discussed in Final EIR, response to Comment F.8-20, research demonstrates that, while compact development may reduce driving, the magnitude of that reduction is small, and the correlation between compact development and reduced driving may be particularly small in Southern California where only 7 percent of jobs are accessible by transit. In any case, the adverse health effects associated with driving are likely to be reduced over time as safer autonomous vehicles become more commonplace in California.[3382, 3383, 3384]

Response to Comment ADD-G.50-5:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not specifically address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.50-6:

The Commenter's opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. With regard to smart

[3381] Jake Elliot. 2014. The Three Housing Problems That Most Affect Your Health. The Guardian, August 8, 2014.
[3382] Grayson Brulte. 2017. The Furturistic Health Benefits of Self-Driving Cars, Thanks to AI. GE Reports. https://www.ge.com/reports/futuristic-health-benefits-self-driving-cars-thanks-ai/.
[3383] Sara Kessler. March 29, 2017. A timeline of when self-driving cars will be on the road, according to the people making them. Quarz. https://qz.com/943899/a-timeline-of-when-self-driving-cars-will-be-on-the-road-according-to-the-people-making-them/.
[3384] Mallory Locklear. 2018. California will allow autonomous cars to pick up passengers. Engadget.com. https://www.engadget.com/2018/06/01/california-allow-autonomous-cars-pick-up-passengers/.

growth, please see response to Comment ADD-G.50-1. This comment does not specifically address the adequacy of the EIR, and no further response is required.

From: terrymgrill@yahoo.com
Sent: Tuesday, July 10, 2018 4:13 AM
To: rruiz@planning.lacounty.gov; jsackett@planning.lacounty.gov
Cc: firstdistrict@bos.lacounty.gov
Subject: Tejon Ranch Development

I am a resident of Los Angeles County and live at 464 W 7th Street in Claremont, CA. I have spent time at the Tejon Ranch and recommend that it remain conserved as open space. This is especially important in Los Angeles County, a park poor region of the United States. While increased access to affordable housing is important in our county, the need is in more central areas, next to public transportation and jobs. I am very concerned about energy consumptions and vehicle pollution from residents having to commute log distances to places of work and increased The Antelope Valley already suffers from some of the regions worst air pollution and the Project will only make poor air quality worse. At the very least the Project should be GHG emissions neutral as was Newhall Ranch. ADD-G.51-1

Please consider approving projects adjacent to public transportation and those that will not put further stress on our already crowded interstate corridor. Please do not approve projects that will increase air pollution and reduce the ability of LA County to meet emissions reduction goals.

Regards,
Terry Grill

Sent from my iPad

Sent from my iPad

Response to Comment Letter ADD-G.51
Terry Grill
July 10, 2018

Response to Comment ADD-G.51-1:

Thank you for your comment and for your participation in this public process. The comment's general opposition to the Project and stated preference that Tejon Ranch be conserved as open space is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. As explained on Draft EIR page 4-45, on June 17, 2008, the Tejon Ranch Company entered into a Conservation and Land Use Agreement with various non-profit environmental and conservation organizations which provides for the dedication or sale of conservation easements over approximately 240,000 acres, or approximately 90 percent, of the Tejon Ranch, thus preserving this land as open space in perpetuity.

As this comment correctly notes, there is a significant need for additional housing in Los Angeles County, but this need is not only in more central areas, as this comment suggests. As explained in Final EIR, response to Comment F.8-20, 30,145 new housing units are needed to meet future housing demand in the North Los Angeles County Subregion, which includes Antelope Valley, through 2021, and it is anticipated that this number will grow when the Southern California Association of Governments adopts the next Regional Housing Needs Allocation in Fall 2020.

Regarding the Commenter's general concerns regarding pollution emissions related to vehicle use and energy consumption, please refer to Draft EIR Sections 5.11, Air Resources, and 5.21, Climate Change, which comprehensively analyze the Project's potential impacts related to air emissions and greenhouse gasses. This comment's recommendation that the Project be "GHG emissions neutral" is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration, although it should be noted that the Project has committed to achieving no net increase in GHG emissions generated by Project electricity use, and that the County proposes to adopt a large number of mitigation measures to further reduce GHG emissions.

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From: brianesquivel35@yahoo.com
Sent: Tuesday, July 10, 2018 12:23 PM
To: jsackett@planning.lacounty.gov
Subject: Sorry it's in all caps, people tend to not listen to what I have to say most of the time.

I DON'T KNOW IF YOU'LL BE READING THIS, I KNOW YOU LIVE A BUSY LIFE AS WE ALL DO. I WOULD LOVE FOR YOU TO HEAR ME SPEAK UP AGAINST WHAT IS GOING TO HAPPEN AT TEJON. BEING A COLLEGE STUDENT THAT SURROUNDS HIMSELF AROUND NATURE AND ALL THINGS PLANTS. THIS WILL VERY MUCH AFFECT NOT JUST ME, BUT ALL OF US. I HAVE DISCOVERED HOW COOL NATIVE PLANTS ARE BY GOING TO NATIONAL PARKS AND OTHER RECREATIONAL PLACES. LOOKING AT TEJON AND READING THAT ITS A GRASSLAND I PUT ON MY PLANT CONSERVATIONIST HAT. I START TO DECIPHER WHAT PLANTS WOULD BE GROWING THERE FROM ESCHOLZIA CALIFORNICA(California poppy used by pollinators for pollen and seed eating birds), ASCLEPIAS FASCICULARIS (milkweed important host plant for monarch butterflies the ONLY plant that they will eat.), ERIGONUM FASCICULATUM (buckwheat feeds pollinators and the California state bird the quail), YUCCA SPECIES, AND OFCOURSE THE WONDERFUL OAK SPECIES. WITHOUT THESE PLANTS YOU'LL BE SENDING A SHOCKWAVE DOWN TO THE MOST TINIEST ORGANISMS AS EVERY ANIMAL AND LIVING BEING BENEFIT FROM THE PLANTS AT TEJON. EVEN US AND I YOU KNOW YOU HAVE PROBABLY HEARD THIS STATEMENT MANY TIMES ALREADY THEY CLEAN THE AIR AND TRAP POLLUTION WITHIN IN THEM. LASTLY, I MAY HAVE NOT CHANGED YOUR MIND, BUT AT LEAST I TRIED AND I KNOW THAT WITHIN YOU, YOU KNOW WHAT IS THE RIGHT CHOICE TO DO SO YOU DECIDE!

ADD-G.52-1

Response to Comment Letter ADD-G.52
Brian Esquivel
July 10, 2018

Response to Comment ADD-G.52-1:

Thank you for your participation in this public process. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Commenter's opposition to the Project is noted. The EIR thoroughly analyzes special status plant and oak tree impacts, and proposes mitigation measures to reduce Project-related impacts to special status plants and oaks to a less than significant level. See Final EIR, Appendix 2.0-C.Rev, Mitigation Monitoring and Reporting Program. For further discussion regarding special status plants, see Draft EIR, Section 5.7, pages 5.7-142 to -145; Final EIR responses to Comments F.8-128 to F.8-131. For further discussion regarding oaks and oak woodlands, please see Draft EIR, Section 5.7, pages 5.7-157, -160, -161; Final EIR, responses to Comments A.2-7, B.4-50, B.4-41, and F.8-132 to F.8-135. This comment does not specifically address the adequacy of the EIR, and no further response is required.

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From: Carol Bornstein [mailto:caroljb53@gmail.com]
Sent: Tuesday, July 10, 2018 9:00 PM
To: ExecutiveOffice; SecondDistrict; Rosie Ruiz; jsackett@planning.lacounty.gov
Subject: Centennial Project

10 July 2018

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple St. Ste 383
Los Angeles, CA 90012
(213) 974-1411
executiveoffice@bos.lacounty.gov
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Los Angeles County Regional Planning Commission
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012
(213) 974-6411
rruiz@planning.lacounty.gov

jsackett@planning.lacounty.gov

RE: Oppose the City-sized "Centennial" Sprawl Development in L.A. County

Dear Los Angeles County Board of Supervisors, Supervisor Mark Ridley Thomas, and Regional Planning Commission:

I regret that I am unable to attend the upcoming hearing on 11 July to express my concerns about the Centennial project in person. Instead, I am submitting this letter urging the Board and Planning Commission to oppose this ill-conceived and ecologically unsound project. You have ample evidence of the deleterious impacts that would result should this project be approved, including the following:

- Constructing a completely new, non-contiguous community consisting of thousands of homes, commercial, and non-residential development is an example of urban sprawl at its worst.
- The loss of or at best severe damage to a highly significant, biologically diverse landscape that supports many rare and endangered plants and animals.
- The vast amount of fossil fuels that will be consumed by residents of this new community as they commute to established urban areas, adding to the already horrendous traffic problems in the greater Los Angeles Basin.
- Increased air pollution resulting from this additional traffic and the consequent negative impact on human health.

I also question the underlying assumption that our region can accommodate everyone who wants to live here. Where is the water going to come from to support a project of this size? What is the ecological "carrying capacity" of the Los Angeles Basin? If we truly wish to achieve and sustain a healthy - and affordable - quality of life in our region, difficult decisions that limit growth must be made. At minimum, we need to insist upon projects that reflect smart growth principles and thoughtful urban planning. We simply cannot continue to build this kind of ecologically irresponsible development that compromises irreplaceable and increasingly threatened natural resources without doing harm to ourselves and to the environment that sustains us.

ADD-G.53-1

ADD-G.53-2

ADD-G.53-3

Sincerely,

Carol Bornstein
1215 ½ S. Point View
Los Angeles, CA 90035

Response to Comment Letter ADD-G.53
Carol Bornstein
July 10, 2018

Response to Comment ADD-G.53-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.53-2:

The County disagrees with the Commenter's characterization of the Project, and specifically notes that the Project does not constitute urban sprawl, that Project-related impacts to biological resources are mitigated to the greatest extent feasible, that traffic-related impacts would be substantially reduced with mitigation measure implementation, and that the Project has been sited and designed to protect human health and reduce criteria pollutant and greenhouse gas emissions. For a specific, in-depth refutation of the assertion that the Project constitutes urban sprawl, see Final EIR, response to Comment F.8-20. For more with regard to biological resources and mitigation, please see Draft EIR, Section 5.7; Final EIR Appendix 2.0-C.Rev, Mitigation Monitoring and Reporting Program.

Response to Comment ADD-G.53-3:

The Commenter's opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The County disagrees with the Commenter's characterization of the Project. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion. With regard to the Project's water supply, please see Draft EIR, Section 5.18, Water Resources, and Final EIR, responses to Comments F.3-4 through F.3-9, and F.8-220.

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ADD-G.54

1115 Truxtun Avenue, Room 502
Bakersfield, CA 93301

Phone (661) 868-3660
Fax (661) 868-3666
district2@co.kern.ca.us

Zack Scrivner
Supervisor - Second District

July 18, 2018

David W. Louie, Chair
Los Angeles County Regional Planning Commission
320 W. Temple Street
Los Angeles, CA 90013

RE: Centennial Specific Plan (Project No. 02-232-(5))

Dear Chairman Louie,

Kern County and Northern Los Angeles County share a common focus to bring affordable, well planned housing and sustainable jobs for our residents. As the Supervisor for Kern County's Second District which includes the Antelope Valley portion of Eastern Kern as well as the areas of Interstate 5 of Lebec and Frazier Park into Mettler, Tejon Ranch projects represent an opportunity for carefully planned communities while providing our future generations with permanent conservation areas.

I support the work of Tejon Ranch to implement the Ranch wide agreement that protected over 90% of the ranch while providing for well planned communities such as Tejon Commerce Center, Tejon Mountain Village Specific Plan, Grapevine Specific Plan in Kern County and now the Centennial Specific Plan before your Commission.

The balance of protecting our open spaces and wildlife areas with creating homes for our next generation takes careful planning and thoughtful design. The Centennial Specific Plan will be complementary to the Kern County projects we are already implementing and support economic development in the Antelope Valley.

ADD-G.54-1

Sincerely,

ZACK SCRIVNER
Second District
Kern County Board of Supervisors

Response to Comment Letter ADD-G.54
Zack Scrivner
July 18, 2018

Response to Comment ADD-G.54-1:

Thank you for your participation in this public process. The Commenter's support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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7/18/18

ADD-G.55

County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Fl. Room 1348
320 West Temple St.
Los Angeles, CA 90012

I'm writing to urge you to oppose the Centennial Project at Tejon Ranch. I believe them untrustworthy as developers in such a unique area for California Flora & Fauna which should result in an absolutely high standard of consideration that should exceeds the current EIR. ADD-G.55-1

A couple points:

Tejon Ranch Conservancy: When many major Environmental Advocacy Groups entered into agreement to no get in the way of the proposed development, one of the stipulations was "significant public access". I can frustratingly report that as a member of the public that is eager to explore one of the most unique areas in the most unique state in the world, there has been no significant public access. For many years, there were months on end without any opportunity for the public to visit any area of the ranch. Often payment was required. When I broached the subject with them, inept claims of 'lack of funding' and pleas of how difficult it is to coordinate access. This is certainly absurd considering how easy it is to access the ranch for commercial filming projects. I'm happy to share my correspondence if you're interested. ADD-G.55-2

Illegal Hunting It should be pointed out that the Tejon Ranch knowingly participated in the Illegal hunting and killing of mountain lions on their property. http://articles.latimes.com/2012/feb/11/local/la-me-0211-tejon-lions-20120211 This is another instance where this company considered their goals above those of the public, and the laws of our state. ADD-G.55-3

While these two issues may not seem significant in the face of such an ambitious project, they illustrate that this organization does not respect the Public and our laws. Couple this with the absolutely unique ecosystems the proposed development would disrupt, an incredibly high standard should be adopted so we don't make a grand mistake that would ruin an irrecoverable area of our fine State. Yes, they'd like to dangle a carrot of additional housing that we need, there are far less destructive ways to meet such goals. ADD-G.55-4

Thank You

Ben Oswald
4223 Portola Ave.
Los Angeles, CA 90032

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DEPT OF REGIONAL PLANNING

Response to Comment Letter ADD-G.55
Ben Oswald
July 18, 2018

Response to Comment ADD-G.55-1:

The Commenter's opposition to the Project and opinion regarding the Applicant is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Response to Comment ADD-G.55-2:

This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required under CEQA. However, for informational purposes, the County notes that the Commenter is correct that the RWA addresses public access. Section 3.11 of the RWA addresses public access, indicating that the Owner shall provide significant and appropriate access to Tejon Ranch to the public. Section 3.11 of the RWA required the preparation of a Public Access Plan as part of the RWMP, which has been duly prepared, and the Applicant has been implementing the public access plan. See Final EIR, Appendix 5.7-D, Ranchwide Management Plan, Volume 3, Public Access Plan, for more information. Neither the RWA nor the RWMP restricts the Applicant's ability to restrict or manage access to its private property.

Response to Comment ADD-G.55-3:

This comment has been noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. With regard to illegal killing of mountain lions, it is not Tejon Ranch policy to do so. As indicated in the article referenced by the Commenter, the Applicant has publicly explained that it expresses "deep regret that such incidents took place on ranch property and the company is doing everything within its power to ensure that something like this never happens again." Further, the killings "occurred without the knowledge and/or consent of Tejon Ranch's senior officers." This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.55-4:

The Commenter's opposition to the Project and opinion regarding the Applicant is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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30 JULY 2018

To: Mr. Jodi Sackett
Los Angeles County Regional Planning Commission
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

From: Joseph L. Medeiros
Professor Emeritus, Biological Sciences
Sierra College, Rocklin, CA 95677
2018 Conservationist of the Year, John Muir Association

Dear Mr. Sackett,

This note to you is a very sincere plea to relay my wishes to the Los Angeles Regional Planning Commission. It is my hope that they deny the application for Centennial, a new city of enormous proportions in their region of California.

I have spent some marvelous time at the Tejon Ranch, taken aback at the size and grandeur of this rare and near-intact slice of early California. I am 70 years old, grew up in the San Joaquin Valley and have lived in Placer County for nearly thirty. In both locations I observed enormous tracts of biologically productive land, subdivided and transformed by human sprawl. Thousands of acres that will never be seen again, excepting for rooftops and parking lots.

I am not against well-planned and environmentally-conscious growth. But I am strongly against projects that invade the ecological integrity of sensitive remnants of California – especially those of significant size, like the Tejon Ranch.

ADD-G.56-1

The Tejon Ranch is already a good example of mixed-use. There, wildflowers can flourish, condors can soar and sportspersons can hunt sustainably. Add to this is a flourishing Conservancy that allows citizens to visit and observe, real-time, a California that is nearly extinct.

As a grandfather who helps sustain his grandchildren with rich and wild experiences of California, I implore you to reject this "camel's nose in the tent" project. Let's think of our grandchildren's grandchildren. Save the Tejon for them!

Very sincerely,

Joseph L. Medeiros
marmots@pacbell.net
(530) 906-8429 cell

Response to Comment Letter ADD-G.56
Joseph Medeiros
July 30, 2018

Response to Comment ADD-G.56-1:

The Commenter's opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required. Further, the County disagrees with the Commenter's characterization of the Project. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.

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Stephanie Pincetl
130 So Sycamore Ave
Los Angeles CA 90036
310-245-2339
spincetl@gmail.com

August 6, 2018

Dear Regional Planning Commissioners

Earlier in July this summer, I participated in a conference of the Association for Public Policy Analysis and Management in Mexico City. Mexico City is about the same population of Los Angeles County, approximately 10 million. One day, I went to visit the pyramids about 20 km north of the city. As we drove out of the basin, we came upon a recently urbanized area made up of hundreds of thousands of slum dwellings converted to permanent housing. There is no public transportation from this area into the city, where there are the jobs. Traffic is terrible as people struggle to get to work in the city, arguably as bad as in LA, air is pollution worse. Like Los Angeles, Mexico City, made up of previously separate villages, is a dense low slung city, struggling to weave itself together with transit in the face of increasing urban expansion in search of cheaper land.

The residents and tax payers of Los Angeles County have repeatedly expressed their commitment to transportation accessible living through imposing sales tax increases on themselves to some of the highest rates in the state. Everyone is concerned about affordability of housing and the need for more housing. Many are also concerned about the rate of transformation of their communities as mega- unit housing complexes are built (replete with parking), reflecting the high transaction costs of infill. Building human scale, affordable, transit accessible housing for all is difficult, not doing so has other consequences, including our inability to house growing numbers of people, including women and children who are now ending up on the street. It also makes development proposals like Centennial, not to mention Newhall, seem self-evident.

Yet a closer look yields very problematic consequences. These include, as my previous letter indicated:

1. Exposing people to extreme heat days, increasing numbers of days of the year.
2. Increasing vehicle miles traveled and the costs associated with vehicle ownership and maintenance, time spent in the car, additional air pollution and added freeway congestion
3. Additional exposure to fire risk due to habitat fragmentation, more roads and habitat transformation
4. Loss of productive grazing lands and open space

ADD-G.57-1

5. Increased burden on stretched state water resources
6. Growth inducing development where there is no existing infrastructure
7. Huge and unquantified need for materials for building and infrastructure – asphalt, concrete, copper, plastics and more.

Let me amplify several of these points, a number of which have been commented upon by other experts and which could be developed in much greater detail that I have sketched here.

ADD-G.57-1 cont.

Energy. Centennial is proposed to be built essentially in the high desert. While the developers may claim zero net electricity by adding photovoltaic panels on roofs of buildings, this does not obviate the need for power in the evening and at night, when the demand is now the highest. In most parts of the region, that 'peak power' and night time load, is generated by natural gas peaker power plants. These are often high-emission peaker plants because larger generators can't operate continuously during the low demand of midday, so the high emission plants step in for the peak load. The slope of the increase to ramp up dictates how quickly resources have to be brought online to meet the increasing net load. Evening peak is likely correspondingly higher under climate change scenarios because there are still cooling needs after the sun sets to compensate for higher heat during the day. Zero net electricity simply refers to the roof top solar generating as much as the building uses in electricity throughout the year, but does not mean there is no need for imported power at peak use times and at night as the electricity generated during the day is unavailable at peak. Centennial is also not proposing full electrification of buildings – no natural gas heating, water heating or cooking, and full electrification of all new commercial and industrial buildings. This is problematic as Centennial will add to both the need for power production and the emissions of pollution and greenhouse gases required for the development. Full electric microgrid energy would be the way to surmount this problem, including, of course, battery storage.

ADD-G.57-2

Transportation. The state is still far from a 100% electric vehicle fleet. Therefore it is indisputable that the development will add to air pollution, probably affecting the southern San Joaquin Valley that already has some of the dirtiest air quality in the state. This means that land development on the Los Angeles county side will have negative impacts on Kern county, externalizing our costs onto others. This is in addition to the traffic burden that will be incurred by this new development. It is delusional to assert that any road widening, traffic signal synchronization or other tweaks will alleviate this fact. We have only to look at the result of the widening of the 405 Freeway. Who will bear this burden? Not the developers, but the residents and commuters/drivers who use the 5 corridor. Private gain, public burden. Perhaps most problematic is that this far flung ex urban development contravenes the intentions of state policy to reduce vehicle miles traveled and to encourage transit accessible communities. Centennial is a legacy development that was included in the General Plan before state policy changed and before there was such vivid evidence of a warming climate, resulting from burning fossil fuels. This development is a poor precedent relative to the county's commitment to a climate sound and sustainable future and certainly makes SB 375 much harder to comply with.

ADD-G.57-3

Fire. As we have seen in this summer's spectacular fire season, suburban developments burn, and they burn badly. Surrounded by open space, most of which has not undergone a regular burning regime, it is likely this area is a tinderbox, waiting for an engine spark, a downed powerline, an escaped ember from an innocent fire, to go up in flames. The costs to the state and to the residents will be high. These fires, as we have seen, are very difficult to contain and are largely correlated to patterns of land development (see https://www.mercurynews.com/2018/08/05/california-wildfires-its-a-people-problem/). A human induced fire in this area could have catastrophic consequences. ADD-G.57-4

Water. Water resources for Centennial are based on provision from the state water project which is already five times over allocated. Robbing Peter to pay Paul is the condition of water allocations in the state for new developments. This aspect should be scrutinized very closely and the county should insist in a zero net water development wherein the developer mitigate through water conservation in other places, any new water use. This needs to be quantified and monitored through record keeping of water billing over time. ADD-G.57-5

Open space. Many write off peri-urban agriculture and grazing as insignificant and therefore disposable. I think this is an error. Such open space lands are important as carbon sinks and are not reproducible; we are not able to make more land, planting trees in the suburban development will not compensate for the loss of this carbon sequestration. There are long term unknown consequences of eliminating potential grazing lands and agricultural lands in our peri-urban region. Uncertainty about trade, about climate impacts, food needs in places from which we are obtaining our food are increasing. Developing our working lands is short sighted. ADD-G.57-6

Infrastructure. Materials flows and the cost of implementing new infrastructure are really never fully accounted for. The cost of developing brand new infrastructure in a place that is not developed is quite significant. It is of an order of magnitude greater than enlarging or improving the infrastructure in the already built environment to address additional residents. The same amount of investment would have a much larger multiplier effect for many more people in the already urbanized area. And it would make the existing historic expenditures go much farther. New development in areas with no existing infrastructure is not an efficient use of resources nor an effective way to amortize all the funds expended in the already urbanized core. Clearly if the county is interested in moving toward greater sustainability, there is a need to begin to think about these issues. ADD-G.57-7

Affordability and urban design. Finally there is the question of affordability and urban design. Only 31% of the population of Los Angeles County can purchase a median priced single family home, this means nearly 70% cannot afford to buy in Los Angeles County. This argues for Centennial to offer a large percentage of its units at affordable rates in order for the development to help address the housing needs of people in the region – 50% affordable? Further, the development ought to include very low cost units for the poor or currently homeless. If indeed, the developers are creating more than a bedroom community, enabling all people to live together at prices that they can afford is a first step, especially since, if one adds ADD-G.57-8

in the costs of commuting to jobs, the affordability of any housing so far away from jobs becomes relative.

ADD-G.57-8 cont.

For Centennial to be a climate appropriate community, plopped as it will be in the high desert, it will need a dramatically different urban form. Narrow streets, light colored roofs, walls and pavement, shaded walk ways, common wall buildings, all are time tested urban adaptations to hot climates. For people to feel like walking anywhere when it is hot, shade is needed, sheltered areas need to be provided. For buildings to be energy conserving and cool, they need to be common wall. The answer is a village like development, as one would find in Greece, southern Italy or other Mediterranean areas. What is being proposed is an entirely inappropriate urban form to the place it is being proposed. An affordable village, supported by good transit links with highly compacted impacts on the land and small infrastructure footprint might be manageable in terms of the sustainability impacts a new development in the middle of nowhere might make. Short of that, the development is simply continuing a well-worn path of car dependent, energy and material intensive suburban development that exposes its residents to risk of heat, fire and disruption. It continues robbing investments in the already developed urban areas, undermining the investments funded by tax payers such a public transportation investments, rendering them ineffectual and ultimately frustrating.

ADD-G.57-9

The commission might consider a set of briefings that shed light on a number of issues pertaining to new developments into the future.

1. What are the likely climate impacts across the county
    a. High heat
    b. Fire incidents
2. What are the likely water availability impacts with decreasing snow pack?
3. The status and activities of the County Clean Power Authority
    a. Microgirds versus grid connected
    b. Constraints on solar due to Rule 21
4. How CO2 emissions mitigation are accounted for:
    a. Zero net electricity
    b. Zero net carbon
    c. Zero carbon
    d. Off sets versus credits
        i. Who are the authorizing/monitoring entities of each
        ii. What are the accountability and enforcement mechanisms
        iii. Large reporters under cap and trade versus land developers
    e. Carbon sequestration by non-urban soils, forests and urban trees
5. Urban heat island effect and its mitigation
    a. Cool roofs
    b. Cool building surfaces
    c. Cool pavements
    d. Cool parking lots
6. Strategies and materials for urban stormwater infiltration
    a. Permeable pavements

ADD-G.57-10

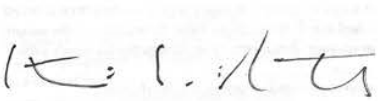
   b. Bioswales
   c. Retaining stormwater on site
7. What are zero net water budgets? How are they established and enforced?
8. Alternative land use strategies
   a. Urban limit lines
   b. Transfer of development rights
   c. Different types of easements
9. How much and where can the county's urbanized area be infilled, at what densities and proximities to transit.
   a. What is the economic effect of reducing parking requirements on development costs?
   b. What are strategies for community parking lots to reduce costs of development?
   c. What are strategies for car share at new developments to mitigate the need for private cars?

ADD-G.57-10 cont.

Only when the RCP has a full range of alternatives and understanding of this rapidly changing regulatory period to deal with housing affordability, climate impacts, water uncertainty and carbon mitigation strategies, including a range of infill options, can decisions of the impact of Centennial be made with certainty.

I would suggest, that given my knowledge of the points above, there are few overriding considerations that make the Centennial development appropriate going forward, other than a general plan designation that reflected the prevailing thinking of the time. Times have changed. Decisions should too.

Respectfully yours



Stephanie S. Pincetl

Response to Comment Letter ADD-G.57
Stephanie Pincetl
August 6, 2018

Response to Comment ADD-G.57-1:

Thank you for your participation in this public process. The Commenter's concerns are noted for the record and will be provided to the Regional Planning Commission and the Board of Supervisors for consideration. This introductory comment provides background information unrelated to the Project and a list of the topic areas addressed in the Commenter's letter. Responses to specific comments on each topic are provided below. No further response is required to this introductory comment, which does not raise specific concerns regarding the EIR.

Response to Comment ADD-G.57-2:

The Commenter misstates the Project's commitment with regard to net zero carbon for the electric sector. As part of the Project's proposed development agreement with the County, the Project has committed to achieving a "net zero carbon for the electric sector" standard on all public and private facilities constructed within the Project, which means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions as documented over time as part of each application for a tentative tract map.

The information presented by the Commenter regarding power generation and the Commenter's concern regarding the Project's energy use are noted, and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The County notes that the EIR appropriately analyzed energy demand and infrastructure requirements specific to the Project and location, and consulted with utility providers to ensure that sufficient energy and infrastructure will be provided for the Project. Electrical service to the Project site is provided by Southern California Edison (SCE), which has transmission and distribution facilities located within and near the Project site as described on Draft EIR page 5.20-7. The Draft EIR acknowledges that the Project would place new demands on electrical service and create the need for new utility infrastructure. (Draft EIR, page 5.20-8) During operations, SCE estimates that all proposed land uses in the Project over a 20-year horizon would generate a peak increase in electricity demand of approximately 165 MW at buildout – this is a conservative assumption that does not take proposed energy efficiency measures into account. (*Id.,* pages 5.20-8, -9.) SCE would serve the Project's demand for electrical service through the existing distribution facilities on the Project site and the utility improvements that are proposed as part of the Project, which are described on Draft EIR pages 5.20-10 through 5.20-12. SCE has indicated that with proposed infrastructure improvements, there would be adequate electrical supplies to serve the Project under peak demand conditions. (*Id.,* page 5.20-9) Further, per MM 20.2-1, the Project Applicant/Developer will coordinate with SCE to ensure that there are no prolonged disruptions to existing transmission lines that extend through the study area, and coordinate

in the design and implementation of future services and facilities, to ensure that service and infrastructure is adequate to serve proposed land uses and are available for the first occupied uses. (Final EIR, page 3-82)

With regard to energy use and Project design, the Project is subject to a myriad of energy efficiency and green development regulations and requirements incorporated into Project design and mitigation measures. For example, the Centennial Green Development Program's Green Building component requires all Project development to comply with CALGreen Code Mandatory Measures and voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances. Additional measures are also included to further improve energy, water, and material management conservation and efficiency, and to assure healthy building materials and walkable/bikable designs. Please see Final EIR, response to Comment F.8-204 for in-depth discussion of this topic.

Response to Comment ADD-G.57-3:

The Commenter's opinions are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the County disagrees with the Commenter's assertions and characterization of the Project.

With regard to the assertion that air pollution impacts will increase from additional vehicles, the lead agency notes that the EIR thoroughly and appropriately analyzes potential vehicle-related air quality impacts from Project implementation, and incorporates all feasible mitigation to reduce impacts, both for temporary impacts from construction vehicles and from long-time operational vehicle use. At Project buildout, in 2035, long-term operational emissions of VOC, NOx, CO, PM10, and PM2.5 would exceed AVAQMD and SCAQMD CEQA significance thresholds, and the primary source of emissions would be from vehicle operations. MMs 11-4 through 11-6 would be implemented to reduce operational emissions; however, the impact would remain significant and unavoidable. It should be noted that the Project's proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trip making. The Project requires establishment of a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations, to maximize transit efficiencies and services. The TMA would reduce dependence on automobiles and provide for a more efficient use of transportation resources among Project occupants, reducing pollutant emissions. MM 11-10 requires implementation of PDF 11-6, which specifies that residences or other sensitive land uses shall not be built within 150 feet of SR-138. The analysis demonstrates that the incremental cancer risk and chronic non-cancer health risk to sensitive receptors beyond the 150-foot buffer would be less than significant. The analysis also indicates that health risks to existing residents adjacent to SR-138 in the Project vicinity would be less than significant with incorporation of MM 11-10. Further, the Project would not conflict with AVAQMD and SCAQMD air quality management plans (AQMP) because the land uses, population, and vehicle travel elements of the Project are anticipated in the SCAG 2012–2035 RTP/SCS and the Southern California Association of Governments' (SCAG) 2016–

2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is the basis for AQMP development.

With regard to the assertion that the Project would impede SB 375 goals and is poor planning, the County disagrees. The Project provides development on a site planned to accommodate projected growth in a manner consistent with regional strategies for achieving mandatory reductions in GHG emissions attributable to the land use sector. The Project has been sited and designed to promote regional "smart growth" planning principles established by the SCAG 2016-2040 RTP/SCS and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and GHG emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion. In fact, the SCAQMD has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (Final EIR, Comment D.4-2).

With regard to the assertion that mitigation measures requiring roadway and highway improvements will not alleviate impacts, the County disagrees. The Project EIR thoroughly and appropriately analyzes traffic-related impacts and identifies feasible mitigation. As explained in Draft EIR, Section 5.10, Traffic, Access, and Circulation, under Thresholds 10-1 and 10-2, in accordance with the MMRP, the Project must provide the required funding for the implementation of all identified roadway and highway improvements necessary to reduce Project-related impacts to a less than significant level, either through an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. If built, improvements identified in the MMRP would fully mitigate all potential Project-related significant impacts to SR-138 and other state highways. However, as recognized in the EIR, Caltrans is legally responsible for implementing planned improvements of State facilities, and the Project Applicant and the County do not have the authority to require that Caltrans do so. For this reason, the EIR concludes that if improvements are not implemented, the Project would contribute to significant and unavoidable impacts. (Draft EIR, Section 5.10, pages 5.10-1, -2, -130) The Commenter provides no evidence for its assertion that EIR analysis is insufficient, and no further response is required.

Response to Comment ADD-G.57-4:

With regard to increased fire risk, the EIR appropriately recognizes potential fire risks and adequately analyzes the impact of introducing urban development, specifically the Project as designed, into an area subject to wildfire, concluding that the Project would comply with regulatory requirements and incorporates mitigation measures that would reduce impacts to a less than significant level. (Draft EIR, Section 5.3, Hazards and Fire Safety, pages 5.3-35 to 5.3-39) As noted in the EIR, the Project site is located in an area designated as a Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection. (Draft

EIR, Appendix 5.19-A, page 5.3-30) The majority of the Project site is either within a Very High Fire Hazard Severity Zone (VHFHSZ) or High Fire Hazard Severity Zone (HFHSZ), while the eastern edge of the Project site is within the Moderate Fire Hazard Severity Zone (MFHSZ). (Final EIR, page 3-103) The Draft EIR determines that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance. This determination, however, does not rely solely upon implementation of MM 3-9 or other mitigation measures. Rather, the Draft EIR concludes that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protections services, including but not limited to MM 3-9. For further discussion, see Draft EIR, pages 5.3-35 to -39; Final EIR, responses to Comments F.8-63 and F.8-64.

With regard to the space between Project development and open space, the Project is required to implement fuel modification to comply with State and County regulations. Per MM 3-9, the Project must prepare and implement a Fuel Modification Plan to be reviewed by the LACFD Forestry Division, whose major components will ensure a minimum 20-foot setback from the edge of any structures; an irrigation and transition zone from 20 to 100 feet away, and native brush thinning zone between 100 and 200 feet away from structures. Some Project development is proposed in areas that would be adjacent to large open spaces areas with moderate vegetative cover. Under existing conditions, the plant communities that make up this cover are highly combustible and would therefore present a high fire hazard and pose a potentially significant impact to development in these areas. As development of the Project site proceeds, however, fire hazards associated with the natural vegetative cover would be eliminated through its replacement with urban landscape vegetation, which is irrigated and less combustible than the existing vegetation. (Draft EIR, page 5.3-36) For further details of fuel modification requirements, please see Draft EIR, Section 5.3, and Final EIR, responses to Comments A.2-6, F.8-63, and F.8-64.

Response to Comment ADD-G.57-5:

The Commenter's opinion regarding the reliability of the State Water Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees and concludes that Project EIR analysis demonstrates reliable and sustainable water supplies, including with regard to water from the State Water Project. After thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts. With regard to the reliability of imported water supplies for the Project, the potential delivery reliability and variability of Project State Water Project supplies is discussed in Draft EIR Section 5.18,

Water Resources, pages 5.18-20 to -28 and -54 to -64. The analysis of Project imported water supplies uses the Early Long Term scenario also used in the California Department of Water Resources' State Water Project Delivery Capability Report, and incorporates the effects of the most severe droughts during the 82-year historical record, plus additional adjustments to account for potential climate change effects and the 5 percent single-dry year delivery level used by the Antelope Valley-East Kern Water in the Agency's 2015 Urban Water Management Plan. Consequently, the Draft EIR includes a discussion of State Water Project delivery reliability that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. Commenter provides no evidence to dispute EIR analysis, and no further response is required.

Response to Comment ADD-G.57-6:

With regard to carbon sequestration and existing vegetation, as this comment correctly notes, the Project would result in the conversion of some vegetative cover that currently sequesters carbon, as disclosed and analyzed in Draft EIR Section 5.21, Climate Change (pages 5.21-5, -50). It should be noted, however, that the Project would plant an estimated 35,123 new trees, as required by the County Tree Planting Ordinance, which would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent, as discussed on Draft EIR page 5.21-83. The Commenter's opposition to this approach is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the County notes that the Project is consistent with County requirements.

With regard to the conversion of agricultural lands, the Commenter's opinion is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the County notes that the EIR thoroughly and appropriately analyzes impacts to farmland. For a detailed discussion, see Final EIR, responses to Comments F.8-182 through F.8-185. Further, the Project represents the culmination of a long-term, comprehensive regional and local planning process designed to accommodate projected growth in the Antelope Valley while also protecting the Antelope Valley's valuable open space and agricultural resources.

Response to Comment ADD-G.57-7:

The Commenter's preference for revitalizing existing communities and infrastructure and building the Project in an infill location to reduce costs is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The economic cost of the Project is purely a socioeconomic impact not related to adequacy of the EIR. CEQA Guidelines § 15064(e). Nonetheless, the County notes that the Project will provide significant net economic benefits to Los Angeles County, including expected annual revenues of $43,394,902.00 versus $21,827,596.00 of annual costs to the County's General Fund for reoccurring public services, representing an annual net benefit to the General Fund of about $21,567,306.00. The Project will also generate an estimated $22,328,502.00 of property tax

revenues. Further, an estimated 23,675 permanent jobs would be created by Project uses, with about 25,000 construction jobs. See the Draft Statement of Overriding Considerations[3385] for further discussion. The Project and the construction of related infrastructure will be appropriately funded, and it is specifically a Project objective to "Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers." (Draft EIR, page 4-4) To provide just two examples of how the Project will carry out this objective:

- The proposed Centennial Transportation Improvement Program Agreement provides a mechanism for transportation-related improvements to be implemented by providing advance funding for planning, design, and construction of certain improvements and establishing a funding program to collect fair shares for other improvements. (Draft EIR, page 7-19)
- As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. (Final EIR, page 2-503; Final EIR, Appendix 2-C to Appendix 4.0-A)

The Project is not incompatible with the use of infill parcels for multi-family development. While the lead agency acknowledges the benefits of infill development, the EIR extensively documents the sustainable and walkable nature of the Project, and clearly explains that the Project represents the culmination of a long-term, comprehensive regional and local planning process designed to accommodate anticipated growth in the Antelope Valley while also protecting the Antelope Valley's valuable open space and agricultural resources. The Project has been situated and designed to promote regional "smart growth" planning principles established by the SCAG 2016-2040 RTP/SCS (per SB 375) and the AVAP for the purpose of sustainably accommodating regional growth projections in a manner that reduces pollutant and GHG emissions and promotes public health. (Draft EIR, pages 4-3 to -15; 5.8-1 to -11, -19 to -74; 5.9-1 to -21, -23 to -31; 8-4) Further, as part of the Project's overall transportation demand management (TDM) strategy to reduce the dependence on the private automobile, which would result in a consequential reduction in overall volume of Project-generated trips off site, the Project Applicant will be required to participate in or form a Transportation Management Association (TMA) to serve the residents and employees of businesses within the Project area or will be organized in conjunction with an existing organization in the Antelope Valley or Santa Clarita area. Regional and local agencies report successful implementation of the types of TDM measures that the TMA would consider to meet the standards set forth in MM 10-25, and which are listed in Table 2-C-2 of the Specific Plan's Mobility Plan (Appendix 2-C to Final EIR Appendix 4.0-A.Rev). For further discussion, please also see Final EIR, responses to Comments F.8-20 and F.8-72 (in-depth refutation of the assertion that the Project is "sprawl"), and F.8-204 (in-depth discussion of the Project's walkable and sustainable design and features).

[3385] Available at http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180711-attG4.pdf.

Response to Comment ADD-G.57-8:

The Commenter's request for more affordable housing in the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Project is designed to create a complete and balanced community, with appropriate infrastructure and services to be provided, and a mix of housing types affordable at different price points. With regard to affordable housing details, please see the Affordable Housing Implementation Plan in the Specific Plan, at Final EIR, Appendix 3-C to Appendix 4.0-A.Rev. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.57-9:

The Commenter's assertion that a different Project design is necessary to reduce energy use and meet climate goals is noted. However, the County disagrees. With regard to sustainability and County goals, see response to Comment ADD-G.57-7. With regard to energy use and Project design, the Project is subject to a myriad of energy efficiency and green development regulations and requirements incorporated into Project design and mitigation measures. For example, the Centennial Green Development Program's Green Building component requires all Project development to comply with CALGreen Code Mandatory Measures and voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances. Additional measures are also included to further improve energy, water, and material management conservation and efficiency, and to assure healthy building materials and walkable/bikable designs. Please see Final EIR, response to Comment F.8-204 for in-depth discussion of this topic.

With regard to the note that common wall buildings reduce energy use and the Commenter prefers such development, the County notes that the Project has been designed to maximize energy efficiency. The Project incorporates multi-unit and townhome residential buildings in appropriate locations but provides a wide range of housing types to address the state's shortfall of about 3.5 million units needed by 2025 in both affordable and market rate housing.[3386] With regard to the preference for investments in existing communities, please see response to Comment ADD-G.57-7.

Response to Comment ADD-G.57-10:

The Commenter suggests that the Regional Planning Commission seek to receive briefings on a wide range of topics, to inform development decisions. This suggestion and the Commenter's opposition to the Project are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The County notes that for this Project, the EIR thoroughly and appropriately analyzes all potential impacts on the environment, and mitigates them to the largest extent feasible, as required by CEQA. Further, the County disagrees with the Commenter's characterization of the Project, which has been sited and designed to meet smart growth goals and to be consistent with the AVAP approved

[3386] McKinsey Global Institute, A Tool Kit to Close California's Housing Gap: 3.5 million Homes by 2025, October 2016. Available at: https://www.mckinsey.com/featured-insights/urbanization/closing-californias-housing-gap. Last accessed July 3, 2018.

in 2015, as further discussed in Final EIR, response to Comment F.8-20. This comment does not directly address the adequacy of the EIR, and no further response is required.

From: DAVID SWANSON <davidrsw@msn.com>
Sent: Wednesday, August 8, 2018 11:05 AM
To: Jodie Sackett
Subject: Centennial Specific Plan Project

Dear Mr. Sackett:

I have concerns regarding the Centennial Specific Plan Project's EIR, Specific Plan, GPA, Zone Change, CUP and Tentative Parcel Map for the project. ADD-G.58-1

My overriding concern regarding the Centennial development is the degradation of the night skies, which is bound to happen when such a large development is situated in some of the last remaining dark skies in Los Angeles County. I fully support the building of the city. The location is a perfect place for a new city.

The proposed project is just 3.5 miles from my Pine Grove Ranch on Pine Canyon Road. I partially chose this ranch location years ago because of the dark skies and very little human light pollution. In addition, astronomers from Los Angeles, Ventura and Kern Counties use the Mt. Pinos area for astronomical observing in relatively dark skies. Over the years, light pollution has brightened the skies. Further degradation of the night skies can be avoided by some simple Centennial Project modifications.

I would urge the County to impose the strictest possible controls on the proposed development to minimize light pollution. Among the conditions of approval should be a requirement to use only full cutoff fixtures, use the lowest possible illumination levels, use of timers and motion sensors to shut off lights when not needed (is it really necessary that a parking lot must be lit all night long)? Also, no light fixture should allow light to radiate above the horizon. Billboard signs would be an example of what to avoid. ADD-G.58-2
In addition to the quantity of lighting, the quality of the lighting should also be considered. Harsh, glare producing LEDs, which output much of their illumination in the blue end of the light spectrum, are not only bad for people and wildlife but also astronomy. Low pressure sodium lights are the best astronomically speaking because their output is within a narrow wavelength, which astronomers can more easily filter out. Lights that output in multiple wavelengths are more difficult to filter out.

For more guidance on the best practices in minimizing light pollution, please follow the recommendations of the International Dark Sky Association ("IDA".) The mission of the IDA is to promote quality lighting and reduce light pollution. Please see the information at this link: http://www.darksky.org/lighting/

Wildlife, people, and astronomy all suffer from light pollution. Fortunately this light pollution can be avoided if proper planning is incorporated into this new development. With the Centennial Project in the planning stages, the time is perfect for getting it right the first time. ADD-G.58-3

Thank you for the opportunity to express my concern.

Dr. David Swanson
Pine Grove Ranch
Three Points, CA

Response to Comment Letter ADD-G.58
David Swanson
August 8, 2018

Response to Comment ADD-G.58-1:

Thank you for your participation in this public process. The Commenter's concern about the Project is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Response to Comment ADD-G.58-2:

The Commenter's general support for development of the Project in its location is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Commenter's specific suggestions for light-related conditions of approval is also noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. However, the County notes that the Project EIR has appropriately analyzed light and glare impacts and identified appropriate mitigation to reduce them to the greatest extent feasible. The EIR discloses that the Project would cause new sources of light and glare during construction activities and during Project operation. With regard to construction activity impacts, motorists on SR-138 could be affected by light and glare from construction of new structures adjacent to it, which would be a significant impact absent mitigation. (Draft EIR, page 5.13-26) Therefore, MM 13-5 requires that security lighting at the construction equipment and building material staging areas be directed away from roadways and existing residences, and that it be screened and directed away from on-site residences that have been occupied as each development phase is built. (*Ibid*.) This security lighting would also be limited and temporary in nature. With MM 13-5 incorporated, construction-related impacts would be less than significant. (*Ibid*.)

With regard to long-term, operational light and glare, the Commenter is correct that the Project would introduce new light and glare sources into the Project site that would result in nighttime lighting and glare, and nighttime sky glow. (*Ibid*.) Nighttime sources of light would include streetlights, vehicle headlights, and lights used in an around buildings, parking lots, parks, and walking paths located on the Project site. (*Id*., page 5.13-27) These outdoor lighting sources would also cause increased sky glow in the area. (*Id.,* pages 5.13-27, -28) To reduce the above-identified impacts, PDF 13-3 has been incorporated into the Project and all feasible mitigation has been identified and is required in MMs 13-2 and 13-6. PDF 13-3 and MM 13-2 require the implementation of detailed components of the Green Development Program listed on Draft EIR pages 5.13-29 and 5.13-30. MM 13-6 requires the preparation of an Exterior Lighting Plan in coordination with a qualified Biologist to minimize impacts, review by an Electrical Engineer, and approval by the County prior to the submittal of each building permit. (*Id*., page 5.13-31) It would apply to all proposed structures and to all development areas that border natural open space resources, and must include, at a minimum, the elements listed on Draft EIR page 5.13-31.

The requirements of MMs 13-2 and 13-6 are consistent with Los Angeles County's Rural Outdoor Lighting District Ordinance, enacted in 2012.[3387] In developing the ordinance, the County considered community input, reviewed the requirements of other successful jurisdictions, and incorporated relevant parts of the Model Lighting Ordinance created over the course of seven years by the International Dark Sky Association and the Illuminating Engineering Society of North America.[3388] The ordinance was established to permit the reasonable use of outdoor lighting for nighttime safety, utility, security, productivity, and enjoyment while promoting dark skies for the enjoyment and health of humans and wildlife.[3389] The County duly conducted an environmental review of the ordinance under CEQA, concluding that its implementation would not have a significant impact on the environment, but rather would reduce existing impacts because outdoor light was not being consistently regulated in much of the County. Despite the incorporation of these measures, the Project site is currently an undeveloped area with few existing light sources, and it is not possible to fully mitigate the impacts of introducing new sources of nighttime light and glare from the Project. The Draft EIR therefore concludes that the impact would be significant and unavoidable. (Draft EIR, page 5.13-29)

Response to Comment ADD-G.58-3:

With regard to the Project's light and glare impacts, please see response to Comment ADD-G.58-2. Specifically, with regard to wildlife impacts due to lighting, this is fully addressed in Section 5.7, Biological Resources, of the Draft EIR. Draft EIR page 5.7-141 recognizes that indirect impacts on biological resources as a result of Project implementation may include "increased lighting and glare effects on wildlife species in the remaining and adjacent open space areas…" Implementation of MMs 13-2 and 13-6 from Section 5.13, Visual Resources, of the Draft EIR, which require the Project Applicant to develop a Lighting Plan to reduce potential impacts to biological resources caused by light and glare, would reduce the level of the impact. The Lighting Plan, also referred to as the Dark Sky Plan, shall be consistent with County lighting standards and shall provide guidelines for outdoor lighting that will be used throughout the Project site. Final lighting orientation and design shall be approved by the County of Los Angeles Department of Building and Safety. This measure will reduce the impact of light and glare on wildlife to a level considered less than significant.

[3387] Los Angeles County Department of Regional Planning (LACDRP). 2017 (accessed October 2). Rural Outdoor Lighting District Ordinance. Los Angeles, CA: LACDRP. http://planning.lacounty.gov/view/rural_outdoor_lighting_district_ordinance/.

[3388] Los Angeles County Department of Regional Planning (LACDRP). 2011. Staff Report to the Regional Planning Commission re: Project No. R2011-004-25-(1-5) Case No. RADVT20100006/ENV Case No. T201100135, Amendment to Title 22 (Zoning Ordinance) Regarding Proposed Rural Outdoor Lighting District Ordinance (pp. 3, 8). September 8, 2011. http://planning.lacounty.gov/assets/upl/data/ord_outdoor-lighting-rpc-package.pdf

[3389] *Id.,* p. 8

From: Kathleen Trinity <ktrinity46@gmail.com>
Sent: Saturday, August 18, 2018 3:59 PM
To: Jodie Sackett
Subject: Centennial Project Comment
Attachments: Kathleen Trinit7.docx, Written Comment to LA County on Centennial, 8-16-2018.docx

Dear Mr. Sackett:

Attached is my comment on the Centennial Project at the Tejon Ranch. It is intended for the Planning Commission to be read before August 29, 2018. Mr. Louie had requested written comment for that meeting a week in advance. ADD-G.59-1

Thank you,

Kathleen Trinity

Kathleen Trinity

August 18, 2018

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Dear Mr. Sackett:

Having read Sections 5.7, Biological Resources, 3.0, Setting, and 7.0, Cumulative Impacts of the 2017 DEIR, and Volumes 1 and 2 of the FEIR for the Centennial Project Tejon Ranch, as well as various other pages in other sections, I note the serious failure to address the habitat, foraging/ hunting, life history requirements, and movement/linkages needs of large mammals, especially of the California Mountain Lion. While such needs of the pronghorn antelope, mule deer, and bobcat, are also woefully under addressed, the California Mountain Lion is mentioned only three or four times, and with only a phrase or sentence at most. There is no mention of the California Mountain Lion in Table 5.7-2 either. Given that 1) Tejon Ranch has a poor history of illegally permitted taking of mountain lions (see the LA Times, February 12, 2012), 2) mountain lions require extensive roaming space and linkages, 3) open space has been increasingly fragmented and degraded , and 4) manmade structures such as the California Aqueduct, the I-5 freeway, and the SR 138 (to be expanded into 6 lanes) present large mammals with impassible or dangerous barriers to crucial movement, there is no excuse for the DEIR and the FEIR to avoid a specific and thorough description and assessment of the needs of this animal. This is a serious deficiency of description, assessment, and plan, and dictates that the Project should not proceed.

ADD-G.59-2

Section 5.7 states that wildlife linkages are vital for population maintenance, genetic exchange, escape during catastrophic events, and travel to pursue food, water and resources (5.7-52). Large species such as deer, bear, bobcat, and mountain lion belong to "high mobility guilds," and require "relatively large home ranges..." (5.7-51 and 5.7-53). Mountain lions are "expected to occasionally forage at lower elevations, including the Project site," (5.7-50). In fact, as the DEIR acknowledges "immediately north of SR 138 and east of the Aqueduct on the Project site (which) may serve as a valuable foraging resource area....Tracks of mountain lion, bobcat, black bear...were observed along this drainage," (5.7-63). Thus we can see that while "the Tehachapi Mountains east and north of the I-5

ADD-G.59-3

represent an area that is sufficiently extensive and open (with a few current barriers to movement)" (5.7-53), California mountain lions, bears, bobcats, gray foxes, antelope and mule deer still need a broader home range, and parts of the Project site are included in this home range. It is perplexing then, when 5.7 asserts that a large urban development "of such density that only limited movement corridors are an option, designs that separate development from open spaces by hardened edges" are the "preferred design strategies," (5.7-54). This assumes that the project, especially one of such overwhelming scale, is appropriate for this natural area and its large range-requiring wildlife. This is especially perplexing when the DEIR rightly claims that "Wildlife and plant diversity is nearly always enhanced by the maintenance of naturally occurring open space linkages in the face of land development, (5.7-54)." The argument posed by the DEIR seems to be that because there are at least some sizable manmade barriers to wild life movement on the Project site, and some natural but constrained linkages that can be deemed dead ends or deleterious, then none of the area within the project site is worth preserving for wildlife that might wish to pass through or use the area. A second reason given by the DEIR (5.7.-53, -54) is that most species, because they are specifically adapted to the differing ecosystems of the region, will not traverse into or over the Tehachapi Mountains (5.7-56). While this is true for many species, especially guilds of smaller stature, this is not true of mountain lions, deer, bobcats or coyotes. Residents in the San Gabriel Mountains can attest to the movement of mountain lions, deer, bobcats or coyotes, on local valley floors realize that these animals require access that can accommodate their movement to the valley and into other mountain ranges. A third reason given for allowing the Project site to take over open space and therefore some linkages is that most species not adapted to sparse vegetation and the topography of the eastern portion of the site will not use it very often. Again, portions of the eastern site have been used by mountain lions and other large wildlife, and it is not as if they -can be pointed to other linkages farther west at a given time. Appendix F (F-26: Mountain Lion) acknowledges the area near the SR 138 as "part of the "species range," but the DEIR dismisses this wildlife resource since "this species is known to occur throughout much of the region both on- and off- the Project site." Current knowledge ("Southern California mountain lion's genetic connectivity dangerously low," June 15, 2017, UC Davis) recognizes the dangers of isolation and ensuing loss of genetic diversity among many mountain lion populations in southern California. While it is absolutely necessary for there to be a large linkage in the foothills of the Tehachapi mountains to the north of the project site, this is not a reason to take away the area from north of SR 138 in order to construct the Project.

ADD-G.59-3 cont.

ADD-G.59-4

Section 5.7-51 to 5.7-53 points out that the Project region contains many natural and manmade features which contribute to a large degree of isolation and narrow landscape linkages,"(5.7-53). The manmade features are the formidable barriers of 1) the California Aqueduct, 2) the I-5 Freeway, and 3) the SR-138, slated for expansion into a 6 lane freeway. The DEIR 5.7-53 to -54 argues that "very few species in the project region tend to move across open or otherwise exposed landscape area" unless compelled because of adaptions to specific habitat features and topography, but large or high mobility species such as deer, bobcat, and mountain lion are expected to be able to cross from the Tehachapi Mountains to the western San Gabriel Mountains. The DEIR rightly points out the inadequacy of current narrow and dangerous opportunities for crossings at four locations, seriously constrained by tall chain link fences, barbed wire, proximity to or necessity of crossing the SR-138 (slated for expansion to a 6 lane freeway), and/or proximity to the I-5 near the Aqueduct. There have been a few suggestions for underpasses and overpasses, especially at the I-5 and the Aqueduct, but these appear to be few and small in size. Without advance planning, it is impossible to say that wildlife will be cognizant of various options in all situations. The DEIR further states that the Biological Resources Assessment of SEAs "does not reference any studies that demonstrate that the project site serves a significant element of the regional landscape linkage," (5.7-57). However, absence of studies is not disproving of the need for linkages on the project site, especially given the number of impassible manmade and other barriers on the project site.

ADD-G.59-5

Finally, the DEIR acknowledges "some losses of areas that may be used for foraging and/or breeding of these species (5.7-166)," (larger wide ranging species references 5.7-165). It also acknowledges that Project implementation would increase barriers to movement and that "substantial increases in truck traffic at the SR-138 crossing due to the realignment of Cement Plant Road to intersect with SR-138 immediately adjacent to the potential local wildlife crossing point at the SR-138 (location 4, Exhibit 5.7-6)." This follows the discussion of pronghorn antelope (FEIR 2-145), but equally applies to mountain lion and other large, free roaming wildlife that use both heavy shrub and conifer areas as well as grasslands. If it has been shown that there is a very large wildlife corridor north of the project site and south of the Tehachapi Mountains, then that does not mean that considerable portions of the project site are not important to large, wide ranging wildlife, especially at differing time and seasons. Once again, they have been found at the site and are expected to be found there. One corridor, however large, will not meet the immediate needs of all large wildlife. Additionally, the presence of the I-5 and the California Aqueduct should make preservation of the Project site's open spaces and linkages as parts of the home range even more important, not less. So, while it is true that narrow and dangerous passages exist near

ADD-G.59-6

the I-5, the Aqueduct, and the SR-138, how much greater is the need to find solutions for wildlife crossings and linkages that are generous and safe. The argument that the project site "is not expected to interfere with a majority of regional wildlife movement," (5.7-165) because "the majority of the site is grassland and does not support the forest and shrub cover that many larger, wide-ranging species tend to use during movement episodes," could not refer to mountain lions. Mountain lions typically cross out of these areas and into grasslands often.

ADD-G.59-6 cont.

California wilderness and its wildlife are an invaluable treasure for Californians and for the world's visitors. Wildlife faces ever increasing threats from development, pollution, climate change, and loss of habitat. Our beautiful wilderness should not be allowed to deteriorate and fragment into isolated pockets. It has been said that Los Angeles County needs additional housing, and indeed it does. However, considering that the Centennial project would include commercial and industrial elements along with massive infrastructure for more than 57,000 residents and even more people coming into the area for work, services, or recreation, then one has to ask if this massive development should not be constructed elsewhere. A great number of people who need housing will not have access geographically or financially to the type of housing that will be offered at Centennial. Thus, if we weigh the precious treasure which includes what many would consider less than valuable in resources, but valuable for its wild inhabitants, and which acts as a natural buffer for "richer" open lands, against such a massive urban project, then it is clear that the gem of wilderness is far more valuable than the commercial value of such a project. Once this area is removed for construction, it will be removed forever. We cannot ask our wildlife to adapt to the unadaptable. When we remove their habitat and linkages, even if other areas are preserved, we remove what they currently use and need forever. The price is not worth paying.

ADD-G.59-7

Response to Comment Letter ADD-G.59
Kathleen Trinity
August 18, 2018

Response to Comment ADD-G.59-1:

Thank you for your participation in this public process. These comments are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This introductory comment does not address the adequacy of the EIR and no further response is required.

Response to Comment ADD-G.59-2:

The Commenter's concerns about habitat loss are addressed in Final EIR responses to Comments F.8-107 and F.8-108, and discussions about foraging/hunting of large mammals are addressed on pages 5.7-50, 5.7-63 and 5.7-64 of the Draft EIR. Life history requirements of large mammals such as the mountain lion, while not discussed for specific species, is a topic covered in the movement discussion on pages 5.7-56 through 5.7-64 of the Draft EIR, and concerns about wildlife movement/linkages are addressed on pages 5.7-56 through 5.7-64 of the Draft EIR as well as responses to Comments B.4-56, B.4-57, F.5-13, F.7-21, F.8-109, F.8-110, and F.8-168 of the Final EIR.

Additionally, pronghorn antelope are discussed at length in responses to Comments B.4-35 and B.4-36, B.4-37, F.8-165 F.8-166, and F.8-167 in the Final EIR. The mule deer and bobcat are discussed as expected to occur (or were observed on the Project site) in the Draft EIR on page 5.7-50; and are mentioned in the wildlife movement section on pages 5.7-56 through 5.7-64 of the Draft EIR. A specific thorough discussion of these two species was not warranted due to their status as common wildlife (not formally "special status" species); however, they are considered in the wildlife movement section on pages 5.7-56 through 5.7-64 of the Draft EIR. As noted in the Draft EIR, potentially significant impacts to wildlife movement and habitat for general wildlife that would result from implementing the Project would be reduced to less than significant levels with implementation of MMs 7-14 through 7-18.

The Commenter's concerns for the mountain lion are noted. The Draft EIR lists special status species in Table 5.7-8. Special status species are defined on page 5.7-88 of the Draft EIR as those species that are State- and/or federally listed as Endangered, Threatened, or Candidate Species; or those species formally considered to be "of concern" by the CDFW.[3390] The formal status of the mountain lion, as listed by CDFW is "specially protected species". This status was initiated by Proposition 117 in 1990, making mountain lion hunting illegal in California, and is not related to rarity or habitat loss. The following paragraph regarding mountain lion status in California can be found on the CDFW website:

[3390] The Yuma mountain lion (Felis concolor browni), is listed by CDFW as a Special Status Species; however, the range of the Yuma mountain lion does not overlap that of the Project site.

Mountain lions are not threatened nor endangered in California. In fact, the lion population is relatively high in California and their numbers appear to be stable. Mountain lions are legally classified as "specially protected species". This has nothing to do with their relative abundance and does not imply that they are rare.

Because the mountain lion is not considered a special status species that should be added to Table 5.7-8, direct impacts to the mountain lion and impacts to mountain lion habitat do not warrant lengthy discussion in the Draft EIR As mentioned above for the mule deer and bobcat, impacts to the mountain lion are considered as part of the wildlife movement discussion on pages 5.7-56 through 5.7-64 of the Draft EIR.

With regard the historic taking of mountain lions, see response to Comment ADD-G.55-3. With regard to wildlife linkages, and potential barriers to those linkages (e.g. SR-138), refer to Draft EIR pages 5.7-52 through 5.7-64 and 5.7-164 through 5.7-166, as well as Final EIR response to Comment F.5-13.

Response to Comment ADD-G.59-3:

The Draft EIR discusses the appropriateness of discouraging wildlife from entering into developed areas. As stated on page 5.7-54 of the Draft EIR, "constrained landscape linkages may subject wildlife to higher mortality from edge effects and increased contact with humans, and constraints on the linkage can result in lower (not greater) likelihoods of regional persistence. In most circumstances, open space linkages within development, especially linear narrow corridors, have not been shown to enhance survival of the species that are most in need of conservation attention. In development adjacent to wildlands, where development is of such a density that only limited movement corridors are an option, designs that separate development from protected open spaces by use of hardened edges are the preferred design strategies (MacArthur and Wilson 1967; Soule 1987; Harris and Gallagher 1989; Bennett 1990)." In summary, the Draft EIR recognizes the advantages of appropriately designed wildlife corridors (e.g. not "linear/narrow").

Neither the Draft EIR nor the Final EIR make the argument that "none of the area within the Project site is worth preserving for wildlife that might wish to pass through our use the area". On the contrary, Section 5.7, Biological Resources, and Section 7, Cumulative Impacts, of the Draft EIR assess all aspects of Project-related impacts to wildlife movement and corridors. As discussed in Final EIR response to Comment F.8-109, the Project site does provide unobstructed local movement opportunities for small animals and aerially dispersing plants and animals that reside in the area. As discussed on page 5 of the Draft Interim Wildlife Movement Corridor Assessment report, mountain lion is expected to occasionally occur on the site in search of prey though there appears to be very little suitable denning habitat (WM-1 of Appendix 5.7-B of the Draft EIR). Further, because the majority of the Project impact area is sparsely vegetated and does not provide adequate cover, it is not expected to be heavily utilized by species such mule deer or the mountain lion. The Project design has incorporated two undercrossings to facilitate local movement across SR-138. MM-14, described on Draft EIR pages 5.7-190 and 5.7-191, sets forth the specific requirements for the undercrossing located where SR-138 crosses the Project's western border near the

current intersection with Cement Plant Road and requires an open space buffer near the bridge over the aqueduct for the Cement Plant Road and other areas to allow for greater wildlife mobility.

Nevertheless, even with the design features and mitigation, the Draft EIR conservatively concludes that the Project may contribute to a cumulative significant impact on regional wildlife movement.

Response to Comment ADD-G.59-4:

Please refer to pages 5.7-56 through 5.7-64 of the Draft EIR, and responses to Comments B.4-56, B.4-57, F.5-13, F.7-21, F.8-109, F.8-110, and F.8-168 of the Final EIR regarding regional and local wildlife movement.

The discussion on page 5.7-56 in the Draft EIR that describes how species that are adapted to specific ecosystems, generally tend to stay within those ecosystems, and not traverse over large mountains through very different habitats, is a general statement and applies to most species. The discussion is not intended to describe all species in a given region. Some species are able to persist in a large variety of habitat which generally allows them to move through changing habitats and elevations such as traversing over a mountain range to and from valley floors. All four of the species mentioned (mountain lion, bobcat, deer, and coyote) are generally this type of species. As a result, they are less restricted in movement than other species, have a broader range and steady populations throughout the region, and are not considered special status due to rarity by the CDFW (see Comment ADD-G.59-2). The Draft EIR (pages 5.7-51, and 5.7-53) (as well as multiple wildlife movement studies included in Appendix 5.7-B of the Draft EIR) acknowledges the large home ranges of certain species such as the mountain lion, and states that the mountain lion is expected to occur infrequently on the Project site (Draft EIR pages 5.7-50, and 5.7-166). Regional movement linkages are critically important for genetic flow and the health of regional mountain lion population, whereas a small portion of an individual mountain lion's home range or general use area, such as the eastern portions of the site, is not.

Neither the Draft nor the Final EIR suggest that the mountain lion, bobcat, or coyote do not occur on the Project site, or that the Project site is not within their home range. Potential Project impacts to these species are considered in the wildlife movement section on pages 5.7-56 through 5.7-64 of the Draft EIR. As noted in the Draft EIR, potentially significant impacts to wildlife movement and habitat for general wildlife that would result from implementing the Project would be reduced to less than significant levels with implementation of MMs 7-14 through 7-18.

In regard to the comment stating that the suggested overcrossings and undercrossings in the Draft EIR are few and small in size, these crossing are actually improvements from the existing condition which currently requires crossing the road at grade. In addition to improving these crossing locations, the size is appropriate for local movement, which is the primary type of movement that exists within the immediate area. The purpose of the crossing is not to increase the level of movement beyond the existing conditions; indeed, any

such increase would also increase the potential for human interaction within the Centennial development and potentially increase harm to wildlife. As mentioned in the Draft EIR, the primary regional linkage occurs to the west of the project site.

The Commenter also states that it is impossible to determine if wildlife that will be cognizant of various options for movement. However, the Draft EIR is not intended to suggest that wildlife would be directed to change current behavioral patterns. Rather, the Project design, coupled with mitigation measures, minimize impacts as much as feasible by placing development further away from the regional linkage areas to the west and adding features for safer passage for local movement in and around the Project site. All suggested crossing and avoidance measures are based on the known behaviors of wildlife in the region and there is no expectation that project measures would require wildlife behavioral changes in order to be successful.

The comment regarding the low genetic diversity of the mountain lion is noted. The concept of gene flow is part of the discussion on wildlife movement and is discussed on pages 5.7-53, 5.7-60, and 5.7-166 of the Draft EIR. While a discussion of mountain lion gene flow specifically is not necessary in the Draft EIR to provide an adequate impact assessment, regional movement of large mammals is discussed at length in the responses to Comments B.4-56, B.4-57, F.5-13, F.7-21, F.8-109, F.8-110, and F.8-168 of the Final EIR.

Response to Comment ADD-G.59-5:

Regarding the ability of wildlife to find and utilize the Project's proposed underpasses and overpasses, as stated in MM 7-14, the width of the underpass will be 100 feet and then will flare out to a 150-foot width adjacent to SR-138. The flare out areas on either end of the underpass are intended to act as funnels to guide wildlife users toward the underpass.

The Draft EIR does not suggest that the absence of studies in the Biological Resources Assessment of SEAs equates to a lack of need for linkages on the Project site. Please refer to response to Comment ADD-G.59-3 and ADD-G.59-4 above.

Response to Comment ADD-G.59-6:

Regarding the ability of wildlife to find and utilize the Project's proposed underpasses and overpasses, as stated in MM 7-14, the width of the underpass will be 100 feet and then will flare out to a 150-foot width adjacent to SR-138. The flare out areas on either end of the underpass are intended to act as funnels to guide wildlife users toward the underpass.

The Draft EIR does not discount the importance of wildlife movement to large wide-ranging wildlife, and in fact, the Draft EIR conservatively concludes that the Project may contribute to a cumulative significant impact on regional wildlife movement. There is a difference between considering an area an important corridor for movement (e.g. SEA 17), and an area where certain species may be found occasionally in search of food or water (the Project site). The comment states that the mountain lion typically crosses out of areas with cover into grasslands often. This may be the case in certain areas, but the Project site has not been

shown to be an area of high importance to the mountain lion by any of the wildlife movement studies that focus on the region (Draft EIR Appendix 5.7-B).

Further, the proposed Project will not completely block off movement to large mammals such as the mountain lion. Instead, it includes two underpasses and one overpass bridge crossing of SR-138. The underpasses would provide for local wildlife usage within the area and infrequent regional movement that may traverse from areas northwest of the Project site to areas south of the Project site.

The Commenter is correct in stating that there is a very large wildlife corridor north of the Project site. This corridor is one of the main biological functions of SEA 17. The Commenter states that "this does not mean considerable portions of the Project site are not important to large, free roaming wildlife that use both heavy shrub and conifer areas as well as grasslands." However, the heavy shrub and conifer habitat commenter describes occurs west of the Project impact area; this portion of the Project was redesigned to avoid impacts to potentially important wildlife corridor habitat. The Draft EIR does acknowledge that certain mammals with large home ranges may occur on the Project site (pages 5.7-50, and 5.7-166); however, the site has not been shown to be a crucial habitat linkage area for these species. The Project site occurs outside of the large wildlife corridor (SEA 17) and was not included in SEA 17 because the habitats do not support crucial movement areas.

Please refer to responses to Comments B.4-56, B.4-57, F.5-13, F.7-21, F.8-109, F.8-110, and F.8-168 of the Final EIR for further discussion regarding regional and local wildlife movement in the Project region.

Response to Comment ADD-G.59-7:

This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The EIR considered and rejected alternative sites for the Project. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Draft EIR Section 8.4.1 (which discusses why an alternative site was not evaluated in detail in the Draft EIR) and Final EIR, response to Comment F.8-20 for further discussion.

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August 4, 2018

Ms. Amy Bodek
Director, Department of Regional Planning
County of Los Angeles
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Bodek:

I'm writing in support of Centennial at Tejon Ranch.

The County of Los Angeles has been working on Centennial for nearly two decades, and it's time to approve the project and move it forward.

As you know, Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, commercial, schools, parks and trails, natural open space, cultural, and public uses.

The community masterplan is simply the implementation of the AVAP, a balanced plan of economic opportunity and conservation. Centennial has also been at the table with the Golden State Gateway Coalition in regards to fast tracking the I-5 improvements before this new community has been set.

It is important to define the project location in terms of synergy with the growing populations near the Centennial project. There is great synergy between other Tejon Ranch projects in Kern County, including Grapevine and Tejon Mountain Village, as well as the Antelope Valley and Santa Clarita.

Centennial is LA County's opportunity to take advantage of growth at Tejon Ranch in Kern County by increasing tax revenue for the general fund and providing increased public services to North LA County, but also providing diverse working-class and middle-income families an opportunity for homeownership.

In addition, Centennial includes plans to focus on water conservation through the use of recycled water and several other sustainable sources. The project's Green Development program requires reduced potable water consumption through the use of drought-tolerant plants, low-flow showerheads, faucets, and toilets. The Centennial master plan will also use recycled water for landscape irrigation in residential common areas.

I urge the Regional Planning Commission to approve and allow Centennial to move forward. We need to finally begin development on this much-needed community.

Sincerely,

ADD-G.60-1

Response to Comment Letter ADD-G.60
Form Letter 7
August 4, 2018

Response to Comment ADD-G.60-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-7 to this document. The Commenters' support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This form letter does not specifically address the adequacy of the EIR and no further response is required.

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To: Jodie Sackett
Subject: Centennial is the Wrong Vision for Los Angeles

Dear Jodie Sackett,

Scientists warn that we're in the middle of a climate crisis. Because transportation is the single largest driver of carbon pollution in California, new development located far from existing cities has disproportionately large climate impacts. Centennial exemplifies poor, outdated land-use planning on an unprecedented scale. This isolated new city would lock in at least 75,000 new vehicle trips per day with an average trip length of over 45 miles.

If you're committed to a sustainable future for L.A., then you need to say no to Centennial.

L.A.'s wildlands are rapidly diminishing. Ninety-nine percent of California's native grasslands are already gone forever, paved over by similar sprawl development. The Centennial project site contains the last, largest and best native grassland and wildflower fields left in California. Rare wildlife such as California condors, bald eagles, kit foxes and pronghorn also will be harmed if Centennial is built.

It's your job to protect our communities and natural resources, not sell them out to developers.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, urban, affordable housing. Centennial is a poster child of 20th-century sprawl development that exacerbates threats to our population through increasing greenhouse gas production and climate change, air pollution and a deteriorating quality of life.

ADD-G.61-1

The proposed site is in "high" and "very high" fire hazard severity zones. And it's directly on top of California's two major earthquake faults. The area was rated by the U.S. Geological Survey as having the highest level of earthquake hazard.

The county and its taxpayers will be on the hook for millions to provide basic public and emergency services to this remote area.

Instead of allowing isolated sprawl development on irreplaceable grasslands in an area at extremely high risk for fires and earthquakes, L.A. should focus on creating safe housing and economic opportunities in or near existing cities.

Please say no to Centennial: It's the wrong vision for L.A.

Sincerely,

Response to Comment Letter ADD-G.61
Form Letter 8
Various Dates

Response to Comment ADD-G.61-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-8 to this document. This comment's stated opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. With regard to the topics raised in this letter, please see Draft EIR Section 5.3, Hazards and Fire Safety, Section 5.8, Biological Resources, Section 5.10, Traffic, Access, and Circulation, Section 5.11, Air Resources, and Section 5.21, Climate Change, and Final EIR responses to Comments A.3-3, A.3-4, A.3-5, A.3-7, B.4-20, B.4-21, B.4-22, B.4-23, F.2-2, F.2-5, F.3-29, F.3A-46, F.8-20, F.8- 95, F.8-128 to F.8-131, F.8-189, F.8-204, G.31-1, H.21-1, and J.1-6. Since this comment does not raise any specific concerns regarding the adequacy of the EIR, no further response is required.

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To: Jodie Sackett; cperry@bos.lacounty.gov; Kathryn@bos.lacounty.gov
Subject: Centennial Letter

Name :
Email :
Address :
City :
Zip:

Dear Mr. Sacket:

I'm writing in support of Centennial at Tejon Ranch. The County of Los Angeles is facing a housing crisis and we need a variety of housing types in various locations throughout Los Angeles County. Centennial's master-plan will do just that; create more price-attainable housing and it will help accommodate the planned regional population and economic growth in our county.

As you know, Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, commercial, schools, parks, natural open space, cultural, and public uses.

The community masterplan is simply the implementation of the AVAP, a balanced plan of economic opportunity and conservation. Centennial has also been at the table with the Golden State Gateway Coalition in regards to fast tracking the I-5 improvements before this new community has been set.

It is important to define the project location in terms of synergy with the growing populations near the Centennial project. There is great synergy between other Tejon Ranch projects in Kern County, including Grapevine and Tejon Mountain Village, as well as the Antelope Valley and Santa Clarita.

ADD-G.62-1

Centennial is LA County's opportunity to take advantage of growth at Tejon Ranch in Kern County by increasing tax revenue for the general fund and providing increased public services to North LA County, but also providing diverse working-class and middle-income families an opportunity for homeownership.

In addition, Centennial includes plans to focus on water conservation through the use of recycled water and several other sustainable sources. The project's Green Development program requires reduced potable water consumption through the use of drought-tolerant plants, low-flow showerheads, faucets, and toilets. The Centennial master plan will also use recycled water for landscape irrigation in residential common areas.

I urge the Regional Planning Commission to approve and allow Centennial to move forward. We need to finally begin development on this much-needed community.

Response to Comment Letter ADD-G.62
Form Letter 9
Various Dates

Response to Comment ADD-G.62-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-9 to this document. The Commenters' support for the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This form letter does not specifically address the adequacy of the EIR and no further response is required.

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To: Jodie Sackett
Subject: Centennial is a terrible deal for L.A. County.

Dear Jodie Sackett,

Centennial is a terrible deal for L.A. County. Centennial would be located in a "high" and "very high" fire hazard area subject to intense winds. Locating thousands of people in this fire-prone area will certainly lead to more human-caused wildfires, scorched homes and loss of life. The immense costs of protecting residents in this remote area from inevitable wildfires would be borne by Californians in and beyond Los Angeles County.

Centennial will not help address the county's housing shortage. Building a new city 65 miles from downtown LA will not help residents live near their jobs. Instead, Centennial would require construction of a new freeway at an initial cost of $830 million, which would divert scarce funds away from transit projects that make our existing communities more livable and sustainable.

Centennial would add tens of thousands of new cars each day onto Highway 5, leading to further gridlock in Santa Clarita and the San Fernando Valley. Thousands of long-distance car trips will lead to more cancer- and asthma-causing air pollution, as well as associated public health and treatment costs.

Your decision on Centennial is perhaps the most far-reaching decision you will ever make as a county official. Please, don't approve Centennial. It would reward Wall Street speculators while leaving county residents stuck with more freeway maintenance and fire-prevention costs, more traffic, and more air pollution.

ADD-G.63-1

Sincerely,

Response to Comment Letter ADD-G.63
Form Letter 10
Various Dates

Response to Comment ADD-G.63-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-10 to this document. This comment's stated opposition to the Project is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. With regard to the topics raised in this letter, please see Draft EIR Section 5.3, Hazards and Fire Safety, Section 5.9, Population, Housing, and Employment, Section 5.10, Traffic, Access and Circulation, Section 5.11, Air Resources, and Section 5.18 Water Resources. Since this comment does not raise any specific concerns regarding the adequacy of the EIR, no further response is required.

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3.6 RESPONSES TO PUBLIC TESTIMONY GIVEN AT AUGUST 29, 2018 REGIONAL PLANNING COMMISSION HEARING

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Vickie Kirshenbaum			
RPC-328[3391]	Biology Affordable Housing Greenhouse Gases	Hi. My name is Vickie Kirshenbaum. I strongly oppose the Centennial development. This project is wrong on every level. It would mean the destruction of native grasslands, critical habitat for rare birds and animals. Second, L.A. County desperately needs to invest in its urban core and create affordable housing, especially permanent affordable housing, and not far flung sprawl. We have thousands of people living on our streets. Third, voters strongly want the Southland to be a leader in reducing greenhouse gases. Our State just passed SB 100, 100 percent renewables by 2045, and yet transportation remains the biggest source of CO2 emissions. We don't want a project that would mean 75,000 automobile commutes per day. If you all move to Centennial, really, would you jump on a bus to get to work? Would you carpool? Would you able to purchase an electric vehicle? I think most of us would continue using the vehicles we're driving today, so I think it's unrealistic to think -- to -- to listen to the comments that were made earlier. Thank you.	Thank you for your participation in this public process. The Commenter's opposition to the Project, and preference for development elsewhere was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County disagrees with the Commenter's characterization of the Project, which is consistent with regional and state climate change goals as discussed more fully in Final EIR, response to Comment F.8-20. With regard to grasslands and wildlife, the EIR thoroughly analyzes Project-related impacts and proposes feasible mitigation measures to avoid or substantially lessen them. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

[3391] Please note that Responses to Testimony RPC-1 through RPC-327 are contained in a document entitled County Responses to Public Testimony Given at the June 6 and July 11, 2018 Regional Planning Commission Hearings, available at the County of Los Angeles Planning Department, and online at: http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180816-attH2.pdf.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Christina Fiallo			
RPC-329	Biology	Hi. Good morning. My name is Christina Fiallo. I was born and raised in California and I'm a resident of L.A. County. And I'm in love with this state. I love being able to explore beautiful trails that have not been paved over, take in breathtaking landscapes, and know that all around us wildlife exists, from bald eagles to burrowing owls to the amazing little kit fox that, like me, loves our arid climate here in L.A. Some of these creatures are thriving but some of them are on the road to extinction, and that breaks my heart. Sometimes it's easy to think that it's not our fault, it's not our fault that nature around us is dying, we aren't to blame, but our decision today will have a direct impact on these animals and on our beautiful -- on my beautiful home state. I'm not a scientist or an environmental attorney. They can tell you more about what this project is going to do. But I can speak from my heart. There is not much I know in this life, but I do know that extinction is forever. If you approve this project, this project will destroy the Antelope Valley wildlands. It will be gone. It contains some of the most diverse native grasslands and wildflower fields remaining in California, as well as species that are on the brink of extinction. These grasslands will be gone. These wildflowers will be gone. These animals may not survive. They will be gone. But what will L.A. residents get in return?	Thank you for your participation in this public process. The Commenter's opposition to the Project and preference for preservation of the Project site was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to grasslands and wildlife, the EIR thoroughly analyzes Project-related impacts and proposes feasible mitigation measures to avoid or substantially lessen them. With regard to the Commenter's assertion that resources unique to Tejon Ranch will be lost, this is incorrect. The Project region is an important ecological region, but preservation of thousands of acres of important biological resources is an objective of the Project, and the proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. (Draft EIR, page 4-4; Response to Testimony RPC-219) The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas. While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land are preserved through the Project's mitigation process. This comment does not provide evidence of any inadequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-330	Fire Safety Geology	We will get more traffic, more pollution, more angry Angelenos. On top of that, we will be allowing homes to be built in a high-fire, high-earthquake zone. In fact, the project site sits on one of the areas rated as having the highest earthquake risk in California. I was five years old when in 1989 -- when the 1989 earthquake hit the San Francisco Bay Area where I lived. It was the most terrifying day of my young life. I would not wish that on any child, on any family. If we approve this, we'll be exacerbating the effects of a future earthquake on these unsuspecting families who will move there and then commute here each day.	With regard to fire, the EIR thoroughly analyzes Project-related impacts and reduces impacts to a less than significant level with implementation of MM 3-9, including with regard to its location in Very High, High, and Medium Fire Hazard Severity Zones. See Draft EIR, Section 5.3, Response to Testimony RPC-309, Final EIR, response to Comment A.2-6, and Response to Testimony RPC-339 in this document for further discussion. With regard to earthquake hazard, as disclosed in Draft EIR Section 5.1, Geotechnical, the San Andreas Fault Earthquake Fault Zone and fault line cross the southwestern edge and southernmost point of the Project site, as shown on Draft EIR Exhibit 5.1-2, Geologic Hazards. However, with implementation of PDF 1-1 and compliance with State and County requirements for construction and setbacks, impacts would be less than significant.
RPC-331	Affordable Housing	There are much better solutions for housing shortages and the need for affordable housing, ones that are in line with our values of protecting residents and protecting our State's beauty. I urge you not to approve this project. Thank you.	The Commenter's opposition to the Project and request for more affordable units has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required. The Commenter is correct, however, that there is a great need for additional housing choices and affordable housing in the region. The Project will provide needed housing choices and affordable housing.
Marty Caruso			
RPC-332	Transportation/ Traffic Biology	Good morning. My name is Marty Caruso [phonetic], and I want to state my complete opposition to the development of Centennial. I'm a six-generation Californian. I was born in Bakersfield, and we always admired the Tejon Ranch. It was a large piece of open space in our landscape. We don't admire the traffic that's on the I-5, and that this Centennial town is only going add to that. There are no provisions for it. There's no enforcement for any of the traffic that Centennial will create.	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Commenter appears to assert that mitigation requirements identified to avoid significant traffic-related impacts would not be enforced. However, this is incorrect. Mitigation measures are binding requirements that will be enforced on an ongoing basis by the County, and a Mitigation Monitoring and Reporting Program will be adopted to help ensure mitigation measures will be implemented. With regard to other planning efforts for Lancaster and Los Angeles, the Commenter's testimony has been heard and will be provided to the Board of Supervisors, but such testimony does not address the adequacy of the EIR or the Project, and no further response is required. However, the Project is consistent with all applicable long-range planning documents, including the Antelope Valley Area Plan and

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		As far as the Master Plan for Lancaster -- Lancaster and Los Angeles, we see beyond the Master Plan. We see that we need to preserve the open space for wildflowers, for the native plants that sur- -- that are surviving only there in the Tejon Ranch. They're being studied now. We need a place to retreat. We need a place to -- to hike on the trails. We need a place to – we need to know that there is open space still in the State of California.	the Los Angeles County General Plan, as discussed in the Draft EIR, Section 5.8. With regard to the Commenter's assertion that plants unique to Tejon Ranch will be lost, this is incorrect. The Project region is an important ecological region, and the proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas. While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land are preserved through the Project's mitigation process.
RPC-333	Affordable Housing	We do not need any more affordable housing. You can't even agree, the makers of the plan do not even agree what is 10 percent affordable housing. It's not going to be affordable housing. It's going to be medium-income housing. Plus the Centenni- -- I thought the Centennial project we put aside 19,000 residences for affordable housing for people from Tehachapi who need it and maybe the jobs in Kern County. And it's not going to be that either. It's going to be a chance at home ownership between 400,000 and 500,000. It's not really very affordable.	The Commenter's preference for a larger amount of affordable housing, and opinions regarding what should qualify as affordable, were heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. For details on the Project's affordable housing program, please see the Affordable Housing Implementation Plan in the Specific Plan, at Final EIR, Appendix 3-C to Appendix 4.0-A.Rev. This testimony does not specifically address the adequacy of the EIR, and no further response is required.
RPC-334	General	So, in -- in general, I just want to state my opposition to this plan. I think it's one more – one more chance at urban sprawl in our County, which does not need it. It's one more building of roads, which there are no roads there now, there are no sewer there now, there's no power plant there now. It's one more way to ruin our state, and I'd like to register my opposition to the plan. Thank you.	The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. Regarding this comment's assertion that the Project constitutes urban sprawl, please see Final EIR, response to Comment F.8-20.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Tom Budlong			
RPC-335	Sprawl Greenhouse Gases	Excuse me. My name -- my name is Tom Budlong. I'm an L.A. County resident. In looking through the planning document, the agenda document, and I'm reading the words in here, which emphasizes my -- emphasize my opposition to putting this new town out in the middle of nowhere: adding expressways, highways that are proposed in order to serve circulation needs, major expressways, pipelines and well storage tanks, wastewater reclamation, solid waste, composting, road and highway construction and realignment, bridge construction, electrical, gas. This is not a benign project. This is urban sprawl at its worst. In fact, it's -- it's worse than urban sprawl. It's leapfrog urban sprawl where the cancer has gone into another organism -- as another organism. The impacts are unmitigable. I read through the EIR, as best I could, because it's only 3,000 pages, I think, and you can see them there struggling to explain and provide mitigation which will alleviate some of the negative impacts. You cannot pretend that this is mitigatable. It is unmitigable. There is going to be a huge impact to the land out there. And like I said, this is sod busting. This is leapfrog sprawl. It's sod busting as if it were the 1850s when it was an open country with unlimited room and unlimited resources, where it was almost a duty to concur the wilderness and -- and -- and the vacant country that's there. I can't imagine in this day of global warming and greenhouse gases that this will have nothing but	Thank you for your participation in this public process. The Commenter's opposition to the Project has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. Regarding this comment's assertion that the Project constitutes urban sprawl, please see Final EIR, response to Comment F.8-20. The County disagrees with the Commenter's characterization of the Project, and note that the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Also, although the comment alleges that comments on the EIR related to unrecognized impacts were inadequately considered, no further response is possible because the comment does not identify specific alleged deficiencies.

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		another added impact on the greenhouse gases, which is not necessary. The talk of electric vehicles is very nice, and it might help, but it's still going to be there. I noticed in the EIR a huge list in the comments of unrecognized impacts in the EIR that were inadequately considered. There is no way to adequately consider those impacts. They will be there. You can't help it. Los Angeles needs more housing. It's already built up. It can build further up and do more – do more density here. To sacrifice our lands out there to urban sprawl, when will it stop? This is an avenue towards the total destruction of our lands. By the way, a long time ago -- I'm old enough -- it was a long time ago, I camped out there, probably illegally trespassing, but it was a magnificent experience. I was there for three or four days out in the grasslands with the wild animals that were out there, and I -- it just -- it makes me shiver to imagine destroying that. Thank you very much.	
Dorothy Johnson			
RPC-336	Population/ Housing	Yeah. My name -- my name is Dorothy Johnson. I was trained as a paralegal, but I'm not in there -- in for that purpose. I'm just a private citizen. We need more jobs in L.A. We need more housing for the homeless. The City has properties all over L.A. and they own -- own businesses all over L.A., buildings that are empty. They could be used to help the homeless. And I don't mean just to give them the -- the places to live. I mean to get them actively involved in	The Commenter's suggestions for County planning for the homeless, preference for a larger amount of affordable housing, and opinions regarding what should qualify, were heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County notes that details on the Project's affordable housing are in the Affordable Housing Implementation Plan in the Specific Plan, at Final EIR, Appendix 3-C to Appendix 4.0-A.Rev. This testimony does not specifically address the adequacy of the EIR, and no further response is required.

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		building them. Help them -- get them to help -- help with the building on them. We also need jobs because I have friends that -- well, actually two people in my own family have bought property in Arizona, and everybody that I know is moving to Arizona, so they're going to be pretty good there. And so the only thing that I have about this problem is that I feel that this company -- I don't know that much about them, but I feel that this company is just saying "yes" because they want to get this – this project approved. The -- the prices of the houses, I don't know what the price would be, but low income would be – not be 4 or $500,000. It would be not -- not profitable -- not -- not profitable for most people to be able to go ahead and do that. I see right now 20 years down the line if their houses are built, it's going to be another Palmdale. They're going to be all wanting to move back to L.A. because the traffic is too far, too - too much to get by. So that's -- that's my -- my take on it. Okay. Thank you.	
Diana Coronado			
RPC-337	Support	Good morning, Chair and Commissioners. My name is Diana Coronado, and I'm here on behalf of the Building Industry Association. The BIA represents 1,200 companies who employ over 100,000 people all affiliated with building. That includes your builders, engineers. You have electricians, plumbers, construct -- those in construction, and many more. We are here today in support of the Centennial project.	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		As you all know, we're in a severe housing crisis -- I mean, a severe housing shortage. The bottom line is, we need more housing. According to the State and the Southern California Association of Governments, for the 2013/2021 cycle, we're topped out at a housing need of 30,199 units. So far the County has only been able to permit 3,149 units. Unfortunately, none of those units include moderate housing. However, today you have the opportunity to change that. With over 19,000 price-attainable units being developed and 10 percent of them being affordable housing, Centennial is a step in the right direction for the County. Centennial is designed to bring its first-time buyers just starting out and families looking for housing opportunities. This project will provide price-attainable housing for the missing middle. Those are your teachers, firefighters, law enforcement, nurses, and many more, as previously stated. Centennial will offer small lots, single-family detached residences, including single-family, multi-family, attached residences, townhomes, condos and apartments. With their multimodal transportation system, Centennial will encourage public transportation and walking and will provide transportation alternatives for getting to and from work as well. The BIA urges you to recommend approval to allow Centennial to move forward. We appreciate your thoughtful consideration on this project.	

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Katie Brown			
RPC-338	Fire Safety	Good morning. My name is Katie Brown, and I'm from Lancaster and the Antelope Valley near where Centennial would be poised on a very high-fire risk area. And growing up in the desert, I'm no stranger to wildfire. During my freshman year of high school, fire spread from Leona Valley to Lancaster, and ash rained from the sky and we struggled to breathe and even to see. My sister rushed to her house across town and prepared to evacuate in case the fire jumped the road into her neighborhood. Luckily her home was safe that day, but the air we breathed was not, and 7,000 acres burned. I also grew up visiting my grandma in eastern Washington, which is a similar climate to northern L.A. County, and her home was beautiful, surrounded by quail and blue jays and hummingbirds, but four years ago, fires along the Columbia River came down the mountainside and burned her home to the ground. And though somber, that's not a unique story. Homes are lost every year, and we'll continue to face that reality as fires become more frequent and more intense with climate change. We can't continue to suppress fire and ecological zones that necessitate fire, like where the Centennial is plotted to be built, and we know the outcome. If my personal story doesn't make a difference to you, let's consider the economic impacts of fire. Since 2010, costs from suppressing wildfires and the damage they cause have reached $18.6 billion versus 600 million in the 1980s, 3,000 percent higher. And developers and investors do not bear those costs; rather, California residents pay for Cal – Cal	Thank you for your participation in this public process. The information the Commenter presented about fire was considered by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.

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		Fire, government subsidies and hazard mitigation grants for homes in high-risk areas through their taxes. And I'd like to finish by reading a short passage from Ecology of Fear, by Mike Davis, which was written 20 years ago, yet we're making the same mistakes. "For generations market-driven urbanization has transgressed environmental common sense. Monolithic public works have been substituted for regional planning and a responsible land ethic. As a result, Southern California has reaped flood, fire and earthquake tragedies that were as avoidable, as unnatural as the beating of Rodney King and the ensuing explosion in the streets. In failing to conserve natural ecosystems, it has also. Squandered much of its charm and beauty." Thank you.	
Rebecca Leevers			
RPC-339	Fire Safety	This is interesting that I should follow this speaker. I am University of California Cooperative Extension trained and master gardener, and in -- Oh, yes. My name is Rebecca Leevers [phonetic]. I'm sorry. Also I'm a member of the California Native Plant Society. But in that capacity as a master gardener and following our -- you know, the sustainability model that we're supposed to help homeowners with, I spend most of my time talking to homeowners about preparing for fire, hardening their home and of course that 100 feet of defensive space, but yet sometimes I feel a little hypocritical because I realize that how limited landscaping is when faced with a ranging inferno.	With regard to fire, the EIR appropriately evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and

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		And so I'm looking at the fire regimes and timing and our climate, our Mediterranean climate with the native plant communities that adapted to them, but natural fire, which is not our problem, Cal Fire states that now 95 percent of our fires are due to just human activity, much of which we're not even aware of. The frequency and intensity of these fires increased, and these fires are destructive to the natural flora and fauna, as well as they are to the communities that they engulf. Wildfires have many causes, and I just want to look at one that is kind of interesting and many of us are not aware of. Cal Fire states that 14 percent of California's wildfires are ignited by vehicles just normally driving down main transportation corridors and happen to go through high-fire severity areas, so like the vehicle that suffered mechanical failure causing the car fire near Redding. If Centennial were built, Highway 35 would be transformed from a back-area road to another heavily-traveled corridor through a known very high-fire hazard severity zone. The entire Centennial project is surrounded by high and very high-fire hazard severity zones. Building this community in this isolated wilderness area would add many miles of additional wildland/urban interface to our overextended firefighting resources that would be expected to protect it with the people of California underwriting the cost. This is not right. It's just not right. The economic cost of last year's fires totally is estimated to be $180 billion, and this says nothing about the other more painful cost of wildfire. Wildfire suppressing costs have tripled in the fiscal years just from June 2013 to June 2018.	vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. With regard to vehicles traveling through the Project site igniting, first, CEQA does not require an analysis of the environment's impacts on the Project, but rather the Project on the environment. Further, the LACFD has determined that proposed fire services would meet Project-related demand, and this would include all foreseeable ignition sources. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6. More specifically with regard to fuel modification, MM 3-9 requires implementation of a Fuel Modification Plan, whose major components will ensure a minimum 20-foot setback from the edge of any structures; an irrigation and transition zone from 20-100 feet away, and native brush thinning zone between 100 and 200 feet away from structures. For further details of fuel modification requirements, please see Draft EIR, Section 5.3, and Final EIR, responses to Comments A.2-6, F.8-63, and F.8-64. The Commenter provides no evidence to refute that EIR analysis and mitigation are appropriate, and no further responses is required.

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		California's fire season is now 12 months long, and we're all anxiously awaiting October, which is the height of that season. It hasn't come along yet. Building Centennial would be creating another potential fire disaster, the last thing Californians need, including the people who would buy homes here. Thank you.	
Dillon Cohen			
RPC-340	General Opposition	My name is Dillon Cohen, and I'm a resident of Supervisor District 1. I am here today to ask you to vote "no" on the Centennial Specific Plan. As a Ph.D. student and researcher who studies biodiversity and evolution in the Western United States and South America, I would like to stress how important it is to conserve places like Centenn- -- Centennial. I have had the opportunity to visit Tejon Ranch several times and -- and my experiences on this very special piece of land have led me to conclude that the Centennial the site is inappropriate for development. The proposed Centennial new city is located in a well-known zone of ecological transitions. There's no other places -- place in California where plants and animals from the Tehachapi Mountains transverse ranges, the Mojave Desert intermingle. Also, given the reality of climate change, the preservation of these ecological transition zones is of utmost importance in order to ensure the species and ecological processes that have a chance to persist. Precious and beautiful habitats, such as this, should not be traded for unimaginative leapfrog development projects like Centennial.	Thank you for your participation in this public process. The Commenter's opposition to the Project, and preference for development elsewhere was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The EIR appropriately analyzes impacts to habitat connectivity and wildlife movement, and the Project design and mitigation measure requirements would ensure less than significant impacts, as discussed more fully in Draft EIR, Section 5.7, Biological Resources, and Final EIR, response to Comment A.2-6. This comment does not address the adequacy of the EIR, and no further response is required.

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		I urge you to send -- to send this project back to the drawing board. Thank you in advance for rejecting the Centennial Specific Plan.	
George Waddell			
RPC-341	Transportation/ Traffic Geology	Hello. I'm George Waddell. I'm a resident of Los Angeles City. I'm opposed to this. And a -- a representative of the Native Plant -- California Native Plant Society. I'm opposed to this. I think the main argument is poor planning, to increase the amount of traffic on the 5. It's going to very -- have very negative effects on -- on the traffic there. It's also poor planning to put so many people in harm's way on the most -- the largest, one of the largest and most dangerous earthquake faults in the -- in the world. It's like just asking for trouble, so -- Thank you very much.	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The EIR thoroughly and appropriately analyzes Project impacts with regard to traffic (see Draft EIR, Section 5.10, Traffic, Access, and Circulation) and seismic hazards (see Draft EIR, Section 5.3, Hazards and Fire Safety) consistent with CEQA requirements, and mitigates impacts with feasible mitigation measures. This comment does not address the adequacy of the EIR, and no further response is required.
Pat Daw			
RPC-342	Miscellaneous	Hello, Commissioners. Thank you for the opportunity to speak. My name is Pat Daw. I am a retired architect and city planner with about 50 years of experience, a lot of it in large-scale development, maybe not unlike the magnitude of this. I have sat on the side of the table that the Tejon Ranch Company is sitting on now, so I know a lot about the insides of these projects and how they're put together and some of the things that they run into. I didn't come here to oppose this development or advocate for it. What I really came here to do was to appeal to your sense of vision in building out this site. I'm pretty convinced that you're going to pass something and this is going to go ahead.	Thank you for your participation in this public process. The Commenter's opinion about Project design is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to mitigation, implementation of all Project mitigation measures, including mitigation measures for long-term impacts, will be included in a fully enforceable Mitigation Monitoring and Reporting Program. This testimony does not address the adequacy of the EIR, and no further response is required.

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		My big ask is that you do it with some idea about demanding, really, that the Tejon Ranch Company come forward with some vision. This has to happen early in the process. It may be that we're too advanced for that to happen, but I -- I'm pretty sure that to get something in this irreplaceable piece of California, you need something really, really different, and I don't see that in the existing plan. I see it as kind of a cookie cutter thing, you know, it could have landed on the side of Orange County, for all I know. I mean, it's like something that I would have seen back in my early days as a student planner, I'm sorry to say. So I'm not really opposed to something happening, but what I'd really like you to do is, one, take Commissioner Smith's advice about enforceability seriously. If this thing is going to be built out over 20 years, what's going to happen is that this long, long list of mitigations that you're all faced with that are trying to make this plan into a silk purse are going to be really, really hard to enforce. I mean, here we are today. 20 years out, it may not even be built out yet, but if there's a new city of Centennial, who is going to have the political will and the leverage to really enforce the standards that you imposed on them? So that's a -- it's a concern to me. I haven't seen -- because I haven't really studied this in depth -- the financials and the market feasibility. I -- I somewhat question putting a standard -- sort of a standard one-size-fits-all plan on that site, as I see in the plan. It's really going to lure the market and the -- and result in the financial success that Tejon Ranch Company wants to get.	

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		I know that the planning community can do better than this. I just know it. I've seen it. I've been part of things like this, internationally and the U.S. So I just -- I guess I just appeal to you as you go forward to really, you know, take your name seriously. You're the Regional Planning Commission. Let's -- let's do some planning here and get those people who are bringing projects in to you to really think hard about that and come up with something – if there's something going to happen, I'd like to see it be the best it can be. Thank you.	
Patsy Ayala			
RPC-343	Support	Good morning. My name is Patsy Ayala, a board member from the Antelope – Antelope Valley Chamber of Commerce, Hispanic Chamber of Commerce, which represents over 20,000 employees in the Antelope area. I come before you today not -- not only as a board member but also as a resident of the area. A major concern through the region has been access to affordable housing and good jobs. The lack of these two things has caused residents to commute long distances for work, leaving little time for their people, for their family or the things they want to do. This causes great strains not only on the individuals but families as well. And then there are those who are missing the opportunity to have a house or even the dream. A dream is a dream, and always a family, as an individual you are working hard to get one of the dreams, that is having a fam- -- family in a home. That is a reality that is not happening for many families in the L.A. County area. This a great project that has a great balance between having nature but also addressing one of	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		the most important problems to address in L.A. County, that is affordable housing. In this project, there -- there will be different options. It's not one price house. There are different options for families, as condos, apartments, and affordable housing, and also single-family homes, making sure that there is always something for every budget in this area. A project of this size also means the creation of a large number of jobs, both for construction workers as well as permanent jobs for the community. The Centennial project will bring economic development, affordable housing and a balance with nature. I humbly ask for you to approve this project as it will help address the housing crisis that is impacting many in the region. Thank you for your consideration.	
Karen Moreno-Scott			
RPC-344	Support	Good morning. My name is Karen Moreno-Scott. I am a resident of the Santa Clarita Valley, and I have come to express my support for Centennial. I am an Angelino at heart as I lived in the City of Los Angeles until I was priced out. The process of moving out of the community which I loved and where I lived happily for so many areas was painful. Looking for housing, I moved to San Fernando Valley, and eventually to the Santa Clarita Valley with my husband, who is an officer for the Los Angeles Police Department. Since then, we look to our future and are strongly considering early retirement so that we may enjoy our adult children and their growing families. But we are worried for them and wonder whether they	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		will ever be able to afford their own homes. The cost of living has been central to our discussions concerning their future, as well as ours, and whether they can afford to have children, which as you know brings with them many other expenses. Centennial seeks to address the concerns that I and many other across the State have with the current housing crisis. The applicant has put together a project that has all the necessities to create a family-friendly environment with a bright and prosperous future. With the development of multiple schools, a library, parks and a sheriff station, plus jobs, Centennial is a place where anyone can start a family, if they want to, without having to deal with the high cost of living. I ask the Commission approve this project so that we as a State can start addressing the issues that many of us are facing every day, an issue that is being perpetuated onto the next generation for whom home ownership is becoming a dream less likely to come true. This is not acceptable. It's time to get back on track and create opportunities for the American dream to become a reality for most. Thank you for your time and consideration.	
Joseph Farewell			
RPC-345	Biology Fire Safety	Good morning. My name is Joseph Farewell [phonetic], and I'm a resident in Kathryn Barger's 5th District, and I'm a second-year law student at Loyola Los Angeles School just across the 110 Freeway. However, I'm not speaking here as a legal student but more as a citizen concerned about the Centennial development and the myriad issues it poses for L.A. County.	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to fire risk, please see Response to Testimony RPC-339. With regard to wildflowers, the EIR concludes that Project mitigation measures and the preservation of 14,908 acres of grasslands coupled with long-term management through implementation of the Ranch-wide Management Plan will sufficiently offset and fully mitigate for impacts on wildflower fields associated with the Project. See Draft EIR, Section 5.7, Biological Resources, and Final EIR, responses to Comments B.4-17, B.4-43, F.3A-19, F.8-119, F.8-

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		Indeed, while Centennial ostensibly addresses a chief concern in the Southland, housing or, more accurately, the lack thereof, it creates more problems than it purportedly solves. Given time constraints, however, I'll focus on just three of Centennial's countless problems: fire concerns, environmental damage and policy implications. First the fire considerations, always at issue in California but particularly now and especially in the near future because of our rapidly warming climate. In short, I worry that the Centennial development is putting tens of thousands of Californians directly in harm's way. This is an area that burns easily, that burns freely and will be exponentially more likely to burn with hotter temperatures and with so many more people living in this wild area. Second, the environmental damage here at the scale and in this beautiful place is unacceptable and distinctly unCalifornian. We're stewards here of a unique and fragile environment, and nowhere is this dynamic more immediate than in this particular area of California. Ripping out fields of wildflowers might be something that they do in other states, in other places, but it's not what we do here, at least in 2018.	123 to F.8-125, and H.21-1 for further discussion of impacts to and mitigation to address such impacts to wildflower fields. With regard to fire risk and the Project's designation as partially a Very High Fire Hazard Severity Area, please see Responses to Testimony RPC-338 and RPC-339. Further, as more thoroughly discussed in response to Comment ADD-G.70-1, designation of fire hazard severity zones is not intended to prevent all development, but rather to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk.[3392] Further as the Project is built out over 20 years, the Fire Codes, standards, and guidelines would likely be continually updated by the State and County agencies as the knowledge gained from past fires is increased; these updated code requirements, as finalized through discussions with the LACFD, would be applied to subsequent development phases of the Project to ensure that Project development continues to meet evolving standards to ensure impacts are less than significant. (Draft EIR, page 5.3-37)
RPC-346	Population/ Housing	Lastly, the policy considerations. Every one knows that we need more housing. As a married law student who lives in his parents' back house to save money, hopefully for a house one day, I'm particularly sensitive to this fact. However, I, and I think the majority of L.A. County constituents recognize that our planning should be governed by sustainable, climate-friendly policies.	The Commenter's opinion was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. However, the County disagrees with the Commenter's characterization of the Project, which has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions

[3392] CALFIRE, Wildland Hazard and Building Codes Frequently Asked Questions: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_faqs.

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		Centennial flies in the face of such considerations. Put simply, our local government needs to encourage and implement policies that empower sustainable development, that means vertical construction, investment in public transit corridors and building units that minimize resource use. A massive city in the middle of a beautiful nowhere accomplishes none of these goals, and its realization threatens the progressive, sustainable direction of our County's policies. Thank you.	and to promote public health. It also includes many sustainability features that go beyond what is legally required. For a more detailed discussion, please see Final EIR, responses to Comments F.8-20, F.8-204.
Hilary Black			
RPC-347	Fire Safety	Hi. I'm Hilary Black. And as a former editor of a magazine, we would get letters, and whenever we got a letter telling us how the reader felt, we knew that that represented hundreds, maybe more, maybe thousands. So I just want to acknowledge that those of us who are here today, there's a long line of people behind us who couldn't get childcare to come here today, couldn't get transportation, had to work, that feel very strongly about this project, as well, not moving forward. I am not for this project for all of the reasons that have been stated so well so far. I have a childhood friend who lived in the Coffey Park neighborhood. I was there a month before the fires. That fire jumped the 101 Freeway. I don't know if you're familiar with Santa Rosa, but it's -- this neighborhood was in the northern part of the developed City of Santa Rosa. That fire jumped four lanes, two on each side, I think -- no, more than that. I'm not sure. The 101 Freeway -- and it decimated that -- that neighborhood. We built in that neighborhood before that was a possible fire problem.	Thank you for your participation in this public process. The Commenter's testimony with regard to recent fires and preference for infill was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to fire risk and fire services, please see Draft EIR Sections 5.3, Hazards and Fire Safety, and 5.16, Fire and Law Enforcement, and Final EIR, response to Comment A.2-6 and Response to Testimony RPC-339. With regard to infill development, while the Project site is not infill, it provides development on a site planned to accommodate regional projected growth in a manner consistent with regional strategies for achieving mandatory reductions in GHG emissions attributable to the land use sector. For further discussion, please see Final EIR, response to Comment F.8-20.

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		We know that there's a fire (unintelligible). So we have so much more information today than these gentlemen did -- women and gentlemen who have been planning this -- this development. It's passé. That -- that planner who was up here, that architect who was speaking. It's passé. This is not the way we need to move forward. We need to be an example to the rest of California. It's time Los Angeles County is an example. Let's deal with in-fill. Let's -- let's figure out how to reconfigure these empty office buildings. Let's -- let's be creative. Let's not take open space that cannot be replaced.	
RPC-348	Biology Geology	In my opinion, these houses, if they get built, they should cost 310 -- there's no price. They should be priceless because we can never recover this corridor, this wildlife corridor ever again. And I think for all of us looking to the future and acknowledging the science behind climate change, the cost that the -- that the -- the business entity is willing to pay for all of these services, a fire that comes through there, they're not going to be able to handle that by themselves and, again, I think it will come back to the taxpayers. So I really recommend you not voting this plan as it is or this plan perhaps even as it goes forward. Thank you.	The Commenter's preference for preservation of the Project site has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This testimony does not address the adequacy of the EIR, and no further response is required. However, with regard to fiscal impacts, the Commenter's opinion is noted, but the County notes that as discussed in the Draft EIR, such as in Section 5.16, Fire and Law Enforcement, and Section 5.17, Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities. With regard to the Commenter's assertion that the Project will destroy a wildlife corridor that cannot be recovered, the Commenter is incorrect. The wildlife movement studies conducted in the Project region[3393] do not support the notion that the Project site is situated within a crucial wildlife movement corridor. Local movement is mostly retained through the open space corridors scattered throughout the site, and regional wildlife movement largely occurs, based on the literature, west of the Project site.[3394] The Project site itself does not represent high quality long-range movement habitat due to the existing California Aqueduct barrier and the overall lack of cover. Wildlife are not drawn to the Project site as it generally lacks attractive resources, topography, and cover.[3395] Wildlife movement occurring from the Tehachapi Mountains to the San Gabriel Mountains south

[3393] DRP 2017. Table 5.7-2; *Id.,* pp. 5.7-23, -55, -56
[3394] *Id.,* pp. 5.7-56 to -64, -164 to -166
[3395] *Id.,* pp. 5.7-63, -64

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			of the Project is much more likely to cross west of the Project site. Studies on wildlife movement in the Project region have generally shown the Project area as a whole to be largely outside the critical regional corridor linking the Sierra Nevada-Cascade Cordillera with the Sierra Madre-Transverse-Peninsular Range Cordillera. Although the Tehachapi Linkage area, which represents the connection between these two mountain systems, occurs just to the west of the Project, the Project lands have generally not been included as part of this regional corridor. The primary resources in SEA 17, which surrounds the Project to the west and south and will remain unimpacted by the Project, are wildlife movement and the mosaic of associated habitats.[3396] Additionally, as described on Draft EIR pages 5.7-62 and 5.7-63, two regional conservation plans will assist in sustaining the functionality of the regional landscape linkage for future wildlife populations. These plans offer elements for long-term sustainability and management of a Tehachapi Mountains landscape linkage: the Tejon Ranch Conservation and Land Use Agreement and the Tehachapi Upland Multiple Species Habitat Conservation Plan. Please see Linkage Analysis for the Southernmost Portion of the Linkage from Sierra Madre to Sierra Nevada and Draft Interim Wildlife Movement Corridor Assessment, Centennial Project Site, Tejon Ranch in Draft EIR Appendix 5.7-B for more details and graphics. Also see the following responses to Comments for additional discussion of wildlife movement: F.3-24, F.3-25, F.3A-32, F.3A-33, F.3A-34, B.4-56, B.4-57, F.5-2, F.8-168, F.7-22, F.3A-34, F.3A-32, and F.3A-33.

[3396] DRP 2017, p. 5.7-8

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Jennifer Pilapil			
RPC-349	Geology Hazards Public Services	Hi. My name is Jennifer Pilapil. I'm a resident of Cerritos in Janice Hahn's district. I'm coming here today wearing different hats. I used to be the Former Deputy Director for -- in the City of Pasadena for the Health Department in charge of Medi-Cal programs, so I'm very aware of health care access issues. I also am I member of the California Native Plant Society and work in conservation. Again, I wear different hats, so -- A lot of speakers today have been talking about the wildfire issue. I know some folks -- I -- I'm sorry. I apologize. I came at 9:45, but I know there's also data out there. I don't know if anyone presented about the San Andreas Fault being an issue. Remember, the Board of Supervisors more than ten years ago, and it's always been an issue -- Olive View Hospital is the closest care-giving hospital with full service trauma and emergency services. If something happens on that side of the mountain, that's the closest hospital, which is 50 miles away. That's probably two mile -- two hours to get to. There's no way helicopters can come and rescue people. They're -- they're thinking about developing 21,000 homes? Again, in Cerritos we have about 16,000 homes with a population of about 15 -- 50,000. That's five-zero-thousand people. And you can't take all those people out of that area to bring them care. They're probably going to have to go to other counties, and then the L.A. County is going to have to figure out how to subsidize those costs to -- perhaps giving money to Kern County or	Thank you for your participation in this public process. The Commenter's testimony has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to earthquake hazard, as disclosed in Draft EIR Section 5.1, Geotechnical, the San Andreas Fault Earthquake Fault Zone and fault line cross the southwestern edge and southernmost point of the Project site, as shown on Draft EIR Exhibit 5.1-2, Geologic Hazards. However, the Project has been designed to avoid all designated fault buffer zones via a Geologic Safety Zone, which requires a 100-foot setback in both directions for the San Andreas Earthquake Fault Zone and unnamed faults on the Project site. Implementation of Project design, coupled with compliance with State and County requirements for construction and setbacks, would ensure impacts would be less than significant. With regard to medical care, in order to help create a complete community, the Institutional/Civic land use designation of the Project allows for the future development of a hospital/medical center and other public institutional uses of 110 acres of the Project site. Further, Health services (doctor, dentist, and clinics), medical facilities and centers, and medical/dental offices are permitted in areas designated as Commercial, Business Park, Mixed Use, and Institutional/Civic. Urgent care centers are conditionally permitted in these same land use designations. See Final EIR, response to Comment F.3A-67 for further discussion. With regard to the Project's fiscal impacts, the Commenter's opinion is noted, but the Commenter is incorrect. As discussed in the Draft EIR, such as in Section 5.16, Fire and Law Enforcement, and Section 5.17, Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities. The Commenter provides no evidence to support assertions to the contrary, and no further response is required.

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		those sort of things. Emergency vehicles will be having a hard time getting and accessing care. I know the developer has been asked to provide their own infrastructure for those kind of things, but it's probably still going to have a shortfall. In Cerritos, we have the Sheriff's Department that the City has actually gave money, built a station for them, more than 20 -- 20 years ago, and we still have a shortfall. One deputy, our Neighborhood Watch deputy with the Sheriffs, he cost $300,000. That's just one person. And he is actually juggling watching -- like doing patrol and helping the Neighborhood Watch captain, which I am also a Neighborhood Watch captain for about 350 homes. So, again, all these are critical issues and economic needs that will have to be weighed. For -- for a grant writer, which is one of the things I do as a program manager, we're required – if we want to apply for government funding in the State, we're required to do California environmental screening to -- to check, based on Senate Bill 535, what the allocations are for a disadvantaged community. That area, because of Lancaster and a lot of the foreclosures that have happened on that side of the mountain, have actually experienced a lot of things where they're not getting the services and money that they need also. So it's going to be high-allocation needs that will be decentralized when we're already a very decentralized city just here on the other side of the mountain, so I encourage if you cannot have this developer make this happen. Thank you.	

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Elka Kolodinsky			
RPC-350	Population/ Housing Transportation/ Traffic	Good morning. Thanks for letting us be here. My name is Elka Kolodinsky, and by day I'm a policy analyst, but 24 hours a day I'm a proud Californian. I've lived my entire life in Los Angeles County, from Palmdale to Palos Verdes, Pasadena to Culver City, and a bunch of places in L.A. City, so I know this County and I've watched it change over the last 40 years. One of the things L.A. has done for the last 80 years is to try to develop itself out of its increasing housing shortages over and over again by putting single-family homes in large tracts on empty land, and that has caused a lot of issues, a lot of sprawl, a lot of traffic, all kinds of other problems for L.A. County. Just because there is an empty tract of land still available in Southern California doesn't mean that we have to put buildings there; it doesn't mean that that has to be the answer to a housing shortage. We can look into the areas where we already live, and through rezoning and other more creative ways of using the land we already inhabit, we can face our housing shortage. A lot of other people have said a lot of good things today, and that's all I'm going to say. Thanks.	Thank you for your participation in this public process. The Commenter's preference for alternative locations and methods of development is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The County notes that while the Project site is not infill, it has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.
Anabella Mazariegos			
RPC-351	Affordable Housing	Good morning, ladies and gentlemen. My name is Anabella Mazariegos. I am from OCLA and the Los Angeles (unintelligible) union and also Occupy Los Angeles. The reason that I am opposing this project, I'm advocizing for -- for housing, but I dislike very much that the government lands to be used -- given to developers.	Thank you for your participation in this public process. The Commenter's opinion with regard to affordable housing requirements is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. For details about the Project's affordable housing, please see the Affordable Housing Implementation Plan in the Specific Plan, at Final EIR, Appendix 3-C to Appendix 4.0-A.Rev. The County also notes that the Project site is privately owned, and there are no government owned lands that are part of the Project site. This testimony

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		We need to preserve our nature for our future generations. I grew up around nature, and I know how beautiful is nature. So we need to give that right to our kids, to our grandchildren. They deserve that future to enjoy because nature is beautiful. Please, stop that project. We have too many buildings unoccupied. We need to rehabilitate them, those buildings. If they – if they -- the developers, if they don't rent the units, they get taxes write-off. If people can no longer afford the high rents, people get displaced. That's not fair. To be building on government lands and provide 10 or 20 percent affordable housing and 90 or 80 percent is going to be regular market, to me something wrong. Developers build for profit not because they care for working class people. This is not an affordable house project. Stop catering to the 1 percent. We need to preserve those lands. I'm against the -- the 20 percent mandatory 2 affordable housing condition not because affordable housing is affordable -- low income, that's the way it should be, because if government is going to provide for housing, it should be 100 percent housing, not 20 percent, 10 percent. This is ridiculous. That keep catering to the 1 percent. That's why we have so many problems. People are being displaced because the corruption has been in the government when the (unintelligible) was removed from our -- our -- our laws. Now it was open flag for all the developers to start raising their rents in manipulating the -- the housing market. It's not fair. Think about the future. You always not going to be	does not address the adequacy of the EIR, and no further response is required.

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		in that position that you are right now. You have kids and grand -- and grand kids. You don't know the future. They might be homeless. Think about the future of those kids that is coming into the future. Please do not accept this project, please, not on government lands. Keep our government lands for our enjoyment of our future generations, and us too because we're still here. We haven't departured. So please, I'm against this project. Thank you.	
Jerard Wright			
RPC-352	Support	Good morning, Honorable Chair David Louie and the Regional Transpor- -- Regional Planning Commissioners. A change of pace here. My name is Jerard Wright, Policy Manager of L.A. County Business Federation. On behalf of the L.A. County Business Federation, also known as BizFed, a grassroots alliance of more 170 business organizations that represent 390,000 employers of over 3.5 million employees in L.A. County, we are -- we are here to express our support for Centennial at Tejon Ranch as a mixed-use project, which plan to build 19,000 new homes, making a significant dent in our housing crisis. But there's an important other piece that's mentioned that's been suggested by -- by -- by the public up here, which is looking for other opportunities to build and make a dent in our housing crisis. And it's just a sobering thought, that we can stimulate our increase in housing production, done so with the accessible dwelling units, building more housing on existing land and existing zoning. But here's the problem. It's called CEQA. And the CEQA lawsuits are killing and stopping urban in-fill	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		projects in Los Angeles County next to transit, the very areas that we need and should put in more housing. This is per SCAG data. So if you have any other questions. I also sent that to Rosie Ruiz because this has just come up spure of the fly through the public comments, and I presented that to the Commissioner. You should have received that via e-mail. But it's important to realize that 70 percent of those lawsuits affect the urban in-fill environment. Why is that important? Because that's why Centennial has its project here, because you can't build it anywhere else. It's an important -- it's important to note and sobering to note that when you do not and cannot build housing, we're just going to drive the costs up of how to live. That's why people are traveling so far just to find affordable housing of price -- pricing of housing that they can afford to grow a family, to build long-term financial income and wealth. Those are important aspects when we're looking at our -- at our local economy, as well as our generational economy, because that's what's going to be important for our kids, our future generations to thrive and survive here in Los Angeles County. And I state that because we need to be very mindful of that -- that effect of CEQA lawsuits. And that's something we will present to the Commissioners later at a future date. But that's just sobering to know. 70 percent of those lawsuits affect urban in-fill housing. If we just eliminate that, there would be a lot of -- a lot more housing supply. We're only permitting 10 percent of what we could possibly make and build for -- for our region.	

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		So with that, I will close. Thank you for your consideration and your attention at this point in time.	
Nodeey Dodson			
RPC-353	Miscellaneous	My name is Nodeey Dodson. I spoke previously but want to make some comments about the developer. The property being said is devalued and not worthy of preservation and that is based on science? I want to point out whose science? Many of the science is signed by the developer and signed non-disclosure agreements. That means if they find something super rare on that property. They are not allowed to devulge that. I also find disingenuous that the property owner is not giving the conservative property to the public. It's giving it to the Conservancy and the Conservancy is controlled by Tejon Ranch Company. They tell the Conservancy what to do and who is allowed on that property. It is not public access. I would urge you to have them make that change. I believe the land is high value. As everybody has said it is high value grassland, it's a corridor, it's annual wild flower fields that millions of people come to see each year.	Thank you for your participation in this public process. To the extent the Commenter would prefer preservation of the Project site, this opinion was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. To the extent the Commenter asserts that the EIR represents the Project site as devoid of biological resource value, this is incorrect. The EIR thoroughly analyzes the Project site and Project-related impacts with regard to biological resources, and acknowledges that the Project site occurs within an important ecozone. The EIR identifies feasible mitigation measures to avoid or substantially lessen impacts., and vast swaths of biologically rich land are preserved through the Project's mitigation process. The proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. With regard to the Commenter's testimony about management of Project open space and mitigation lands, the County disagrees with the Commenter's assertions. The Tejon Ranch Conservancy was created by the RWA to serve as an independent, third party responsible for holding conservation easements and managing public access, scientific study, and restoration activities in the open space conservation areas of Tejon Ranch. The Conservancy has a twelve-member Board of Directors, with four members appointed by the environmental groups who are signatories to the RWA (Natural Resources Defense Council, Sierra Club, California Audubon, Endangered Habitats League, and Planning & Conservation League), four members appointed by Tejon Ranch, and four independent Board members. The County also has authority to monitor and will monitor compliance with binding mitigation measure requirements on an ongoing basis. The Commenter appears to assert that because signatories to the RWA signed non-disclosure agreements during negotiations, and have agreed not to oppose the Project, important scientific information relevant to Project impacts has not been disclosed. This is incorrect. The entirety of the Project site has been evaluated for biological resources and to appropriately assess potential Project-related impacts. The EIR, including its biological impact analysis, complies with CEQA requirements, as further discussed in response to Comment ADD-F.13-16. Further, as appropriate under CEQA, the Draft EIR

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			focuses on impacts associated with solely the Project site, and not the Tejon Ranch as a whole.
RPC-354	Public Services Water Resources	I also ask how does this project provide its own water in this land of drought in the desert? The developers said they will finance all the infrastructure, but who will pay all the salaries and benefits and on going equipment costs for those people that need to be hired to staff the sheriff's and the emergency facilities and the schools? Fine, you build the building, that's fine, but you know yourself what a policemen costs just for salary, $100,000 a year, a doctor, a teacher, that comes from the taxpayers and that's it. Thank you so much.	With regard to water supply and drought, after thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts. Please see Draft EIR, Section 5.18, Water Resources, and Response to Testimony RPC-76 for further discussion. With regard to fiscal impacts, the Commenter's opinion is noted, but the County notes that as discussed in the Draft EIR, such as in Section 5.16, Fire and Law Enforcement, and Section 5.17, Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities.

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Steve Hartman			
RPC-355	Biology	Good morning, my name is Steve Hartman, a Los Angeles resident and President of the Board of the California Native Plant Society. In a letter to the Planning Commission dated August 17th, CNP staff or Nick Janson states the land is already preserved with conservation easements for its mitigation design. What that means is that the Centennial project proponents double dipped when it came to the mitigation lands. The plant community most affected is native grass lands. one of the most threatened vegetation types in our states and the land which is not spoken for in our nation is not adequate mitigation. Does the Tejon Ranch Company have a viable mitigation preserve if the lands that they are saying are for mitigation already have conservation easements on them. I haven't heard the Commissioners discuss is that issue, and Nick could send that letter in so I would like to hear the answer on that. The more I dig into this project, the more problems I see.	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to the California Native Plant Society's letter dated August 17th, signed by Nicholas Jensen, the County reviewed and prepared responses to all comments contained in said letter, which can be found at responses to Comments ADD-F.16-1 through ADD-F.16-10. These were presented to and considered by the Regional Planning Commission. Specifically, with regard to the adequacy of conservation easements, please see responses to Comments ADD-F.16-3 through ADD-F.16-7.
RPC-356	Biology	What about the land surrounding Centennial. It is not as if there will be an invisible wall preventing the citizens of that new city from venturing a field and introducing human impacts into a habitat into adjacent lands that have previously been relatively left alone. Human impact such as fire, off road vehicle tracks and thus the introduction of invasive weed species pose a serious and on going problem. This is not a profit when it comes to preserving Los Angeles's biological diversity. Last time I came to you guys, I called this leapfrog development. It's not leapfrog development. It's leap bull frog development. Thanks.	With regard to areas surrounding the Project site, the EIR appropriately analyzes both Project-related impacts and the potential for growth inducement. With regard to growth-inducement, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments could be made outside the West EOA, which is considered a significant, adverse indirect growth-inducing impact. Draft EIR, Section 7.0, Cumulative Impacts, pages 7-19, and Section 6.0, Growth-Inducing Impacts, pages 6-6 to 6-9. However, the Project does not constitute leapfrog development, nor would it contribute to sprawl, as discussed further in Final EIR, response to Comment F.8-20. With regard to Project development-related impacts on surrounding areas, Project design takes the surrounding environment into account, and the EIR appropriately analyzes and mitigates impacts on the Project site and areas immediately surrounding it with

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			feasible mitigation measures. This testimony provides no evidence to the contrary, and no further response is required. With regard to invasive weeds, the EIR appropriately analyzes potential impacts (see Draft EIR, page 5.7-167) and identifies mitigation to reduce impacts to a less than significant level – MM 7-13 requires the Landscaping Plan to include a plant palette composed on non-invasive species only, and include a list of invasive species prohibited from being planted on the Project site, which will be provided by the Homeowners Association to future residents, along with related educational materials. (Draft EIR, page 5.7-190) In addition, retail sales of these invasive plant species will be prohibited at any businesses (nurseries) located within the Project site; Landscape plans shall encourage planting of local natives typical of native vegetation within ten miles of the Project site. (*Ibid*.)
Richard Dickey			
RPC-357	Biology	Hi, my name is Richard Dickey a professional photographer and taking pictures of Los Angeles County over 30 years in the county. I visited this land for many years. I want to talk to you about the reason the Los Angeles county has a program and why this program should still be enforced in this area. Visualize yourself standing among a sea of flowers and a soft winter and filled with the airs and flowers flapping in the breeze and this suddenly envelopes you and the russeling seem to vibrant upon you and the flowers under your nose and one becomes aware of the powerful giddy radiating from the land and the completeness flows in the desert as if mother earth were laughing with flowers. Only in California land steep has become an ethos to the world and one been able to witness such things. Once California's wildlife and wild flower preservation. California slowly being loved to death exceeded by a population that is quickly disappearing into history with only remote islands and native habitats remaining. In the west valley, a place called the Tejon Ranch. If ever there is a reason to have seas and keep them in force, this is why the program was created. This is an emotional	Thank you for your participation in this public process. This testimony has been heard by the Regional Planning Commission and will be passed on to the Board of Supervisors for consideration. While a portion of Significant Ecological Area (SEA) 17 is within the Project site, Project development avoids the SEA entirely. The SEA would remain intact, and the Project would not result in any fragmentation of this area (see Draft EIR Exhibit 5.7-15, Significant Ecological Areas). Approximately 3,865 acres of on-site lands are located within the boundaries of SEA 17 and would be preserved as potential on-site mitigation lands. MM 7-21 further requires that all brush clearance zones be contained within the current Project impact boundary and no overlap with SEA 17 shall occur. This testimony does not address the adequacy of the EIR, and no further response is required.

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		and spiritual resource for all in Los Angeles County to cherish and protect for future generations. Trust me, you will not find anything like this anywhere else in the state or the planet. Let's not mess this up too. Thank you.	
Miles Lewis			
RPC-358	Fire Safety	Can I begin? Okay. Hello Commissioners, I came last time too. My name is Miles Lewis, I live in the west San Fernando Valley. I came knowing that change can be quite gradual and in the last 50 years there have been policy considerations for the region in general and there has been improvement but it does seem especially with these wildfires that a lot of symbolic substantial changes has to happen where we can address a new norm and given how inappropriate this development is. This doesn't only apply to development but environmental advocacy and they talked about a lot about how they had a settlement and this was before the wildfires. The worst and second worse wildfires that we've ever had in the past years. I doubt that anyone would want to resettle that because it would be a blight on everybody's name.	Thank you for your participation in this public process. This testimony has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors. With regard to fire risk and fire services, please see Draft EIR Sections 5.3, Hazards and Fire Safety, and 5.16, Fire and Law Enforcement, and Final EIR, response to Comment A.2-6 and Response to Testimony RPC-339. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-359	Public Services Transportation/ Traffic	But, another point is when the architect spoke, he talked about his 50 years of experience and how this is a cookie cutter development project and how to raise the bar. So it seems like they are doing very little as he was noting requiring electrics of all homeowners seems the only way you will be able to accomplish anything in that direction. We already have electric charging which seems very little in terms of electric incentivize. You can have all regard and mandatory public transportation. This would be an ideal experimental community like we had 40 years ago. Even then it would be an environmental disaster. It seems like kind of a joke.	The Commenter's opposition to the Project, including with regard to Project design, electric vehicle use, and medical care is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. Project design and mitigation measure requirements provide a robust program to minimize GHG emissions, reduce vehicle miles traveled, encourage alternative modes of transportation, and incentivize electric and other alternative vehicle use. For example, MM 10-25 requires implementation of the Project's Mobility Plan and the creation and ongoing operation of a Transportation Management Association (TMA) to implement on-going transportation improvements and programs, including a combination of measures to ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than single occupancy vehicle use, and a minimum of 20 percent on total off-site

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		And what seemed to me like cynical jokes. The micro hospital which the chair brought up. It sort of seems like a joke. It doesn't really seem to address some of the major concerns that came up last time.	peak hour commutes to and from the Project site are completed by using transit modes other than single occupancy vehicles. MM 10-25 also requires that the TMA provide an am and pm peak hour demand-based multi-passenger transit service for Project residents and employees that links the Project to the nearest Metrolink station and commuter transit hub to the south, east, and north, and to other commuter destinations as warranted by consumer demand. The EIR includes several mitigation measures to ensure an appropriate amount of EV charging stations and preferential parking will be provided (see MMs 11-4, 11-6, 21-15, 21-16, 21-17, 21-18, and 21-19. Please see Final EIR, response to Comment F.8-204, and Final EIR, Appendix 2.0-C.Rev, Mitigation Monitoring and Reporting Program, Appendix 4.0-A.Rev, Centennial Specific Plan, and Attachment H to Supplemental Staff Memo to Regional Planning Commission, titled Updated Greenhouse Gas Calculations for the Centennial Project Final Environmental Impact Report and provided to the public in advance of the August 29 Regional Planning Commission hearing[3397], for further details. This testimony does not specifically address the adequacy of the EIR, and no further response is required.
RPC-360	Affordable Housing	Affordable housing, you had a discussion of 15-10% affordable housing. And they seemed to drop it and joke about it.	The Commenter's opinion is noted, but the County disagrees with the Commenter's characterization of the Regional Planning Commission's consideration of affordable housing. For details about the Project's affordable housing program, please see please see the Affordable Housing Implementation Plan in the Specific Plan, at Final EIR, Appendix 3-C to Appendix 4.0-A.Rev.
RPC-361	Greenhouse Gases Water Resources	A water supply. The State of California is water wars and labyrinth time with water and policy and law. Having your own water supply doesn't even make sense in environmental terms, and electric vehicle infrastructure which we discussed which is something being figured out now but in no way can be a subtle part of the proposal. Thank you very much.	The Commenter's opinion is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to sustainable water supply, please see Draft EIR, Section 5.18, Water Resources, and Response to Testimony RPC-76. Electric vehicle infrastructure is an important part of the Project, as explained above in Response to Testimony RPC-359.

[3397] Available at: http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180816-attH1.pdf.

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Aaron Elkels			
RPC-362	Miscellaneous	I'm Aaron Elkels. Sorry, I was at the restroom. As mentioned before, this is some of the landscapes that are the most beautiful and last ones left in California. People travel from all over the world to see the California super bloom. It's really incredible that we are considering to collectively allow such a precious area of our state to be paved over again. Regarding the housing crisis, and I'm a young person, I hope to some day own a house too. But the extremely rare ecology of this area of our state should not suffer at the expense of lack of problem solving ability or creativity. Anything can be said of the human experience and that we are constantly learning and having to correct the mistakes of the past. Please do not vote in favor of another mistake. Thank you.	Thank you for your participation in this public process. The Commenter's opposition to the Project and preference for preservation of the Project site are noted, were heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The County notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion. With regard to the Commenter's assertion that resources unique to Tejon Ranch will be lost, this is incorrect. The Project region is an important ecological region, and the proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas. While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land are preserved through the Project's mitigation process. With regard to aesthetic impacts, the EIR acknowledges that the Project will result in significant and unavoidable impacts related to a change in visual character of the site, but the Project does propose to preserve many existing features to minimize visual alteration of the site, as listed in PDFs 13-1 through 13-6, and required by implementation through MMs 7-13 and 13-1 through 13-3. (Draft EIR, page 5.13-1) These include retention of rock outcroppings visible from off-site areas; use of landform/contour grading; use of landscaping designs that are similar to the natural topography; preservation of open space; use of native and regionally appropriate plant species in public landscape areas; provision of development setbacks from natural areas; and inclusion of aesthetically pleasing and consistent Project signing and monumentation both internally and externally. However, even with these features, the overall change to the site resulting from grading and development of the Project would be a substantial visual impact that may be perceived by some as an impact for

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			which no additional feasible mitigation exists and would therefore remain significant and unavoidable. (*Ibid*.)
Priscilla			
RPC-363	Support	Good morning, my name is Priscilla. I have lived in the little Township of Gorman for 19 years with my husband. I'm here to demonstrate my support for Centennial, and you have heard that Centennial offers is a self sustaining community and I have watched this develop over the last 19 years how these people have really worked towards that. They offer housing, parks, schools, are open space, jobs and retail uses with jobs. The benefits that will be brought to the local community are endless. Centennial plans on expanding the public services in the area with a development of a sheriff's station which we need desperately. We can wait up to 2 hours before a sheriff can come to our property. Public library, up to four fire stations, and an urgent care facility. These communities services would have an immediate effect, a positive effect in our community. And emergency responses to our community is very limited. This is something that has a personal effect on me and my family. My husband is 90 years old. I'm quickly approaching my 80s, and when he falls, I have to call the fire department to help me lift him up and to take care of the situation. And he's at a constant risk at falling at this age, and I have had to make very sure in getting here that I have someone at home to watch over him when I leave. Anytime I leave the ramp, it's about a 2-hour round trip just in travel time to the nearest city for services, and shopping. Paramedics would be so helpful here to ease our worries because many people in these mountain communities are advancing ages and we need help.	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		It's just the way it is. And to have a quicker response time would be very very helpful and ease our worries. I have been in contact with this team for many years, for 19 years, they have been so helpful and really listen to the community's concerns. They have proven that. So I urge this commission to approve this project. Thank you very much.	
Richard Zonter			
RPC-364	General Opposition	My name is Richard Zonter. Thank you very much for listening to me today. My family has been in Southern California since the late 1800s. Most people speaking do not live close to this proximity of the project. I have lived here for 30 years and celebrated as a resident all of my life. I have lived the changes in San Fernando Valleys and moving away from the progress. The Tejon Ranch Area is a last example of old California. Please don't allow it to be destroyed. This is leapfrog development at its worse. Thank you.	Thank you for your participation in this public process. The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. For an in-depth refutation of the assertion that the Project constitutes leapfrog development, please see Final EIR, response to Comment F.8-20. This comment does not address the adequacy of the EIR and, therefore, no further response is required.
Rachel Wane			
RPC-365	Introduction	My name is Rachel Wane. I live in Pasadena. I was a former park ranger in Monrovia. Now I lead a group at the national forest. I spoke last time on this subject and thank you for letting me speak again. I would like to contrast this project with the project on the West Carson transient oriented development at the last meeting and the places development already in an organized area right next to employment and with what seems like genuine fair affordability on serving a more realistic population seeking housing. I think that's the kind of project we should be doing. I'm frustrated by what seems to be inadequate responses by the proponent to comment in previous testimonies including my own.	Thank you for your participation in this public process. The Commenter's opposition to the Project and preference for a different type of project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County has appropriately responded to all correspondence received on the Project and the EIR, including testimony at the previous June 6, 2018 and July 11, 2018 Regional Planning Commission hearings. This testimony does not address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-366	Sprawl	So many of us see this project as sprawl. We used that word over and over in the response to comments in the testimony. I have noted that the proponents contest this area and it comes down to notice. I guess it's just a semantic argument but it makes common sense with respect to what's sprawl and what's in fill. I think normal people see this as sprawl.	The Commenter's disagreement with the County's discussion of sprawl and assertion that the Project neither constitutes nor contributes to sprawl was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. The County continues to direct the Commenter and others to the in-depth discussion of this issue, in Final EIR, response to Comment F.8-20.
RPC-367	Air Quality Greenhouse Gases Transportation/ Traffic	Similarly common sense and logic say the project will increase traffic, and with the air quality, climate change problems. The proponents present numbers that contest this but I don't think the numbers on paper really argue against common sense. It's going to be a traffic increasing project.	The Commenter's disagreement with EIR analysis of traffic, air quality, and greenhouse gas related impacts is noted, was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County notes that the EIR thoroughly and appropriately analyzes and mitigates these impacts with feasible mitigation measures. For further discussion, please see Draft EIR Section 5.10, Traffic, Access and Circulation, Section 5.11, Air Resources, and Section 5.21, Climate Change. The Commenter provides no specific assertions or evidence to the contrary, and no further response is required.
RPC-368	Biology	I'm dissatisfied to the response to my own testimony regarding hazardous of the wildlife and I pointed to wildlife hazard and counter hazards. Actually wildlife and counter hazards weren't address in a response. If a snake gets into your garden, you kill it because it's a snake. This is a wildlife interface and there are impacts that aren't mitigated for that don't need to be caused.	The Commenter appears to be referring to her previous testimony and County's response to same, at Response to Testimony RPC-196. The Commenter previously stated that "…there is always a permanent loss to nature. You have to bulldoze buffer areas around our developments. Animals are simply killed because we can't coexist with them – all the things we have to do." The County interpreted the previous testimony as a reference to fuel modification requirements to reduce fire risk, which require the creation of buffer zones around Project development footprint areas. Impacts in these areas have been appropriately analyzed in the EIR and mitigated to the extent feasible. With regard to the Commenter's clarifying testimony about the behavior of Project residents, it can be reasonably assumed that Project residents will follow any legal mandates with regard to wildlife protection. Further, the EIR appropriately analyzes all Project-related impacts on biological resources, including with regard to human intervention, and mitigates them with feasible mitigation measures. This testimony does not provide specific evidence of inadequate analysis, and there is no further response required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-369	Biology Fire Safety	In terms of wildfire, there is a discrepancy in the fuel modification Zone C in the plan which is that is described on maps is undisturbed vegetation, but it's described in text where areas where thinning occurs. As discussed in the Monrovia Community Wild Land Protection Plan vegetation such as chaparral introduces invasive species which are non-disturbing.	Per the EIR, fuel modification Zone C, if applicable, extends from the edge of Zone B up to 200 feet from structures. Vegetation will consist mainly of native plants with appropriate thinning and spacing; adequately spaced ornamental shrubs and trees are allowed (if approved by LACFD) but generally not recommended due to water conservation goals. The objective of this zone is to slow the rate of fire spread, reduce flame lengths, and minimize the intensity of the fires prior to reaching irrigated zones (i.e., Zones A and B) or the structure. (Draft EIR, page 5.3-22) While the majority of the Fuel Modification Zones will be within a Transition Zone per the Specific Plan, if applicable, Zone C may extend past the Transition Zone, and tract maps will provide appropriate detail. See Final EIR, Appendix 4.0-A.Rev, page 3-29 and Figure 3-22. With regard to invasive plant species, the EIR appropriately analyzes potential impacts (see Draft EIR, page 5.7-167) and identifies mitigation to reduce impacts to a less than significant level – MM 7-13 requires the Landscaping Plan to include a plant palette composed on non-invasive species only, and include a list of invasive species prohibited from being planted on the Project site, which will be provided by the Homeowners Association to future residents, along with related educational materials. (Draft EIR, page 5.7-190) In addition, retail sales of these invasive plant species will be prohibited at any businesses (nurseries) located within the Project site; Landscape plans shall encourage planting of local natives typical of native vegetation within ten miles of the Project site. (*Ibid*.)
RPC-370	Biology	In bringing up the conodor, the micro trash and the ingestion will proceed and that is significant. Thank you very much.	The Commenter's opinion with regard to impacts to California condor was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees and notes that the EIR appropriately analyzes impacts on condors and identifies feasible mitigation to ensure less than significant impacts with regard to micro-trash ingestion. MMs 7-6 and 7-15 contain robust microtrash education, avoidance, and removal requirements. (See Final EIR, response to Comment F.8-141, and page 3-165.)

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Ankur Pattel			
RPC-371	Affordable Housing Biology	My name is Oncor Pattel. No one is taking this project lightly. It is to intentionally respond to the criticis brought up at the last month's meeting. Now you are responding to this team with half measures like micro hospitals. 90/10 is left for open space. This is 100% impactful. There is no way of getting away from this. It's almost funny. They are saying they are going to create open space. They are go to to create open space. This whole framing is wrong on its face. The based on science, we know the science shows we are in the middle of an eco side. The planet is being destroyed. A couple electrical cars isn't going to do anything about it. The planet is in the middle of debt and it is our responsibility to plan the future accordingly. This project is going to continue down that path or you are going to have the at some point to rethink this. Seeing that staff is already for this is a little bit disappointing. But your no vote can give the Board of Supervisors leverage for things like 15% or 20% affordable housing today. If you vote no now today, that will give our Board of Supervisors leverage when they appeal and bring it up next time because we know they are not going away. We know their multibillion dollars with all of these lawyers, we know they are not going away but your no vote can give these supervisors leverage. I want this done, I don't see it done meaning none instituted, but again, with the staff recommendation. I'm curious if they even talked to the office of sustainability, but we haven't gotten there yet. There is not mitigation, it is not enough mitigation. No burden to the county,	Thank you for your participation in this public process. The Commenter's opposition to the Project and disagreement with Applicant and County representations were heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County has maintained an appropriate relationship with the Project Applicant at all times, and the EIR has thoroughly analyzed and mitigation Project-related impacts with feasible mitigation measures. This testimony does address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-372	Public Services Utilities	Roadways, fire, school, county, utilities? How is that going to be paid for? Where is that in writing? How is that going to be done?	The EIR, Development Agreement, and Specific Plan all discuss the Project's provisions for roadways, fire services and facilities, and utilities, including with regard to funding. Please see Draft EIR, Sections 4.0, Project Description; 5.16, Fire and Law Enforcement; 5.17, Other Public Services; 5.20, Dry Utilities; Final EIR Appendix 4.0-A.Rev, Centennial Specific Plan (Revised); and the Draft Development Agreement provided with materials for the August 29, 2018 Regional Planning Commission hearing, available at: http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180816-attH11.pdf. With regard to fiscal impacts generally, as discussed in the Draft EIR, such as in Section 5.16, Fire and Law Enforcement and Section 5.17 Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-373	Affordable Housing	The missing middle. They talk about affordable housing. The difference between 10% and 15% of affordable housing, that's $500 million. Probably more. This is not affordable housing in the first place.	The Commenter's preference for more affordable housing and opinion about what should qualify was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. For details on the Project's affordable housing program, please see the Affordable Housing Implementation Plan in the Specific Plan, at Final EIR, Appendix 3-C to Appendix 4.0-A.Rev. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-374	Miscellaneous	But you have leverage and now people with your back with loud voices in favor of a smart approach to this, you have an opportunity to take a bold assistance. Vote no against this developer and rethink this. After 10 years, they still have a lot of bad answers after all of this we have talked about. You mentioned this conservancy, how does this get input as this goes on. You have the leverage to do something better. I still think you have the opportunity to stop this in its tracks but you can do something better.	The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to the Tejon Ranch Conservancy, it was created by the RWA to serve as an independent, third party responsible for holding conservation easements and managing public access, scientific study, and restoration activities in the open space conservation areas of Tejon Ranch. The Conservancy has a twelve-member Board of Directors, with four members appointed by the environmental groups who are signatories to the RWA (Natural Resources Defense Council, Sierra Club, California Audubon, Endangered Habitats League, and Planning & Conservation League), four members appointed by Tejon Ranch, and four independent Board members. This testimony does not address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Frank Williams			
RPC-375	Support	Good morning, Chair and Commissioners. My name is Frank Williams, and I am a volunteer here. This is my second time. My wife actually dressed me today with my suit. I just wanted to let you know that. I am an advocate for housing. I am the Vice-Chair for Los Angeles County for the 200 and we are a statewide coalition of advocates for housing targeting pretty much minorities, the under served communities and of course millennials. I am very proud to be here because I would like to say that I offer a voice for those that don't have one and most of them are homeowners that are not a homeowner yet, I'm sorry. In search of being a homeowner. In my 28 years of experience and having the experience of a family and a young child taking their shoes off and experiencing their own room for the first time has a generational impact. A lot of times when people wonder where are we going to build, there is a lot of CEQA stopping in this area. People like urban areas of California, but these are urban parts of California and they are very selective. I hear a lot about the cancer of urban sprawl. I'm surprised that we don't hear the term of our harmonious neighborhoods. Yes, that was heard right here at this Planning Commission after World War II. That almost seems to have that rising content because those that are approved under the most stringent underwriting for lending but they don't have a home that they qualify for. So 10%, whatever the percentage number that you approve today, those are more families that are going to be greatly affected in their generational wealth. You cannot build wealth if you are a renter and you cannot have more affordable housing. That is going to affect the rental cost. For affordable housing, I would say entry level housing. We are	Thank you for your participation in this public process. The Commenter's general support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		not talking about people being renters but homeowners that are firefighters, teachers, people that are just trying to own something, own a piece of California. And a lot of issues that don't get addressed are issued when you talk about buildings and almost like waiting for them to say, let's not build homes because we are worried about earthquakes. There is a lot of other issues that come across and it's very important that we all understand that this is a self contained project that supports home ownership and general wealth. Thank you.	
Ron Bronze			
RPC-376	Support	Good morning, Commissioners, my name is Ron Bronze. My ranch is in the west of Antelope Valley. I have come here to speak in support of Centennial. My family has been property owners since I was a teenager in that area; and I feel that some of the groups that and individuals from outside of our community have been telling us what we need and what we can't have to enhance our lives in the antelope valley. Centennial has worked directly with the community and outside interest for years. They have had an open and honest about the nature of the project. They have addressed concerns when they were brought up. This project will go a long way to stifling what I call rural sprawl which is what's been going on in the area. Rural sprawl provides little or nothing with regards to infrastructure needs in the area and services. Centennial will fulfill those needs. They are going to provide the infrastructure and services that the community is crying for. In addition, the Tejon Ranch has created approximately 240,000 acres of habitat and open space in a conservancy. A 240,000 acred gift to us, the public. They didn't have to do	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		that. I don't know of any other place in the State of California that has ever gotten that kind of a concession from a developer. After many years of attending multiple hearings and I urge you, the commission, to approve this project so that centennial can do what is needed for the county and for the community. Thank you very much.	
J.P. Rose			
RPC-377	Biology Miscellaneous	Good morning, Commissioners, my name is Jay Rose, I'm an Attorney for the Center of Biological Diversity. The Center has about 5,000 members in Los Angeles County. I was taking a look today at a PowerPoint on today's shareholder meeting and looked at what Tejon is up to today and there are 55 miles of rock and California land. Monetizing tens of thousands of acres of raw California land. Calling it raw cal land, I call It California's natural heritage and wild land fields and the home that animals call home. These rare California landscapes need to be protect for everyone and not monetized for a few. To monetize tens of thousands of raw acres of land will come to a huge cost to the rest of us.	Thank you for your participation in this public process. The Commenter's opposition to the Project and preference for preservation of the Project site is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The Project region is an important ecological region, but preservation of thousands of acres of important biological resources is an objective of the Project, and the proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. (Draft EIR, page 4-4; Response to Testimony RPC-219) The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas. While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land are preserved through the Project's mitigation process. This testimony does not address the adequacy of the EIR, and no further response is required.
RPC-378	Fire Safety	One of those costs is fire. We have seen in the news California is experienced the worse fires on record. We can limit the severity of these fires by not building in high fire hazard areas. However, that is exactly that is proposed here. Centennial will be twice the size of Santa Monica on an area that is at risk for very high wildfires and this will result in damage and fire cost.	The Commenter's opinion is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. With regard to fire risk and fire services, please see Draft EIR Sections 5.3, Hazards and Fire Safety, and 5.16, Fire and Law Enforcement; and Final EIR, response to Comment A.2-6 and Response to Testimony RPC-339.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-379	Population/ Housing Transportation/ Traffic	Approving this development is the epitome of reckless planning. We can't keep repeating this mistake. We know this is a Pipe dream. The Los Angeles Times reports that even in Santa Clarita, 75% of the residents commute out where only 25% work in the city. If Santa Clarita can't achieve this housing balance, do you really think we are going to achieve this balance farther north of Santa Clarita? I think we won't. This is not going to alleviate the housing crisis. We have housing crisis where people need to live and work. People have a difficulty getting to their jobs. This project will net a $38 million expansion of the freeway. Who is going to pay for that? All of us.	The Commenter's opinion with regard to jobs/housing balance and housing needs is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the County disagrees with the Commenter. The Project is designed with a balanced land use plan, as discussed in depth in Final EIR, response to Comment F.8-20, which provides significant environmental benefits including providing a beneficial jobs/housing balance. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village would contain a village core, neighborhood center or town center comprised of higher-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns. The Project would also help meet needs based on estimated future growth in Los Angeles County. The Commenter provides no evidence to support the assertion that the Project will not help meet the County's jobs/housing balance goals, and no further response is required. With regard to the Project's relationship to the Northwest 138 Improvement Project, please see response to Comment ADD-F.10-5.
RPC-380	Miscellaneous	It's a project that could have happened in the urban core. It is completely within your discretion and authority to advise the board against this project and perhaps county counsel can elaborate on that further. This is one of the biggest decisions you will ever face as voters and this will have repercussions for thousands of years. I beg you to say no to this boondoggle of a development.	The Commenter's preference for a different location for development, and opposition to the Project, were heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This testimony does not address the adequacy of the EIR, and no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Katherine			
RPC-381	Biology	Good morning, Chairman Louie and Commissioners. I'm Katherine and I am opposed to this project. The DEIR has failed to prove the movement to the California mountain lion. Given the following that Tejon Ranch has been find for the illegal killing of at least 11 mountain lions possibly 20. Second that my point lions require extensive roaming space and linkages and third that open space has increasingly fragmented and degraded and the California aqueduct and the I- 5 freeway and the 138 due to be enlarged present large animals with dangerous and impassable areas to movement. Because of those, there is no excuse of the D EIR for specific and thorough assessment of the needs of the mountain lion. Certainly we do not want to be responsible for the lack of diversity seen in the Santa Ana Mountains and Santa Monica Mountains. According to a report in 2017, the puma's isolation is due to primarily this urbanization from Los Angeles to San Diego. This is a required wildlife for an exchange and yet it argues for this larger development that includes parts of the home range. It's rationalizing logic assumes massive development first and then justifies it with a dense design with hardened edges that limit corridors. It states "wildlife and plant diversity is nearly always enhanced by the maintenance of naturally occurring open linkages". But it argues that the 3-man-made barriers already compromise the movement of the habitat with this infrastructure it will not really matter because there is a linkage to the north of the foothills of the Tehachapis. And still, their deer, bobcat, mountain lions are found to frequent the area immediately	Thank you for your participation in this public process. This testimony, including the Commenter's opposition to the Project, has been heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County first notes that the mountain lion is not threatened or endangered in California – rather, its population is relatively high in California and their numbers appear to be stable, as reported by the California Department of Fish and Wildlife.[3398] The formal status of the mountain lion, as listed by CDFW is "specially protected species". This status was initiated by Proposition 117 in 1990, making mountain lion hunting illegal in California, and is not related to rarity or habitat loss. Because the mountain lion is not considered a special status species, direct impacts to the mountain lion and impacts to mountain lion habitat did not warrant lengthy discussion in the EIR. The EIR appropriately considers mountain lions as part of its wildlife movement discussion on pages 5.7-56 through 5.7-64 of the EIR. With regard to wildlife linkages, and potential barriers to those linkages, please see Draft EIR pages 5.7-52 through 5.7-64, and 5.7-164 through 5.7-166, as well as Final EIR, response to Comment F.5-13. As noted in the Draft EIR, potentially significant impacts to wildlife movement and habitat for general wildlife that would result from implementing the Project would be reduced to less than significant levels with implementation of MMs 7-14 through 7-18. With regard to illegal killing of mountain lions, it is not Tejon Ranch policy to do so. As indicated in the article referenced by the Commenter, the Applicant has publicly explained that it expresses "deep regret that such incidents took place on ranch property and the company is doing everything within its power to ensure that something like this never happens again." Further, the killings "occurred without the knowledge and/or consent of Tejon Ranch's senior officers."

[3398] https://www.wildlife.ca.gov/conservation/mammals/mountain-lion/faq#359951240-are-mountains-lions-listed-as-a-threatened-or-endangered-species.

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		north of the 138 and to the east in the eastern part of the project. The D EIR admits it will have logic for movement. This will not serve the needs for the large animals who tend to use the southeast. We must step back and look at this urban project. It's not only that 12,000 acres of wilderness will be lost, but the location is isolated and pivotal. Where we could not mitigate for vast destruction of open space, we Californians lose our precious legacy, thank you.	
Ricardo			
RPC-382	Support	Good morning, Commissioners, my name is Ricardo. We represent 400 businesses and non-profits at Los Angeles County. I'm here to urge you to support this important housing crisis that Los Angeles County continues to face. California has a tremendous housing deficit and that includes the lack of production of homes. This is driving the cost of homes and apartments and pushing out working and middle-class families and making it difficult for businesses to attract and retain talent. The only way to get out of the housing crisis is simply by building more. The Tejon Ranch community is taking steps to afford this project today. It will include the planned region for our population and growth in our county. Centennial will provide over 19,000 homes and create 300,000 jobs for the county of Los Angeles. It will transform the region into a vital community and hub. It will generate $25 million of revenue for our county and continue to improve our counties, creating the neighborhoods and we could not continue to do more with housing. Thank you.	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
Susan			
RPC-383	Miscellaneous	I'm Susan, representative of the Mountain Council. We are bordered by the north for the Centennial project and south of the national forest. I want to say that the Antelope Valley Area Plan says that our community is remote and we should not have the expectation of services of our infrastructure. This project is right next door to us; yet, the development isn't considered remote. They are going to create something that isn't remote within their own community. But in the outlying areas. Something else I wanted to touch on is for about 8 years, our town council and me as the representative worked with the town and country outreach plan for the Antelope Valley Area Plan. In the last stretch of the planning process before it went to your Board and the Board of Supervisors, outside interest like developers, I felt and this is my opinion, influenced the plan and caused what I see as a conflict of the rural preservation strategy and this development and the land use development imposed by this planning process. It is deeply concerning that what I have contributed at the last meeting pretty much disappeared. Growth is directed to rural town centers and communities whether it's commercial or housing. The rural preservation strategy is meant to protect residents in outlying areas by decreasing density and lower risk to many residents. This community proposed is going to be highly dense and an area of special hazards management previously mentioned by others.	Thank you for your participation in this public process. This testimony was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The County disagrees with the Commenter's characterization of the Project, and notes that it has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Please see Final EIR, response to Comment F.8-20 for further discussion. The Commenter's opinions about the AVAP planning process are noted, but this does not address the adequacy of the EIR, and no further response is required.
RPC-384	Biology Fire Safety	It's in a major regional wildlife corridor. It's condor territory. Conservation agreement with the ranch allows hunting. There is no refuge for the wildlife as a result of this project. It's mountain lion territory and because of the previous actions, it's kind of hard to trust what the	The Commenter's opinion with regard to impacts to biological resource is noted, was considered by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the County disagrees. The EIR thoroughly and appropriately analyzes Project-related impacts in all areas noted by the Commenter and identifies mitigation measures to avoid or substantially lessen impacts to the extent feasible. For

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		Conservancy is going to do and protect the wildlife in the community. It's part of an Audubon bird area and holds rare native plants and grass lands and oak wild lands. I predict now that the oak grove national forest directly to our south will burn because of a result of urban wildlife interface development. I used a term in my July letter to the Board here, the this project because the wild land communities are pretty much steam rolled.	more specific discussion with regard to wildlife movement, please see Final EIR, responses to Comments B.4-56, B.4-57, F.5-13, F.7-21, F.8-109, F.8-110, and F.8-168. With regard to condors, please see Response to Testimony RPC-197, Final EIR, responses to Comments B.4-20 to B.4-23 and F.8-138 to F.8-143. With regard to hunting, please see Response to Testimony RPC-170. With regard to mountain lions, please see Response to Testimony RPC-381. With regard to birds, please see Response to Testimony RPC-14. With regard to plant preservation and impacts, including grasslands and oaks, please see Response to Testimony RPC-12, Final EIR, responses to Comments F.8-128 to F.8-131 (plants); Final EIR responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 (grasslands and wildflowers); and Final EIR responses to Comments A.2-7, B.4-50, B.4-41, and F.8-132 through F.8-125 (oaks and oak woodlands). With regard to fire-related impacts, please see Response to Testimony RPC-339. With regard to the Oak Grove area in Cleveland National Forest, this testimony is noted, but Cleveland National Forest is not in the Project site area and impacts there are unrelated to the Project.
RPC-385	Conclusion	I can't finish now. I just want you to consider that term "Manifest Destiny", you guys can control this destiny and I urge you to say no.	The Commenter's opposition to the Project is noted, was considered by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This testimony does not address the adequacy of the EIR, and no further response is required.
Dr. Nick Jenson			
RPC-386	Population/ Housing	Thank you very much for your time. My name is Dr. Nick Janson, the story references the need to build housing in Los Angeles County. I think we all agree that Los Angeles County needs real and thoughtful solutions to our housing crisis. These solutions need to align with California's values rather than us choosing leapfrog development close to job centers. This group I have been involved with has submitted hours of public testimony. Source after source point to the conclusion that centennial is a fatally flawed project. I would like to expand on a couple reasons why. First, with only 10% affordable housing and no reasonable public transit Centennial will not help to solve our housing crisis. The project will create three low paying jobs for every moderate to high paying job. This means, I	Thank you for your participation in this public process. The Commenter's opposition to the Project and desire for a larger amount of affordable housing was heard by the Regional Planning Commission and will be provided to the Board of Supervisors. However, the County disagrees with the Commenter's characterization of the Project. For further discussion of the Project's balanced land use patterns, jobs and housing, and in-depth refutation of the assertion that the Project constitutes leapfrog development, please see Final EIR, response to Comment F.8-20. The Project's land use plan would provide an estimated jobs/housing ratio of 1.22 through the development of commercial and business park uses on the site, thus positively contributing to the attainment of the AVAP's targeted jobs-to-housing ratio. As explained in EIR Section 5.9.3 (pages 5.9-18 through 5.9-22, and pages 5.9-29 through 5.9-30), job assumptions are appropriately based on regional employment growth projections published by the Southern California Association of Governments (SCAG), which SCAG adopted as part of its 2012 and 2016 Regional Transportation Plan/Sustainable Communities

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		ask the question, where will people working these low paying jobs live if there is not enough affordable housing?	Strategy (RTP/SCS) planning documents. This testimony does not address the adequacy of the EIR or provide evidence to refute EIR assumptions, and no further response is required.
RPC-387	Transportation/ Traffic	Will they commute to Centennial from Bakersfield or Lancaster or Santa Clarita? We know because of all other communities that have been developed in California and this development will be no different that 75 to 85% of future residents will commute to where they currently have jobs. This means one way commutes of 35 miles to Santa Clarita, 50 to Bakersfield, 45 to Lancaster, 65 to Downtown Los Angeles. These commutes will cost residents $12,000 to $17,000 per year in fuel, vehicle maintenance, health expenses and other sternalities. Can any housing on centennial be affordable.	The Commenter's opinion and information about commute costs is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR's trip analysis meets CEQA requirements. As discussed in more detail in Final EIR, response to Comment F.8-23, Draft EIR page 5.10-91 explains that the traffic analysis assumes that a portion of the Project workforce and resident population will live or work outside the Project area and will commute to jobs outside or within the Centennial Specific Plan area. The analysis also assumes that on-site residents and workers will travel for services and amenities outside of the Project. The proportion of internal and external Project area trips was derived from the North County Sub-Area Traffic Model updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The North County Sub-Area Traffic Model used for the Project analysis is the same model used by the County and other public agencies for transportation planning studies in the region, including the 2015 Antelope Valley Area Plan (AVAP) and County General Plan update EIRs. The model was also used by Caltrans in the preparation of the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS. With regard to Project trip length, as discussed on Draft EIR page 5.10-51, the North County Sub-Area Model results show that 40 percent of the trips made on site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. As shown on Table 3.8 of the traffic study (Draft EIR Appendix 5.10-A), the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. The model estimates that an average external trip will be 45.9 miles in length. Finally, the North County Sub-Area Model estimates that 48 percent of all trips will be internal and 52 percent of all trips will be external to the Project. Consequently, the average Project trip is estimated to be 25.5 miles in length. As discussed on page 3-9 of Draft EIR Appendix 5.10-A, these estimated trip lengths are conservative because they do not reflect the trip reduction measures being implemented by the Project that will encourage trips by walking, biking, and transit. The Commenter provides no evidence to refute EIR analysis, and no further response is required.

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RPC-388	Biology	Second, it could not inhabit ate or allowed on Centennial. This is destroying the wildlife. This shows in the heat of summer in the drought year, these photos and the photos shown during the presentation to this commission, failed to do justice to the beauty and ecological value of this site. We are not going to stand by and allow for this misrepresentation. Will those of you in the audience show the beautiful views of Tejon Ranch. Thank you, guys.	The Commenter's opinion that the EIR and County staff did not adequately discuss the beauty and ecological value of the Project site is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The County disagrees and notes that the EIR thoroughly and appropriately discusses the Project site's existing environmental conditions in Draft EIR Section 3.0, Environmental Setting. Impacts to site's visual resources are discussed in Section 5.13, Visual Resources, and the site's ecological value and Project impacts to biological resources are thoroughly discussed in Section 5.7, Biological Resources. This testimony does not provide evidence of any inadequate discussion or analysis, and no further response is required.
RPC-389	General	You will hear and already heard many of the testimonies today about why this project should not be allowed to proceed. This includes a whole list of things, fire danger and earthquakes, the list is huge, right? But I would like to finish today in the time allotted with a quote from the LA Times article that admits the Centennial looks and isolated and out there. Finally we have found something that we can all agree upon. Thanks for your time.	The Commenter's opposition to the Project was considered by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to fire, please see Response to Testimony RPC-339. With regard to earthquakes, please see Response to Testimony RPC-330. This testimony does not address the adequacy of the EIR, and no further response is required.
Ash Loft			
RPC-390	Sprawl Fiscal Impacts	Thank you, Commissioners, my name is Ash Loft, a community organizer with the Center for Biological Diversity. We have over 35,000 members in Los Angeles County. I would sincerely thank each of you for your time in these hearings. I will submit 3 points as to why you should reject this. That is protecting wildlife and promoting housing. This is for transit and affordable housing where people already work and need homes. Transit is the economic driver in California and producing 75% long commutes and pollution and affecting California's climate goals and requires the public to spend on infrastructure including roads and fire stations and exposes the	Thank you for your participation in this public process. This testimony has been considered by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees with the Commenter's characterization of the Project. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion and an in-depth refutation of the assertion that the Project constitutes or contributes to sprawl or leapfrog

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		valley to a high area of infrastructure. We need to build housing in a way that addresses displacement and access and sustainablity and climate change. It's disingenuous to call this affordable housing and relative to a public shifting narrative. Isolated leapfrog development undermines this entire California area by increasing traffic and requiring more public spending on infrastructure and risking air pollution. The average commuter spends $1400 every year because of sprawl. If approved, Centennial would increase the cost to Los Angeles County. Our limited funds should be directed to improving records and infrastructure and existing communities, not for supporting leapfrog development. Because Centennial fails to provide affordable housing that provides sustainable access to social, educational and transit economic resources. We believe this project should be rejected.	development, please see Final EIR, response to Comment F.8-20. With regard to sustainability, walkability, and reduction of vehicle miles traveled through project design and transportation demand management, please see Final EIR, responses to Comments F.8-20, F.8-204, and Sections 3.2 and Appendix 2-C, Mobility Plan to the Centennial Specific Plan (Final EIR, Appendix 4.0-A.Rev). With regard to fiscal impacts, the County disagrees with the Commenter about impacts to Los Angeles County. As discussed in the Draft EIR, such as in Section 5.16 Fire and Law Enforcement and Section 5.17, Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities.
RPC-391	Fire Safety	If we want to keep Californians safe, we can no longer ignore warning signs of imminent fire risk. Building development in fire proned areas will only lead to disaster. Total cost of fire suppression in fire county area in 2016-2018 is $6.6 billion. It was an estimated $12 billion in insurance claims in 2017. That would mean that $18.6 billion in wildfire cost in 2016 and 2017 which is an increase and is pretty astounding. These costs are loud and clear and we need to discourage development in high fire areas. This is why over 35,000 members request you reject this project. Thank you.	With regard to fire-related impacts, please see Response to Testimony RPC-339. This testimony does not directly address the EIR, and no further response is required. The Commenter's opposition to the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration.

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Tom Eggen			
RPC-392	Biology Fire Safety	My name is Tom Eggen. For defenders members for wildlife. Defenders members are dedicated to protect wildlife and communities and navigate ground solutions for biological diversity. Habitat diversity and wild land loss. I'm here to speak for the Centennial project foreman I would specifically add on to the previous comment this morning relative to the overall revisiting of the overarching vision of the entire housing project. In looking at the documents and there have been plenty of them, we see very little coordination to the conservation investment strategy. This has been going on for a couple years now and it eight critical component to this planet that we struggle to get the ranch folks involved in and they refuse to date to do that. This involves all the areas and not just the Centennial housing project and we really think that needs to be revisited. And management to proposed areas for proposed live stock really needs to be revisited particularly in the climate change and the incredible wildlife and wildfire risk out there. There are ways to increase the wildfire potential. The proposed Centennial project will be also be in the heart of the California designated area for the California condor. A true endangered species. We got this animal from 27 birds before they were removed from the wild to over 400 birds now with more birds in the wild today than captivity. A true success story. This project is going to be located in the heart of this recovery zone. With this development, led sources are going to impede the recovery of this. One of the most truly iconic birds in our nation. We encourage you to oppose this Centennial project. Thank you.	Thank you for your participation in this public process. The Commenter's opposition to the Project, opinion that Tejon Ranch has not been responsive to their desires, and preference for a different planning vision were heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. Specifically, with regard to the California condor, the EIR concludes after thorough and appropriate analysis that impacts would be less than significant, which would be further ensured by MM 7-6. For further discussion of condor, please see Draft EIR, Section 5.7, pages 5.7-94, -119, and -120, -148 and Final EIR, responses to Comments B.4-20 to B.4-23 and F.8-138 to F.8-143. With regard to the Regional Conservation Investing Strategy (RCIS) referred to by commenter, it is a pilot program authorized by Assembly Bill 2087 (2016), and the County fully addressed how it relates to the Project in Final EIR, responses to Comments F.8-172 and F.8-172A. With regard to wildfire, please see Response to Testimony RPC-338. This testimony does not provide evidence disputing EIR analysis, and no further response is required.

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Justin			
RPC-393	Support	I'm Justin, for the corporation, a large union contractor in the State of California. I'm currently running projects from the San Diego border to the Oregon border. I have spent a tremendous amount of time on the 5 freeway going from one state to the other. I'm here to speak today a little bit more about the construction of this industry rather than the habitat and the wildlife. Currently I'm running 300 employees. I'm a 40-year resident of the Antelope Valley myself. Our business has been there for 44 years. Currently in the Antelope Valley itself we have three affordable housing projects going. One is a veterans and senior center. I'm very informed about that side of the discussion today. More important for me, I do have a heart. I live on a horse ranch and I have cattle and two desert tortoises on my ranch. I respect people's opinions and stuff like that, but as a young business owner with an eight-month-old son, I can't help but worry about the people of the State of California and the needs for people to be able to own a home and the needs for people to have jobs close to their home that they have now. The majority of my employees spend half their week driving. It took me 4 hours to get here this morning, 77 miles. I think we are taking mothers and fathers away from their families. I think we are seeing a lot of people injured in car accidents and things that a project like this can prevent a lot of that. I can't help but be more concerned about the human race than about flowers. I would ask that the, that everybody in this room will look at the dates of some of these pictures to date. I drive by that land on a daily basis. Those photos is not a direct reality of what it is today. We heard from the nice lady from Gorman and the need for the fire departments and the police departments and things like that. If you actually live in this area and function in that area,	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		there is a need for a lot of that stuff. There is hundreds of places where we are go for smelling flowers. But the reality is we need homes, parks, gas stations, we need all of that stuff in this area. I would like everybody to be very open minded about the amount of jobs and the other opportunities for family life that this project will create versus what we are going to ruin. I think that we are going to create a lot more good than what we are going to ruin. That's my stance here today and thanks for hearing me.	
No name provided			
RPC-394	Support	Good morning, we are working on the homeland of the Centennial project. The work done to date by the Planning Commission itself and your County staff and shown as centennial as a model is extremely impressive. Thank you for your hard work to date on this. Centennial will be a community that creates jobs right in the community and presents the health and wildlife style of the residents and will permit the open space. According to the McKinley global institute, the state needs to build over 3 million houses. An agreement with the previous speaker. I appreciate his passion and sincerity. Being able to put a human face on the housing crisis is even more important for us to provide housing for those that have been left out of the dream of home ownership. The future families who will 1 day call Centennial their own home is why we are here today. We have been building homes for future generations and we are in full support of this successful project. I applaud each of you for your thoughtful work today regarding the Centennial plan and I encourage you today to bring this project forward to the Board of Supervisors today.	Thank you for your participation in this public process. The Commenter's support for the Project was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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		Thank you once again.	
Roslyn			
RPC-395	Biology Population/ Housing Sprawl	My name is Roslyn, I grew up in similar I valley. I don't think the question is whether we build or whether we seek to provide jobs, but whether we build the right way and provide the right kinds of jobs and the right kinds of job opportunities. Right now we are in a crisis in California. We rely in a healthy overall ecosystem for healthy people. I would say is this development is about and opposing this development is about keeping people healthy and supporting the right kinds of jobs of supportive housing that is more in fill and not far flung sprawl housing. And I think this has changed as to this housing that's being proposed. If you look at the region, there has been a very high amount of sprawl development across California region and you need to think about migrating animals for animals. They need 19 large areas in order to survive and thrive and be part of that healthy ecosystem but keeps us healthy too. When we approve projects like this, it's at this point that is one of many many projects that have been bit by bit encroaching on this healthy ecosystem across California. We need to be part of this solution instead of part of this encroachment. I have concerns that should we approve this project in this area that as the years go by and the population in that area expands because of this project, we would be looking at pressures to start approving new developments in the area and increase the encroachment into new critical habitat. Thank you.	Thank you for your participation in this public process. The Commenter's opposition to and opinion about the Project was considered by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees with the Commenter's characterization of the Project. The Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion and an in-depth refutation of the assertion that the Project constitutes or contributes to sprawl or leapfrog development, please see Final EIR, response to Comment F.8-20. With regard to sustainability, walkability, and reduction of vehicle miles traveled through project design and transportation demand management, please see Final EIR, responses to Comments F.8-20 and F.8-204, and Section 3.2 and Appendix 2-C, Mobility Plan, to the Centennial Specific Plan (Final EIR, Appendix 4.0-A.Rev). With regard to potential growth-inducing Project impacts, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments could be made outside the West EOA, which is considered a significant, adverse indirect growth-inducing impact. Draft EIR, Section 7.0, Cumulative Impacts, pages 7-19, and Section 6.0, Growth-Inducing Impacts, pages 6-6 to 6-9. For further discussion of growth-inducing impacts, see Draft EIR, Section 6.0, Growth-Inducing Impacts, and Final EIR, responses to Comments F.8-47 through F.8-49. With regard to use of the Project site by large mammals who have large home ranges, the Commenter's concerns about habitat loss are addressed in Final EIR, responses to Comments F.8-107 and F.8-108, and discussions about foraging/hunting of large mammals are addressed on pages 5.7-50, 5.7-63 and 5.7-64 of the Draft EIR. Life history requirements of large

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			mammals such as the mountain lion, while not discussed for specific species, is a topic covered in the movement discussion on pages 5.7-56 through 5.7-64 of the Draft EIR, and concerns about wildlife movement/linkages are addressed on pages 5.7-56 through 5.7-64 of the Draft EIR as well as responses to Comments B.4-56, B.4-57, F.5-13, F.7-21, F.8-109, F.8-110, and F.8-168 of the Final EIR This testimony does not directly address the EIR, and no further response is required.
Rose Bryant			
RPC-396	Biology	I'm here -- hello, I'm Rose Bryant. I want to talk about the Quayle Lake Wildlife Habitat. It's on the western part of the Antelope Valley. I'm sure you are all familiar with it. We sent you an e-mail on this pamphlet that we have that we are trying to alert you to all the animals and birds that reside in these areas or that are travelers and come from north to south and south to north. This project that wants to build and I'm actually proposing an alternative for that area for the western Antelope Valley. We had sent several or we considered a lot of alternatives that if you do pass this project that you consider that very seriously if you are going to pass this. I want to read you the last paragraph of this pamphlet because I think it is important. "although the building of the Centennial city will do damage to the part of California and will have far reaching echo effects on California. It will at least limit the damage to east of the aqueduct. It would preserve the important grassland hill habitat north of Quayle Lake where the county black forest and will allow Quayle Lake to continue to function as an independent feeding ground to migratory rest stop for many species of birds." . This includes all the animals that come from the hills and mountains that actually drink water there.	Thank you for your participation in this public process. In this testimony, the Commenter refers to a letter and corresponding pamphlet the County received on August 15, 2018, and which was provided to the Regional Planning Commission for consideration. This correspondence and responses to it appear in the document entitled The Centennial Specific Plan Project, Project No. 02-232(5), Responses to Additional Correspondence Received Through August 22, 2018, available at the Los Angeles County Planning Department and online – this response addresses the Commenter's testimony about Quail Lake and attendant biological resources.[3399] Please see Letter ADD-F.15, and response to Comment ADD-F.15-1. Specifically, with regard to the Commenter's preference for Alternative E, the Commenter's preference is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Commenter has previously expressed this preference in much more detail, and the County has responded appropriately. For detailed responses, please see Responses to Testimony RPC-70 through RPC-74, and responses to Comments ADD-F.13-2 through ADD-F.13-8. With regard to human interference with wildlife, it is reasonably assumed that Project residents will follow any legal mandates with regard to wildlife protection. Further, the EIR appropriately analyzes all potential Project-related impacts on biological resources, including with regard to human intervention, and mitigates them with feasible mitigation measures. This testimony does not provide specific evidence of inadequate EIR analysis, and there is no further response required.

[3399] Available at: http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-20180829-correspondence.pdf.

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		I have seen them. I used to run that area every single day and I would pass by all of these animals that would come into that area. I thought it was really incredible that they had it for the animals. I know that everybody thinks we should eliminate them all because everybody is killing them up there. You know, even snakes, whether they are rattlers or not, they are eliminating them. My neighbors think that killing 35-40 snakes a year is pretty good, this is really nice, and that they are poisoning all the rest of their animals because they are encroaching on their particular housing. It makes it really unfortunate that we have to even build in these beautiful areas. But, if you are going to do that, let's put it down. Make it smaller. I know that smaller isn't what they want, but I think that is what would be very important.	
RPC-397	Water Resources	Also, I want to say that going to water because water is very important to all of us there in the Antelope Valley. Is that unless you have guaranteed 30 years of water to be able to build even a portion of this development.	With regard to water supply for the Project, after thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts. Please see Draft EIR, Section 5.18, Water Resources, and Response to Testimony RPC-76 for further discussion.
RPC-398	Conclusion	Yes, I will wrap that up. Hopefully you can look at that and consider it very seriously. I really appreciate this Commission, by the way, as we deal with the Tricounty and Kern County and Ventura County and LA. You are the best, I must say, thank you.	The Regional Planning Commission heard this testimony and will consider it. It will also be passed on to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

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Leslie			
RPC-399	Miscellaneous	I'm Leslie. I would like to speak to something Chairman Louie brought up and I don't have an actual definitive answer, but in terms of the settlement agreements by several of the environmental groups including the Sierra Club which I am a member but I'm not here as a Sierra Club member at all. My understanding is that a settlement agreement preserve a relative large portion of Tejon Ranch and in exchange partly these groups were not going to oppose other development portions of Tejon Ranch. It doesn't mean that they support it by a long shot. I think it just means that they can't actively publically oppose them. So I just wanted to try to speak to that a little bit.	Thank you for your participation in this public process. This testimony has been considered by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. As noted by the Commenter, signatories to the 2008 Tejon Ranch Conservation and Land Use Agreement ("Ranchwide Agreement" or "RWA") agreed not to oppose four Tejon Ranch development projects, including the Centennial Project, after years of cooperative study and identification of the most appropriate respective locations for preservation and development. Per RWA recitals, "[t]he long-term conservation of Tejon Ranch has been one of the highest priorities" of the signatory organizations, and the agreement "follows many years of scientific analysis of conservation values on Tejon Ranch by TRC and others, including the Resource Organizations." This testimony does not address the Project or the adequacy of the EIR, and no further response is required.
RPC-400	Biology	And I had set something earlier about in the former hearing about raising the issue of this State, developing its plan for maintaining and preserving natural lands that is important for sequestration. The County's response basically said they were going to be planting a lot more trees, so that would address that issue. I don't know that planting trees is the same as maintaining this natural open space and working lands that are very historic and very important for many other reasons that people have spoken about for wildlife as well.	The Commenter correctly notes that the Project would result in the conversion of some vegetative cover that currently sequesters carbon. As the County previously explained in response to the Commenter's previous testimony, at Response to Testimony RPC-307, this is appropriately disclosed and analyzed in Draft EIR Section 5.21, Climate Change (pages 5.21-5 and -50). It should be noted, however, that the Project would plant an estimated 35,123 new trees, as required by the County Tree Planting Ordinance, which would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent, as discussed on Draft EIR page 5.21-83. The Commenter's opposition to the Project due to loss of vegetative cover, and preference for preservation of the Project site, was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This testimony provides no evidence refuting EIR analysis or conclusions, and no further response is required.
RPC-401	Air Quality Greenhouse Gases	I would like to bring up a few more points. In the greenhouse emissions to increase the eb in 20 years. I don't know if that is true or not, but I raise that as an issue. The LA valley AQMD apparently did not respond and possibly this is an issue to the adequacy of the EIR.	With regard to electric vehicle utilization, this testimony appears to refer to discussion in Attachment G – GHG Reduction Memo, to the July 11, 2018 Regional Planning Commission Public Hearing Staff Report ("GHG Memo"), which clearly explains its assumed increase in EV adoption rate from current 4 percent to 50 percent at the time of Project buildout. The current CalEEMod default value for EV use is approximately 4 percent of all vehicles, which does not reflect reasonably foreseeable future EV adoption rates

Testimony No.	Environmental Topic	Testimony	Response to Testimony
			based on ongoing public and private sector efforts to develop and deploy EV technologies and products.[3400] As discussed further in the GHG Memo, global projections in a Bloomberg New Energy Finance report indicate that by 2040, 55 percent of new car sales will be electric, and a University of California, Berkeley report estimates achieving up to 46 percent market share for EVs nationally by 2030. (GHG Memo, page 4). An International Monetary Fund working paper indicates that the share of EVs in national vehicle stock would be 30 percent by 2027, and by 2042 this would be over 90 percent. (*Ibid*.) Although these projections vary, they all point toward a much higher level of EV sales and adoption in the country in the near future. See GHG Memo, pages 4-5, for further discussion. The Commenter's concern regarding lack of AVAQMD (presumably the agency the commenter labeled "LA Valley AQMD") comments on the Draft EIR is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. AVAQMD does have an important role in the CEQA process for this Project. As described in Draft EIR Section 4.8, Intended Use of the EIR, the County is lead agency for the Project, and AVAQMD is a responsible agency. (Draft EIR, pages 4-102, -110.) Approximately 85 percent of the Project site lies within the Mojave Desert Air Basin, over which AVAQMD has jurisdiction for air quality. Developers and businesses who plan to install equipment with the potential to emit air pollutants, including toxic and hazardous air pollutants, must obtain permits from the applicable Air Quality Management District prior to construction or operation. Examples of businesses and equipment that require permits are gas stations, dry cleaners, emergency generators, boilers for heating and hot water in large buildings, restaurant cooking equipment, and manufacturing facilities. Accordingly, AVAQMD was provided with an opportunity to review the EIR and is expected to use the information in the EIR for consideration of approvals related to and involved in the implementation of the Project. This comment does not specifically address the Project or the adequacy of the EIR, and no further response is required.

[3400] See, e.g., CARB's 2018 Annual Evaluation of Fuel Cell Electric Vehicle Deployment & Hydrogen Fuel Station Network Development, available at: https://www.arb.ca.gov/msprog/zevprog/ab8/ab8_report_2018_print.pdf. As noted in this report, in just the 12 months of 2017, there was a significant shift in momentum of California's hydrogen fueling station network development and Fuel Cell Electric Vehicle (FCEV) development and deployment. Per Executive Order B-48-18, there is a target of 5 million ZEVs by 2030, and FCEVs are expected to comprise a significant portion of this future fleet. The California Fuel Cell Partnership anticipates 1 million FCEVs on the road by 2030

Testimony No.	Environmental Topic	Testimony	Response to Testimony
RPC-402	Fire Safety Water Resources	Other people raise the high wind and fire danger. I think it's very important now to address that differently, and readdress that. The adequacy of the water analysis related to the drought to my view is inadequate. And referring to water extraction that now has to be part of the plan. Another adequacy issue. I think it's the wrong development in the wrong place at the wrong time. Thank you.	The Commenter's opposition to the Project is noted, this testimony was considered by the Regional Planning, and will also be passed on to the Board of Supervisors for consideration. With regard to fire risk and fire services, please see Draft EIR Sections 5.3, Hazards and Fire Safety and 5.16, Fire and Law Enforcement, and Final EIR, response to Comment A.2-6 and Response to Testimony RPC-339. With regard to water supply analysis, including in drought conditions, please see Draft EIR, Section 5.18, Water Resources, and Responses to Testimony RPC-76, and RPC-209. This testimony does not provide specific criticisms of EIR analysis, and no further response is required.
RPC-403	Conclusion	Let me see what else did I want to say. Well, I don't know. I think I will just leave it at that. I think there are more appropriate places to develop and including the Antelope Valley itself where there has already been graded lands. Please consider this proposal and think about your responsibilities and in terms of long range planning. Thank you.	This testimony and the Commenter's opposition to the Project have been considered by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. With regard to the Commenter's preference for another location, the County notes that the Project site is planned for intensive development under the AVAP. This testimony does not address the adequacy of the EIR, and no further response is required.
George Dickerson			
RPC-404	Support	My name is George Dickerson. I'm going to read so I communicate everything I want and respect everybody's time. I have been a former valley resident for 27 years and I'm a former marine and own my own business in the Antelope Valley for the past 25 years. I spoke in support before at the remote location in Lancaster. Now I'm in full support of this project. I heard at the last hearing about transportation for construction workers and commuters. In the latest project commitment, they have committed this for local residents. This is what we need when they listen and respond to the needs. There is a lot of new homeowners who are very excited about this new town in the west and the valley. I know this because Im active with the chamber members and events in the Antelope Valley where we have discussed this project. When I discuss with dozens of homeowners, one of the	Thank you for your participation in this public process. The Commenter's support for the project was heard by the regional planning commission and will be provided to the board of supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

Testimony No.	Environmental Topic	Testimony	Response to Testimony
		biggest challenges and concern is the lack of affordable housing for employees and especially for the lower middle-class. I support a couple veteran non-profits in the AV as well. They are looking for affordable housing which is their main focus and the purpose of getting out of the military and working at the Plant 42 and Edwards when they get out. We need housing and -- Centennial is a project that will be available and this will suit all the needs of the community including parks, civic center, medical and many other amenities. I have heard many of the concerns regarding natural habitat and ecological concerns. I'm an avid outdoors man. Also I served summers across the country for natural habitat. I do hear their concerns but satisfied that this is a historic land and many have heard these concerns. The last focus is my focus and many of families that live in California. And the reality is that many are losing their kids and grandparents to move out of the state. Hopefully my daughter can stay local 1 of the ways to housing for our future generations is to build housing that is affordable and sustainable for that practice. It's this consistent plan that produces water walk ability and preservation of local jobs and centennial with this economic growth. I don't know of any other project of this magnitude that has met and exceeded this. I'm impressed. I hope you will keep our generation in California. We need these houses and services. Thank you.	

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3.7 RESPONSES TO CORRESPONDENCE RECEIVED PRIOR TO DECEMBER 11, 2018 BOARD OF SUPERVISORS HEARING

All comment letters received by the County through October 28, 2018 have been included and responded to herein. Comments that raise environmental issues pertinent to the analysis presented in the EIR have been thoroughly addressed in these responses.

With respect to the new comments letters received, individual comments within the body of each letter have been identified and numbered. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. Responses to each bracketed comment are included on the page(s) following each comment letter, and the electronic PDF file includes hyperlinks between the comment and the associated response to facilitate ease of review.

Table 3.7-1 below presents a summary listing of the additional comment letters received, including the commenting agency/individual; the assigned numbering for each comment letter; the date of the correspondence; and the page number where the comment letter can be found herein.

TABLE 3.7-1
ADDITIONAL LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	**Commenter**		
A. Federal Agencies			
-	-	-	-
B. State Agencies			
-	-	-	-
C. County Agencies			
-	-	-	-
D. Regional Agencies			
-	-	-	-
E. Local Agencies			
-	-	-	-
F. Organizations			
ADD-F.18	Golden State Gateway Coalition	August 21, 2018	3-508
ADD-F.19	Association of Rural Town Councils	August 23, 2018	3-510
ADD-F.20	Citizens for Los Angeles Wildlife	August 28, 2018	3-532
ADD-F.21	Southern California Edison	October 1, 2018	3-534
G. Individuals			
ADD-G.64	Form Letter 11 – Various Commenters	Various Dates	3-536
ADD-G.65	Form Letter 12 – Various Commenters	Various Dates	3-538
ADD-G.66	Form Letter 13 – Various Commenters	Various Dates	3-540

TABLE 3.7-1
ADDITIONAL LIST OF COMMENTERS

Comment Letter Category		Date of Correspondence	Follows Page Number
Letter No.	Commenter		
ADD-G.67	Andrea L. Bell, LCSW, SEP	August 22, 2018	3-542
ADD-G.68	Jacquelyn Chase	August 22, 2018	3-544
ADD-G.69	Jacquelyn Chase	August 22, 2018	3-546
ADD-G.70	Gregory Simon, Ph.D.	August 24, 2018	3-552
ADD-G.71	Ann Dorsey	August 25, 2018	3-558
ADD-G.72	Michael Hayes	August 28, 2018	3-566
ADD-G.73	Diana Coronado	August 28, 2018	3-568
ADD-G.74	Paul Edelman	August 28, 2018	3-570
ADD-G.75	Elizabeth Davidsohn	August 30, 2018	3-572
ADD-G.76	Ed Salisbury	August 28, 2018	3-574
ADD-G.77	Form Letter 14 – Various Commenters	Various Dates	3-576
ADD-G.78	Matthew Schmahl	October 24, 2018	3-578
ADD-G.79	Kathy Davis	October 14, 2018	3-580
ADD-G.80	Mark Waldner	October 23, 2018	3-584
ADD-G.81	Timothy Martinez	October 23, 2018	3-586
ADD-G.82	Form Letter 15 – Various Commenters	Various Dates	3-588

F. Organizations

CENTENNIAL

at TEJON RANCH

ADD-F.18

GOLDEN STATE gateway COALITION

A coalition of community and business leaders focused on the health and vitality of California's transportation backbone:
— Interstate 5 —

August 21, 2018

Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

RE: Centennial Specific Plan

Dear Commissioners:

The Golden State Gateway Coalition is a non-profit organization focused on improving roadway transportation in North Los Angeles County. Our current priorities include the Interstate 5 corridor and SR 138.

I am writing today to express the Coalition's support for a recommendation for approval of the Centennial Specific Plan Project.

In 2002, Centennial was a founding member of the Golden State Gateway Coalition. They later helped advance Interstate 5 improvements by voluntarily making a substantial contribution to the cost of environmental studies for the I-5 capacity enhancement project. Completed and planned improvements to the freeway in North Los Angeles County include truck climbing lanes through the Newhall Pass, 14 miles of carpool lanes from the I-5/SR14 interchange to Castaic, auxiliary lanes, soundwalls and widened bridges.

It is this type of forward thinking and commitment by the private sector - - Centennial and others - - in partnership with the County and State that will result in reduced traffic congestion, safer roads, cleaner air and more efficient freight movement.

Final design on the I-5 HOV lanes will be completed this year. Passage of LA County Measure M included $240 million for construction of I-5 improvements. Just last May the California Transportation Commission unanimously approved $247 million from the state's trade corridor enhancement program for I-5 construction. In June, a federal grant of $47 million was awarded for "chokepoint relief" in the I-5 corridor.

ADD-F.18-1

28042 Avenue Stanford, Unit E, Santa Clarita, CA 91355
Telephone (661) 775-0455 • Fax (661) 295-0692 • www.goldenstategateway.org

This is a significant project that will create thousands of good jobs and improve our quality of life in North County. This is an environmentally cleared, ready-to-go project. And Centennial helped make it happen. Construction is scheduled to begin next year.

The Gateway Coalition and Centennial also support the State Route 138 corridor improvement project. The planned SR138 improvements will not only accommodate anticipated economic growth, but also improve safety and goods movements for a critical North LA County roadway system consisting of I-5, SR-14, and the planned high desert corridor.

The environmental documents for SR-138 have already been approved and Metro and Caltrans are exploring safety improvements that can be made to this critical route, connecting interstate 5 and the proposed High Desert Multi-Modal Transportation Corridor.

Because of this commitment from Centennial to improve transportation for North LA County we can firmly stand in support of this new project. I urge the Regional Planning Commission to recommend approval to the Board of Supervisors for the Centennial at Tejon Ranch project.

Thank you for your consideration of my comments.

ADD-F.18-1 (cont.)

Sincerely,

Victor Lindenheim
Executive Director

C: J. Sackett

Response to Comment Letter ADD-F.18
Golden State Gateway Coalition
August 21, 2018

Response to Comment ADD-F.18-1:

Thank you for your participation in this public process. The Commenters' support for the Project is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the adequacy of the EIR, and no further response is required.

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Association of Rural Town Councils
C/O Three Points-Liebre Mountain Town Council
P.O. Box 76
Lake Hughes, CA 93532
ourartc@gmail.com

23 August 2018

SENT VIA EMAIL

Regional Planning Commissioners
Mr. Jodie Sackett
Los Angeles County
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov
213.974.6443

Dear Commissioners and Mr. Sackett,

RE: Project No. 02-232, Centennial Specific Plan Final Environmental Impact Review

The Association of Rural Town Councils (ARTC) is comprised of member councils in unincorporated Northern Los Angeles County, originally formed to serve as a forum for rural residents and councils to participate in state, regional, county, and local issues, as well as an exchange for information regarding their governance. Each of our communities enjoy diverse surroundings unique to rural areas of the Antelope Valley. Concerning the Centennial Project (Project) we have apprehension and concern for the impacts to our rural town areas, and impacts to the natural areas slated for development as a result of this Project, and additional cumulative effects from major planned infrastructure projects like the Northwest Highway 138 and California High speed Rail, as well as thousands of acres of utility-scale renewable energy project proliferation. ADD-F.19-1

There is great privilege in large landowner property rights, and their gain is paid by the tremendous cost to small community rural residents. There is no doubt that a faceless, large corporate interest has wielded political, social, and economic influence in its efforts to bring this Project forward. Furthermore, in its final form, the "new city" will wield its political, social, and economic influences over claimed resources, as well as surrounding rural communities, who will bear the "significant but unavoidable impacts" from growth-inducing development, infrastructure that encourages growth, and at the same time, new use and/or degradation of water resources, increased traffic, increased fire hazards, and injury or destruction of environmental resources. ADD-F.19-2

Limited liability companies who build the "villages" and industrial park, will walk away once sold without any repercussion for impacts to their own community development, neighboring communities, or residents and workers, via earthquake, fire, flooding, air pollution, water pollution, or public health issues. The Project's Economic Opportunity Areas are excluded from policy requirements and ultimately skirt liability--by allowed increased density and intensity of development within "Special Management Areas," and responsibility for loss due to disaster imposes costs on taxpayers across the County. Moreover, the AVAP indicates "the planning area is predominately rural and has major constraints, including natural hazards, environmental issues, lack of ADD-F.19-3

infrastructure, and limited water supply. It is critical that existing rural communities, agriculture, natural resources and biological diversity remain protected" (General Plan, Ch. 5, Planning Areas Framework, Antelope Valley Planning Area, P. 33).

ADD-F.19-3 (cont'd)

The Tejon Ranch Corporation achieved its land use zoning desires in the Antelope Valley Area Plan (AVAP), converting rural land use and large parcel minimums to high density residential, suburban residential, and high intensity commercial and industrial uses that exclude adherence to policy requirements for hazards management and biological resource considerations. Land Use goals and policies listed below identify the exclusions, which show inherent conflict between designated economic opportunity areas (EOA) development and policies meant to protect residents from hazards:

> Goal LU 3: A land use pattern that minimizes threats from hazards.
>
> · Policy LU 3.1: *Except within economic opportunity areas, prohibit new development on fault traces and limit the amount of development in Seismic Zones*, through appropriate land use designations with *very low residential densities*, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
>
> · Policy LU 3.2: *Except within economic opportunity areas, limit the amount of potential development in Very High Fire Hazard Severity Zones,* through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
>
> · Policy LU 3.3: *Except within economic opportunity areas, limit the amount of potential development in Flood Zones designated by the Federal Emergency Management Agency, through appropriate land use designations with very low residential densities*, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
>
> · Policy LU 3.4: *Except within economic opportunity areas, limit the amount of potential development on steep slopes identified as Hillside Management Areas, through appropriate land use designations with very low residential densities,* as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
>
> · Policy LU 3.5: *Except within economic opportunity areas, limit the amount of potential development in landslide and liquefaction areas, through appropriate land use designations with very low residential densities*, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.
>
> · Policy LU 3.6: *Except within economic opportunity areas, limit the amount of potential residential development in airport influence areas and near military lands, through appropriate land use designations with very low residential densities*, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan. (This should include military airspace, a crucial and large economic force in the Antelope Valley and for national security.)

ADD-F.19-4

Furthermore, the AVAP explains "local governments needed to balance increased growth with obligations to protect existing natural resources. These new obligations, combined with a better understanding of the importance of balancing rural and urban areas in Los Angeles County, have created a new model for regional development. This new model, which directs new investment to areas with existing and/or planned services and facilities *and away from areas with natural hazards and environmental resources*, will shape land use in the Valley, with policies that emphasize resource efficiency, economic growth, and the preservation of rural

ADD-F.19-5

character" (AVAP LU-2 June 2015). During the AVAP update process, infill was promoted, which would direct future development to areas of existing infrastructure and services, presumably in response to AB 857, which outlines "smart growth" objectives: "to promote infill development by rehabilitating, maintaining and improving existing infrastructure *presently* served by transit, streets, water, sewer, and other essential services; to *protect environmental and agricultural resources*; and to encourage development patterns by ensuring that any infrastructure associated with development that is not infill, is built *adjacent* to existing developed areas." However, in the last days of the AVAP planning process, influenced by Project proponents, policies and goals diverged from this State-mandated strategy.

ADD-F.19-5 (cont'd)

TRAFFIC

What we term the Lakes and Valleys Communities—town councils comprising the areas of Leona Valley, Green Valley, Elizabeth Lake and Lake Hughes, and Three Points; in addition to the community of Antelope Acres to the northeast, will feel direct impacts from the Project and other large infrastructure projects meant to support this massive development.

The "remote" (AVAP) rural community of Three Points, directly adjacent to the proposed Project, has two possible access points from the Northwest Highway 138, and join five other routes that connect to Lancaster/Palmdale and Santa Clarita Area. We are concerned that traffic movement from Old Ridge Route Road to Pine Canyon Road, and also Three Points Road to Pine Canyon Road, both direct routes to and through our community, will cause undue traffic impacts as the Project is built. According to the FEIR, no impacts are identified. However, Alternative 2 of the NW Highway 138 Improvement Project locates a roundabout/ramp at Three Points Road, even after their town council requested that no roundabout/ramp be placed at Three Points Road. At the same time, the AVAP shows no intersection identification at Three Points Road, and this reflects policies meant to protect rural communities.

ADD-F.19-6

As it pertains to the Lakes and Valleys Communities, and evidenced by other suburban, commercial, industrial, and specific plan development in Lancaster/Palmdale and Santa Clarita, large volumes of commuter traffic use Elizabeth Lake Road from Palmdale to Bouquet Canyon Road to Santa Clarita., and San Francisquito Canyon Road (ending at Copper Hill Road in Santa Clarita); Lancaster commuters traveling to Santa Clarita use West Avenue K to Johnson Hill Road, to Elizabeth Lake Road to San Francisquito Canyon Road (or Bouquet Canyon Road) to Santa Clarita, as well. These routes are used both directions to avoid traffic on State Route 14 because of congestion, dangerous driving conditions, weather impacts, and road closures. The traffic and noise impacts to the rural communities of Leona Valley, Green Valley, Elizabeth Lake, Lake Hughes, and Three Points along the previously identified routes will increase considerably, and are not discussed in the DEIR or The FEIR, which assumes virtually all traffic will use NW Highway 138 to reach Interstate 5 or State Route 14.

ADD-F.19-7

The ARTC believes it is reasonable to expect similar and increased Highway 138 traffic impacts created by the Project that bring drivers to our roads now. Interstate 5 closures divert cars to Highway 138 via Pine Canyon Road from Lake Hughes Road (Castaic) to Three Points Road, San Francisquito Canyon Road, and Bouquet Canyon Road. Old Ridge Route Road to Three Points Road to Pine Canyon Road to Elizabeth Lake Road to Munz Ranch Road, Johnson Hill Road, or the other canyon routes provide a bypass for commuters and travelers avoiding traffic on NW Highway 138 moving to and from SR 14, with commuters looking for more direct routes to areas of Santa Clarita, as well as commuters seeking to avoid an already congested I-5, with *its own* dangerous driving conditions, semi-truck traffic, weather impacts, and road closures.

ADD-F.19-8

Antelope Acres Town Council area will also face tremendous impacts from the Project and its associated infrastructure requirements of widening NW Hwy 138 to State Route 14. The highway expansion will further divide the community and will add an off-ramp at the intersection of 90th Street West--the community's main thoroughfare, increasing traffic and changing the complexion of their rural community; along with the Central EOA and its high density, high intensity development potential, will attract even more growth, traffic, and

ADD-F.19-9

congestion. The AVAP DEIR has not identified 90th Street West in the (AVAP) Project Area Roadway Network Table 5.16-1, and the Congestion Management Plan offers no 90th Street West/NW Hwy 138 evaluation (5.16-11). Moreover, the NW Hwy 138 FEIR states the improvements will, "change the community character with the widening of the roadway and other highway safety features" (NW Hwy 138 FEIR Figure 25 Proposed Treatments Alternative, 134/518).

ADD-F.19-9 (cont'd)

The FEIR states that Caltrans' Northwest Highway 138 (NW Hwy 138) Improvement Project will determine its own schedule for implementing planned improvements. However, FEIR documents state the current highway conditions will accommodate only 10 percent of the project build. To accommodate beyond 10 percent, and up to seventy-five percent of the project, will require Caltrans to complete the NW Hwy 138 Improvement Project, and the final portion will require a six lane expressway from 300th Street West to approximately 240th Street, involving the portion of Three Points-Liebre Mountain Town Council area along Highway 138, including the intersection of Three Points Road/ Hwy 138. This configuration of additional lanes to accommodate one hundred percent of the project was not evaluated in the Environmental Review of the AVAP or the NW Highway 138 Improvement Project EIR for its impacts to Lakes and Valleys and Western Antelope Valley communities. The AVAP Transportation and Traffic section of the EIR, Chapter 5.16, neither lists Three Points Road in table 5.16-1, Project Area Roadway Network, nor provides evaluation in the Congestion Management Plan (CMP), while listing sections of NW Highway 138 considered part of the CMP freeway network, and stating sections were selected based on locations that could be impacted by the Proposed Project (AVAP DEIR, 5.16).

ADD-F.19-10

It is understood the AVAP EIR could not evaluate impacts from all future projects, but the Centennial land use and zoning was mapped into the AVAP, and the plan language indicates the project is associated with and relies upon the NW Highway 138 Improvement Project for traffic management. In order to comply with CEQA, Regional Planning, as the lead agency, must be responsible for requiring conditions and mitigation to reduce traffic impacts to the Three Points-Liebre Mountain Town Council Area, as well as the rural communities of Leona Valley, Green Valley, Elizabeth Lake, Lake Hughes, and Antelope Acres. As such, the ARTC requests that indirect access to NW Highway 138 be made via a frontage road from 240th Street West to Three Points Road, indirect access to 240th/245th St. West/Lancaster Road; and indirect access provided to Old Ridge Route Road. The NW Hwy 138 FEIR, which contains language that will allow for this request, states, "Between Gorman Post Road and SR-14, all existing intersections with major roadways would be modified to restrict access to higher traffic roadways in order to improve safety and operations of the facility," and "The decision on the actual intersection treatment will be determined during the final design phase" (State Route 138 Corridor Improvement Project, S.3.3, Build Alternative 2).

ADD-F.19-11

Finally, Caltrans' own NW Highway 138 Natural Environment Study (NES) states, ***"The widening of SR-138 is expected to create growth inducement that will increase human disturbance associated with all-terrain or off-highway vehicle use, littering,vagrancy, pollution, introduction of pet species. New residential and commercial construction in the area is also expected to occur which will contribute to the edge effect of adjacent habitat. These new residential and commercial development projects include Centennial Ranch, Newhall Ranch, Tejon Industrial Complex, Southern California Logistics Airport, Palmdale Airport and Sunshine Landfill"*** (NES, March 2016, Ch.4.4.6, 116). This is counter to statements in the FEIR that contend the project is "growth accommodating" rather than "growth inducing," and that the NW Hwy 138 will be improved without the Project development. It is reasonably certain Caltrans would not invest in improvements in the near term, or even several years from now, if traffic created by the Project did not exist and Level of Service remained adequate. The question remains, will we be able to have both preserved rural community environments in our Lakes and Valleys and Western Antelope Valley communities *and* accessibility provided by an improved NW SR 138, more than 19,000 homes and 10 million square feet of commercial/ industrial space?

ADD-F.19-12

FIRE

The words "fire" associated with "urban-wildland interface" are horrifying to rural residents, especially those of us who have experienced wildfire destruction. Some of the worst fires in California, during the last two years occurred at the urban-wildland interface, where there is increased human presence which is identified as a major cause of fire. Even the Angeles Forest Land Management Plan admits that 90% of fires are human caused. Increased building allowed by planning departments, increased population, and forest use will place nearby rural communities at risk, including the Project area; and even accounting for the firefighting agreement between Los Angeles County and the US Forest Service for reimbursable and non-reimbursable cost, and the location of Fire Services within the Project, we have seen that in less densely populated areas contiguous to forest boundaries in which the Forest Service assumed incident command, large areas of the forest burned, and rural residents left to face consequences. This affects watershed capability, introduction of invasive weed species, and represents a huge cost for not only local residents, but County residents who benefit from natural resources and cultural and social benefits of experiencing natural areas. The AVAP addresses High Fire Hazard Severity Zones by implementing low density land use development in "Special Management Areas" that are excluded from the Economic Opportunity Areas of the Centennial Project. In addition, the project area is in a frequent high wind event area, making fighting fires especially difficult, and directly contributes to spread of fire to adjacent areas. Low density housing would reduce impacts to the currently rural area and surrounding natural areas. Planners overlooked the hazards and monetary costs to taxpayers' increased burden associated with high density residential, commercial, and industrial development in the EOAs, like Centennial, which seek to build and populate the "urban-wildland interface."

ADD-F.19-13

BIOLOGY

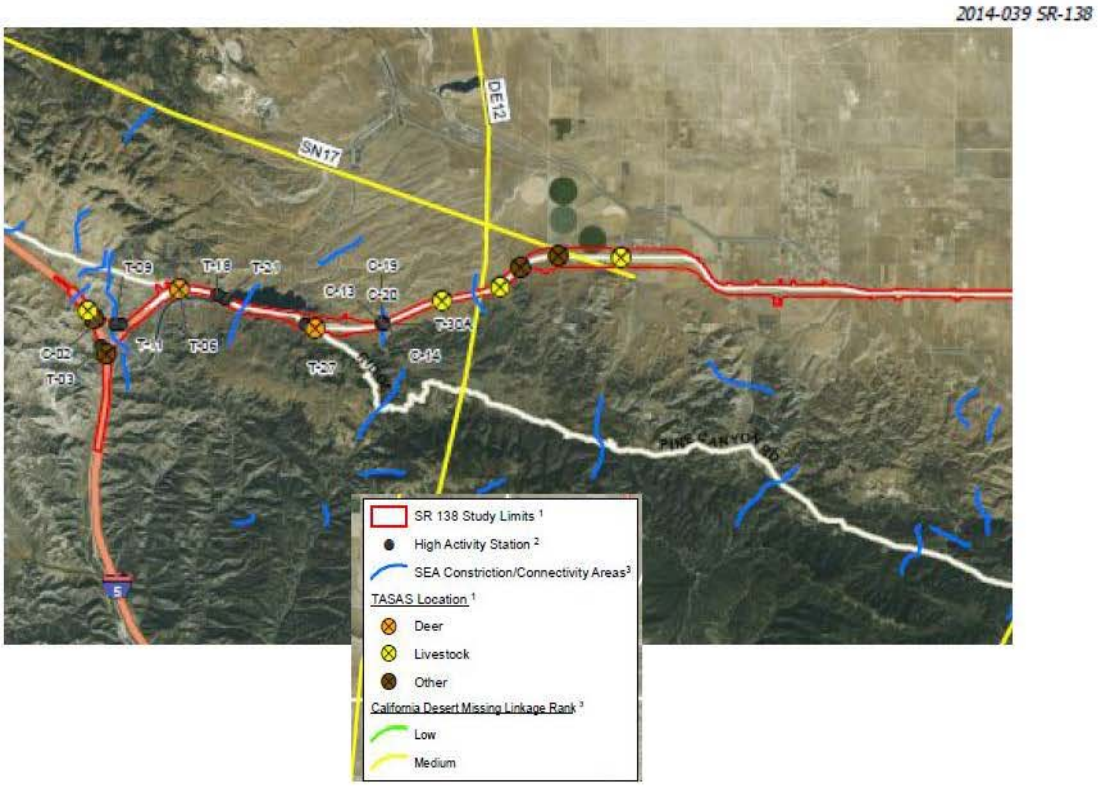
Our reading of the Biological Resources Section 5.7 found a continuous downplay of wildlife crossing the project area identified as a convergence of the Transverse, Tehachapi, and San Gabriel mountain ranges, and a highly valuable biologically rich area. Surveys of wildlife movement were performed and persist in the assumption the I-5, Highway 138, and the Aqueduct are substantial barriers in place already. Personal accounts of roadkill and live animals in the vicinity of the project and near the intersection of the NW Highway 138 and Interstate 5 indicate large and medium sized mammals do attempt to cross the area: Mountain lion, black bear, feral pig, bobcat, badger, fox, and deer. We logically see development along the drainages in the Project area as eliminating movement possibilities for species sensitive to human presence and urban development activities. Combined with strictures at the highways (without crossing structures) and impediments described along the California Aqueduct, it would be crucial to provide crossing structures as well as protected broad swaths of landscape for movement and cover, which Project documents indicate would *not* be provided. Is it possible development will drive wildlife movement to the west toward the "formidable obstacle"of the I-5/138, Gorman Post Road connection, as well as both north and south, across Highway 138—a proposed six lane freeway, toward the industrial development area bordering the SEA 17 oak and pine forest? The Project DEIR Section 5.7 explains barriers to movement—even though "natural landscape features of the region such as the Tehachapi Mountains, ***form a natural linkage or corridor on a regional scale***. Many of these features are further constrained by anthropogenic barriers such as I-5 and the California Aqueduct resulting in small wildlife crossing where passage for some species is ***one of a small number*** of remaining linkages in the region"--all the more reason to create safe crossings. Furthermore, local wildlife movement on the Project site is speculatively described: "the Aqueduct *probably* effectively serves to block east-west movement on the Project site for most ground-dwelling wildlife. . . limited opportunities for wildlife to cross the Aqueduct have been identified at four locations, but wildlife movement across that formidable barrier is *probably* a rare event" (5.7-54). How can the DEIR Biological Resources Section claim with certainty limited wildlife crossing linkages, and also use "probably" to describe the freeway, highway, and Aqueduct as "formidable barriers." This causes one to question if there were wildlife corridor/movement studies.

ADD-F.19-14

Caltrans' "Wildlife Corridor Study: Revised Final Report for the State Route 138 Northwest Corridor Improvement Project, Interstate 5 to State Route 14, Los Angeles County, California, 2016" shows crossing studies in the Project Area, and part of the Study's Figure 13 (59/65) captures priority areas for wildlife movement--recorded high activity, SEA constriction/connectivity areas, and California Desert Missing Linkages rank, from the areas directly west and east of Quail Lake, comprising the Project area. The tracking stations placed throughout the study area (Hwy 138/I-5 to SR 14) "documented the movements of seven target mammal species: coyote, black-tailed jackrabbit, bobcat, desert kit fox, mule deer, raccoon, and mountain lion throughout the study" (5.2 Results of the Study 54/65). The western portion of the study area contained bobcat, gray fox, mountain lion, and pronghorn antelope observations from I-5 to 300th Street West, essentially spanning the Centennial Project area (5.2.4, Incidental Observations 56/65). High use areas are located at stations T-11, T-18, T-21, C13, C-20, and C-14. Station T-03, while not a high activity study location, was recorded as such due to documented observance of a mountain lion traveling through the drainage there (inserted photograph of lion roadkill, below, was taken near this area); and mountain lion tracks traveling northward were observed near the entrance of the High Desert Hunt Club, part of the Centennial "conservation open-space," near C-24 and T-37 (5.3 Wildlife Movement Analysis 55/65). The Report further states, "Due to the large amount of open space required for mountain lion survival (mating, foraging, and cover), [these] location[s] may be an [sic] important area[s] for mountain lion travel within the Project corridor. Along the same lines, one set of mountain lion tracks traveling north were incidentally observed near the entrance to the High Desert Hunt Club (near stations C-24 and T-37). This area should also be considered a high use area for the same reasons that T-03 is considered a high use area." (5.3 Wildlife Movement Analysis 55/65). We question, then, the Project studies performed at culverts along the I-5, between Gorman and the Grapevine, and the assertion that those structures would provide adequate crossing opportunities for wildlife in the area.

ADD-F.19-15

Figure 13. Highest Priority Areas within the Project Corridor for Wildlife Movement



We can easily assert the presence of mountain lions and their movement on the Tejon Ranch, the area of SEA 17 directly adjacent to the project, in addition to well documented presence of healthy lion populations on Portal Ridge Wildlife Conservation Area in the vicinity of the community of Three Points, that verifies the range of this large mammal's movements, since they are known to require from 10 to 370 square miles of territory. We know lions cross the Highway 138 because we have seen roadkill—documented in the photograph below, struck at the transition to the I-5.





HIGH DESERT HUNT CLUB ENTRANCE, HWY 138
LION TRACKS OBSERVED MOVING NORTHBOUND

We believe this justifies necessity of Project design features that provide several safe crossing areas at the I-5 and Highway 138 as well as movement features for the eastern portion of the Project, for not only large, but medium and small mammals. This is supported by SEATAC comments (07/07/2008) and discussion which suggests study of wildlife corridors for Centennial: "Wildlife corridors exist in nature and are naturally-occurring functions of the land developed over hundreds to thousands of years. Centennial project studies should have been conducted to locate existing corridors for large and small wildlife and plan the project around them, not suggest new directions for wildlife to travel after build out. One cannot, for convenience, move the wildlife corridors to peripheral areas around the project. There is probably some movement of wildlife in an N-S direction across the grasslands between the Tehachapis and Liebre Mountain. Corridors may be a network rather than singlestrand, linear. The biological reports need to present studies that investigate the current, natural, unimpeded wildlife movement across the project site, between the mountain ranges. The report should provide a map clearly indicating where the movement now occurs." If it is the intent of the Tejon Ranch to support conservation, preservation and improved conditions for wildlife displaced or forced to avoid the Project in foraging, breeding, and dispersal movements, it is imperative the Project be required to mitigate wildlife crossing issues, not merely propose consideration for one area, as stated in PDF 7-7, "the Project Applicant will *explore* locating a wildlife-friendly crossing across the Aqueduct with the California Department of Water Resources" (5.7-139). We add that the previously cited Caltrans study was by no means complete, since biologists did not perform spring and summer wildlife dispersal studies due to contract limitations, but believe it provides other information valuable to our argument for crossing structures.

ADD-F.19-16

The State of California Fish and Wildlife (CDFW) DEIR Letter requests testing of wildlife and water sources for rodenticides. The Mitigation and Monitoring Program indicates: "All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs (MMRP, C-12). However, there is no real enforcement capability to determine whether rodenticides are being used, or how any

ADD-F.19-17

additional efforts will prevent their use. The only way to evaluate the success of the prohibition is to test surface water and animals themselves. Research reveals the extent of anti-coagulant poisoning in wildlife:

> California's mountain lions are still being exposed to deadly second-generation rat poisons despite a 2014 ban on those rodenticides being sold over the counter. That's the upshot of a California Department of Fish and Wildlife database of mountain lion mortalities that tallies the results of liver tissue samples from 68 dead lions delivered to CDFW between November 2015 and December 2016. The CDFW tested liver samples from the lions for the presence of seven different anticoagulant rat poisons. Of the 68 on the list, only five showed no evidence of exposure to any of the seven rodenticides tested for. Of the remaining 63 pumas, all but four had detectable amounts of more than one rodenticide in their livers, with 43 showing at least traces of three or more anticoagulants. One unlucky big cat, which died in March 2016 in Orange County, had significant amounts of six different rodenticides.
>
> ("Despite Ban, Rat Poisons Still Sickening Mountain Lions," Chris Clarke, KCET, https://www.kcet.org/redefine/despite-ban-rat-poisons-still-sickening-mountain-lions)

ADD-F.19-17 (cont'd)

The Defenders of Wildlife also provides additional education regarding poisoning of wildlife, posting information that a California Department of Fish and Wildlife study found that of the nearly 500 wild animals tested between 1995 and 2011, 70 percent had anticoagulants in their system. Species included bobcats, eagles, foxes, hawks, mountain lions and owls and found the rodenticide [d-Con] was implicated in the deaths of 25 different wild animal species, including hawks, mountain lions, endangered San Joaquin kit foxes and northern spotted owls, as well as numerous cats and dogs" (https://defenders.org/magazine/fall-2014/d-con-be-gone). Is it prudent to ask about levels in humans who do not take medically prescribed anti-coagulants? As mentioned, the DEIR mitigation details offering pamphlets to homeowners forbidding the use of such poisons, but no effective way for monitoring the success of the action. The answer is as the the CDFW recommends--animal and water testing. This must be required.

ADD-F.19-18

The ARTC has deep reservations regarding the stewardship on conservation lands and open-space allocated on the Project site. All of the organizations and biologists associated with the formation of the Tejon Ranch Conservancy (TRC) have been required to sign non-disclosure agreements, and are forbidden to talk about the Centennial Project in any way, and cannot comment on *any* Tejon Ranch project. Make available all biological reviews, surveys, and documents associated with wildlife studies to members of the public. Additionally, recent "blacklisting" of certain members of the California Native Plant Society occurred, who were told their access permission to TRC lands had been rescinded without explanation, and after commenting on the Project DEIR. The Tejon Ranch asserts its authority to determine who will gain access, and it is understandable to limit activities in order to preserve the integrity of conservancy lands. "The Conservancy will oversee managed public access to conserved lands and will provide interpretive and environmental education programs for local communities" (DEIR, 5.7-16) However, the Conservancy has received State of California monies in the amount of 15 million dollars for purchase of conservation land. How is it they can restrict members of their local community and members of the public who helped pay for this acquisition if they properly apply for access and pose no threat to the conservation lands? The TRC should reveal the requirements for public access and amend them to provide fair and equal treatment for access, and non-discrimination based on rights to free speech.

ADD-F.19-19

The non-disclosure requirements of working with the Tejon Ranch extends to employees as well, even when it involves the ranch breaking the law. In 2012, it was reported "The Tejon Ranch has agreed to pay $136,500 in fines and restitution for illegally killing at least 11 mountain lions to prevent them from competing for game with high-paying trophy hunters, the Kern County district attorney's office announced Friday. The settlement capped a 10-month investigation by the California Department of Fish and Game into claims made by a former Tejon Ranch Corp. hunting guide who said he was fired after he complained about the illegal killing of the wild

ADD-F.19-20

predators" (Los Angeles Times, "Tejon Ranch to pay fine for killing mountain lions," February 11, 2012, Louis Sahagun). It was reported as many as 20 lions were killed. "As a result of their investigation, state wildlife authorities determined that mountain lions were, in fact, unlawfully killed by Tejon ranch employees."

ADD-F.19-20 (cont'd)

The Project DEIR Biological Review tells us that urban development will impact the open-space conservation areas and wildlife movement corridors (5.7-168 Centennial Project Draft EIR):

> *Urban development also tends to attract wildlife species that are better adapted to urban s*ettings; these include house sparrows (*Passer domesticus*), European starlings (*Sturnus vulgaris*), rock pigeons (*Columba livia*), brown-headed cowbirds, American crows (*Corvus brachyrhynchos*), ravens (*Corvus corax*), striped skunks, Virginia opossum (*Didelphis virginiana*), red foxes (*Vulpes vulpes*), raccoons, and Norway rats (*Rattus norvegicus*). **Most native species are less adapted to urban development; their populations tend to decrease or be eliminated entirely in the vicinity of residential or recreational developments.** In addition, local increases in meso-predators (e.g., skunk, opossum, fox) can adversely impact native rodent and bird populations. Developed areas also attract non-native Argentine ants, which respond to high soil moisture in horticultural circumstances. These ants have the potential to impact native ant populations, which serve as pollinators and seed dispersers for many native plant species. Additionally, the reduction of native ant populations due to the introduction of Argentine ants could adversely affect various wildlife species such as the coast horned lizard (a species of special concern), which depends on native ants as a food source and which does not eat the exotic Argentine ants. **Such impacts may result in reduced viability of wildlife movement corridors in adjacent open space areas.**

ADD-F.19-21

These statements give the reader the impression the Project has identified impacts that will have significant permanent pervasive impacts. It is essential that more effort be made to reduce impacts by providing for "buffer zones," than might function to reduce edge effects, and that do not count as mitigation land, and by improving and maintaining habitat affected by urban development proposed by the project, and to eliminate activities allowed by the Ranch-Wide Agreement. These include: hunting, mining, oil and gas development, and water extraction.

It is usual for conservation mitigation to be awarded to independent conservancies, to be held and managed in perpetuity; however, it appears a conflict of interest for the Tejon Ranch Corporation to control to such an extent all the preserved lands on the ranch, including those of the Centennial Project. The conservation lands offered for the eastern portion of the Project actually contain the High Desert Hunt Club. The Ranch-Wide Agreement allows "harvesting" of wildlife as a form of conservation management and income; it it operates a business offering trophy and upland game hunting. Moreover, the agreement that guides the Ranch, its Conservancy, and business operations allows activities on preserved lands that veer from the idea of providing 'safe haven' to wildlife displaced by the massive Project area and intensity of its proposed development:

ADD-F.19-22

> Wildlife Management. Grantor retains the right to use, and to permit other parties to use, the Easement Property for activities intended to manage wildlife on the Easement Property, including, but not limited to, creating, operating and maintaining commercial and non-commercial hunting programs (including raising, lodging, introduction and dispersal of native species and pheasant (and other non-native species, subject to Grantee's prior written approval, which shall not be unreasonably withheld) for purposes of hunting on the Conserved Lands), non-consumptive wildlife viewing (Exhibit N - Page 19 Tejon Ranch Conservation and Land Use Agreement 181/267).

> Weed, Non-Native Plant Control. Grantee may use pesticides, herbicides or other biocides, mechanical removal or other reasonable methods to control noxious weeds and to eliminate non-native plant species from the Easement Property, except that Grantor's prior written consent (which may be granted or withheld in Grantor's sole discretion) shall be required for any such activities in the Designated Farm Areas, Designated Mining Areas, Designated Oil and Gas Areas and Designated Water Bank Area, or for any controlled burning. In addition, Grantee shall coordinate all such activities with, and shall not unreasonably interfere with, Grantor's grazing and fuel management activities (Exhibit N - Page 25 Tejon Ranch Conservation and Land Use Agreement).

So, "management" of wildlife via "harvesting" will be permitted on conservation lands, which we assume includes the open-space set aside for the Project--the High Desert Hunt Club (counted as open-space allocation and conservation land), and the rest of the Ranch not occupied by its development projects. Chemical removal of non-native plant species is allowed, and it is easy to question the effects this has on special-status plants, grasslands, grazing lands, and wildlife that resides in and moves through conservation areas. The Tejon Ranch and its Conservancy, through the agreement, will maintain hunting operations, its mining areas, oil and gas activities, and grazing and fuel modification activities. County land use designation (Title 22, Part 9) O-S allows for a variety of uses—including parking lots, golf courses, crops, oil and gas drilling, etc. The open-space lands set aside for Centennial must not be used for any of the above activities, and it has been suggested in past correspondence that an independent conservation organization steward the open-space conservation land for the Project that will protect wildlife seeking refuge from hunters, and from the effects of the Project's other activities and urban development.

ADD-F.19-22 (cont'd)

Alternative A-No Project, is most advantageous here. However, if there is a preferable alternative that provides additional preserved acreage, it is identified as Alternative E (DEIR, 8.0, 8-18, Alternatives to Proposed Project, 1819/2003). It describes more density and intense development east of the Aqueduct, adding more than six hundred acres to Conservation-OS, with no development or added infrastructure west of the Aqueduct, protecting oak woodlands and savanna. "Hunting, fire management, and grazing impact oak woodlands on the ranch. Depending on the intensity, duration and seasonality of grazing, livestock can influence seedling recruitment, both directly by way of browsing and indirectly by reducing the competition from annual grasses. Grazing can also alter soil properties including bulk density and infiltration rates. Fire influences oak woodlands by altering fuel loads, understory assemblage and composition, and soil properties. Hunting impacts oak woodlands by affecting deer, elk, and feral pig populations, and the understory community" (Ecology and Management of Oak Woodlands on Tejon Ranch, 2011, UC Santa Barbara). For the improvement of the conservation area provided by Alternative E, exclusion of grazing is crucial and recommended, but controlled and maintained by the Ranchwide Agreement. Mitigation must include cessation of grazing and restoration activities to improve the conservation area.

ADD-F.19-23

<u>WATER</u>

We have other concerns regarding the adequacy of water, since wells will serve over 5,000 residents before any other water is used, even though the Project has acquired rights for water to be delivered via the Aqueduct. Antelope Valley-East Kern Water Agency, during times of drought, has limited allocations to five percent of normal, which has driven major water purveyors in the Antelope Valley to pump additional water to make up for the loss. What if AVEK water and banking are not enough? If rather common and perhaps greater drought conditions persist, will pumping draw down water levels in the Western AV and affect rural residents with private wells? Prove a five year supply is enough to protect the water of current residents in the area. Guarantee this Project will not cause a serious drop in water levels and deplete watershed resources over time.

ADD-F.19-24

Will groundwater pumping affect seeps, springs, and riparian habitat that exist on the Project property and conservation areas? There must be limits to preserve wells and riparian areas, and independent monitoring/mitigation to assure against their loss.

ADD-F.19-24 (cont'd)

AIR QUALITY

The ARTC has been concerned for some time over air quality in the Antelope Valley, and has recently undertaken a grant proposal for California Air Resources Board's Community Air Protection Program (AB 617) to evaluate, quantify, and define mitigation measures for unclassified particulates in our air. Antelope Valley residents have the highest death rates in the County for pulmonary and respiratory diseases caused or exacerbated by PM 2.5 and PM 10. Childhood asthma rates are the highest in the County. Antelope Valley residents are also nine times more likely to contract the fungal disease Valley Fever (caused by *Coccidioides immitus* carried on fugitive dust) than anywhere else in the County. The Project will contribute greatly to fugitive dust issues during construction phases over *twenty years or more*! Dust Control Best Management Practices, to date, have been ineffective in controlling fugitive dust from development projects during frequent drought conditions and high-wind events.

This Project will establish a commuter community with associated automobile emissions during its first phases without industrial park development that supposedly keeps people from commuting to jobs elsewhere. (The validity and lack of success regarding such a claim—Smart Growth—can be observed in Santa Clarita area's specific or master planned communities and traffic congestion created as a result) Conversely, industrial development will bring emissions from businesses and diesel truck traffic combined with current cement mining operations—blasting, earth moving, diesel equipment, trucks, and fuel-burning kilns. Prevailing westerly winds will carry pollutants to rural communities to the east and southeast across the Antelope Valley. We see a future of increased air pollution and resulting public health issues made worse by this Project, and without meaningful management practices and actual mitigation.

ADD-F.19-25

SUMMARY

Our requests include assurance of public access, participation, and representation at the Tejon Ranch Conservancy Meetings; require changes to eliminate exclusion to conservancy properties, require full disclosure and transparency of conservation board actions and biological studies on conservancy lands, including those set aside for the Centennial Project. Independent management of lands and transparent actions would go a long way toward improving public perception. Open-Space zoning designation includes a variety of uses; use of O-S conservation land should consist of preservation, conservation, and habitat improvement and no other uses to assure least amount of impact, since O-S will adjoin the city of Centennial and will be subject to deleterious effects associated with incompatible use. The Tejon Ranch-wide Agreement also allows uses that are counter to preservation of natural areas and wildlife through Tejon Ranch Corporation and hobbled Conservancy Board control of all resources on conservancy lands. Lands are subject to private corporate "management" that includes trophy hunting, mining, oil extraction, and groundwater extraction, that will affect wildlife seeking refuge from development. Reticence to improve wildlife movement and connectivity through additional provisions for safe passage across highways, roads, and water barriers gives us pause to question Project commitment to conservation. If an alternative must be chosen, preference is Alternative E, for its additional preservation of land west of the Aquaduct.

Pumping of groundwater will affect all public and private wells in the area, surface water, riparian habitats, drainages, ephemeral streams, vernal pools, seeps and springs crucial to current rural residents and future health of natural areas meant to support wildlife. Air quality impacts of the Project's twenty year construction build-out, and early phase creation of a commuter community will never be reversed, is not "Smart Growth," and will add public health burden to rural communities nearby and downwind. Air quality is associated with climate change, as is urban heat island effect. Heating of our already hot and dry high desert area can create local climate change, and affect the amount of rainfall that reaches our mountain watershed areas, and is anticipated to

ADD-F.19-26

cause movement of wildlife upslope. Locally harsh, intemperate weather conditions like high-wind events, heat, extreme cold, and snowfall will crimp actual use of the Project's highly-touted walkable areas and bicycle paths. This is seen in other urbanized areas of the Antelope Valley that provide sidewalks and bicycle lanes. Combined with lack of public transportation, this encourages automobile use. Effects of increased traffic throughout adjacent rural communities requires mitigation for additional freeway lanes that neither Planning nor Caltrans has reviewed in their EIR documents.

ADD-F.19-26 (cont'd)

Finally, it is not enough to provide mitigation; desirable outcomes must be evaluated, ensured, and enforceable, and the Project accountable. It was suggested by SEATAC, when the Centennial Project included SEAs, "To insure preservation of the biological resources of the open space there needs to be a detailed management plan. Although it is typical to have such a plan approved by County without public input after the EIR has been approved, in this case the impact is so substantial that SEATAC thinks the detailed plan should be part of the EIR and subject to SEATAC review as well as to public comment. The permit on the EIR once granted, cannot be revoked, neither legally, nor in the de facto sense" (SEATAC Meeting Minutes, 9/8/2008, 13/47). This would also be valuable to the numerous other significant impact categories discussed above that cannot be adequately mitigated to less than significant, but need ongoing review to assure desired outcomes are achieved, and if they are not, remedial action and responsibility required for the time long after permits are issued.

ADD-F.19-27

Sincerely,

Susan Zahnter

Director

Response to Comment Letter ADD-F.19
Association of Rural Town Councils
August 23, 2018

Response to Comment ADD-F.19-1:

Thank you for your participation in this public process. These comments have been provided to the Regional Planning Commission and will be provided to the Board of Supervisors for Consideration. This introductory comment does not address the adequacy of the EIR, and no further responses is required. With regard to the areas of concern listed in this comment, please see more detailed responses below.

Response to Comment ADD-F.19-2:

With regard to the assertion that surrounding communities will bear the burden of the Project's impacts, or will subsidize the Project, the Commenter's opinion is noted, but the County disagrees. As discussed in the Draft EIR, such as in Section 5.16, Fire and Law Enforcement, and Section 5.17, Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities. The Project will provide significant net economic benefits to Los Angeles County, including expected annual revenues of $43,394,902.00, versus $21,827,596.00 of annual costs to the County's General Fund for re-occurring public services, representing an annual net benefit to the General Fund of about $21,567,306.00. The Project will also generate an estimated $22,328,502.00 of property tax revenues. Further, the Project will provide schools and other necessary services, a variety of retail and other commercial uses, and employment centers to the community. The Project includes a network of sidewalks, greenway trails, and community trails to link its residential, schools, shopping, and employment centers. (Draft EIR, page 4-34) With regard to Project-related impacts in areas mentioned by the Commenter, please see Draft EIR Sections 6.0 (growth-inducing impacts), 5.18 (water resources), 5.10 (traffic), 5.3 and 5.16 (fire hazards and services). This comment does not specifically address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.19-3:

With regard to the assertion that surrounding communities will bear the burden of the Project's impacts, please see response to Comment ADD-F.19-2. With regard to the assertion that the Antelope Valley Area Plan (AVAP)'s Economic Opportunity Areas (EOAs) and the AVAP in general are not sufficiently protective, the County disagrees. Further, as discussed in more detail in Final EIR response to Comment F.8-20, the Project has been designed to be consistent with the AVAP's "Rural Preservation Strategy", which is intended to ensure that the "growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment" and focuses on "preserving the rural lifestyle and rural character of the region." (AVAP, pages I-6, -7) Consistent with these goals, the Project appropriately concentrates development in the West EOA so that areas around it can be preserved and maintained at low density, or for agricultural use. (*Id*., page I-8) With regard to Project-

related impacts in areas mentioned by the Commenter, please see Draft EIR sections 5.1 (earthquakes), 5.3 and 5.16 (fire), 5.2 (flooding), 5.11 (air pollution and public health), 5.4 (water pollution). This comment does not specifically address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.19-4:

With regard to the assertion that the AVAP's EOAs and the AVAP in general are not sufficiently protective, the County disagrees. The Project appropriately concentrates development in the West EOA consistent with the AVAP's Rural Preservation Strategy, so that areas around it can be preserved and maintained at low density, or for agricultural use. (AVAP, page I-8) Please see Final EIR, response to Comment F.8-20 for further discussion of this topic. With regard to the Project's consistency with AVAP policies, please see Draft EIR, Section 5.8, Land Use. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.19-5:

With regard to the assertion that the AVAP's EOAs and the AVAP in general are not sufficiently protective, the County disagrees. The Project appropriately concentrates development in the West EOA consistent with the AVAP's Rural Preservation Strategy, so that areas around it can be preserved and maintained at low density, or for agricultural use. (AVAP, page I-8) Please see Final EIR, response to Comment F.8-20 for further discussion of this topic. With regard to the Project's consistency with AVAP policies, please see Draft EIR, Section 5.8, Land Use, which demonstrates consistency with these policies. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.19-6:

The County is aware that the Caltrans preferred alternative for the Northwest 138 Corridor Project includes recommendations for roadway access to SR-138 that differs from the AVAP. Accordingly, the EIR includes analysis consistent with the AVAP assumptions as well as the access points specified in the Caltrans preferred alternative. State Route 138 is under the jurisdiction of Caltrans, not the County, and the County does not have the legal authority to determine or limit access points along SR-138 in the vicinity of the Project site. As contemplated by the AVAP, as part of the Centennial Specific Plan EIR, the County prepared the November 2017 Supplemental Traffic Study (STS) to analyze the Project's traffic impacts consistent with the SR-138 access points ultimately selected by Caltrans to be its preferred alternative (see Draft EIR Appendix 5.19-C).

The STS evaluates impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the AVAP approved by the County in June 2015. The STS determined that the implementation of Caltrans' preferred SR-138 alignment, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and

operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR. With regard to the Commenter's assertion that the Project will add to impacts on segments of Pine Canyon Road, Significant use of Pine Canyon Road by Project residents or non-residents seeking alternative routes to State Route (SR) 138, which extend east and west to the north of Pine Ridge Road is not likely to occur for several reasons. First, the use of Pine Ridge Road to traverse east and west along the Antelope Valley would require substantially longer travel times than travel on SR-138 even under relatively congested conditions. Travel from the Project site or from SR-138 to Three Points Road via Pine Canyon Road would take significantly longer than using SR-138. In addition, under current conditions, the use of Pine Canyon Road to bypass SR-138 would increase travel time by approximately 300 percent as compared to using SR-138 (26 minutes versus 8 minutes). Finally, as discussed in the Draft EIR, Caltrans is planning to improve SR-138 by implementing the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project").

With regard to the Project's relationship to the NW Highway 138 Improvement Project, the County has fully addressed this issue. Please see response to Comment ADD-F.10-5.

Response to Comment ADD-F.19-7

The information the Commenter presents about local traffic patterns around Palmdale, Santa Clarita, and Lancaster was considered by the Regional Planning Commission and will be provided to the Board of Supervisors. As noted in the EIR, Project-related traffic is reasonably anticipated to utilize the major regional roadways across a broad geographical area, shown in EIR Exhibit 3-2, Project Vicinity Map. The major highway in the area is SR-138, which runs through the southern portion of the Project site and is currently built as a two-lane rural highway. The primary regional access road is via I-5, an eight-lane portion of the highway that connects with SR-138 approximately one mile west of the Project site's westernmost boundary. Major access to the Antelope Valley is via SR-14, which connects with I-5 southeast of the Project site in the Santa Clarita Valley; SR-14 then moves northeast and becomes the major north-south access into Lancaster and Palmdale. Just north of Lancaster, SR-14 connects with SR-138 east of the Project area (see EIR Exhibit 3-1, Regional Location).

Whereas the mountain roadways mentioned by the Commenter can be a viable alternative for Palmdale and Lancaster residents to avoid recurring congestion on SR-14, the Centennial EIR traffic study determined that the future residents of Centennial would experience shorter travel times to and from Palmdale, Lancaster, and Santa Clarita by using the main highways (SR-138, SR-14, and I-5) versus using the mountain roadways.

For example, analysis of SR-138 indicated that level of service (LOS) would generally be LOS B and C during peak travel times with full development of Centennial together with the SR-138 improvements identified as mitigation (Final EIR Appendix 5.10-C, Table 3-8). With LOS B and C conditions, travel times on SR-138 would experience minimal added delay with

average speeds of 59 to 60 mph (Draft EIR Table 5.10-15). Based on these travel speeds, a trip from Centennial to Palmdale during the peak hour by way of a route that utilizes SR-138 and SR-14 is approximately 44 miles in length with a travel time of approximately 40 minutes on what will be a fully improved expressway and a freeway. In comparison, a route that utilizes Pine Canyon Road and Elizabeth Lake Road is approximately 39 miles in length with a travel time of approximately 52 minutes, which is 30 percent longer than the SR-138 and SR-14 route.

Pine Canyon Road and Elizabeth Lake Road are each rural two-lane roadways subject to additional delay due to slower moving vehicles and the lack of passing areas. Since the SR-138/SR-14 route represents a substantial savings in travel time, and since the route utilizes what will be a fully improved expressway and a freeway with ample opportunities to pass other vehicles, the number of vehicle trips from Centennial to use Pine Canyon Road and Elizabeth Lake Road is expected to be minimal. Analysis that was done by the County when developing the AVAP determined that traffic on Elizabeth Lake Road with full development of the Centennial Project would remain at LOS A conditions with volume to capacity (V/C) ratios on the roadway segments ranging from 0.31 to 0.58.

Similarly, from Centennial to Castaic, a route that utilizes SR-138 and I-5 is approximately 32 miles in length with a travel time of approximately 30 minutes on what will be a fully improved expressway and a freeway. Analysis of I-5 indicated that LOS would generally be LOS C and D during peak travel times with full development of Centennial (Final EIR Appendix 5.10-C, Table 4-2). With LOS C and D conditions, travel times on I-5 would experience minimal added delay with average speeds of 58 to 68 mph (Draft EIR Table 5.10-9). In comparison, a route that utilizes Pine Canyon Road and Lake Hughes Road is approximately 41 miles in length with a travel time of approximately 58 minutes, which is almost double the travel time compared to the SR-138 and I-5 route. Pine Canyon Road and Lake Hughes Road are each rural two-lane roadways subject to additional delay due to slower moving vehicles and the lack of passing areas. Since the SR-138/I-5 route represents a substantial savings in travel time, and since the route utilizes what will be a fully improved expressway and a freeway with ample opportunities to pass other vehicles, the number of vehicle trips from Centennial to use Pine Canyon Road and Lake Hughes Road is expected to be minimal.

Response to Comment ADD-F.19-8

As noted in response to Comment ADD-F.19-7, traffic generated by Centennial is forecast to primarily utilize I-5 for trips between Centennial and the Santa Clarita Valley as that route is shorter in both distance and time under typical conditions when compared to the mountain roadways such as Lake Hughes Road. However, natural events including snowfall and wildfires can sometime result in the need for segments of I-5 to be closed. When that occurs, the northbound direction of I-5 is typically closed at Castaic since that is the last community with services for motorists such as food and lodging. Closures typically last for less than 24 hours and are required no more than a few times each year. Centennial traffic could result in temporary increases in traffic volumes on Lake Hughes Road, Pine Canyon Road, and Three Points Road to avoid a closure of I-5. Centennial traffic is also anticipated to utilize SR-14 as

a bypass route despite it being a longer distance since it is a fully improved highway that is easier to drive during inclement weather conditions. As any increase in traffic on the mountain roadways due to a natural event would be temporary, it would not be considered a significant Project impact. For further discussion with regard to I-5 and SR-138 traffic jams and potential closures, please see responses to Comments F.3A-63, F.3A-64, and F.7-16

Response to Comment ADD-F.19-9

The information the Commenter presents about the differences between the SR-138 improvements as proposed by Caltrans in the Northwest Highway 138 Project Report and Environmental Document in comparison to that described by the County for the Antelope Valley Area Plan (AVAP) study will be provided to the Board of Supervisors. As noted in the comment, the preferred alternative selected by Caltrans differs in some respects from the highway configuration identified by the County in the Antelope Valley Area Plan (AVAP) study. These differences are primarily in regard to where SR-138 would be accessed from the County roadways. Because of these differences in highway access, the Centennial EIR includes traffic studies based on both configurations. For either case, the Centennial EIR identifies impacts and presents the roadway improvements that effectively mitigate Project and cumulative impacts and that are consistent with either access configuration. With regard to the Project's relationship to the NW Highway 138 Improvement Project, please see response to Comment ADD-F.10-5.

Response to Comment ADD-F.19-10

The Commenter summarizes EIR discussion regarding Project-related impacts and necessary improvements. As disclosed in the Final EIR, in July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, the Centennial Specific Plan Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers Project impacts under existing and future (cumulative) traffic conditions. Impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. As discussed on Draft EIR pages 5.10-2 to 5.10-5, both the Draft EIR and the NW SR-138 FEIR use the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County. The Draft EIR utilizes a more recent version of the model that was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. The STS also uses the traffic forecasts from the updated North County Sub-Area Model provided by the County to analyze Project and cumulative impacts to reflect the most current information available regarding traffic conditions in the North County region.

The implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative conditions, and additional improvements consistent with the SR-138 facilities considered in the Draft EIR would be required to accommodate all of the Project's full buildout traffic under long-range cumulative conditions. The NW SR-138 FEIR also clarified certain aspects of the SR-138 design details that would

be implemented with Alt 2, including the number and locations of intersections along SR-138 from I-5 to SR-14. The NW SR-138 FEIR addressed several types of intersection configurations for each location but defers selection of the final configurations to the SR-138 design phase. Subject to minor adjustments for consistency with these Alt 2 design details, the SR-138 facilities that would result from the additional improvements to Alt 2 required for full Project buildout under long-range cumulative conditions as described in the STS are substantially similar to the full buildout SR-138 facilities discussed in the Draft EIR. The STS provides a summary of SR-138 improvements in the context of the implementation of Alt 2, including the following:

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[3401]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[3402]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[3403]

As discussed in the STS[3404], the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2. As required by MMs 10-3 and 10-4, the Project will contribute fair share funding or provide funding for SR-138 improvements in accordance with a mitigation agreement with Caltrans for the implementation of Alt 2, improvements required to connect the Project circulation system with the Alt 2 facilities, and, if confirmed in traffic studies submitted in conjunction with the review and approval process for future Project tract maps, additional SR-138 improvements that may be required to accommodate full Project buildout under cumulative traffic conditions. Updated improvements necessary for full Project buildout have appropriately been studied in this Project EIR, and not the AVAP EIR or NW Hwy 138 Improvement Project EIR, because they are separate projects. Please see Final EIR, responses to Comments B.3-6 and B.3-7 for further discussion of Project-related improvements as they relate to Alt 2 of the NW Hwy 138 Improvement Project.

Response to Comment ADD-F.19-11

The County has incorporated all feasible mitigation measures and conditions to reduce traffic-related impacts on surrounding communities to a less than significant level for full Project buildout with mitigation implemented. With regard to suggestions for additional or different roadway access points and roadway improvements, these are not necessary to

[3401] *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
[3402] *Id.,* Appendix 5.10-C, Section 2.1
[3403] *Id.,* Appendix 5.10-C, Section 2.4
[3404] *Id.,* Appendix 5.10-C, Section 5

avoid significant impacts, and the County has fully addressed this in responses to Comments ADD-F.11-7 and ADD-F.11-8, and Responses to Testimony RPC-143, RPC-146. With regard to the Project's relationship to the NW Highway 138 Improvement Project, please see response to Comment ADD-F.10-5.

Response to Comment ADD-F.19-12

With regard to the Project's relationship to the NW Highway 138 Improvement Project, the County has fully addressed this issue in response to Comment ADD-F.10-5. With regard to the Project's growth-inducing impact discussion, the Commenter misrepresents EIR discussion. The EIR appropriately analyzes Project-related growth-inducing impacts and comes to differing conclusions when analyzing the Project in relation to regional planning and anticipated regional growth projections versus in relation to existing Project site conditions. In relation to regional planning, the Draft EIR concludes that because the Project is consistent with growth projections, allowable land uses, and development densities/intensities in the AVAP and because the EIR for the AVAP adequately analyzed the growth-inducing impacts of the AVAP, the Project would not have any growth-inducing impacts that were not previously analyzed in that certified EIR, and would not be considered growth-inducing in relation to planned-for and foreseeably anticipated regional growth. (Draft EIR, page 6-2). However, with regard to the Project's impacts in comparison to existing Project site conditions, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments could be made outside the West EOA, which is considered a significant, adverse indirect growth-inducing impact. (Draft EIR, pages 7-19, 6-6 to 6-9) For further discussion of growth-inducement, please see Final EIR, responses to Comments F.8-47 through F.8-49.

Response to Comment ADD-F.19-13:

With regard to fire, the Commenter's opinion that less dense development is preferable is noted, was heard by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the County concludes that the EIR thoroughly and appropriately evaluates the Project's fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and

mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. Specifically, with regard to protection from fire for surrounding open space areas and wildlife residing there, MM 3-9 requires implementation of a Fuel Modification Plan, whose major components will ensure a minimum 20-foot setback from the edge of any structures; an irrigation and transition zone from 20-100 feet away, and native brush thinning zone between 100 and 200 feet away from structures. For further details of fuel modification requirements, please see Draft EIR, Section 5.3, and Final EIR, responses to Comments A.2-6, F.8-63, and F.8-64. The EIR recognizes that the Project site sometimes experiences high wind events, and this has been taken into account in Project impact analyses. (Draft EIR, pages 5.11-23, 5.3-17) With regard to wildfire and the urban-wildlands interface, please also see responses to Comments ADD-G.69-1 through ADD-G.69-6 and ADD-G.70-1, in this document.

Response to Comment ADD-F.19-14:

Contrary to the Commenter's assertion, the EIR does not avoid appropriate evaluation of the Project site and surrounding area's use for wildlife movement. Rather, the EIR thoroughly discusses impacts to habitat connectivity and wildlife movement, and the Project design and mitigation would ensure less than significant impacts. In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains was considered in detail (Draft EIR, pages 5.7-50 to -64, -164 to -170). The thorough assessment concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions (*Id.,* page 5.7-166). The wildlife movement impact analysis beginning on page Draft EIR page 5.7-164 does conclude that development of the Project site will result in some losses of areas that may be used for foraging and/or breeding for species; pathways to or from foraging or breeding grounds on the Project site, such as along ridge-lines or canyon bottoms, may become "dead ends" to through dispersal. However, these losses are not expected to significantly impact wildlife movement, and sufficient habitat connectivity would be retained in the region for these species, especially given the substantial amount of similar terrain in the northwestern Antelope Valley area. Further, two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement and the TUMSHCP, although not providing mitigation for Centennial, would act in concert with the Centennial mitigation preserves to help sustain the functionality of the regional landscape linkage for future wildlife populations. Multi-generational gene flow (a series of connected wildlife movement events over time, allowing for genes to pass within and between populations) among wildlife populations in the region is expected to be sustained in the open spaces on and off the site that will remain following Project implementation. These open spaces provide sufficient habitat connectivity to allow for such gene flow. Implementation of MM 7-14, which designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) where the current intersection with National Cement Plant Road exists, will also allow for local wildlife movement to pass through the Project area down to SEA 17.

The direct impacts of Project development on wildlife movement, therefore, are appropriately considered less than significant after mitigation for local wildlife movement

impacts. Nonetheless, the Draft EIR (page 7-17) discloses that the Project when combined with other projects in the region would result in a cumulatively significant impact on wildlife movement. Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP) including with regard to open space designations, SEA protection, and preservation of habitat linkages. With regard to the use of the word "probably" in EIR discussion of local and regional wildlife movement, such language is not indicative of a lack of appropriate study. The EIR wildlife movement assessment is based on detailed scientific study, including site-specific studies listed in Draft EIR Table 5.7-2.

The crossings that the Commenter suggests through the Project site are neither necessary nor relatively effective. In most circumstances, open space linkages within development, especially linear narrow corridors, have not been shown to enhance survival of the species. (Draft EIR, page 5.7-54). Rather, in development adjacent to wildlands, where development is of such a density that only limited movement corridors are an option, designs that separate development from protected open spaces by use of hardened edges are preferred design strategies, as discussed further in the Draft EIR at pages 5.7-54 to -55.

For further discussion of the adequacy of the EIR's wildlife movement and habitat connectivity impact analyses, please see Final EIR, responses to Comments B.2-3, B.4-34 to B.4-37, B.4-56, B.4-57, B.4-75, F.3-23 to F.3-25, F.3A-32 to F.3A-34, F.5-2, F.7-22, F.8-109, F.8-110, and F.8-165 through F.8-169.

Response to Comment ADD-F.19-15:

This comment describes various results of the SR-138 Improvement Project EIR technical study, which looked at wildlife use along SR-138 through the Antelope Valley and including the Centennial Project site. The Commenter questions the studies performed at culverts along I-5, between Gorman and the Grapevine, and the assertion that those structures would provide adequate crossing opportunities for wildlife in the area. In response, pages 5.7-56 through 5.7-64 of the Draft EIR provide a discussion of large mammal life requirements, and pages 5.7-56 through 5.7-64 of the Draft EIR address wildlife movement/linkages. The Final EIR does not make the assertion mentioned in the comment. The Final EIR analyzes the impacts of the proposed Project on wildlife movement and its potential to affect the persistence of regional populations of wildlife species. As discussed in the Draft EIR (pages 5.7-56 through 5.7-64), based largely on an independent study (South Coast Missing Linkages- Linkage Design for the Tehachapi Connection) that specifically researched and delineated regional movement areas critical for connecting the Tehachapis with the coastal ranges and San Gabriel Mountains, the Project is expected to have less than significant impacts on these identified critical linkage areas. As a result, mitigation is not required with regard to wildlife movement. Relevant studies performed at culverts along I-5, between Gorman and the Grapevine, are appropriate references to further verify the validity of independent studies looking at critical linkages in the region. The constraints of the various features in the Project area are part of the existing condition, and as such the Project is not required to determine the adequacy of those structures. In conclusion, the Draft EIR, therefore, does not assert adequacy or lack thereof of these structures.

The wildlife observations presented in this comment are not inconsistent with the Draft and Final EIR wildlife movement and corridor impact analyses and conclusions. Use of lands within the Centennial Project site by various wildlife species is not disputed, and is described in the Draft EIR on pages 5.7-56 through 5.7-64. Wildlife using the site are expected to move between areas both within the site and to and from the site and other areas. Although these actions constitute wildlife movement, they would fall largely into the local movement category, and loss of local movement areas is not expected to affect regional population sustainability, as discussed further in the DEIR.

For further discussion of this topic, please also refer to Final EIR, responses to Comments B.4-56, B.4-57, F.5-13, F.7-21, F.8-109, F.8-110, and F.8-168, as well as responses to Comments ADD-G.59-2, ADD-G.59-3, ADD-G.59-4, ADD-G.59-5, and ADD-G.59-6.

Response to Comment ADD-F.19-16

The Commenter states their belief that the Project design features are necessary to provide several safe crossing areas at I-5 and SR-138 for large as well as medium and small mammals. Section 5.7, Biological Resources, and Section 7, Cumulative Impacts, of the Draft EIR assess all aspects of Project-related impacts to wildlife movement and corridors. As discussed in Final EIR response to Comment F.8-109, the Project site does provide unobstructed local movement opportunities for small animals and aerially dispersing plants and animals that reside in the Project area. As discussed on page 5 of the Draft Interim Wildlife Movement Corridor Assessment (WM-1 of Appendix 5.7-B of the Draft EIR), mountain lion is expected to occasionally occur on the site in search of prey, though there appears to be very little suitable denning habitat. Further, because the majority of the Project impact footprint is sparsely vegetated and does not provide adequate cover, it is not expected to be heavily utilized by species such a mule deer or mountain lion.

The Project has incorporated two undercrossings to facilitate local movement across SR-138. MM-14, described on Draft EIR pages 5.7-190 and 5.7-191, sets forth the specific requirements for the undercrossing located where the SR-138 crosses the Project's western border near its current intersection with Cement Plant Road, and requires an open space buffer near the bridge over the aqueduct for the Cement Plant Road and other areas to allow for greater wildlife mobility than in the existing condition. In addition, PDF 7-7 on page 5.7-139 of the Draft EIR requires the Applicant to explore locating a wildlife-friendly crossing across the Aqueduct with the California Department of Water Resources. The ideal location for such a crossing would be adjacent to Quail Lake or adjacent to the new bridge proposed across the Aqueduct. Final design of any such crossing must be reviewed and approved by Los Angeles County.

With regard to wildlife linkages, and potential barriers to those linkages (e.g., SR-138), please refer to Draft EIR pages 5.7-52 through 5.7-64 and 5.7-164 through 5.7-166, as well as Final EIR response to Comment F.5-13.

The Draft EIR also discusses the appropriateness of discouraging wildlife from entering into developed areas. As stated on page 5.7-54 of the Draft EIR, "constrained landscape linkages

may subject wildlife to higher mortality from edge effects and increased contact with humans, and constraints on the linkage can result in lower (not greater) likelihoods of regional persistence. In most circumstances, open space linkages within development, especially linear narrow corridors, have not been shown to enhance survival of the species that are most in need of conservation attention. In development adjacent to wildlands, where development is of such a density that only limited movement corridors are an option, designs that separate development from protected open spaces by use of hardened edges are the preferred design strategies (MacArthur and Wilson 1967; Soule 1987; Harris and Gallagher 1989; Bennett 1990)." In summary, the Draft EIR advocates for appropriately designed wildlife corridors (e.g., not "linear/narrow").

Furthermore, the Draft EIR (as well as multiple wildlife movement studies included in Appendix 5.7-B of the Draft EIR) acknowledges the large home ranges of certain species such as mountain lion, and states that mountain lion is expected to occur infrequently on the Project site. Regional movement linkages are critically important for genetic flow and the health of regional mountain lion population, whereas a small portion of an individual mountain lion's home range or general use area, such as the eastern portions of the site, is not critically important.

With regard to mountain lion specifically, neither the Draft EIR nor the Final EIR suggest that the Project site is not within the mountain lion's home range. See, for example, Draft EIR pages 5.7-50 to -51, -63, -161, -166. Impacts to these species are considered in the Environmental Impacts section (Section 5.7.6 of the Draft EIR) for general wildlife. As noted in the Draft EIR, potentially significant impacts to wildlife movement and habitat for general wildlife that would result from implementing the Project would be reduced to less than significant levels with implementation of MMs 7-14 through MM 7-18. Please see response to Comment ADD-G.59-2 for State CEQA guideline requirements for discussing the mountain lion.

For further discussion of this topic, please also refer to Final EIR responses to Comments B.4-56, B.4-57, F.5-13, F.7-21, F.8-109, F.8-110, and F.8-168, and responses to Comments ADD-G.59-2, ADD-G.59-3, ADD-G.59-4, ADD-G.59-5, and ADD-G.59-6. With regard to SEATAC and its relationship to the Project, please see response to Comment ADD-F.19-27.

Response to Comment ADD-F.19-17:

The Commenter mischaracterizes the CDFW's request in its comment letter on the Draft EIR (Final EIR, Comment Letter D.4). CDFW recommended that the Project's Integrated Pest Management Program prohibit the use of all rodenticides containing anticoagulants or other toxins that may result in secondary poising in non-target wildlife (see Final EIR, Volume 1, Comment B.4-16) Only if this could not feasibly be required, the CDFW then recommended regular monitoring of blood samples from wildlife to determine impacts. (Ibid.) Because the CDFW's primary suggestion was incorporated into MM 4-2 and this requirement is binding, CDFW's suggestion for testing is no longer applicable. With regard to the enforcement of the prohibition, CC&Rs are a binding enforcement mechanism, and violations of the CC&Rs are subject to private enforcement by the master developer and the HOA. The County also has

enforcement authority for implementation of mitigation measure requirements. See Final EIR, response to Comment B.4-16 for further discussion.

Response to Comment ADD-F.19-18:

As discussed further in response to Comment ADD-F.19-17, the Commenter's suggestion is noted, but is not necessary to ensure less than significant impacts. CC&Rs are a binding enforcement mechanism, and violations of the CC&Rs are subject to private enforcement by the master developer and the HOA. The County also has enforcement authority for implementation of mitigation measure requirements. See Final EIR, response to Comment B.4-16 for further discussion.

Response to Comment ADD-F.19-19:

The Commenter appears to assert that because signatories to the Ranchwide Agreement signed non-disclosure agreements during negotiations, and have agreed not to oppose the Project, important scientific information relevant to Project impacts has not been disclosed. This is incorrect. The entirety of the Project site has been evaluated for biological resources and to appropriately assess Project-related impacts. The EIR, including its biological impact analysis, complies with CEQA requirements, as further discussed in response to Comment ADD-F.13-16. Further, as appropriate under CEQA, the Draft EIR focuses on impacts associated with solely the Project site, and not the Tejon Ranch as a whole.

With regard to ranch access, the Commenter's opinion is noted, but access does not relate to the adequacy of the EIR. However, for informational purposes, the County notes that many scientists have been and continue to be allowed access to the ranch per the Ranchwide Agreement (RWA) and the Ranch-wide Management Plan (RWMP), and thorough, independent scientific review of Tejon Ranch has been conducted. The Project Applicant addressed ranch access in its July 11, 2018 testimony to the Regional Planning Commission, explaining that the RWA does not provide unrestricted public access to Tejon Ranch, but rather provides the express right to withhold access permission. The Applicant further explained that its intention has been to deny access to Center for Biological Diversity and their partner organizations, such as the California Native Plant Society, who have active, ongoing litigation against Kern County, Los Angeles County, and Tejon Ranch and oppose all Tejon Ranch projects. With regard to requirements for public access, Section 3.11 of the RWA indicates that the Owner shall provide significant and appropriate access to Tejon Ranch to the public. Section 3.11 of the RWA required the preparation of a Public Access Plan as part of the RWMP, which has been duly prepared, and the Applicant has been implementing the public access plan. See Final EIR, Appendix 5.7-D, Ranchwide Management Plan, Volume 3, Public Access Plan, for more information. Neither the RWA nor the RWMP restricts the Applicant's legal right to refuse access to its private property if it is not "appropriate".

Response to Comment ADD-F.19-20:

With regard to illegal killing of mountain lions, it is not Tejon Ranch policy to do so. As indicated in the article referenced by the Commenter, the Applicant paid applicable fines and

has publicly explained that it expresses "deep regret that such incidents took place on ranch property and the company is doing everything within its power to ensure that something like this never happens again." Further, the killings "occurred without the knowledge and/or consent of Tejon Ranch's senior officers." This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.19-21

The quote provided by the Commenter is from a discussion in Draft EIR Section 5.7, Biological Resources, addressing impacts related to exotic and pest wildlife. (Draft EIR, page 5.7-168) The Commenter has provided just a portion of the discussion, which goes on to note that implementation of mitigation measures MM 7-16 through 7-18 would reduce the impacts identified to a less than significant level. (*Ibid*.) With regard to edge effects and the Commenter's suggested "buffer zone" between development and open space, the EIR thoroughly and appropriately analyzes and discloses potential edge and/or indirect impacts on surrounding areas consistent with CEQA requirements and identifies all feasible mitigation to reduce such impacts. The Project site's development areas and preserved areas have been specifically chosen with the intent to minimize edge effects so that the biological resources within them are not jeopardized by the Project or potential future development in the region. For further discussion of edge effects, please see Draft EIR, Section 5.7, pages 5.7-54, PDF 7-1 at pages 5.7-136 and 5.7-160. With regard to uses permitted in the Project's open spaces, see response to Comment ADD-F.19-22.

Response to Comment ADD-F.19-22:

With regard to the Commenter's assertion that Tejon Ranch Conservancy's management of mitigation lands is a conflict of interest and a different organization should be identified for management, the County disagrees. The Tejon Ranch Conservancy was created by the RWA to serve as an independent, third party responsible for holding conservation easements and managing public access, scientific study, and restoration activities in the open space conservation areas of Tejon Ranch. The Conservancy has a twelve-member Board of Directors, with four members appointed by the environmental groups who are signatories to the RWA (Natural Resources Defense Council, Sierra Club, California Audubon, Endangered Habitats League, and Planning & Conservation League), four members appointed by Tejon Ranch, and four independent Board members. The County also has authority to and will monitor compliance with binding mitigation measure requirements on an ongoing basis.

With regard to hunting, all recreational hunting is prohibited in the On-Site Mitigation Preserve, per MM 7-23, and in the Off-Site Mitigation Preserve, hunting is restricted to Ranch authorized individuals within designated hunting areas. Hunting on the ranch as a whole is subject to restriction in the TUMSHCP, and hunting areas are considered compatible in the Off-Site Mitigation Preserve because no new disturbances or increases in hunting permit issuances is anticipated. Further, all hunting activities must be coordinated with the California Department of Fish and Wildlife, and the Project Applicant is not entitled to remove or kill animals disrupting the hunting program and has no policy to do so.

With regard to Project open space use (the Commenter asks about hunting, golf courses, parking, oil and gas, crops, and water extraction, for example), specific uses are addressed in Specific Plan Table 2-16. Further, the EIR (see Final EIR, response to Comment F.8-18) is clear about permitted uses for the four open space subdesignations, which are:

- *On-Site Mitigation Preserve*: Uses restricted to use and continued maintenance of existing ranch roads and trails for access, as well hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers. Only habitat enhancement, restoration and creation activities approved by the County shall be permitted. Grazing shall be allowed to continue strictly for resource management values.
- *Off-Site Mitigation Preserve*: These areas, although available for mitigation including enhancement, restoration, and enhancement, are not available for mitigation acreage value as preservation. Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County shall be permitted. Grazing shall be allowed to continue strictly for resource management values.
- *Disturbed Green Space*: Disturbed Green Space will be amenities for the Project and could include one or more of the following uses: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. No Mitigation credit has been taken into account for the Project impacts from the Green Spaces. While Green Spaces could be impacted initially, the concept of these areas is to restore it for community amenities and visual aesthetics between neighborhoods of development.
- *Undisturbed Green Space*: uses are restricted to continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational

motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

Response to Comment ADD-F.19-23

The County will make final determinations about the feasibility of Alternatives A and E when it adopts CEQA findings for the EIR. Per Public Resources Code § 21081(a)(3) and CEQA Guidelines § 15091(c)(3), a lead agency in its CEQA findings may reject a project alternative it finds to be "infeasible." When considering the feasibility of a project alternative, CEQA provides that the lead agency may take into account economic, environmental, social, technological, and legal factors, as well as "other considerations." See, Public Resources Code § 21081(a)(3); CEQA Guidelines § 15091(a)(3); *California Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1002. After weighing these considerations, a lead agency may determine that a project is undesirable from a policy perspective and on that basis reject a project alternative as infeasible. *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417.

This comment's stated preference first for Alternatives A and then E over the Project is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration. Alternative A, No Project, assumes that existing cattle grazing and agricultural land uses would remain and that no new development would occur on the Project site. (Draft EIR, page 8-16). While many of the impacts of development on the site would be avoided, Alternative A would result in higher risk of wildfire, because no fire prevention program would be in place. (Draft EIR, page 8-27) Further, Alternative A would not further County planning efforts to meet the future housing and employment needs in Los Angeles County, and would not be consistent with the intent of the AVAP or the West EOA within the Project's development footprint. (Draft EIR, page 8-28) The Project is proposed with the objective of creating a self-contained, self-sustaining community in which people could live and work in the same community; however, implementation of this Alternative would not support this primary goal due to the lack of new development or provision of any housing and employment opportunities on the site. (Draft EIR, page 8-30)

With regard to Alternative E, as this comment correctly notes, the EIR identifies Alternative E as the "environmentally superior alternative" under CEQA. However, Alternative E would not provide a second vehicle crossing over the California Aqueduct, which could limit emergency evacuation options for Project residents and thus be inconsistent with County policies regarding public safety. Alternative E would not reduce any of the Project's significant and unavoidable impacts to less-than-significant levels, as discussed on Draft EIR page 8-60, though it would somewhat reduce some significant impacts as compared to the Project. Alternative E would not provide a regional trail connection that is proposed by the Project and could result in higher costs for public infrastructure improvements that correlate with higher intensity of uses, such as parks.

In addition, Alternative E implicates policy considerations that are not discussed in the preliminary draft findings but could be added to the final findings. For example, if approved,

Alternative E would eliminate the Project's proposed Village Nine, and Village Eight's Low Density Residential-designated lands located east of 300th Street would instead be designated as Very Low Residential, as explained on Draft EIR page 8-18. Thus, Alternative E would provide approximately 865 fewer acres of land designated for Low Density Residential uses, as compared to the proposed Project. Although Alternative E would provide the same number of residential units as the proposed Project, most of these units would either be medium/high density attached residential units or very low density detached units, with substantially fewer low density detached units included in the community's overall housing mix. Accordingly, Alternative E, would provide an unbalanced range of housing types by reducing the supply of low density single family detached residential units that are typically attractive to middle income families. This result could dissuade both middle income workers (and employers hoping to hire them) from relocating to the Project site. Moreover, Alternative E's lack of balanced housing choice would be inconsistent with General Plan Housing Element Policy 3-1, which seeks to promote mixed income neighborhoods and increase housing choices for all economic segments of the population.

In addition, Alternative E could lead to higher housing cost for those families looking to purchase high density housing in Village Three. As explained in response to Comment ADD-F.13-6, under Alternative E, all of the units planned for Village Nine and approximately 603 units in Village Eight would be accommodated in Village Three's multifamily Medium Density, High Density, and Very High Density designations. According to a recent report prepared by housing experts at the University of California, Berkley (UCB Report), high-rise and even mid-rise (e.g., six story) residential buildings are far more costly to build on a per square foot basis than single family homes – three to five times higher – and are thus infeasible in most California markets.[3405] Even less costly multi-family units such as quadplexes (four units in a two-story building) and stacked flats (one or two units per floor, generally limited to four stories) – are approximately 30 percent more costly than single family homes on a per square foot basis.[3406] Thus, Alternative E would likely result in higher sales prices for Village Three's attached dwelling units.

The UCB Report also indicates that Southern California counties faced a larger negative fiscal impact for compact multi-family residential development than is the case with lower density development.[3407] Thus, Alternative E may result in fiscal losses to the County or otherwise reduce or eliminate the fiscal surplus projected by the Project. Finally, it should be noted that, in adopting the AVAP and its "Rural Preservation Strategy," the County has made a policy choice to maximize development in designated Economic Opportunity Areas (EOAs) so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of the Antelope Valley outside of EOAs, as discussed in Final EIR, response to Comment F.8-20. Alternative E would be inconsistent with this policy

3405 Nathaniel Decker et al., Right Type Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. U.C. Berkeley Terner Center for Housing Innovation and Center for Law, Energy and the Environment (March 2017): http://ternercenter.berkeley.edu/uploads/right_type_right_place.pdf.

3406 *Ibid*.

3407 *Ibid*.

choice, however, by limiting the type and extent of development that could occur in the West EOA.

In summary, although Alternative E would reduce some of the Project's significant and unavoidable environmental effects, it would not reduce any such effects to less-than significant levels. Moreover, it would (i) not provide a secondary evacuation route across the California Aqueduct, (ii) increase maintenance costs of certain categories of public infrastructure, such as parks, (iii) provide an unbalanced mix of housing options, (iv) increase housing costs for multifamily residential units, (v) have a negative fiscal impact on the County, and (vi) be inconsistent with certain County housing and planning policies. Please also see responses to Comments ADD-F.13-2 through ADD-F.13-8 for a more in-depth discussion of Alternative E.

With regard to the Commenter's suggestion that all grazing must be ceased, this suggestion was heard by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees, and notes that grazing is appropriately an allowed used in the Open Space Preserve Mitigation Lands and occurs throughout the Tejon Ranch conserved lands as an integral component of the Ranch-wide Management Plan. As also noted on Draft EIR pages 5.7-11, -45-, -159 and in Final EIR, response to Comment F.8-110, grazing has occurred at Tejon Ranch since it was initially established in 1843 and has shaped the ecological values present on the site today. For example, grazing has helped manage non-native grasses, and allowed persistence of native grasses and forbs. Grazing also reduces wildfire risks by reducing fuel loads. Grazing practices on Tejon Ranch lands used as mitigation for wildlife agency permits are also subject to review and approval by those agencies, and managed grazing has been a required component of such permits. Management grazing practices are designed to protect and preserve existing natural resource values, and can vary based on the nature of the resource being protected or enhanced. For example, some areas of habitat restoration, such as enhancing riparian vegetation or oak woodlands, generally require temporary grazing exclusion until new vegetation becomes more mature. For all of the above reasons, the Commenter's suggestion is unnecessary to reduce Project-related impacts and would be inappropriate for ongoing open space management.

Response to Comment ADD-F.19-24:

The Commenter's concern with regard to the adequacy of water supply for the Project and impacts on existing water users in the area in the event of a drought, is noted, has been provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the EIR analysis demonstrates reliable and sustainable water supplies, including with regard to water from the State Water Project. After thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of climate change impacts. With regard to the reliability of

imported water supplies for the Project, the potential delivery reliability and variability of Project State Water Project supplies is discussed in Draft EIR Section 5.18, Water Resources, pages 5.18-20 to -28, and -54 to -64. The analysis of Project imported water supplies uses the Early Long Term scenario also used in the California Department of Water Resources' State Water Project Delivery Capability Report, and incorporates the effects of the most severe droughts during the 82-year historical record, plus additional adjustments to account for climate change effects and the 5 percent single-dry year delivery level used by the Antelope Valley-East Kern Water in the Agency's 2015 Urban Water Management Plan. Consequently, the Draft EIR includes a discussion of State Water Project delivery reliability that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single dry year reliability level, used in the Antelope Valley-East Kern Water Agency's 2015 Urban Water Management Plan. The Commenter provides no evidence to dispute EIR analysis, and no further response is required.

The Commenter is correct that a series of wells for water banking, monitoring and potential groundwater extraction would be installed and maintained within the Project and on adjacent land owned by Tejon Ranch Company. With regard to groundwater pumping specifically, such use is strictly managed and controlled pursuant to Antelope Valley Basin Adjudication Judgment and Physical Solution ("Adjudication"). (Draft EIR, Appendix 5.18-D) The Adjudication was approved to sustainably manage Antelope Valley groundwater resources over time. Groundwater use consistent with the Adjudication takes account of and avoids long-term, cumulative impacts to the Antelope Valley Basin. Per Section 1.5 of the Adjudication, the basin's safe yield is 110,000 acre-feet per year. Per Section 3.5.43 of the Adjudication, safe yield is the amount of annual extractions of water from the basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Per Section 3.4 of the Adjudication, the physical solution governs groundwater, imported water and basin storage space to ensure that the basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication allocates overlying production rights in amounts consistent with sustainable yield and provides that, after a seven-year rampdown period applicable to all users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The Project's groundwater use will be limited to this allocation. With regard to groundwater recharge, the Project has been designed to maximize recharge opportunities, with low impact development stormwater management techniques to promote recharge, as required by MM 4-1. (Final EIR, pages 3-6, 3-108) For further discussion of Project groundwater use and the Adjudication, see Final EIR, responses to Comments A.2-8, D.3-1, F.8-219, and J.1-10.

Response to Comment ADD-F.19-25:

The Commenter's concerns about local air quality are noted, were provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. However, the County notes that the EIR thoroughly analyzes Project impacts with regard to particulate matter, Valley Fever, industrial emissions, and fugitive dust, and mitigates impacts with feasible mitigation measures.

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

With regard to Valley Fever, the EIR appropriately analyzes and discloses Project impacts related to Valley Fever, including with regard to the condition, potential for Valley Fever spores to be found in soils in the Antelope Valley, the effects of contracting Valley Fever, and risks from possible exposure to both construction workers and Project residents. See Draft EIR, Section 5.3, Hazards and Fire Safety, pages 5.3-13 to -14 and -17 to-19, Section 5.11, Air Resources, pages 5.11-28 and -29, and -64 through -67; Final EIR, responses to Comment F.3-29 through F.3-32, F.3A-5, F.3A-38 through F.3A-45, F.3A-68, F.3A-69, and G.13-1. Implementation of fugitive dust control measures required by AVAQMD and SCAQMD and MMs 3-2 and 3-3 would mitigate impacts related to Valley Fever to be less than significant.

With regard to fugitive dust from construction activities, all such potential fugitive dust has been included in Project emissions calculations, air quality analysis, and identification of appropriate mitigation, as discussed in Final EIR, response to Comment F.8-195. The Project Applicant/Developer is required to implement dust control measures as prescribed in AVAQMD Rule 403, Fugitive Dust, and SCAQMD Rule 403, Fugitive Dust. AVAQMD Rule 403 and SCAQMD Rule 403 require that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Further, MM 3-11 requires the Project Applicant/Developer to be responsible for creating and regularly updating a website on the proposed Project internet that provides public information regarding dust-generating activities and Valley Fever risk, throughout the Project construction period. The Project Applicant/Developer must also send a one-time notice to surrounding communities and schools of the website's existence and contents. Per MM 3-1, the Project Applicant/Developer "shall employ a Dust-Control Supervisor who will be on the site within 30 minutes of the start of work taking place each morning; will have the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all

AVAQMD Rule 403 and SCAQMD Rule 403 requirements; and will have completed the SCAQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class. Contact information for the Project's Dust Control Supervisor shall be posted on-site to ensure that the public has a means of providing complaints regarding fugitive dust. The Dust Control Supervisor shall be responsible for tracking complaints, conducting corrective action, as necessary, and for maintaining an up-to-date log of complaints and responses for periodic County review. (Draft EIR, page 5.3-26) The Commenter provides no evidence to support the assertion that the above-described requirements would be insufficient to reduce impacts to a less than significant level, and no further response is required.

The Commenter's disagreement with the theory and effectiveness of Smart Growth design is noted, but the County disagrees. The Project has been situated and designed to promote regional Smart Growth planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy and the County's Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. For a more detailed discussion, please see Final EIR, response to Comment F.8-20. Please note that the South SCAQMD reviewed the Centennial EIR and determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Final EIR, Volume 1, Comment D.4-2).

Response to Comment ADD-F.19-26:

This comment summarizes many of the points the Commenter makes elsewhere in their letter. With regard to public access to Tejon Ranch lands and scientific study on Tejon Ranch and the Project site, please see response to Comment ADD-F.19-19. With regard to open space management and permitted uses, please see response to Comment ADD-F.19-22. With regard to Alternative E, please see response to Comment ADD-F.19-23. With regard to groundwater usage and impacts, please see response to Comment ADD-F.19-24. With regard to air quality and climate change impacts, Project design, and Smart Growth, please see response to Comment ADD-F.19-25 and Final EIR, responses to Comments F.8-20, F.8-204. With regard to Project site weather conditions, that is a characteristic of the existing environment that is common to the planning area and is not expected to be exacerbated by the Project in any meaningful way

Response to Comment ADD-F.19-27:

The comment correctly states that a portion of the Project, in its previous design prior to 2008, was subject to Significant Ecological Areas Technical Advisory Committee (SEATAC) review. Prior to 2008, the Project was designed to overlap with a portion of SEA 17 (previously SEAs 58 and 59), which would have resulted in impacts to the SEA. The prior design is described in the 2004 Notice of Preparation, included in Draft EIR Appendix 2.0-B.

However, the Project design was subsequently changed and considerably reduced in size, and is currently designed to avoid all direct impacts on SEA 17. As a result, SEATAC no longer has jurisdiction to comment on the Project. Implementation of Draft EIR PDF 7-1, dedication of a Mitigation Preserve, sets aside thousands of acres within SEA 17 and as such these areas shall be preserved and managed in perpetuity. (Draft EIR, pages 5.7-135 to -137, revised Exhibit 5.7-10) For further discussion of SEATAC, the SEA program, and its relationship to the Project, please see Draft EIR, pages 4-29 to -30, and Final EIR, responses to Comments B.4-48, F.7-19. With regard to the Commenter's assertion that Project mitigation efforts must be monitored and enforced to ensure appropriate implementation, this is already a Project requirement, as reflected in the Mitigation Monitoring and Reporting Program.

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CITIZENS FOR LOS ANGELES WILDLIFE
CLAW
PO Box 50003 Studio City, CA 91614
805-225-5766 info@clawonline.org www.clawonline.org

ADD-F.20

August 28, 2018

Via Electronic Mail

Regional Planning Commission
Los Angeles County
320 W. Temple Street
Los Angeles, California 90012

RE: Opposition to Centennial Sprawl Project No. 02-232-(5)

Dear Planning Commissioners:

Citizens for Los Angeles Wildlife (CLAW) is a non-profit environmental organization concerned with the well-being of wildlife and wildlife habitat for Los Angeles and beyond. A citizenry of more than 3000 individuals supports our organization's multiple calls for biodiverse practices and policy to benefit LA City, County, California and the globe. Our organization joins thousands of LA County residents and organizations opposed to the current up-zone plan for Centennial. ADD-F.20-1

You are by now well aware that the sight is home to endangered fauna and rare flora and that the proposed Centennial project's sprawl-style development will server habitat linkages and block wildlife movement. Please help protect our biodiversity and prioritize this unique regional ecosystem. The power to NOT up-zone thousands of acres of iconic and pristine land lies in your hands. ADD-F.20-2

Sincerely,



Tony Tucci,
Chair, Citizens for Los Angeles Wildlife

CLAW is a public benefit non-profit 501(c)(3) environmental organization that works to protect and restore the environments of wildlife of Los Angeles and California from dwindling open spaces. Our mission is to promote, educate and protect the fundamental importance of wildlife, wildlife habitats and wildlife corridors everywhere.

Response to Comment Letter ADD-F.20
Citizens for Los Angeles Wildlife
August 28, 2018

Response to Comment ADD-F.20-1:

Thank you for your participation in this public process. These comments were provided to the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Commenter's opposition to the Project is noted. With respect to the Commenter's assertion that the Project is "upzoning," the County notes that the Project has been designed consistent with requirements of the AVAP, which the County approved in 2015 and which concentrates development in Economic Opportunity Areas (EOAs) including the Project site, which is the Western EOA. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-F.20-2:

With regard to the Commenter's assertion that the Project constitutes sprawl, please see Final EIR, response to Comment F.8-20. With regard to Project impacts on special-status wildlife and plant species, the EIR thoroughly analyzes impacts and incorporates enforceable, feasible mitigation measures. With regard to habitat linkages and wildlife movement, the EIR appropriately analyzes both, and the Project design and mitigation would ensure less than significant impacts. In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains was considered in detail (Draft EIR, pages 5.7-50 to -64, -164 to -170). The thorough assessment concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions (Id., page 5.7-166). The wildlife movement impact analysis beginning on page Draft EIR page 5.7-164 does conclude that development of the Project site will result in some losses of areas that may be used for foraging and/or breeding for species; pathways to or from foraging or breeding grounds on the Project site, such as along ridge-lines or canyon bottoms, may become "dead ends" to through dispersal. However, these losses are not expected to significantly impact wildlife movement, and sufficient habitat connectivity would be retained in the region for these species, especially given the substantial amount of similar terrain in the northwestern Antelope Valley area. Further, two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement and the TUMSHCP, although not providing mitigation for Centennial, would act in concert with the Centennial mitigation preserves to help sustain the functionality of the regional landscape linkage for future wildlife populations. Multi-generational gene flow (a series of connected wildlife movement events over time, allowing for genes to pass within and between populations) among wildlife populations in the region is expected to be sustained in the open spaces on and off the site that will remain following Project implementation. These open spaces provide sufficient habitat connectivity to allow for such gene flow. Implementation of MM 7-14, which designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) where the current intersection with National Cement Plant Road exists, will also allow for local wildlife

movement to pass through the Project area down to SEA 17. The direct impacts of Project development on wildlife movement, therefore, are considered less than significant after mitigation for local wildlife movement impacts. Nonetheless, the Draft EIR (page 7-17) discloses that the Project when combined with other projects in the region would result in a cumulatively significant impact on wildlife movement. Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP) including with regard to open space designations, SEA protection, and preservation of habitat linkages. For further discussion of wildlife movement and habitat connectivity, please see Final EIR responses to Comments B.2-3, B.4-34 to B.4-37, B.4-56, B.4-57, B.4-75, F.3-23 to F.3-25, F.3A-32 to F.3A-34, F.5-2, F.7-22, F.8-109, F.8-110, and F.8-165 through F.8-169.

SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL® Company

Ronald O. Nichols
President

October 1, 2018

Gregory R. Bielli, President & CEO
Tejon Ranch Company
4436 Lebec Road
Tejon Ranch, CA 93243

Dear Greg,

As a follow up on our conversation regarding Tejon Ranch's Centennial project, I am writing to commend you on this state-of-the-art development.

As you know, SCE is committed to supporting California's clean energy goals. Our Clean Power and Electrification Pathway proposal aims to clean the power grid, build out the infrastructure for electric transportation, and electrify buildings and homes. SCE cannot achieve these goals alone and collaborations with like-minded partners such as Tejon Ranch are essential to creating a clean energy future.

The Centennial green master-planned community is a forward thinking project. It integrates significant onsite renewable energy, electric vehicle, and energy efficient home design features. It is estimated that more than half of the project's total electricity demand will be met with onsite renewable energy generation. This is truly a praiseworthy proposal as it will represent one of the highest percentages of onsite generation committed to by a planned community in our service territory to date.

The plan to install electric vehicle home charging outlets in single family residences, as well as charge stations throughout the community, is a key design element for a carbon-free future. It is also in alignment with SCE's Charge Ready program which seeks to reduce greenhouse gas emissions and air pollution by expanding electric vehicle charging at home, work and public places.

The project has also committed to exceed the current California Building Energy Efficiency Standards and meet the voluntary 2016 CALGreen Tier 1 standards for residential buildings and nonresidential building, further demonstrating Centennial's commitment to energy efficiency and sustainability.

Tejon Ranch is leading the way for future sustainable developments and as the electric transmission and distribution provider for the project, SCE looks forward to doing our part to make Centennial a success.

Please reach out directly to me or my staff if you need any assistance as you move forward with this project.

ADD-F.21-1

Best regards,

Ronald O. Nichols
President
Southern California Edison

cc: Jodie Sackett, Department of Regional Planning
Supervisor Kathryn Barger, Fifth Supervisorial District

8631 Rush Street
Rosemead, CA 91770
626-302-2429

Response to Comment Letter ADD-F.21
Southern California Edison
October 1, 2018

Response to Comment ADD-F.21-1:

Thank you for your participation in this public process. The Commenters' support for the Project's energy and sustainability features is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not specifically address the adequacy of the EIR, and no further response is required.

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G. Individuals

CENTENNIAL

at TEJON RANCH

Dear Mr. Sacket:

I'm writing in support of Centennial at Tejon Ranch. The County of Los Angeles is facing a housing crisis and we need a variety of housing types in various locations throughout Los Angeles County. Centennial's master-plan will do just that; create more price-attainable housing and it will help accommodate the planned regional population and economic growth in our county.

As you know, Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, commercial, schools, parks, natural open space, cultural, and public uses.

The community masterplan is simply the implementation of the AVAP, a balanced plan of economic opportunity and conservation. Centennial has also been at the table with the Golden State Gateway Coalition in regards to fast tracking the I-5 improvements before this new community has been set.

It is important to define the project location in terms of synergy with the growing populations near the Centennial project. There is great synergy between other Tejon Ranch projects in Kern County, including Grapevine and Tejon Mountain Village, as well as the Antelope Valley and Santa Clarita.

ADD-G.64-1

Centennial is LA County's opportunity to take advantage of growth at Tejon Ranch in Kern County by increasing tax revenue for the general fund and providing increased public services to North LA County, but also providing diverse working-class and middle-income families an opportunity for homeownership.

In addition, Centennial includes plans to focus on water conservation through the use of recycled water and several other sustainable sources. The project's Green Development program requires reduced potable water consumption through the use of drought-tolerant plants, low-flow showerheads, faucets, and toilets. The Centennial master plan will also use recycled water for landscape irrigation in residential common areas.

I urge the Regional Planning Commission to approve and allow Centennial to move forward. We need to finally begin development on this much-needed community.

Response to Comment Letter ADD-G.64
Form Letter 11
Various Dates

Response to Comment ADD-G.64-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-11 to this document. The Commenters' support for the Project is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This form letter does not specifically address the adequacy of the EIR and no further response is required.

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Dear Jodie Sackett,

Centennial is a terrible deal for L.A. County. Centennial would be located in a "high" and "very high" fire hazard area subject to intense winds. Locating thousands of people in this fire-prone area will certainly lead to more human-caused wildfires, scorched homes and loss of life. The immense costs of protecting residents in this remote area from inevitable wildfires would be borne by Californians in and beyond Los Angeles County.

Centennial will not help address the county's housing shortage. Building a new city 65 miles from downtown LA will not help residents live near their jobs. Instead, Centennial would require construction of a new freeway at an initial cost of $830 million, which would divert scarce funds away from transit projects that make our existing communities more livable and sustainable.

Centennial would add tens of thousands of new cars each day onto Highway 5, leading to further gridlock in Santa Clarita and the San Fernando Valley. Thousands of long-distance car trips will lead to more cancer- and asthma-causing air pollution, as well as associated public health and treatment costs.

Your decision on Centennial is perhaps the most far-reaching decision you will ever make as a county official. Please, don't approve Centennial. It would reward Wall Street speculators while leaving county residents stuck with more freeway maintenance and fire-prevention costs, more traffic, and more air pollution.

ADD-G.65-1

Response to Comment Letter ADD-G.65
Form Letter 12
Various Dates

Response to Comment ADD-G.65-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-12 to this document. This comment's stated opposition to the Project is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration. With regard to the topics raised in this letter, please see Draft EIR Section 5.3, Hazards and Fire Safety, Section 5.9, Population, Housing, and Employment, Section 5.10, Traffic, Access and Circulation, and Section 5.11, Air Resources. Since this comment does not raise any specific concerns regarding the adequacy of the EIR, no further response is required.

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Dear Jodie Sackett,

Scientists warn that we're in the middle of a climate crisis. Because transportation is the single largest driver of carbon pollution in California, new development located far from existing cities has disproportionately large climate impacts. Centennial exemplifies poor, outdated land-use planning on an unprecedented scale. This isolated new city would lock in at least 75,000 new vehicle trips per day with an average trip length of over 45 miles.

If you're committed to a sustainable future for L.A., then you need to say no to Centennial.

L.A.'s wildlands are rapidly diminishing. Ninety-nine percent of California's native grasslands are already gone forever, paved over by similar sprawl development. The Centennial project site contains the last, largest and best native grassland and wildflower fields left in California. Rare wildlife such as California condors, bald eagles, kit foxes and pronghorn also will be harmed if Centennial is built.

It's your job to protect our communities and natural resources, not sell them out to developers.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, urban, affordable housing. Centennial is a poster child of 20th-century sprawl development that exacerbates threats to our population through increasing greenhouse gas production and climate change, air pollution and a deteriorating quality of life.

ADD-G.66-1

The proposed site is in "high" and "very high" fire hazard severity zones. And it's directly on top of California's two major earthquake faults. The area was rated by the U.S. Geological Survey as having the highest level of earthquake hazard.

The county and its taxpayers will be on the hook for millions to provide basic public and emergency services to this remote area.

Instead of allowing isolated sprawl development on irreplaceable grasslands in an area at extremely high risk for fires and earthquakes, L.A. should focus on creating safe housing and economic opportunities in or near existing cities.

Please say no to Centennial: It's the wrong vision for L.A.

Sincerely,

Response to Comment Letter ADD-G.66
Form Letter 13
Various Dates

Response to Comment ADD-G.66-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-13 to this document. This comment's stated opposition to the Project is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for their consideration. With regard to the topics raised in this letter, please see Draft EIR Section 5.3, Hazards and Fire Safety, Section 5.7, Biological Resources, Section 5.8, Land Use, Section 5.10, Traffic, Access, and Circulation, Section 5.11, Air Resources, and Section 5.21, Climate Change, and Final EIR, responses to Comments A.3-3, A.3-4, A.3-5, A.3-7, B.4-20, B.4-21, B.4-22, B.4-23, F.2-2, F.2-5, F.3-29, F.3A-46, F.8-20, F.8- 95, F.8-128 to F.8-131, F.8-189, F.8-204, G.31-1, H.21-1, and J.1-6. Since this comment does not raise any specific concerns regarding the adequacy of the EIR, no further response is required.

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From: Andrea Bell, L.C.S.W.
To: Jodie Sackett
Subject: Fwd: Centennial development
Date: Wednesday, August 22, 2018 3:29:15 PM

Greetings,
I would like to request that Mr Sackett please deliver my comment (in the email attached below) to the Regional Planning Commission.

Thank you, and best regards,
Andrea Bell
Long Beach, CA

Sent from my iPhone

Begin forwarded message:

From: "Andrea Bell, L.C.S.W." <andreab.lcsw@gmail.com>
Date: August 21, 2018 at 6:37:03 PM PDT
To: "fourthdistrict@bos.lacounty.gov" <fourthdistrict@bos.lacounty.gov>
Subject: Centennial development

Dear Ms. Hahn,

As a certified California Naturalist (through the University of CA) and an ecotherapist, I am writing to you to implore you to please oppose the Centennial development.

This project is proposed for a critically imperiled habitat that is home to rare plants, wildlife, and the Antelope Valley's last hard of pronghorn antelope.

In my opinion, what we humans seem to be missing is that we are all dependent on the web of life. If we kill it, then eventually, we die too. As a naturalist, I know that land use change is one of THE most under-rated and devastating threats to our wildlife and sustainability. When we take away the habitat for plants and animals, they have nowhere to go and they die.

Our beautiful state of California is a jewel. It is known worldwide as a biodiversity hotspot—but we are relentlessly extinguishing that. We can't continue to cram unlimited numbers of people here; our ecosystems simply won't support it. When does it end?

Please oppose this new development on this threatened land.

ADD-G.67-1

Sincerely,

Andrea L. Bell, LCSW, SEP
California Naturalist
(562)243-9963
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Andrea L. Bell, LCSW, SEP
Licensed Clinical Social Worker, Somatic Experiencing Practitioner
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http://secure-web.cisco.com/1IpktdkBN6WZ9cWELqgtildwFjB9M6n8ymQyde57hlwdMFzKQhWb3baJKb2Mf9LokkPILdRXH_fNopxiFZbIPTqtztClQdgSN6BxjWWPVkJKiVgp677h6tDLAFyqkHFHMp7dSQch2k4CuvPmiN6G869aFfSjm4her7mnUyVNyp-kw3WKy8z6SxlGyuslNod_fegR0mVHO8ZRTr_TdOimr9tkwt1D3aabT5mix6LvqgDLBnqGtxVmJ0RcRRyPI7F3KsDRoA3I4rKFjZuwMrjr0knq-a4y8UfVj38XvLupJw9q3cJmV9yRh4LRWEmeJyIxleDefkoFFppWHdY1UAFBYsmKB2xJBCp4ZO1CjQNGdA_43eFB4T26D3bwL09xs8AWEMi-fSh3xDHKPra8OIj31w/http%3A%2F%2Fwww.somaticwise.net

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Response to Comment Letter ADD-G.67
Andrea L. Bell, LCSW, SEP
August 22, 2018

Response to Comment ADD-G.67-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted, this comment was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR thoroughly analyzes Project impacts on wildlife, plants, and habitat, and identifies feasible mitigation measures to reduce such impacts. Please see Draft EIR, Section 5.7, Biological Resources, Final EIR responses to comments on biological resource impacts, and the Mitigation Monitoring and Reporting Program for more information on these topics. This comment does not specifically address the adequacy of the EIR and no further response is required.

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From: Jacquelyn R Chase
To: Jodie Sackett; DRP LDCC
Subject: Recent email with attachments
Date: Wednesday, August 22, 2018 10:31:29 PM
Attachments: Reilly Free riders cost of wildfire mgmt.pdf

Dear Mr. Sackett,

I'm sorry to bother you with this but I recently attempted to send you a follow up email with copies of the referenced works in my earlier letter of today, but Outlook said the email was too large. However, it appears it may have gone through after all. I was asking in that email that you include the attachments with the letter in case the commissioners wish to review any of the sources.

Could you confirm that you received an email from me with several PDFs attached? There should be 8 or 9 attachments.

If so, please make sure the one attached here is included. I had removed it so as to reduce the MB in the message.

ADD-G.68-1

Thank you.

Jacquelyn Chase

Response to Comment Letter ADD-G.68
Jacquelyn Chase
August 22, 2018

Response to Comment ADD-G.68-1:

Thank you for your participation in this public process. The attachment transmitted by Commenter was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not address the EIR, and no further response is required. For responses to the separate letter that Commenter references in this email, which letter is dated August 22, 2018, the letter has been labeled ADD-G.69. Please see Responses to Comments ADD-G.69-1 through ADD-G.69-6.

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August 22, 2018

Mr. Jodie Sackett, Senior Planner
County of Los Angeles Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Re: Centennial

Dear Mr. Sackett,

I wish to comment on some of the assumptions the Centennial plan makes about mitigating for wildfire. The fire research community and fire responders are increasingly skeptical of prescriptions to "fire safe" the landscape. Fire behavior is changing across the state's wildland-urban interface areas (WUIs). Fires are getting bigger, faster, more erratic and more destructive (Strader 2018). Ember ignitions challenge reliance on defensible space. Fires keep breaking records in California. Of 20 largest fires since 1932, 14 have been since 2000, and six since 2012 (Pope 2018).The cost of fire in the WUI is being externalized to all of us as fire agencies are called to fight fires at the cost of billions of dollars each year (Reilly 2015). As a resident of California, a county planning commissioner in a fire-prone region, and member of the Northern Sacramento Valley Chapter of the California Association of American Planners, I believe I have a stake in opposing this development. ADD-G.69-1

The plan states that the area for the project encompasses land classified by Cal Fire as high or very high fire severity zone. The surrounding vegetation is known to be combustible, and the dry, hot and windy conditions at the site will continue to produce wildfires. Much of the terrain is steep, which accelerates fire and aggravates its containment. There have been 31 wildfires of over 100 acres on or near the site between 1964 and 2015. The plan calls for medium and low density development, similar to WUI neighborhoods such as Keswick Estates (Redding), The Trails (Rancho Bernardo—San Diego) and Coffey Park (Santa Rosa)—all which were destroyed in wildfires in the last decade.

I am not saying that because those developments burned that Centennial will suffer the same fate, or that these measures should be abandoned in existing WUIs. I'm saying that despite them, quasi-suburban places, with ample hardscapes and irrigated, non-flammable vegetation, have suffered huge losses during WUI fires. One-third of the homes that burned in the Trails subdivision in San Diego were "hardened" (Maraghides and Mell 2011). Burned-out residents (and most of us who read about their plight) are shocked to learn that such a mix of cement, lawns, pools, and paved roads would ignite as they have in San Diego, Redding, Santa Rosa, Santa Barbara, and so on. The Centennial project is essentially leapfrog development, as it will be surrounded on all sides by undeveloped land. This makes it the most vulnerable of any kind of WUI (Syphard et al. 2013). ADD-G.69-2

The plan makes only a vague distinction between the needs for fighting structural (urban) fires and wildland fires. The plan says it will locate four fire stations in the development, which would create a ADD-G.69-3

response time of no more than five minutes to any place on the site. That is fine as far as responding to individual fires starting within town goes, but it hardly addresses the scenario of a wildfire that comes into Centennial from the outside, or that is started by people from within the development (or commuting to and from home, or recreating in surrounding areas) and spreads to adjacent wildland vegetation.

ADD-G.69-3 (cont'd)

Dealing with conflagrations involves many agencies which must be reimbursed. Fires in California this year got help from as far away as Australia and New Zealand. If the state requires classification of land by fire risk, as noted above, under what circumstances can you justify moving tens of thousands of people (and their life's savings) into harm's way and assuming that other agencies will come to the rescue when state or county resources are already scarce or unavailable during wildfire season (Reilly 2015)?

ADD-G.69-4

The Centennial plan says the developers will mitigate with vegetation clearance and building standards. Management practices give a false sense of safety and lead to more development in places that are at high risk for fire (Butsic, Kelly and Moritz 2015). The reliance on vegetation management to create defensible space is wishful thinking. Fire researchers are unconvinced that such "Firewise" landscapes are enough to defend communities from the generation of wildfires that the state is experiencing. Fire breaks help but embers caused 2/3 of the destruction of homes by the Witch and Guejito fires in San Diego's Trails neighborhood in 2007 (Maranghides and Mell 2011). An unknown number of homes were burned by neighboring ignitions in these suburbs Gonzalez-Mathiesen and March 2018). The Centennial plan promises to remove untold acres of native vegetation to improve the chances of the community to survive a wildfire, without solid research to back this assumption up. In the process, such clearing will destroy habitat for native species. County planning cannot ignore biodiversity, agriculture, and conservation all in the name of hazard mitigation (Mann et al. 2014)—especially when the evidence for success is missing.

Firefighting units are increasingly skeptical about putting their personnel at risk during WUI wildfires to defend property when they perceive that the owners have not done enough to create defensible space or have done so incorrectly (McNeal 2011). WUI communities are notorious for inconsistent compliance with the arduous and expensive process of keeping properties cleared.

Prevention through landscape engineering will not work. The defensible space solution touted by this project shows that it is out of touch with the reality of wildfire in California and with countless studies that propose different solutions. The emerging consensus is to think of wildfire areas much like we see floodplains as "no go" zones.

ADD-G.69-5

I know your general plan supports this new town vision for the Antelope Valley, but everything we know about wildfire has changed since its writing. Fires keep breaking records in size, deaths, and numbers of structures destroyed, and the consensus is that we should steer growth away from the WUI. Millions of Californians already live in rural acreage that will subdivide and densify, but this process has been more gradual and the resulting footprint is known to be (relatively) more resilient to fire than WUI suburbs. The opposite can be expected from suburban growth in fire-prone areas. These develop quickly, they are the most vulnerable to fire, and their growth drives the catastrophic human toll of fire today.

ADD-G.69-6

Sincerely,

Response to Comment Letter ADD-G.69
Jacquelyn Chase
August 22, 2018

Response to Comment ADD-G.69-1:

The Commenter's opposition to the Project, and information on fire behavior and firefighting, were provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The EIR thoroughly and appropriately analyzes the Project's fire-related impacts, including with regard to the wildland-urban interface. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. Additionally, as required by MMs 16-1 through 16-3, the Project will provide within the Project site up to four new fire stations staffed by a minimum four-person engine company. In Village 1, one fire station is proposed east of the National Cement Plant Road. The second fire station is proposed in Village 4, and the third fire station is proposed in Village 7, with the location of a potential fourth station to be determined. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department's (LACFD's) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Applicant would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project.

With regard to the changing nature of wildfires, the County notes that years of experience by expert fire agencies and others have led to the state statutory strategy followed for the Project and described further in response to Comment ADD-G.69-5. Further, as the Project is built out over 20 years, it is likely that the Fire Codes, standards, and guidelines would be continually updated by the State and County agencies as the knowledge gained from past fires is increased; these updated code requirements, as finalized through discussions with the LACFD, would be applied to subsequent development phases of the Project to ensure that Project development continues to meet evolving standards to ensure impacts are less than significant. (Draft EIR, page 5.3-37) Compliance with State and County regulations that apply to the proposed Project is required. With adherence to the required and best-accepted practices for fuel-modification zone management, emergency access, building materials and methods, as well as the changes in land use, and existing mutual aid agreements, the Project's potential to constitute a dangerous fire hazard, or to expose people or structures to a significant risk of loss, injury or death involving fires, would be reduced to a less than significant level. For further discussion, please see Draft EIR Sections 5.3 Hazards and Fire

Safety and 5.16 Fire and Law Enforcement, responses to Comments ADD-G.69-2 through ADD-G.69-6 and ADD-G.70-1, and Final EIR response to Comment A.2-6.

Response to Comment ADD-G.69-2:

As noted by the Commenter and disclosed in the Draft EIR and Final EIR Exhibit 5.3-2, the western and southeastern edges and eastern portions of the Project site are designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a Very High Fire Hazard Severity Zone (VHFHSZ), the western and central portions are designated as a High Fire Hazard Security Zone (HFHSZ), and the eastern edge is designated as a Moderate Fire Hazard Severity Zone (MFHSZ), and the potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes. (Draft EIR, pages 5.3-35, -36) The EIR acknowledges that existing Project site vegetation is highly combustible, and that the Project site's topography is challenging, both adding to the Project site's designations. (*Id*.) As the Commenter also notes, the EIR explains that a recorded total of 31 wildfires over 100 acres in size within approximately 5 miles of the Project site have occurred from 1964 through 2015, and fire history is a factor in the Project site's current designations. (Draft EIR, pages 5.3-33, -34) The Commenter's comparison of the Project site to other development is noted, but the County notes that Project-specific conditions have been thoroughly evaluated, and appropriate feasible mitigation identified to ensure that Project-specific impacts are mitigated to a less than significant level. With regard to the comment that the Project is designed for only medium and low density, the Commenter mischaracterizes the Project. The Project includes a balance of residential use types, including Very Low Density Residential, Low Density Residential, Medium Density Residential, High Density Residential, and Very High Density Residential. (Draft EIR, pages 4-17 to 4-23)

With regard to the ignition potential of Project building materials, the County notes that a major purpose of designating fire hazard severity zones is to identify the appropriate requirements for building materials. The Project would comply with State law and with all County requirements related to development in a designated VHFHSZ or HFHSV. As discussed in the EIR, due to the Project site's designations, it must comply with the County of Los Angeles' standards in "Materials and Construction Methods for Exterior Wildfire Exposure" of the Building Code (Title 26) and in the Fire Code (Title 32), which include but are not limited to the following requirements:

- All roof coverings shall be of fire retardant Class A materials. Wood-shingle and wood-shake roofs are prohibited in Very High Fire Hazard Severity Zones (VHFHSZs) regardless of classification (Section 704A.1.2).
- Where the roof profile allows a space between the roof covering and roof decking, the spaces shall be constructed to prevent the intrusion of flames and embers; shall be firestopped with approved materials; or shall have one layer of No. 72 American Society of Testing and Materials (ASTM) cap sheet installed over the combustible decking (Section 704A.1.2).

- Ventilation openings shall be constructed on the underside of eaves and cornices. The Building Official may accept or approve special eave and cornice vents that resist the intrusion of flame and burning embers (Section 706A.3 et. seq.).
- Exterior windows, window walls, glazed doors, and glazed openings in exterior doors shall be multi-pane glazing units with a minimum of one tempered pane, or glass block units, or have a fire-resistance rating of not less than 20 minutes, when tested according to ASTM E 2010, or they shall conform to the performance requirements of the Office of the State Fire Marshall (SFM) 12-7A-2 (Section 704A.3.2.2).
- Spark arresters constructed with heavy wire mesh or other noncombustible material with openings not to exceed ½ inch shall be provided in chimneys of any fireplace, barbecue, incinerator, or any heating appliance in which solid or liquid fuel is used (Section 326.12.2).
- Clearance of brush and vegetative growth shall be maintained (Section 325.2). (Draft EIR, pages 5.3-32, -33)

Further, it as the Project is built out over 20 years, the Fire Codes, standards, and guidelines would likely be continually updated by the State and County agencies as the knowledge gained from past fires is increased; these updated code requirements, as finalized through discussions with the LACFD, would be applied to subsequent development phases of the Project to ensure that Project development continues to meet evolving standards to ensure impacts are less than significant. (Draft EIR, page 5.3-37)

With regard to the assertion that the Project constitutes "leapfrog" development, the County disagrees, as is discussed thoroughly in Final EIR, response to Comment F.8-20.

Response to Comment ADD-G.69-3:

The Commenter's assertion that the EIR addresses fire service requirements for on-site structure fires but does not adequately address wildland fire and regional fire potential was considered by the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. However, the County disagrees.

First, the County notes that with regard to a potential off-site fire traveling to the Project site, where the Project does not exacerbate such impact, CEQA does not require an analysis of the environment on the project but rather, per CEQA Section 21065, whether a project "may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." According to the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) (62 Cal.4th 369), "CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents." (CBIA v. BAAQMD at 369, 378) However, the EIR fully analyzes the Project's impacts related to fire safety, as explained further in responses to Comment ADD-G.69-6 and ADD-G.70-1, and Final EIR response to Comment A.2-6.

The Project's fire services proposal was developed in consultation with the Los Angeles County Fire Department Project (LACFD), and it has been appropriately evaluated with regard to the ability of the LACFD to provide service to the Project in the event of any type of reasonably foreseeable fire based on Project development and fire hazard designation of the Project site. In addition to the four proposed fire stations to be constructed as part of the Project, additional fire protection services would be provided by the closest available LACFD response units listed in Draft EIR Table 5.16-1. (Draft EIR, page 5.16-7) Further, in the event of a significant fire event such as a wildfire, if within the jurisdiction of the LACFD, the Project would be served by the resources of the LACFD as a whole instead of just the station nearest to the site. (Id.) In the case of a more significant incident requiring additional fire protection resources, as discussed on Draft EIR page 5.16-8, the LACFD participates in a statewide mutual aid system that allows unaffected fire agencies to voluntarily provide aid to other agencies, local governments, operational areas, and the State. The State of California also participates in a nationwide mutual aid system (County of Los Angeles 2012). In addition, the LACFD has automatic mutual aid agreements with the Kern County Fire Department, the Ventura County Fire Department, and the United States Forest Service (USFS), which would allow for these other fire agencies to respond to fire incidents at the site and for the LACFD to respond to fire incidents in Kern County, Ventura County, and the Angeles National Forest (LACFD 2015b).

Response to Comment ADD-G.69-4:

Contrary to the Commenter's assumption, the EIR does not assume that unidentified agencies will "come to the rescue." Rather, it discusses the appropriate measures that LACFD has taken to ensure that it has the ability to deal with reasonably foreseeable fire events through a combination of LACFD services, regional mutual aid, statewide mutual aid, and the state through its participation in national mutual aid, as discussed more thoroughly in response to Comment ADD-G.69-3. With regard to the "classification of land by fire risk," as more thoroughly discussed in response to Comment ADD-G.70-1, designation of fire hazard severity zones is not intended to prevent all development, but rather to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk.[3408] The comment provides no evidence to support an assertion that the EIR is inadequate, and no further response is required.

Response to Comment ADD-G.69-5:

The Commenter simplifies the Project's approach to fire safety analysis, asserting that the Project relies only on "vegetation clearance and building standards." While the Draft EIR has determined that, with implementation of MM 3-9 (requiring a Fuel Modification Plan), Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance, the Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover,

[3408] CALFIRE, Wildland Hazard and Building Codes Frequently Asked Questions: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_faqs

(v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. For further discussion of the EIR's thorough analysis of fire safety risk, please see Draft EIR, Sections 5.3, Hazards and Fire Safety, and 5.16, Fire and Law Enforcement, Final EIR response to Comment A.2-6, and responses to Comments ADD-G.69-1 through ADD-G.69-4 and ADD-G.70-1.

With regard to the Commenter's assertion that "reliance on vegetation management to create defensible space is wishful thinking," which the County reasonably interprets as an assertion that fuel modification is ineffective, the County disagrees. Years of experience by expert fire agencies and others have led to a state statutory strategy for reducing the chance of building loss and damage through a two-pronged approach: 1) defensible space – reduce flammable material around homes to keep direct flames and heat away from the side of the building; 2) exterior wildfire exposure protection – construct buildings so that they have less chance of catching fire from burning embers.[3409] As noted by CALFIRE, the benefits of fuel treatment include preventing loss of lives, reducing fire suppression costs, reducing private property losses and protecting natural resources from devastating wildfire.[3410] Further, as the Project is built out over 20 years, it is likely that the Fire Codes, standards, and guidelines would be continually updated by the State and County agencies as the knowledge gained from past fires is increased; these updated code requirements, as finalized through discussions with the LACFD, would be applied to subsequent development phases of the Project to ensure that Project development continues to meet evolving standards to ensure impacts are less than significant. (Draft EIR, page 5.3-37) Compliance with State and County regulations that apply to the proposed Project is required. With adherence to the required and best-accepted practices for fuel-modification zone management, emergency access, building materials and methods, as well as the changes in land use, and existing mutual aid agreements, the Project's potential to constitute a dangerous fire hazard, or to expose people or structures to a significant risk of loss, injury or death involving fires, would be reduced to a less than significant level.

Response to Comment ADD-G.69-6:

The Commenter notes that the Project site is not urban and therefore has different fire-related impacts. The EIR acknowledges this and evaluates fire risks specific to the Project site and its urban/wildland interface, and specific to its fire hazard designations, as discussed more thoroughly in responses to Comments ADD-G.69-1 through ADD-G.69-5 above, and response to Comment ADD-G.70-1. The Commenter's preference for development in more developed areas is noted, was considered by the Regional Planning Commission, and will be provided to the Board of Supervisors. The County notes that the EIR thoroughly analyzes the Project's fire impacts and identifies feasible mitigation requirements to ensure less than

[3409] CALFIRE, Wildland Hazard and Building Codes Frequently Asked Questions: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_faqs.
[3410] CALFIRE, Fuels Treatment: http://www.calfire.ca.gov/resource_mgt/resource_mgt_EPRP_FuelsTreatment.

significant impacts. As more thoroughly discussed in response to Comment ADD-G.70-1, designation of fire hazard severity zones is not intended to prevent all development, but rather to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk.[3411] Further as the Project is built out over 20 years, the Fire Codes, standards, and guidelines would likely be continually updated by the State and County agencies as the knowledge gained from past fires is increased; these updated code requirements, as finalized through discussions with the LACFD, would be applied to subsequent development phases of the Project to ensure that Project development continues to meet evolving standards to ensure impacts are less than significant. (Draft EIR, page 5.3-37)

[3411] CALFIRE, Wildland Hazard and Building Codes Frequently Asked Questions: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_faqs.

University of Colorado Denver

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August 24, 2018

Via Electronic Mail
Los Angeles County Regional Planning Commission
c/o Ms. Rosie O. Ruiz
320 West Temple Street, 13th Floor, Room 1350
Los Angeles, California 90012
rruiz@planning.lacounty.gov

Re: Centennial Project Final Environmental Impact Report

Dear Commissioners,

As I write, there are almost 20 wildfires actively burning in California. Almost one million acres of land have burned in 2018. This is the second year in a row we are seeing historic levels of wildfires in California. What is perhaps most frightening is that burned area in 2018 is double that of 2017, and peak wildfire season is still approaching. This trend in increased fire activity extends back many decades. With rising temperatures, prolonged droughts, and urban developments in fire-prone areas fueling these fires, it is time that planners rethink how and where we build our homes.

As a professor researching fire disasters in sub-urban contexts, I am deeply concerned about the proposed Centennial project slated to put >19,000 homes in high and very high fire hazard areas. If we want to keep Californians safe, we can no longer ignore warning signs of immense fire risk. Building developments in fire prone areas will only lead to disaster. In fact, it is *the* most important cause of fire disasters. They will cause more human-induced conflagrations from things like arson, vehicles, improperly disposed cigarettes, or sparks from electrical power lines. They will also provide additional fuel from petroleum-based products in homes, such as wood interiors, paint, furniture, etc., which will facilitate the spread of larger and higher intensity fires where people are living.

I have experienced the chaos and destruction that wildfires at the urban interface cause first-hand. When I was a teenager living in Oakland, California, I was evacuated from my home during the 1991 Oakland Hills Tunnel Fire. More than 3,000 residential structures were destroyed, and 25 people were killed by that fire. Since then

ADD-G.70-1

I have dedicated my career to studying the interplay between urban development and environmental change, specifically focusing on the drivers and impacts of wildfires in the American West. These efforts recently culminated with the publication of a book titled *Flame and Fortune in the American West* (University of California Press).

To be sure, fires are ecologically important for California ecosystems, and historically they have been a natural occurrence throughout much of California's landscape. Areas would burn every 20 to 100 years, which would serve to clear out dead vegetation, provide important nutrients to the soil, and trigger reproduction in various plants. From the 1970s to the 1990s, California had an average of about 7,000 wildfires per decade, and each decade saw about 1.2 to 1.5 million acres burned. Although this may seem like a lot of damage, these fires were smaller, less deadly, less damaging, and more manageable than the more recent wildfires.

But today, we are now seeing larger, more frequent, and higher intensity wildfires. Fifteen of California's 20 largest fires in history have occurred after the year 2000, and much more land has been burned compared to previous decades. In the 2000s about 2 million acres burned in wildfires, and since 2010 over 2.3 million acres have burned.

These wildfires have severe health, social, and economic impacts because they occur in close proximity to human settlements. They cause deaths and injuries to residents and firefighters as well as trauma to the tens of thousands of people that have to evacuate their homes, lose their homes, and struggle to rebuild.

The costs of these wildfires have skyrocketed. Unfortunately, these costs are shouldered by California residents as well as state and federal taxpayers in the form of fire insurance premiums; management and upkeep of Cal Fire, California's Department of Forestry and Fire Protection; and federal government subsidies and hazard mitigation grants for homes in high risk areas.

Total cost of fire suppression (*e.g.*, personnel, equipment) and property damage (*e.g.*, burned down structures) in Cal Fire's State Responsibility Area was about $600 million in the 1980s, while the cost from 2010 to 2017 is already $6.6 billion (see Figure 1). The data presented do not include official damage costs from 2017 from Cal Fire; however, there was an estimated $12 billion in insurance claims that year. That would mean $18.6 billion in wildfire costs between 2010 and 2017, a 30-fold increase from the 1980s, with another severe fire season expected in 2018. California cannot sustain these patterns.

ADD-G.70-1 (cont'd)

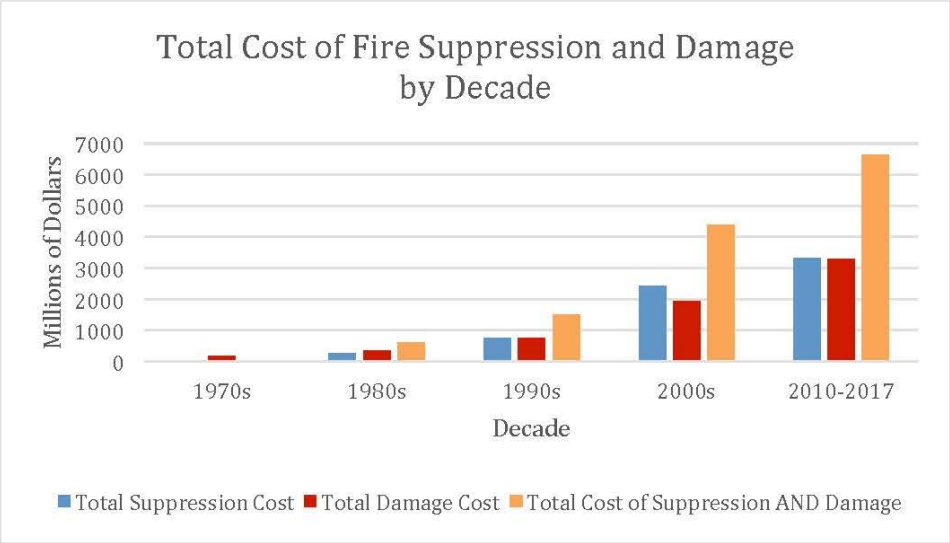

Figure 1. Total Cost of Fire Suppression and Damage by Decade in State Responsibility Areas. Data do not include 2017 damage costs. Data source: Cal Fire.

The proposed Centennial development would only exacerbate these already startling statistics. California's fire regime is being disrupted, and urban settlements extending into areas that are historically prone to wildfires are to blame. If California continues to grow its cities outwards, its residents will inevitably suffer from increasingly deadly and damaging wildfires.

The lessons here are loud and clear. We need to reform our growth strategies by discouraging developments in high fire risk areas and pushing cities to allow for greater densities. Urban planning and design should focus on infill developments in urban core areas, where people have access to jobs, public transit, and community. We can no longer dismiss California's natural fire regime, the impacts of climate change, or the direct relationship between urban sprawl and costly and dangerous wildfires. Please say "NO" to Centennial.

ADD-G.70-1 (cont'd)

Thank you for your time.

Sincerely,

Gregory Simon

Gregory Simon, Ph.D
Associate Professor, Department of Geography and Environmental Sciences, University of Colorado Denver
Research Affiliate (previously), Institute of the Environment and Sustainability, University of California Los Angeles and Center for Spatial and Textual Analysis, Stanford University

Response to Comment Letter ADD-G.70
Gregory Simon, Ph.D.
August 24, 2018

Response to Comment ADD-G.70-1:

Thank you for your participation in this public process. This comment was provided to the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The information the Commenter presents about wildfire statistics, and the Commenter's opinion that the Project site should not be developed due to fire risk is noted for the record. However, the County notes that the EIR appropriately evaluates the Project's fire safety impacts under two thresholds of significance in Section 5.3, Hazards and Fire Safety. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9.

As disclosed in the Draft EIR and Final EIR Exhibit 5.3-2, the western and southeastern edges and eastern portions of the Project site are designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a VHFHSZ, the western and central portions are designated as a High Fire Hazard Security Zone (HFHSZ), and the eastern edge is designated as a Moderate Fire Hazard Severity Zone (MFHSZ), and the potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes. (Draft EIR, pages 5.3-35, -36) CAL FIRE classifies a zone as having a moderate, high, or very high fire hazard based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. These zones are not intended to prevent all development in high or very high fire hazard severity zones, but rather to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements

that reduce risk.[3412] If development was prevented in high or very high fire hazard severity zones, the vast majority of Los Angeles County would be subject to development prohibitions, because the vast majority of Los Angeles County has been designated a VHFHSZ, with very small portions each designated HFHSZ or MFHSZ. (Los Angeles County General Plan, Figure 12.5) Rather, the zones are used to designate areas where California's wildland urban interface building codes apply to new buildings, they can be a factor is real estate disclosure, and local governments consider fire hazard severity in the safety elements of their general plans.[3413] The County Fire Chief periodically reviews Fire Hazard Severity Zone areas and makes recommendations to the Board of Supervisors to revise the limits of these areas based on changes in any of the evaluation criteria. (Draft EIR, page 5.3-33)

With regard to the Project and its current designations, as explained in the Draft EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. (Draft EIR, page 5.3-33) The four above-identified characteristics of the Project site that contribute to its designation would be addressed as the Project site is developed, as follows and as discussed in Draft EIR pages 5.3-35 to -36:

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

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

[3412] CALFIRE, Wildland Hazard and Building Codes Frequently Asked Questions: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_faqs
[3413] Id.

meet all County requirements in support of fire-suppression activities so that less than significant water-related fire hazards would occur.

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

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

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

Under Project conditions, the Angeles National Forest would also have far greater access to fire protection and emergency services in the vicinity of Project site than currently exists. Such access will contribute to LACFD's performance of its obligations under the *Cooperative Fire Protection Agreement Between The County Of Los Angeles Fire Department And The U.S. Forest Service Angeles National Forest* (Mutual Aid Agreement), approved by the Los Angeles County Board of Supervisors on December 20, 2016. The purpose of the Mutual Aid Agreement is to provide for cooperation between LACFD and U.S. Forest Service Angeles National Forest (ANF) in the prevention, detection, and suppression of wildland fires, fuels treatment and prescribed fires with both agencies' respective fire protection areas. The Mutual Aid Agreement also describes the conditions in which "mutual aid" periods are established to provide resources to each on a non-reimbursable basis, as well as the conditions of "Assistance by Hire" on a reimbursable basis. The Project's fire service improvements described above will significantly enhance the LACFD's ability to perform its obligations under the Mutual Aid Agreement to the benefit of the ANF in the vicinity of the Project site.

The County of Los Angeles' standards for fire safety would also be applied to the Project to ensure appropriate building design and materials, as specified in Chapter 7A of the County Building Code (Title 26) and in the Fire Code (Title 32), in compliance with California's wildlands building codes (Chapter 7A) and as discussed more fully at Draft EIR pages 5.3-33 and -34. The Project's proposed Specific Plan further ensures appropriate building placement and design by requiring LACFD review of all Project tentative tract maps and amendments. (Final EIR, Appendix 4.0-A.Rev, pages 4-12, -14) Moreover, to further protect against fire, the Specific Plan's General Development Standards expressly prohibits the use of wood-burning fireplaces on the Project site. (Id., page 2-70) Finally, public access would be restricted in areas of the Project site that are undeveloped and contain steep slopes in accordance with the Specific Plan's Trail Plan and Open Space Management Plan. (Id., pages 3-88, -94) Despite limited access to the general population, those areas of the site with the greatest topographic relief would be accessible to fire-fighting equipment via helicopter, other air transport access, and existing unpaved fire roads. As required by the LACFD, upon their Project-level review (e.g., tract map review), clearance for fire access roads and gates would be incorporated into developed areas. Finally, Project implementation of the Fuel Modification Plan required by MM 3-9 would further reduce fire hazards at the wildland/urban interface. For further information regarding requirements of the Fuel Modification Plan, please see Draft EIR, pages 5.3-31, -32, and Final EIR, responses to Comments A.2-6 and F.8-63.

Compliance with State and County regulations that apply to the proposed Project is required. With adherence to the required and best-accepted practices for fuel-modification zone management, emergency access, building materials and methods, as well as the changes in land use, and existing mutual aid agreements, the Project's potential to constitute a potentially dangerous fire hazard, or to expose people or structures to a significant risk of loss, injury or death involving fires, would be reduced to a less than significant level. The Commenter provides to evidence to support an assertion that EIR analysis is insufficient, and

no further response is required. For additional responses to fire safety risk comments, please see responses to Comments ADD-G.69-1 through ADD-G.69-6.

With regard to the Commenter's preference for infill development, such preference is noted, has been considered by the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. The County notes that the EIR recognizes that while the Project site is not infill, it has been situated and designed to promote "smart growth" planning principles established by SCAG's 2016 RTP/SCS and the County's AVAP for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas emissions and promotes public health, and the Project does not constitute sprawl. Please see Final EIR responses to Comments F.8-20, F.8-191, and F.8-204 for further discussion.

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From: ExecutiveOffice
To: PublicHearing
Subject: FW: Oppose the Centennial Specific Plan
Date: Monday, August 27, 2018 11:10:50 AM
Attachments: image001.png

EXECUTIVE OFFICE
BOARD OF SUPERVISORS

The following correspondence is being forwarded to you for your review and handling. Please confirm receipt and update the ExecutiveOffice@bos.lacounty.gov on the status and/or resolution.

We welcome your feedback and questions at the Customer Service Center: (213(974-1411 or reply back to this email.
Katherine Medina
Customer Service Center
Executive Office
Board of Supervisors

From: Ann Dorsey [mailto:aedorsey@hotmail.com]
Sent: Saturday, August 25, 2018 9:13 PM
To: ExecutiveOffice
Subject: Oppose the Centennial Specific Plan

Los Angeles County Board of Supervisors,

I ask that you oppose the Centennial Specific Plan which would create of a new city with 19,323 residences, approximately 55,000 people and 10.2 million square feet of commercial development, in an unpopulated ecologically unique area of northwest Los Angeles County for the following reasons: ADD-G.71-1

--The project would be located on top of the San Andreas Fault and subject to high fire danger. ADD-G.71-2

--It is located far away from other developed areas (40 miles from Lancaster and 60 miles from Los Angeles) which would require long commute times and degrade a large area of wilderness, well beyond the the city's boundaries, to develop the infrastructure (roads, water supply, electricity, etc.) necessary to support the community. ADD-G.71-3

-- It is a site of ecoregional transitions at the junction of the Antelope Valley, Tehachapi Mountains, and the Liebre Mountains where ecological and evolutionary processes of statewide importance take place.

ADD-G.71-4

-- It is home to at risk wildlife and plants including California condors, pronghorn “antelopes”, 10 oak species, and 6 other plants, is the site of some of the finest native perennial grassland and wildflower habitats that remain in California and is a critical biological corridor necessary for preserving biodiversity.

ADD-G.71-5

-- The proposed mitigation ratio of 1.8:1 (conserved to developed ratio) is too low. At a minimum the area should be mitigated at a rate of 3:1 because of the incredible biodiversity of the area. Tejon Ranch is just 0.25 % of California's acreage, but it includes 14% (911 plants) of the state's native flora.

ADD-G.71-6

We need to be thoughtful about where future development takes place. Starting a community in an area where residents would be subject to strong earthquakes and frequent wildfires, that is far away from other developed areas (increasing greenhouse gas emissions and exacerbating the effects of climate change) and would destroy habitat critical to maintaining the biodiversity of the state is not a good place to do so. It is just the opposite. Please do what is best for Californians and the future and oppose this project.

ADD-G.71-7

Sincerely,

Ann Dorsey
Northridge, CA 91325

Response to Comment Letter ADD-G.71
Ann Dorsey
August 24, 2018

Response to Comment ADD-G.71-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.71-2:

The Commenter's statements regarding Project site proximity to the San Andreas Fault and the risk of fire is noted. With regard to the San Andreas Fault, the potential for the San Andreas Fault and other active faults in the region to generate moderate to severe ground shaking is fully disclosed and addressed in the EIR. (Draft EIR, page 5.1-3) A probabilistic seismic hazard analysis was prepared for the Project consistent with State and County building code requirements and is summarized on Draft EIR pages 5.1-11 and 5.1-12. As shown, the Project site has seismic hazard parameters resulting in peak ground accelerations of 72 to 118 percent the force of gravity, depending on the probability of occurrence. When considering the seismic hazard analysis as well as soil conditions on the site and planned structures, the geotechnical engineer for the Project concluded that there are no soil or geologic (which includes seismic) conditions that would preclude development of the proposed Project, provided that additional site-specific geotechnical studies are performed during later phases of Project implementation, such as tract maps. (Draft EIR, Appendix 5.1-A, page 13) Requirements for site-specific geotechnical analyses as part of tract map processing are part of the County Building Code. Although it may seem as though the Project area may experience heightened seismic activity due to proximity to the San Andreas Fault or past fault activity, in reality "…the overall seismic risk at the Project site is the same as Southern California in its entirety". (Draft EIR, page 5.1-15) In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area.

With regard to fire risk, the EIR appropriately evaluates the Project's fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that

Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. This testimony does not specifically address the adequacy of the EIR, and no further response is required. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.71-3:

The Commenter's opposition to the Project because the Project site is removed from other urban areas and Project development would unduly "degrade" a large area of wilderness was considered by the Regional Planning Commission and will be provided to the Board of Supervisors. However, the County disagrees with the Commenter's characterization of the Project. First, the Project site is not appropriately described as "wilderness," because it has been primarily used for livestock grazing for more than 150 years, while approximately 1,000 acres in the eastern portion of the site have been cultivated as 5 separate pivot fields. (Draft EIR, page 3-9) The EIR thoroughly evaluates the Project site with regard to its ecological value and Project-related impacts on biological resources, and mitigates impacts with enforceable, feasible mitigation measures. Please see Draft EIR, Section 5.7, Biological Resources, and Final EIR Appendix 2.0-C.Rev Mitigation Monitoring and Report Program for further information. With regard to this comment's concerns regarding the length of Project trips, as discussed on Draft EIR page 5.10-51, the North County Sub-Area Model project's that 40 percent of the trips made on site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. The model estimates that an average external trip will be 45.9 miles in length, and that the average Project trip is estimated to be 25.5 miles in length. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.71-4:

As noted by the Commenter, the Project region is ecologically important for many reasons. The area encompasses an important linkage between the San Gabriel Mountains and the Tehachapi Mountains, representing the only mountain linkage from the Transverse Ranges or the Pacific Coast Range to the Sierra Nevada Range (PCR et al. 2000). As noted on page 5.7-8 of the Draft EIR, SEA 17 is identified as significant due to position within a region where multiple diverse biomes (a community of plants and animals) and wildlife corridors come together. It contains a unique mosaic of vegetation types that represent a transitional area between the Mojave Desert, the Coast Ranges, and the Tehachapi Mountains. Much of this important land is included in the Project's proposed Mitigation Preserve. The proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas.

While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land is preserved through the Project's mitigation process. For discussion of wildlife movement and habitat connectivity, please see response to Comment ADD-G.71-5. This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.71-5:

The EIR appropriately documents the Project site's potential for wildlife, special-status plant species, and grassland/wildflower habitat to occur, analyzes Project-related impacts, and incorporates mitigation to reduce otherwise significant impacts. With regard to California condor, as discussed on page 5.7-148 of the Draft EIR, the Project is not likely to lead to events that significantly impact the California condor. Furthermore, as described on page 5.7-148, and as further revised in the Final EIR, MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. For further discussion with regard to California condor, please see Draft EIR, Section 5.7, pages 5.7-94, -119, and -120, Final EIR, responses to Comments B.4-20 to B.4-23 and F.8-138 to F.8-143, and Response to Testimony RPC-197.

With regard to pronghorn antelope, a herd of pronghorn resides in the Antelope Valley. The pronghorn is not on the CDFW list of Special Animals, and CDFW in fact occasionally issues permits for hunting of this herd, but the EIR specifically acknowledges that there is an interest in maintaining this herd. Draft EIR, pages 5.7-153; Final EIR, response to Comment B.4-35. The EIR therefore provides an appropriate impact analysis which is consistent with standard practices for sensitive species and the best available scientific information, including on-site observations, in suitable habitat areas. As noted in the Final EIR, the Project's crossing opportunity under SR-138 connecting areas of appropriate habitat would serve the pronghorn. (Final EIR, response to Comment B.4-36) Further, the RWMP requires the Project Applicant to work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures for pronghorn that are also supported by CDFW. (Final EIR, response to Comment B.4-35) For further discussion specific to pronghorn antelope, see Draft EIR, Section 5.7, pages 5.7-50, -54, -127, -128, and -153, and Final EIR responses to Comments B.4-34 to B.4-37 and F.8-165 to F.8-168.

With regard to oaks, the Project considers impacts to all oak trees as part of the oak woodland impact assessment described on pages 5.7-171 and 5.7-172. Significant impacts to oak tree resources would be reduced to less than significant levels with implementation of MMs 7-11, 7-19, and 7-20. As discussed in Draft EIR page 5.7-182, MM 7-11 requires a minimum 2:1 replacement of impacts mixed oak woodland (13.4 acres total), and 10:1 mitigation for impacts to heritage trees. It should also be noted that Project implementation will preserve 3,090 acres of oak woodland within the Mitigation Preserve. Furthermore, the preserved oak woodlands are very similar to the oak woodlands impacted by the Project. For further discussion specific to oaks and oak woodlands, please see Final EIR responses to Comments A.2-7, B.4-50, B.4-51, B.4-80, and F.8-132 through F.8-125.

With regard to the 6 special-status plant species for which the EIR identifies impacts, the Project's priority is preservation. Prior to issuance of grading permits, detected special status plant species populations on the Mitigation Preserve meeting the 2:1 mitigation ratio, shall be quantified and documented for preservation in perpetuity. If the preservation ratio is less than 2:1 for one or more of the six species, enhancement and/or creation to expand preserved population(s) of the species to a quantity representing a minimum 2:1 ratio within the Mitigation Preserve shall be accomplished. Beyond preservation (the priority for plant mitigation goals), the preferred method for achieving the 2:1 replacement ratio of special status plant species is enhancement or expanding of existing populations. Creation of populations is the method that shall be employed if the 2:1 ratio cannot be met through preservation and enhancement. As further discussed in Final EIR, response to Comment F.8-173, the EIR sets forth applicable performance standards and feasible actions for achieving them, including with regard to the Special Status Plant Species Restoration Plan identified in MM 7-1. For further discussion with regard to these special status plant species, please see Draft EIR, Section 5.7, Biological Resources, and Final EIR, responses to Comments F.8-128 to F.8-130, F.8-173.

With regard to grassland, Draft EIR Section 5.7, Biological Resources, discloses the Project's impact to grasslands and determines that direct and indirect impacts would be mitigated to a less than significant level, but cumulative impacts to native grasslands would be a cumulative significant impact. (Draft EIR, pages 5.7-158, -162.) Project implementation would include mitigation at a ratio of at least 2:1 for grasslands, resulting in improved functions and values of grasslands on the Project site, in addition to preservation in perpetuity within the Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Intensive, multi-year grassland studies have revealed that grasslands of equal or greater value occur in vast quantities in the Mitigation Preserve. Please see Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 for further discussion of grasslands. With regard to wildflowers, after thorough and appropriate analysis, the EIR concludes that Project mitigation measures and the preservation of 14,908 acres of grasslands coupled with long-term management through implementation of the Ranch-wide Management Plan will sufficiently offset and fully mitigate for impacts on wildflower fields associated with the Project. See Draft EIR, Section 5.7, Biological Resources, and Final EIR, responses to Comments B.4-17, B.4-43, F.3A-19, F.8-119, F.8-123 to F.8-125, and H.21-1 for further discussion of impacts to and mitigation to address such impacts to wildflower fields.

The EIR appropriately analyzes impacts to habitat connectivity, and the Project design and mitigation would ensure less than significant impacts. In the wildlife movement assessment, connectivity between the Tehachapi Mountains and the San Gabriel Mountains was considered in detail (Draft EIR, pages 5.7-50 to -64, -164 to -170). The thorough assessment concluded that although maintaining baseline connectivity between the two regions is essential, development of the Project would not significantly impact movement between these regions (*Id.,* page 5.7-166). The wildlife movement impact analysis beginning on page Draft EIR page 5.7-164 does conclude that development of the Project site will result in some losses of areas that may be used for foraging and/or breeding for species; pathways to or

from foraging or breeding grounds on the Project site, such as along ridge-lines or canyon bottoms, may become "dead ends" to through dispersal. However, these losses are not expected to significantly impact wildlife movement, and sufficient habitat connectivity would be retained in the region for these species, especially given the substantial amount of similar terrain in the northwestern Antelope Valley area. Further, two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement and the TUMSHCP, although not providing mitigation for Centennial, would act in concert with the Centennial mitigation preserves to help sustain the functionality of the regional landscape linkage for future wildlife populations. Multi-generational gene flow (a series of connected wildlife movement events over time, allowing for genes to pass within and between populations) among wildlife populations in the region is expected to be sustained in the open spaces on and off the site that will remain following Project implementation. These open spaces provide sufficient habitat connectivity to allow for such gene flow. Implementation of MM 7-14, which designates a SR-138 wildlife underpass (along with a 50-foot open space buffer) where the current intersection with National Cement Plant Road exists, will also allow for local wildlife movement to pass through the Project area down to SEA 17. The direct impacts of Project development on wildlife movement, therefore, are considered less than significant after mitigation for local wildlife movement impacts. Nonetheless, the Draft EIR (page 7-17) discloses that the Project when combined with other projects in the region would result in a cumulatively significant impact on wildlife movement. Lastly, the Project design is consistent with the Antelope Valley Area Plan (AVAP) including with regard to open space designations, SEA protection, and preservation of habitat linkages. For further discussion of wildlife movement and habitat connectivity, please see Final EIR, responses to Comments B.2-3, B.4-34 to B.4-37, B.4-56, B.4-57, B.4-75, F.3-23 to F.3-25, F.3A-32 to F.3A-34, F.5-2, F.7-22, F.8-109, F.8-110, and F.8-165 through F.8-169.

This comment does not address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.71-6:

The Commenter's opinion that the Project does not preserve enough land is noted, was considered by the Regional Planning Commission, and will be provided to the Board of Supervisors. The County notes that 1.8:1 is not the Project's "conserved to developed" ratio, and the area preserved compared to the Project's development envelope in fact exceeds the 3:1 ratio requested by the Commenter, and is between approximately 3:1 and 4:1. The Mitigation Preserve associated with the Project encompasses 43,079 acres of land to be preserved and managed in perpetuity for biological resources values. It consists of an On-site Mitigation Preserve, comprised of approximately 3,866 acres within the Project boundaries, but outside of the development footprint, and an Off-site Mitigation Preserve made up of 39,213 acres within adjacent and nearby off-site lands. These mitigation land provide sufficient land and biological resource values to implement mitigation strategies to fully mitigate for Project biological resource impacts, as more fully discussed in Draft EIR, Section 5.7, Biological Resources, and Final EIR, responses to Comment B.4-64 and F.8-18. The Commenter provides no evidence that Project-related mitigation is inadequate, and no further response is required.

The comment regarding the percentage of land within the State and the percentage of native species present relative to the State refer to the entire 270,000-acre Tejon Ranch property. As described in the Project Description of the Draft EIR (Section 4.5.7), approximately 90 percent of Tejon ranch lands are open space dedication and acquisition areas. The Centennial Project site only represents 0.05 percent of Tejon Ranch, and a portion of that is to be preserved as part of Project-related mitigation. Therefore, the Project's disturbance area represents approximately 0.02 percent of Tejon Ranch and represents approximately 0.0007 percent of land within the State. Furthermore, the number of native plant species that have been detected on the Centennial Project site is 315 based on the Plant Compendium in Appendix 5.7-A of the Final EIR. Assuming the Commenter's information regarding the number of native species occurring throughout the State is correct (911=0.14x; equals 6,507 natives in the State), approximately 4.8 percent of the State's flora is represented on the Centennial Project site, which is considerably less than the Commenter's assertion of 14 percent.

Response to Comment ADD-G.71-7:

The Commenter reiterates their opposition and summarizes some of their previous comments. With regard to earthquake and fire safety impacts, please see response to Comment ADD-G.71-2. With regard to biological resources, please see responses to Comments ADD-G.71-3 through G.71-6.

With regard to the Commenter's assertion that the Project would exacerbate the effects of climate change, the County notes that as discussed more fully in Final EIR, response to Comment F.8-20, the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. CARB has determined that implementation of the 2016 RTP/SCS would achieve SCAG's per capita GHG reduction target of 8 percent by 2020 and would achieve an 18 percent per capita GHG reductions by 2035 (exceeding the SCAG 2035 target of 13 percent by five percentage points). Further, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Final EIR, Comment D4-2). As discussed in Final EIR, response to Comment F.8-204, the EIR and Project include an aggressive approach to reducing GHG emissions arising from the Project. The EIR includes 46 measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and 21-1 through 21-20). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in response to Comment F.8-204, and mitigation measures have been revised and added in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See

revised and added mitigation measures as set forth in Final EIR responses to Comments F.2-2, F.2-5, F.3-29, F.3-34, F.8-189, and F.8-204.

However, climate change is a global phenomenon and the significance of greenhouse gas emissions is inherently cumulative in nature. Although many other agencies with the necessary jurisdiction are currently taking action to reduce GHG emissions, the County cannot assure that these measures would ultimately be implemented by such agencies or sufficient to address climate change given its jurisdictional limitations. Therefore, the Draft EIR conservatively determined that the Project's incremental contribution to the global GHG emissions inventory would be considered cumulatively considerable and that this cumulative impact would be significant and unavoidable, even though the Project satisfies several "pathways to compliance" identified by the *California Supreme Court in Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 2004.

Following publication of the Final EIR, the Project's GHG analysis was updated in Attachment G – GHG Reduction Memo, to the July 11, 2018 Regional Planning Commission Public Hearing Staff Report ("GHG Memo"), at County's request. This revised analysis will be included in revision to the Final EIR. The updated GHG calculations in the GHG Memo show that Project-specific GHG emissions will be approximately 35 percent lower than the quantitative estimates included in the Draft EIR, based on GHG legal reduction mandates that were not in effect when the Draft EIR GHG emissions were calculated, more advanced GHG quantification methodologies, including newer versions of GHG emission models, and the quantification of GHG emissions from Project mitigation measures that reduce GHG emissions. The Updated GHG Calculations include: (1) emissions estimates from the most current version (16.3.2) of the California Emissions Estimator Model (CalEEMod); (2) updated information regarding applicable electric vehicle (EV) adoption rates; (3) estimated internal and external trip reductions attributable to the Project's single occupancy vehicle (SOV) mitigation measures; (4) updated estimates of the Project's water and wastewater energy use and emissions; and (5) revised estimates of the Project's solid waste GHG emissions based on applicable landfill diversion mitigation requirements.

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From: Michael Hayes
To: Samuel Dea
Subject: Centennial - Tejon Pass
Date: Tuesday, August 28, 2018 11:51:03 AM

Hello County Planning,

I'm worried that it's too late to submit my concerns as part of the public comment record (if that was even an option) regarding the proposal to develop 12,000 acres in Tejon Pass that I recently became aware of; even so, I can't resist sharing my disapproval of such an obvious misstep as we strive to achieve sustainable growth in a region that struggles with the nations worst air quality, the nations longest traffic delays, and a landscape known for wide freeways and parking lots devoid of an efficient urban form. Not only is the proposal completely unsustainable, it's depressingly irreversible and increasingly unsafe. ADD-G.72-1

Completely Unsustainable: In comparing other communities of equal distance from LA, namely Hesperia, Victorville, Beaumont, Banning, Hemet and Murrieta are within those boundaries, none of which have proven to be good examples by any stretch, in fact they are all great examples of why we shouldn't build any more exurb communities. Woefully long commutes, devoid of character or charm, no inherent appeal which fuels "brain drain" create Hemet is of particular interest as a community started with the same good intentions as Centennial. In the 30's through the 60s it was an idyllic agro-community, now it's charm and value has been decimated by crime and drug addiction, the result of its isolation and simultaneous dependence on distant commerce. ADD-G.72-2

Depressingly Irreversible: The beauty and value of Tejon Pass is in its natural state. Largely untouched and without blemish from stucco box homes, asphalt plains, big box retailers and other elements that have come to define *The United States of Generica*. I think it's important to consider that in the 1920's Southern California and Tuscany, Italy were remarkably similar save for the language and the buildings that dotted the landscape, the same topography, climate and agricultural output. Now the two couldn't be further apart, what was once bucolic and peaceful is now coated almost entirely in tasteless, unsustainable development that has produced world renowned traffic and air quality problems. When will we learn that suburbia is the lowest and worst use for such prized and naturally valuable land? ADD-G.72-3

Increasingly Unsafe: Lastly, as the state starts to accept the higher frequency of destructive wild fires, are these exurb and rural / urban fringe developments really a good long term idea? From Pismo Beach to Palm Springs, that series of mountain ranges has proven to be fire prone. These remote and smaller towns are at higher risk of fire destruction on the urban / rural fringe and without adequate resources to stave the intensity of this new classification of wild fire. ADD-G.72-4

For so many reasons, Centennial at Tejon Pass is the wrong move for the state! California is my home, it's really very sad to see how it's been destroyed by suburbia over a relatively short time period. From the San Fernando Valley to the orchard of Redlands and the groves of Riverside, the rolling hills of San Joaquin (now Irvine...) what made California so wonderful was its natural beauty, how many more acres of California must we sacrifice before we understand the true destruction of ill-thought development? ADD-G.72-5

Thank you for your commitment and effort to support the healthy lives of southern Californians

--

MH

Response to Comment Letter ADD-G.72
Michael Hayes
August 28, 2018

Response to Comment ADD-G.72-1:

Thank you for your participation in this public process. The County assures the Commenter that these comments were provided to the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. The Commenter's opposition to the Project is noted, but the County disagrees with the Commenter's characterization of the Project. For further discussion of the Project's sustainability, consistency with Smart Growth principles, and design to improve public health, please see Final EIR, responses to Comments F.8-20 and F.8-204. This comment does not specifically address the adequacy of the EIR and no further response is required.

Response to Comment ADD-G.72-2:

The Commenter's opposition to the Project's siting and opinion about other communities is noted. However, the County disagrees with the Commenter's characterization of the Project as unsustainable. Please see Final EIR, responses to Comment F.8-20 and F.8-204 for further discussion. The EIR appropriately limits its analysis to features of the proposed Project, and analysis of the mentioned communities is not required. Further, this comment does not specifically address the adequacy of the EIR or provide specific discussion about other communities and their commonality with the Project, and no further response is required.

Response to Comment ADD-G.72-3:

The Commenter's opposition to the Project's siting and opinion about other communities is noted. The County notes that per the Tejon Ranch Conservancy Ranchwide Agreement (Final EIR, Appendix 5.7-E), approximately 90 percent of Tejon Ranch, or approximately 240,000 acres, will be preserved in perpetuity. This comment does not specifically address the adequacy of the EIR, and no further response is required.

Response to Comment ADD-G.72-4:

With regard to fire, the EIR appropriately evaluates the Project's fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into

consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. Specifically, with regard to protection from fire for surrounding open space areas and wildlife residing there, MM 3-9 requires implementation of a Fuel Modification Plan, whose major components will ensure a minimum 20-foot setback from the edge of any structures; an irrigation and transition zone from 20-100 feet away, and native brush thinning zone between 100 and 200 feet away from structures. For further details of fuel modification requirements, please see Draft EIR, Section 5.3, and Final EIR responses to Comments A.2-6, F.8-63, and F.8-64. With regard to wildfire and the urban-wildlands interface, please also see responses to Comments ADD-G.69-1 through ADD-G.69-6 and ADD-G.70-1, in this document.

Response to Comment ADD-G.72-5:

The Commenter's opposition to the Project is noted, was provided to the Regional Planning Commission and will be provided to the Board of Supervisors for consideration. This comment does not address the adequacy of the EIR, and no further response is required.

From: Diana
To: Jodie Sackett; cperry@bos.lacounty.gov; Kathryn@bos.lacounty.gov
Subject: Support Centennial at Tejon Ranch
Date: Tuesday, August 28, 2018 3:04:00 PM

Name : Diana
Last-name: Coronado
Email : dcoronado@bialav.org
Address : 350 S Bixel St
City : California
Zip:90017

Dear Commissioners:

LA County needs a solution to housing affordability! Centennial at Tejon Ranch is what LA County needs now more than ever!

The Natural Resources Defense Council (NRDC), Sierra Club, Audubon California, Endangered Habitats League and the Planning and Conservation League have all agreed to save 90% of the highest value and most biological diverse portions of Tejon Ranch.

Now, Centennial at Tejon Ranch will match the value of this unprecedented conservation and become a national model of an environmentally sustainable community for working-class Angelenos. It will power the entire community with its own clean, renewable energy, including achieving all 2016 CALGreen Tier 1 measures, use state-of-the-art water conservation measures, and with over 95 miles of trails and clustered development, it will allow the future of residences to walk and bike to work, schools, and retail services.

Centennial is a net zero electricity and net zero water community that will provide 19,000 new homes, 1,900 affordable units, 23,000 new jobs, $21.5 million in surplus to the County, all while preserving 240,000 acres of the most pristine natural lands in California.

The County of Los Angeles has already identified Centennial as an Economic Opportunity Area and the new community is consistent with the County's General Plan. Further, it is included in the Sustainable Communities Strategy and Regional Transportation Plan for the Southern California Association of Governments.

The solution to our County's housing affordability crisis is here!

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in the County of Los Angeles.

We need to approve this project, begin development on this much-needed community and allow for our housing crisis to come to an end.

ADD-G.73-1

Thank you.

--
This e-mail was sent from a contact form on We Need Housing (https://secure-web.cisco.com/1pRLMwfn--dU7-N4D44BjjT6mhiZ99PwQhLO_W1a5Y1UGNUFS8MzmSF_VtMx5F-mPjVGktBzMPAv1RDJ29odgqy_RMjgRhQwQED8KuHHuPz5t1E6i6nbuFBXO0qjtj1Bs8L6itivG3wHFSxg63WroMdhgw7gtEX6mz2FrmZjbZ6560nFiqe6GKnvxOG6I0A6-1G6_jy93qLNAL0Y3aSxUSy_JVbn6LohRotVZr-xXhdXYtyu2Kd1a1NKIqM5qXbHP060zi0LbXOT7Xd0ScLJgqATKcD1KptbA_k8MNqBmtkQCV0Te8rtgTyJfEvpj3XnEklUwUzVF79ttybtG8eKbnZj3YwNq71WMcMkyCMcy-GjLo_YrNfppaH-IGqWMI38bSABI7NVVDkrGoz_qzQqgrg/https%3A%2F%2Fweneedhousing.org)

Response to Comment Letter ADD-G.73
Diana Coronado
August 28, 2018

Response to Comment ADD-G.73-1:

Thank you for your participation in this public process. The Commenter's support for the Project is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment does not address the adequacy of the EIR and, therefore, no further response is required.

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Paul Edelman
5065 Catalon Avenue
Woodland Hills, CA
91364

Via Electronic Mail

August 28, 2018

Regional Planning Commission
Los Angeles County
320 W. Temple Street
Los Angeles, California 90012

Centennial Specific Plan Project - We the People Need Much Better
Project No. 02-232-(5)

Dear Planning Commissioners:

Your Commission is under no obligation to up-zone this vast tract of pristine land. Thus, this project is putty in the hands of your Commission to shape. You can get what the rest of the County wants--not what the developer wants. You should get a project that dramatically contracts the footprint while still providing ample new housing. You should get a homeless shelter and one third of the housing should be low income and some ultra low income. If Centennial Founders LLC does not want to build such a superior project that is their choice.

It is also your Commission's choice not to up-zone thousands of acres for a project that defies all that we have learned and been taught about sound land use and science over the past forty years. We all need a project that benefits the whole county not a project that so clearly is designed to maximize profits for a very select few individuals. We, the rest of the County, are counting on you to put your foot down and make this a progressive defining moment in County history not a horrible regressive one.

ADD-G.74-1

Sincerely,

Paul Edelman
Planner - Biologist

Response to Comment Letter ADD-G.74
Paul Edelman
August 28, 2018

Response to Comment ADD-G.74-1:

Thank you for your participation in this public process. These comments were provided to the Regional Planning Commission and will be provided to the Board of Supervisors for consideration, including with regard to the Commenter's suggested Project changes. The Commenter's opposition to the Project is noted. With respect to the Commenter's assertion that the Project is "upzoning," the County notes that the Project has been designed consistent with requirements of the AVAP, which the County approved in 2015 and which concentrates development in Economic Opportunity Areas (EOAs) including the Project site, which is the Western EOA. With regard to fiscal impacts, the Commenter's opinion is noted, but the County notes that as discussed in the Draft EIR, such as in Section 5.16, Fire and Law Enforcement, and Section 5.17, Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities. The Project will provide significant net economic benefits to Los Angeles County, including expected annual revenues of $43,394,902.00, versus $21,827,596.00 of annual costs to the County's General Fund for re-occurring public services, representing an annual net benefit to the General Fund of about $21,567,306.00. The Project will also generate an estimated $22,328,502.00 of property tax revenues. With regard to an alternative that "dramatically contracts the footprint", as explained in the EIR, it does not analyzed such alternatives because substantial reductions would result in in a development proposal that is not consistent with the goals and policies of the AVAP related to development within the West EOR, or supportive of the Project's objectives of balance and providing a wide variety of housing.[3414] This comment does not address the adequacy of the EIR, and no further response is required.

[3414] Draft EIR, pages .8-10, -69.

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From: Steven Jones <sdjones@planning.lacounty.gov>
Sent: Wednesday, September 5, 2018 8:05 AM
To: Jodie Sackett
Subject: FW: Tejon Ranch

FYI

From: DRP LDCC
Sent: Wednesday, September 05, 2018 7:17 AM
To: Steven Jones <sdjones@planning.lacounty.gov>
Subject: FW: Tejon Ranch

From: Elizabeth Davidsohn <davidsohnelizabeth@gmail.com>
Sent: Thursday, August 30, 2018 6:08 PM
To: DRP LDCC <zoningldcc@planning.lacounty.gov>
Subject: Tejon Ranch

I don't agree with this planning of a new community in a Biodiverse wilderness of plants and animals.

It's ridiculous that people want to live 70 miles north of L.A.

Look at numerous times that Palmdale, Lake Los Angeles and Lancaster was deemed as a new community. Everyone drives to LA. For good paying jobs.

In my opinion, this land should stay as it is.

Tell Centennial to waste their money on Antelope Valley and build there for new community and jobs.

ADD-G.75-1

Thank you for not allowing this fiasco,
Elizabeth

Response to Comment Letter ADD-G.75
Elizabeth Davidsohn
August 30, 2018

Response to Comment ADD-G.75-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted, and this comment will be provided to the Board of Supervisors for consideration. First, the County notes that the Project site cannot fairly be described as "wilderness," because it has been primarily used for livestock grazing for more than 150 years, while approximately 1,000 acres in the eastern portion of the site have been cultivated as 5 separate pivot fields. (Draft EIR, page 3-9) The EIR thoroughly evaluates the Project site with regard to its ecological value and potential Project-related impacts on biological resources and mitigates impacts to the greatest extent feasible. Please see Draft EIR, Section 5.7, Biological Resources, and Final EIR Appendix 2.0-C.Rev Mitigation Monitoring and Report Program for further information. With regard to this comment's concerns regarding the distance of the Project site from Los Angeles and other communities, as discussed on Draft EIR page 5.10-51, the North County Sub-Area Model estimates that 40 percent of the trips made on site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. The model estimates that an average external trip will be 45.9 miles in length, and that the average Project trip is estimated to be 25.5 miles in length. With respect to the comparison between the Project and other Antelope Valley communities (such as Lake Los Angeles, Lancaster, and Palmdale), the Project is designed as a complete, mixed-use community with a jobs-to-housing balance and integrated land use and circulation system that places recreational, commercial, and civic/institutional uses within comfortable walking and bicycling distances of residences. These land use and design features help to overall reduce the amount of offsite commuting trips compared with the other communities mentioned. This comment does not address the adequacy of the EIR, and no further response is required.

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From: Steven Jones <sdjones@planning.lacounty.gov>
Sent: Friday, August 31, 2018 9:48 PM
To: Jodie Sackett
Subject: FW: Tejon Ranch

FYI – for the record.

From: DRP LDCC
Sent: Wednesday, August 29, 2018 4:49 PM
To: Steven Jones <sdjones@planning.lacounty.gov>
Subject: FW: Tejon Ranch

From: Ed Salisbury <evs511@verizon.net>
Sent: Tuesday, August 28, 2018 10:39 PM
To: DRP LDCC <zoningldcc@planning.lacounty.gov>
Subject: Tejon Ranch

The proposed Tejon Ranch project is the wrong approach for development in Los Angeles county. For sustainable development, we should emphasize projects that complement our mass transit system (Tejon Ranch does not). We should also emphasize housing policies that encourage density, and reduce the need for automobile use (Tejon Ranch does not).

Tejon Ranch is the last gasp of the suburban sprawl approach, and it shares all the negative features associated with sprawl. It should not be approved.

ADD-G.76-1

Ed Salisbury
Santa Monica, CA

Response to Comment Letter ADD-G.76
Ed Salisbury
August 28, 2018

Response to Comment ADD-G.76-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project is noted and this comment will be provided to the Board of Supervisors for consideration. With regard to the Commenter's assertion that the Project constitutes sprawl, please see Final EIR, response to Comment F.8-20. With regard to sustainability and Project design, the County disagrees with the Commenter's characterization and notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. This includes design features and mitigation requirements to address transit options and reduce single-occupancy vehicle use. CARB has determined that implementation of the 2016 RTP/SCS would achieve SCAG's per capita GHG reduction target of 8 percent by 2020 and would achieve an 18 percent per capita GHG reductions by 2035 (exceeding the SCAG 2035 target of 13 percent by five percentage points). Further, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Final EIR, Comment D4-2). This comment does not specifically address the adequacy of the EIR, and no further response is required.

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Dear Commissioners:

LA County needs a solution to housing affordability! Centennial at Tejon Ranch is what LA County needs now more than ever!

The Natural Resources Defense Council (NRDC), Sierra Club, Audubon California, Endangered Habitats League and the Planning and Conservation League have all agreed to save 90% of the highest value and most biological diverse portions of Tejon Ranch.

Now, Centennial at Tejon Ranch will match the value of this unprecedented conservation and become a national model of an environmentally sustainable community for working-class Angelenos. It will power the entire community with its own clean, renewable energy, including achieving all 2016 CALGreen Tier 1 measures, use state-of-the-art water conservation measures, and with over 95 miles of trails and clustered development, it will allow the future of residences to walk and bike to work, schools, and retail services.

Centennial is a net zero electricity and net zero water community that will provide 19,000 new homes, 1,900 affordable units, 23,000 new jobs, $21.5 million in surplus to the County, all while preserving 240,000 acres of the most pristine natural lands in California. ADD-G.77-1

The County of Los Angeles has already identified Centennial as an Economic Opportunity Area and the new community is consistent with the County's General Plan. Further, it is included in the Sustainable Communities Strategy and Regional Transportation Plan for the Southern California Association of Governments.

The solution to our County's housing affordability crisis is here!

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in the County of Los Angeles.

We need to approve this project, begin development on this much-needed community and allow for our housing crisis to come to an end.

Thank you.

Response to Comment Letter ADD-G.77
Form Letter 14
Various Dates

Response to Comment ADD-G.77-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-14 to this document. The Commenters' support for the Project is noted, was provided to the Regional Planning Commission, and will be provided to the Board of Supervisors for consideration. This form letter does not specifically address the adequacy of the EIR and no further response is required.

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From: twschmahl@everyactioncustom.com on behalf of Matthew Schmahl <twschmahl@everyactioncustom.com>
Sent: Wednesday, October 24, 2018 1:08 PM
To: Jodie Sackett
Subject: Say No to the Centennial Boondoggle

Follow Up Flag: Follow up
Flag Status: Completed

Dear Jodie Sackett,

As a former and soon-to-be-again resident of Los Angeles county, Centennial is a terrible deal for the county. Centennial would be located in a "high" and "very high" fire hazard area subject to intense winds. Locating thousands of people in this fire-prone area will certainly lead to more human-caused wildfires, scorched homes and loss of life.

Wildlife in general and migratory birds in particular are currently being squeezed by federal policies in ways that they have not been in a century. Between climate change and non-enforcement of federal regulations, wildlife populations need all the safe havens we can provide them. The last thing we should be doing is developing wild, virgin land. It should remain just that: wild.

Centennial will not help address the county's housing shortage. Building a new city 65 miles from downtown LA will isolate potential residents from economic, educational and cultural opportunities. Instead, Centennial would require the construction of a new freeway at an initial cost of $830 million, which would divert scarce funds away from transit projects that make our existing communities more livable and sustainable.

ADD-G.78-1

Centennial would add tens of thousands of new cars each day onto Highway 5, leading to further gridlock in Santa Clarita and the San Fernando Valley. Thousands of long-distance car trips will lead to more cancer- and asthma-causing air pollution, worsening the county's public health.

Your decision on Centennial is perhaps the most far-reaching decision you will ever make as a supervisor. Please, don't approve Centennial. It would reward Wall Street speculators while leaving county residents stuck with the bill for more freeways, more wildfires, more traffic, and more air pollution.

Sincerely,
Matthew Schmahl
6436 New Gate Way Yorba Linda, CA 92886-6833 twschmahl@gmail.com

Response to Comment Letter ADD-G.78
Matthew Schmahl
October 24, 2018

Response to Comment ADD-G.78-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project will be provided to the Board of Supervisors for consideration. This comment does not specifically address adequacy of the EIR, and no further response is required. However, the City notes that the EIR appropriately addresses all topics raised by the Commenter in compliance with CEQA requirements.

With regard to fire, the EIR thoroughly analyzes Project-related impacts and reduces impacts to a less than significant level with implementation of MM 3-9, including with regard to its location in Very High, High, and Medium Fire Hazard Severity Zones. The EIR appropriately evaluates the Project's fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.

The Commenter's preference for preservation of the entire Project site is noted and will be provided to the Board of Supervisors. However, the County notes that the Project site cannot properly be considered "wild" because it has been primarily used for livestock grazing for more than 150 years, while approximately 1,000 acres in the eastern portion of the site have been cultivated as 5 separate pivot fields. (Draft EIR, page 3-9) Further, the EIR thoroughly evaluates the Project site with regard to its ecological value and Project-related impacts on biological resources, and mitigates impacts with enforceable, feasible mitigation measures. Please see Draft EIR, Section 5.7, Biological Resources, and the Mitigation Monitoring and Reporting Program, for further information.

The Commenter's opinion regarding housing is noted, but the County disagrees. The Project is designed with a balanced land use plan, as discussed in depth in Final EIR, response to

Comment F.8-20, which provides significant benefits including providing a beneficial jobs/housing balance, and helping to meet the County's overall housing need.

With regard to traffic, the EIR discloses that 146,154 daily trips would result from Project build-out; 48 percent internal and 52 percent external, and external trips would include trips on I-5. (Draft EIR, page 5.10-50) However, these trip estimates are conservative, as they do not take into account the trip reduction measures implemented by the Project would will encourage trips by walking, biking, and transit. With regard to air quality impacts of increased traffic, the EIR appropriately takes these impacts account into its air quality analysis, as is more thoroughly discussed in Draft EIR, Section 5.11, Air Resources, and Final EIR, responses to Comments F.3-33, F.8-189, F.8-197, and F.8-200. The Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20. Indeed, the South Coast Air Quality Management District (SCAQMD) has reviewed the Centennial EIR and determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Final EIR, Comment D.4-2).

With regard to the Project's fiscal impacts, the County disagrees with the Commenter's characterization of the Project. As discussed in the Draft EIR, such as in Section 5.16, Fire and Law Enforcement, and Section 5.17, Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities.

From: Kathy Davis <kdavis61@verizon.net>
Sent: Sunday, October 14, 2018 6:48 PM
To: DRP LDCC <zoningldcc@planning.lacounty.gov>
Subject: Centennial Specific Plan

I am writing to oppose the Centennial Specific Plan for the following reasons:

- It would add huge amounts of traffic to our already clogged highways
- The location is dangerous: it is in a high fire danger zone and is sited on top of the San Andreas Fault.
- It will add to greenhouse gas emissions, air pollution, and strain our limited water supply
- The land is at a very dynamic area of ecoregional transitions in California
- Once we pave over this unique area, we will NEVER get back the finest native perennial grasslands, wildflower habitat, oak lands, and wildlife habitat for our children and grandchildren to enjoy

ADD-G.79-1

Stop this boondoggle.
Sincerely,
Kathy Davis

Response to Comment Letter ADD-G.79
Kathy Davis
October 14, 2018

Response to Comment ADD-G.79-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project will be provided to the Board of Supervisors for consideration. This comment does not specifically address adequacy of the EIR, and no further response is required. However, the City notes that the EIR appropriately addresses all topics raised by the Commenter in compliance with CEQA requirements.

With regard to the addition of traffic to highways, the EIR considered Project impacts with improvements required to accommodate the full buildout of the Project under existing traffic plus Project buildout conditions, and cumulative traffic plus Project buildout conditions. The EIR identifies mitigation measures that would maintain acceptable level of service (LOS) standards at all applicable highway segments, intersections, and ramps, consistent with Alternative 2 of the NW SR-138 FEIR, as discussed more thoroughly in Final EIR, response to Comment F.7-15. Project impacts would be significant and unavoidable, however, if the improvements are not constructed by Caltrans because the County (as the Lead Agency) lacks jurisdiction and control over State highway facilities and cannot mandate the construction of improvements to these facilities. (Draft EIR, page 5.10-130; Final EIR, responses to Comments F.8-17, F.8-29.)

With regard to fire, the EIR thoroughly analyzes Project-related impacts and reduces impacts to a less than significant level with implementation of MM 3-9, including with regard to its location in Very High, High, and Medium Fire Hazard Severity Zones. The EIR appropriately evaluates the Project's fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.

With regard to fault-related impacts, the EIR thoroughly and appropriately analyzes Project-related impacts due to fault location. First, it should be noted that the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State, so the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area. With regard to the Project site specifically, due to the proximity of both the San Andreas Fault and Garlock Fault to the Project site, a fault research company called Earth Consultants International (ECI) conducted a detailed fault investigation on the Project site and evaluated hazards as a result of fault locations in relation to the Project site and planned development areas. See Draft EIR, Appendix 5.1-A. While earthquakes that may occur along the San Andreas Fault Rift Zone are potential generators of significant ground accelerations at the site, foundation systems must be designed to withstand these accelerations, and secondary impacts such as liquefaction may be mitigated by remedial grazing, structural design and foundations or ground improvement techniques; active fault zones can also be mitigated against by implementing setback zones from Alquist-Priolo Earthquake Fault Zones. Accordingly, as shown on Draft EIR Exhibit 5.1-2, the Project has been designed to avoid development in areas near this zone. Draft EIR, Section 5.1, Geotechnical, page 5.1-16. The Project shall incorporate all applicable geotechnical recommendations identified in the geotechnical documents previously prepared for the Project, and implementation of these requirements would ensure impacts would be less than significant. For further discussion regarding seismic impacts and faults, see Final EIR, responses to Comments F.8-206 to F.8-210.

With regard to greenhouse gas emissions, the EIR thoroughly analyzes Project impacts and identifies appropriate mitigation to ensure impacts are reduced to a less than significant level to the greatest extent feasible. As discussed in Final EIR, response to Comment F.8-79, the Project's GHG impacts from these sources were fully disclosed and analyzed in Section 5.21 of the Draft EIR. Moreover, the Draft EIR includes mitigation measures which require compliance with a non-exclusive list of laws and regulations requiring GHG reductions in equipment, activities, facilities and services associated with the project (MM 21-20) The Draft EIR also includes 45 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and 21-1 through 21-19). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in Final EIR, response to Comment F.8-204, and mitigation measures have been revised in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures as set forth in Final EIR, responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3A-46, and F.8-189. However, climate change is a global phenomenon and the significance of greenhouse gas emissions is inherently cumulative in nature. Moreover, the County of Los Angeles has no jurisdictional control or responsibility for GHG reductions in other parts of California (and certainly not in the context of global action), which all contribute to climate change. Although many other agencies with the necessary jurisdiction are currently taking action to reduce GHG emissions, the County cannot assure that these measures would ultimately be implemented by such agencies or

sufficient to address climate change given its jurisdictional limitations. Therefore, the Draft EIR conservatively determined that the Project's incremental contribution to the global GHG emissions inventory would be considered cumulatively considerable and that this cumulative impact would be significant and unavoidable, even though the Project satisfies several "pathways to compliance" identified by the *California Supreme Court in Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 204.

With regard to air quality, the EIR thoroughly analyzes air quality and related health impacts of the Project and identifies appropriate mitigation to ensure impacts are reduced to a less than significant level to the greatest extent feasible. Project related air pollutant emissions were evaluated both in terms of contributions to regional air quality and localized impacts to uses proximate to the Project site. The Draft EIR disclosed that there would be significant and unavoidable air quality impacts related to construction emissions in the jurisdiction of the AVAQMD as well as the SCAQMD; Long-term operational emissions were also found to exceed the AVAQMD and SCAQMD thresholds of significance for regional emissions. (Draft EIR, page 5.11-1) However, it should be noted that the South Coast Air Quality Management District (SCAQMD) has reviewed the Centennial EIR and determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Final EIR, Comment D.4-2).

With regard to water supply, after thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of climate change impacts. Please see Draft EIR, Section 5.18 Water Resources, Response to Testimony RPC-76, and responses to Comments E.1-5, F.3-4 through F.3-9, F.3A-6, F.3A-9, F.8-213, F.8-214, and F.8-220 for further discussion.

With regard to the Commenter's assertion that resources unique to Tejon Ranch will be lost, this is incorrect. The Project region is an important ecological region, and the proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas. While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land are preserved through the Project's mitigation process. With regard to plant preservation and impacts, including grasslands and oaks, please see Response to Testimony RPC-12; Final EIR, responses to Comments F.8-128 to F.8-131 (plants); Final EIR, responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124, F.8-125, F.8-127, F.8-128, and F.8-131 (grasslands and wildflowers); and Final EIR responses to Comments A.2-7, B.4-50, B.4-41, and F.8-132 through F.8-125 (oaks and oak woodlands).

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From: mark90039@everyactioncustom.com on behalf of MARK WALDNER <mark90039@everyactioncustom.com>
Sent: Tuesday, October 23, 2018 9:16 AM
To: Jodie Sackett
Subject: Please Say No to the Centennial Development

Follow Up Flag: Follow up
Flag Status: Completed

Dear Jodie Sackett,

Please help preserve wild space and do not approve this project. There are so many reasons to not move forward with the Centennial development. Please act for the citizens and wildlife of L.A. County. ADD-G.80-1

Sincerely,
MARK WALDNER
3531 Greensward Rd Los Angeles, CA 90039-2110 mark90039@gmail.com

Response to Comment Letter ADD-G.80
Mark Waldner
October 23, 2018

Response to Comment ADD-G.80-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project will be provided to the Board of Supervisors for consideration. The County notes that the Project site cannot properly be considered "wild" because it has been primarily used for livestock grazing for more than 150 years, while approximately 1,000 acres in the eastern portion of the site have been cultivated as 5 separate pivot fields. (Draft EIR, page 3-9) Further, the EIR thoroughly evaluates the Project site with regard to its ecological value and Project-related impacts on biological resources, and mitigates impacts with enforceable, feasible mitigation measures. Please see Draft EIR, Section 5.7, Biological Resources, and the Mitigation Monitoring and Reporting Program, for further information. Project mitigation would result in improved functions and values of many biological resources, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Further, the project Applicant voluntarily agreed to permanently preserve 90 percent of the Ranch determined to be the most ecologically important, and limit Ranch development to the less than 10 percent of the Ranch determined to be developable without compromising biological integrity and biological values. This comment does not specifically address adequacy of the EIR, and no further response is required.

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From: timmcmartinez@everyactioncustom.com on behalf of Timothy Martinez <timmcmartinez@everyactioncustom.com>
Sent: Tuesday, October 23, 2018 8:04 AM
To: Jodie Sackett
Subject: No to Centennial

Dear Jodie Sackett,

Centennial is an example of the worst type of urban sprawl, which should be a relic of the past. It would move more resources away from the city center, while destroying native habitat in the most biodiverse part of the United States -- California. ADD-G.81-1

How can you approve a new city when LA County has already experienced such water shortages? How can you build more houses in a fire prone area?

Any Supervisor who favors this project has committed one of the worst mistakes for the future of our region, and should not be supported. Such a vote would mean you are actively dooming LA County to become unlivable in the face of drought, fire and climate change.

I urge you, please do whatever is in your power to push for this area to become a State Park, or otherwise protected land. People in LA County's growing cities need more public transportation, walkable communities, and natural open lands for respite in our increasingly urban world.

Please help preserve these lands for the future LA County residents, and for our unique wildlife and biodiversity in our State.

Sincerely,
Timothy Martinez
1404 Chamberlain Rd Pasadena, CA 91103-2312 timmcmartinez@yahoo.com

Response to Comment Letter ADD-G.81
Timothy Martinez
October 23, 2018

Response to Comment ADD-G.81-1:

Thank you for your participation in this public process. The Commenter's opposition to the Project will be provided to the Board of Supervisors for consideration. With regard to the Commenter's assertion that the Project constitutes "urban sprawl," please see Final EIR, response to Comment F.8-20. With regard to habitat destruction, although there is high biological value on portions of the Project site, much of the site has been impacted by non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*). (Draft EIR, page 5.7-159) Similarly, riparian areas are degraded in most of the low-lying drainages. Consequently, biological diversity is less than would otherwise be expected in many less degraded areas. However, native grasslands occur in a patchy distribution throughout large portions of the site which may be attributed to the grazing, which has potentially minimized non-native growth to a level sufficient to allow persistence of native perennial bunch grasses, as described on pages 5.7-42 through 5.7-47 of the Draft EIR. Project implementation would include mitigation actions described in Draft EIR Section 5.7.7, resulting in improved functions and values of many of these resources, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. The Project has been designed to include green space connections between undeveloped open space areas where feasible resulting in increased mobility for species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is therefore considered less than significant. (Draft EIR, page 5.7-166)

With regard to the Commenter's assertion that resources unique to Tejon Ranch will be lost, this is incorrect. The Project region is an important ecological region, and the proposed 43,080-acre mitigation preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values. The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas. While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land are permanently preserved through the Project's design and mitigation measures.

With regard to water supply, after thorough analysis, the EIR appropriately concludes that Project water supplies will sustainably meet buildout potable and recycled water demands and would in fact maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including

single-dry and multiple-dry years, and taking account of climate change impacts. Please see Draft EIR, Section 5.18 Water Resources, Response to Testimony RPC-76, and responses to Comments E.1-5, F.3-4 through F.3-9, F.3A-6, F.3A-9, F.8-213, F.8-214, and F.8-220 for further discussion.

With regard to fire risk, the EIR thoroughly analyzes Project-related impacts and reduces impacts to a less than significant level with implementation of MM 3-9, including with regard to its location in Very High, High, and Medium Fire Hazard Severity Zones. The EIR appropriately evaluates the Project's fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.

With regard to the Commenter's opinion that the entire Project site should be preserved is noted and will be provided to the Board of Supervisors for consideration. The County notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.

Dear Jodie Sackett,

Centennial is a terrible deal for L.A. County. Centennial would be located in a "high" and "very high" fire hazard area subject to intense winds. Locating thousands of people in this fire-prone area will certainly lead to more human-caused wildfires, scorched homes and loss of life.

Centennial will not help address the county's housing shortage. Building a new city 65 miles from downtown LA will isolate potential residents from economic, educational and cultural opportunities. Instead, Centennial would require the construction of a new freeway at an initial cost of $830 million, which would divert scarce funds away from transit projects that make our existing communities more livable and sustainable.

Centennial would add tens of thousands of new cars each day onto Highway 5, leading to further gridlock in Santa Clarita and the San Fernando Valley. Thousands of long-distance car trips will lead to more cancer- and asthma-causing air pollution, worsening the county's public health.

Your decision on Centennial is perhaps the most far-reaching decision you will ever make as a supervisor. Please, don't approve Centennial. It would reward Wall Street speculators while leaving county residents stuck with the bill for more freeways, more wildfires, more traffic, and more air pollution.

ADD-G.82-1

Sincerely,

Response to Comment Letter ADD-G.82
Form Letter 15
Various Dates

Response to Comment ADD-G.82-1:

A form letter was prepared by an unknown source and was made available to the public for submittal to the County via email. These form letters appear as Appendix A-15 to this document. The Commenters' opposition to the Project will be provided to the Board of Supervisors for consideration. The following are responses to the form letter, including as personalized by some individual commenters.

With regard to fire impacts, the EIR thoroughly analyzes Project-related impacts and reduces impacts to a less than significant level with implementation of MM 3-9, including with regard to its location in Very High, High, and Medium Fire Hazard Severity Zones. The EIR appropriately evaluates the Project's fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under both applicable thresholds of significance. The Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9. For further discussion of fire impacts, see Draft EIR, Section 5.3, and Final EIR, response to Comment A.2-6.

The Commenters' opinion regarding housing is noted, but the County disagrees. The Project is designed with a balanced land use plan, as discussed in depth in Final EIR, response to Comment F.8-20, which provides significant benefits including providing a beneficial jobs/housing balance, and helping to meet the County's overall housing need.

With regard to the assertion that the Project will require "a new freeway", the County assumes this is a reference to the Northwest 138 Corridor Improvement Project and notes that the assertion is incorrect. The Northwest 138 Corridor Improvement Project significantly predates the Project. The North County Combined Highway Corridors Study (NCCHCS), completed in 2004, identified SR-138 as a bypass corridor and recommend its expansion to a 6-lane freeway between Interstate 5 and State Route 14 to accommodate

traffic demand that the NCCHS projected would double by 2025.[3415] Four years later, in 2008, the voters approved Measure R, the Los Angeles County half-cent sales tax transportation funding initiative.[3416] Measure R allocated $25 million for approval and environmental documentation of the Northwest 138 Corridor Improvement Project to be used between 2012 and 2018.[3417] The Project's application was not deemed complete by the County until 2008 and the AVAP was not adopted until 2015, well after preparation of the NCCHCS and the Measure R campaign. The Northwest 138 Corridor Improvement Project is a long planned public works project needed to accommodate regional growth projections for areas well beyond the Project site. For further discussion of the Project's relationship to the Northwest 138 Corridor Improvement Project, please see response to Comment ADD-F.10-5.

With regard to traffic more generally, as the Commenters note, the EIR discloses that 146,154 daily trips would result from Project build-out; 48 percent internal and 52 percent external, and external trips would include trips on I-5. (Draft EIR, page 5.10-50) However, these trip estimates are conservative, as they do not take into account the trip reduction measures implemented by the Project would will encourage trips by walking, biking, and transit. With regard to air quality impacts of increased traffic, the EIR appropriately takes these impacts account into its air quality analysis, as is more thoroughly discussed in Draft EIR, Section 5.11, Air Resources, and Final EIR, responses to Comments F.3-33, F.8-189, F.8-197, and F.8-200. The Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. For further discussion, please see the Final EIR, response to Comment F.8-20. Indeed, the South Coast Air Quality Management District (SCAQMD) has reviewed the Centennial EIR and determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Final EIR, Comment D.4-2).

With regard to fiscal impacts, the County disagrees with the Commenters' characterization of the Project. As discussed in the Draft EIR, such as in Section 5.16, Fire and Law Enforcement, and Section 5.17, Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities.

With regard to Matt Pakucko's email, the County notes that as the lead agency, it has complied with CEQA requirements, and has maintained an appropriate and independent relationship with the Project Applicant. The same is true with regard to SoCalGas, which

[3415] Caltrans 2017b, p. 8
[3416] *Id.,* p 1
[3417] *Ibid.*

provides natural gas service to much of the Southern California region, including the Project site; SoCalGas is regulated by the CPUC and is required to provide services to existing and proposed future development in its service area. (Draft EIR, page 5.20-16)

With regard to MaryEllen Schoeman's email, the Commenter's opinion about the appropriate location for affordable housing is noted and will be provided to the Board of Supervisors. However, the County disagrees with the Commenter's characterization of the Project's approach to housing. The Project is designed with a balanced land use plan, as discussed in depth in Final EIR, response to Comment F.8-20, which provides significant benefits including providing a beneficial jobs/housing balance, and helping to meet the County's overall housing need. Further, the Project site cannot appropriately be called "wilderness", because it has been primarily used for livestock grazing for more than 150 years, while approximately 1,000 acres in the eastern portion of the site have been cultivated as 5 separate pivot fields. (Draft EIR, page 3-9) With regard to San Joaquin kit fox, this species in not present on the Project site and the EIR therefore appropriately concludes that the Project site would have no impact on this species. See Draft EIR, Section 5.7, Biological Resources, for further information.

With regard to Kiernan Scanlon's email, the Commenter's preference for revitalization of existing communities will be provided to the Board of Supervisors. Please see response to Comment F.8-20 for additional discussion regarding sustainable levels of infill development in the region. This comment does not address the adequacy of the EIR, and no further response is required.

With regard to Ruth Abigail's opinion that the entire Project site should be preserved, this is noted and will be provided to the Board of Supervisors for consideration. The County notes that the Project has been sited and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. See Final EIR, response to Comment F.8-20 for further discussion.

With regard to the information Jack Eidt presents about his experience and background, this information is noted and will be provided to the Board of Supervisors for consideration.

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4.0 CLARIFICATIONS AND REVISIONS TO THE EIR

4.1 CLARIFICATIONS AND REVISIONS TO THE DRAFT EIR

All additions or corrections to the Draft Environmental Impact Report (EIR) text, tables, and figures generated either from responses to comments or independently by the County, are stated in this section of the Consolidated Final EIR. These Draft EIR revisions are provided to clarify, refine, and provide supplemental information for the Draft EIR, and are incorporated as part of this Consolidated Final EIR for consideration by the Los Angeles County Board of Supervisors (Board of Supervisors). Changes include corrections or clarifications to the text and tables of the original Draft EIR, and changes to clarify the analysis in the Draft EIR based upon the information and concerns raised by the public and the Regional Planning Commission.

Unless otherwise indicated below, edits are as identified in the Final EIR, and no further edits have been made to the text subsequent to publication of the Final EIR. However, where text was originally revised in the Final EIR published in May 2018, and subsequently *further* revised, this Section 4.1 specifically identifies that a subsequent edit has been made, and the subsequent edit immediately follows the first one. The only changes to the Draft EIR since the publication of the Final EIR in May 2018 have been made to select mitigation measures (MMs) and corresponding project design features (PDFs). The clarifications and revisions to the Draft EIR text, tables, and figures have not been published in their entirety as a single revised Draft EIR document; rather, all clarifications and revisions to the Draft EIR are identified herein.

The clarifications and revisions to the Draft EIR contained in this Section 4.1 are in the same order as the information appears in the Draft EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by double underlining (<u>underline</u>) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference. Where further changes have been made subsequent to publication of the Final EIR, all changes previously made in the Final EIR have been accepted and are *not* shown in double underline/strikeout format, and only changes made *after* publication of the Final EIR are shown in double underline/strikethrough.

For example, MM 3-11, which was newly identified in the Final EIR, appears in the Final EIR in double underline as follows:

MM 3-11 <u>The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable interested parties both on- and off-site to easily access</u>

information relevant to potential Valley Fever risk. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebec, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.

Since publication of the Final EIR, further revisions have been made to MM 3-11. In the text identifying the subsequent edit, text previously added in the Final EIR has been accepted in this document, and only the further revisions made after publication of the Final EIR appear in double underline/strikethrough, as follows:

MM 3-11 The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information in both Spanish and English regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable interested parties both on- and off-site to easily access information relevant to potential Valley Fever risk, including information relevant to potential Valley Fever risks to pets, horses, and other animals that may be present at or around the Project site during construction activities. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebec, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.

As presented in Section 2.0, Responses to Comments, and as further discussed in Section 1.4 of this Consolidated Final EIR, the information included in these clarifications and revisions to the Draft EIR does not constitute substantial new information that requires recirculation of the Draft EIR pursuant to Section 15088.5 of the State CEQA Guidelines. Recirculation of the Draft EIR is not required because the new information added to the EIR through these modifications clarifies or amplifies information already provided or makes insignificant modifications to the already adequate Draft EIR.

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All references to the "Centennial Transportation Improvement Program" or "CTIP" are hereby revised throughout the Draft EIR as follows:

~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement

Several mitigation measures in Section 5.10, Traffic, Access, and Circulation and in other sections of the Draft EIR were edited, added, and deleted in response to comments on the EIR. As a result, the numbering of certain mitigation measures changed between the publishing of the Draft and Final EIRs. All references to the following mitigation measures are hereby revised throughout the Draft EIR as follows (the previous Draft EIR MM number is on the left, and the revised, Final EIR MM number is on the right):

Draft EIR MM #	Final EIR MM #	Draft EIR MM #	Final EIR MM #	Draft EIR MM #	Final EIR MM #
10-10	DELETED	10-22	10-19	10-34	10-30
10-11	10-10	10-23	10-20	10-35	10-31
10-12	10-11	10-24	10-22	10-36	10-32
10-13	10-12	10-25	10-23	10-37	10-33
10-14	10-13	10-26	10-24	10-38	10-34
10-15	DELETED	10-27	DELETED	10-39	10-35
10-16	10-14	10-28	DELETED	10-41	10-37
10-17	DELETED	10-30	10-26	10-42	10-38
10-18	10-15	10-31	10-27	10-43	10-39
10-19	10-16	10-32	10-28	10-44	10-40
10-20	10-17	10-33	10-29	10-45	10-41
10-21	10-18	-	-	-	-

Section 1 – Executive Summary

The first sentence under Fire Services on page 1-23 is hereby revised as follows:

> Fire services and emergency response for fire incidents during the initial development phases of the Project would be provided from Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person <u>assessment</u> engine company<u>, which is an engine company with some limited paramedic capabilities</u>.

Table 1-2, Centennial Specific Plan Mitigation Summary, on pages 1-37 to 1-95 is hereby revised as follows:

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.2	**Hydrology and Flood**	**MM 2-1** The Project shall implement hydromodification control Best Management Practices (BMPs) that will meet the requirements of Section 8 – Hydromodification Impacts of the County LID Standards Manual, as confirmed by the County based on a Drainage System Engineering and Planning Report to be submitted with each Project tract map application. This Drainage System Engineering and Planning Report shall describe applicable hydromodification control BMPs and utilize approved Los Angeles County methods to demonstrate compliance with the County LID Standards Manual.
5.2	**Hydrology and Flood**	**MM 2-2** The Project shall implement hydrology and flood-control BMPs that will achieve the following hydrology and flood performance standards: *All project water conveyance facilities must be designed to provide capital flood protection. BMPs must be implemented to ensure that, for the capital storm event, there is no increase in peak discharge rates and no increase in runoff volume offsite compared with peak discharge rates and runoff volumes under existing, pre-development conditions. Compliance with the hydrology and flood performance standard shall be demonstrated by using a methodology approved Los Angeles County Department of Public Works for comparing project site pre- and post-development peak discharge rates and runoff volumes.* Compliance with the hydrology and flood performance standards shall be further confirmed by the County, based on a Drainage System Engineering and Planning Report submitted with each Project tract map application. The Drainage System Engineering and Planning Report shall describe applicable hydrology and flood-control BMPs and utilize approved Los Angeles County methodologies to demonstrate compliance with the hydrology and flood performance standards.
5.2	**Hydrology and Flood**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 2-2** The Project shall implement hydrology and flood-control BMPs that will achieve the following hydrology and flood performance standards: *All project water conveyance facilities must be designed to provide capital flood protection. <u>The "capital flood" is the runoff produced by a 50-year frequency design storm falling on a saturated watershed (i.e. soil moisture at field capacity). A 50-year frequency design storm has a probability of 1/50 of being equaled or exceeded in any year.</u> BMPs must be implemented to ensure that, for the capital storm event, there is no increase in peak discharge rates and no increase in runoff volume offsite compared with peak discharge rates and runoff volumes under existing, pre-development conditions. Compliance with the hydrology and flood performance standard shall be demonstrated by using a methodology approved Los Angeles County Department of Public Works for comparing project site pre- and post-development peak discharge rates and runoff volumes.*

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		Compliance with the hydrology and flood performance standards shall be further confirmed by the County, based on a Drainage System Engineering and Planning Report submitted with each Project tract map application. The Drainage System Engineering and Planning Report shall describe applicable hydrology and flood-control BMPs and utilize approved Los Angeles County methodologies to demonstrate compliance with the hydrology and flood performance standards.
5.2	**Hydrology and Flood**	**MM 2-3** Each Tentative Map shall depict the 100-year floodplain mapped by the Federal Emergency Management Agency (FEMA). The placement of habitable residential, commercial, school and institutional buildings shall be precluded within any mapped 100-year floodplain. All applications for Project tract maps that would locate any structures within a mapped 100-year floodplain must include an engineering report that provides a detailed description of the floodplain boundaries and demonstrates that as-built conditions comply with all applicable FEMA requirements. If required, a conditional letter of map revision (CLOMR) shall be obtained from FEMA prior to construction within a mapped 100-year floodplain.
5.2	**Hydrology and Flood**	**MM 2-4** The Project shall comply with the California General Construction Permit issued by the State Water Resources Control Board (CAR000002, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-0006-DWQ) during all Project construction activity that meets or exceeds the applicable levels of land disturbance and other applicable coverage criteria in the California General Construction Permit notwithstanding the potential absence or presence of Waters of the United States in any Project construction location.
5.2	**Hydrology and Flood**	**MM 2-5** The Project shall implement maintenance measures in consultation with a qualified biologist that encourage stabilized native grasses and/or deep rooting plants to minimize sediment transport within applicable post-construction facilities that incorporated Best Management Practices for hydrology and flood control facilities.
5.3	**Hazards and Fire Safety**	**MM 3-1** The Project Applicant/Developer shall employ a Dust-Control Supervisor who will be on the site within 30 minutes of the start of work taking place each morning; will have the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Antelope Valley Air Quality Management District (AVAQMD) Rule 403 and South Coast Air Quality Management District (SCAQMD) Rule 403 requirements; and will have completed the SCAQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class. Contact information for the Project's Dust Control Supervisor shall be posted on-site to ensure that the public has a means of providing complaints regarding fugitive dust. The Dust Control Supervisor shall be responsible for tracking complaints, conducting corrective action, as necessary, and for maintaining an up-to-date log of complaints and responses for periodic County review.
5.3	**Hazards and Fire Safety**	**MM 3-2** To aid in the prevention of Valley Fever among construction crews on the Project site, the following shall be implemented by the Construction Contractor during all construction activities: • Have Tyvek™ coveralls/suits available in a range of sizes for construction worker use upon request. If used, require the worker to remove the Tyvek™ suit at the work site at the end of the day.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		• Hire crews from Los Angeles and/or Kern County populations, or other areas where Valley Fever is endemic, where possible, since it is more likely that they have been previously exposed to the fungus and are therefore immune. • Prior to Project construction initiation, and for any personnel additions after initial Project construction initiation, the following California Department of Public Health (CDPH) materials on Valley Fever (or the most updated materials applicable to Los Angeles County) shall be distributed to worksite supervisors: o CDPH pamphlet entitled "Preventing Work-Related Coccidioidomycosis (Valley Fever)" available at: http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf. (CDPH 2013a) • Prior to Project construction initiation, and for any personnel additions after initial Project construction initiation, the following CDPH materials on Valley Fever (or the most updated materials applicable to Los Angeles County) shall be distributed to construction workers: o CDPH pamphlet entitled "Valley Fever Fact Sheet" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf. (CDPH 2013b) o CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf (CDPH 2013c). o CDPH pamphlet entitled "Fact Sheet Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf (CDPH 2013d). • Require crews to use masks or respirators that are adequate to restrict inhalation of particulates during Project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations. • During rough grading and construction, the access way into the Project site from adjoining paved roadways shall be paved or treated with environmentally safe dust-control agents.
5.3	**Hazards and Fire Safety**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 3-2** To aid in the prevention of Valley Fever among construction crews on the Project site, the following shall be implemented by the Construction Contractor during all construction activities: • Have Tyvek™ coveralls/suits available in a range of sizes for construction worker use upon request. If used, require the worker to remove the Tyvek™ suit at the work site at the end of the day.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		• Hire crews from Los Angeles and/or Kern County populations, or other areas where Valley Fever is endemic, where possible, since it is more likely that they have been previously exposed to the fungus and are therefore immune. • Prior to Project construction initiation, and for any personnel additions after initial Project construction initiation, the following California Department of Public Health (CDPH) materials on Valley Fever (or the most updated materials applicable to Los Angeles County) shall be distributed to worksite supervisors: o CDPH pamphlet entitled "Preventing Work-Related Coccidioidomycosis (Valley Fever)" available at: http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf. (CDPH 2013a) • Prior to Project construction initiation, and for any personnel additions after initial Project construction initiation, the following CDPH materials on Valley Fever (or the most updated materials applicable to Los Angeles County) shall be distributed to construction workers: o CDPH pamphlet entitled "Valley Fever Fact Sheet" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf. (CDPH 2013b) o CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf (CDPH 2013c). o CDPH pamphlet entitled "Fact Sheet Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf (CDPH 2013d). • During rough grading and construction, the access way into the Project site from adjoining paved roadways shall be paved or treated with environmentally safe dust-control agents. • Provide evidence to the Department of Public Health that the Project Applicant/Developer has developed a "Valley Fever Training Handout," training, and schedule of sessions for education to be provided to all construction personnel. All evidence of the training session materials, training handout(s) and training schedule shall be submitted to the Department of Public Health within 24 hours of the first training session. Multiple training sessions may be conducted if different work crews will come to the Project site for different stages of construction; however, all construction personnel shall be provided training prior to beginning work. The evidence submitted to the Department of Public Health regarding the "Valley Fever Training Handout" and training sessions shall include the following: o A sign-in sheet (to include the printed employee names, signature, and date) for all employees who attended the training session;

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		○ Distribution of a written flyer or brochure that includes educational information regarding the health effects of exposure to criteria pollutant emissions and Valley Fever (including the CDPH informational materials described in this mitigation measure); ○ Training on methods that may help prevent Valley Fever infection; and ○ Train employees how to use personal protective equipment, such as respiratory equipment, how to reduce exposure to pollutants, how to recognize symptoms of Valley Fever, and to promptly report any suspected systems to a work supervisor. Training shall also emphasize the benefits of wearing Tyvek suits in relation to Valley Fever exposure and explain that such protective clothing is available upon request. Proof that the demonstration is included in the training shall be submitted to the Department of Public Health. • Provide construction workers separate, clean eating areas equipped with hand-washing facilities. • Require crews to use masks or half-faced respirators equipped with a minimum N-95 protection factor and that are adequate to restrict inhalation of particulates during Project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations. Respirator equipment shall be readily available and shall be provided to employees during work. • Require employees to be medically evaluated, fit-tested, and properly trained on the use of the required masks or respirators • Provide High-Efficiency Particulate Air (HEPA) filters for heavy equipment with factory enclosed cabs capable of accepting the filters. Require contractors utilizing applicable heavy equipment to furnish proof to the Department of Regional Planning of worker training on proper use of applicable heavy equipment cabs, such as turning on air conditioning prior to using the equipment. • Provide communication methods, such as two-way radios, for use in enclosed heavy equipment cabs. • Install equipment inspection stations at each construction equipment access/egress point. Examine construction vehicles and equipment or excess soil materials and clean, as necessary before equipment is moved off-site. • When possible, position construction workers upwind or crosswind when digging a trench or performing other soil-disturbing tasks. • Prohibit smoking at the worksite outside of designated smoking areas; designated smoking areas will be equipped with hand-washing facilities. • Post Valley Fever warnings at on-site construction areas and restrict access to such areas by visitors without adequate training and respiratory protection.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		• Audit and enforce compliance with applicable California Occupational Safety and Health Administration health and safety standards on the job site.
5.3	**Hazards and Fire Safety**	**MM 3-3** The Project Applicant/Developer shall provide to each prospective property purchaser or tenant a notice and statement of acknowledgment that shall be executed (i.e., read and signed) by the prospective purchaser, lessee, or tenant that the property within Centennial may present a risk of exposure to Valley Fever spores during construction or other earth-moving activities. The form shall include strategies to reduce potential exposure to Valley Fever spores. The form and method of distribution of said notice and statement of acknowledgment shall be as approved by the County.
5.3	**Hazards and Fire Safety**	**MM 3-4** The Project Applicant/Developer shall coordinate with the California Department of Conservation, Division of Oil, Gas and Geological Resources (DOGGR) to facilitate re-abandonment of the two on-site historic dry oil wells in accordance with current DOGGR specifications. The Project Applicant/Developer shall present documentation to the County that it has complied with the DOGGR requirements for re-abandonment of the two on-site wells.
5.3	**Hazards and Fire Safety**	**MM 3-5** The Project Applicant/Developer shall provide documentation to the County that the abandoned mine shaft is permanently closed in accordance with applicable regulations, as directed by the California Department of Conservation Office of Mine Reclamation, to prevent future access and potential ground instability issues.
5.3	**Hazards and Fire Safety**	**MM 3-6** If unanticipated hazardous materials or waste is encountered during construction, all work in the immediate vicinity of the suspect hazardous material shall be halted and the applicable oversight agency(ies) shall be notified. The applicable agency(ies) are determined based on the type and extent of the material encountered, and may include the California Department of Toxic Substances Control (DTSC), the State Water Quality Control Board, and/or local agencies, such as the County of Los Angeles Fire Department. The Project Applicant/Developer shall coordinate with appropriate agency(ies) on the appropriate means to address the suspect hazardous material/waste. All environmental investigation and/or remediation shall be conducted under a Workplan approved by the primary oversight agency(ies) and construction in the affected area shall not proceed until clearance has been issued by the applicable agency(ies).
5.3	**Hazards and Fire Safety**	**MM 3-7** The Project Applicant/Developer shall prepare an Emergency Response Plan for the Project, which shall be updated as needed for each Tentative Map, and shall be submitted to the County for review and approval. The Project Applicant/Developer shall be responsible for distributing the current Emergency Response Plan to each purchaser or tenant of each property within Centennial, and shall distribute the Plan to all landowners through the Transportation Management Agency (TMA).
5.3	**Hazards and Fire Safety**	**MM 3-8** The Project Applicant/Developer shall prepare a Traffic Control Plan in accordance with the California Manual on Uniform Traffic Control Devices (MUTCD). The Traffic Control Plan shall be reviewed and approved by the California Department of Transportation (Caltrans), and all construction activities in the public right-of-way shall comply with the approved Traffic Control Plan to the satisfaction of Caltrans. Documentation of Caltrans approval shall be provided to the County for any Tentative Map involving construction within State Route 138 right-of-way.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.3	**Hazards and Fire Safety**	**MM 3-9** The Project Applicant/Developer shall prepare a Fuel Modification Plan demonstrating compliance with the County Fire Code Title 32 and shall provide all new residents and business owners with recorded Covenants, Conditions, and Restrictions (CC&Rs) or disclosure statements that identify the responsibilities for maintaining the fuel modification zone(s) on their property, as defined in the approved Fuel Modification Plan. The CC&Rs or disclosure statements prepared by the Project Applicant/Developer shall be submitted to the County to confirm that new property owners will be informed of their responsibilities for maintaining the fuel modification zone(s) on their property.
5.3	**Hazards and Fire Safety**	**MM 3-10** The Project Applicant/Developer shall be responsible for ensuring the destruction of the historic water well associated with the former homestead in the central portion of the site is completed in full compliance with the requirements of the California Department of Water Resources' Water Well Standards, including Chapter II, Part III, Section 23 (Requirements for Destroying Wells). The applicable Local Enforcement Agency for implementation of the DWR's Well Standards is the Los Angeles County Department of Health Services, Drinking Water Program (LACDHS). The Project Applicant/Developer shall present documentation that is has complied with the DWR Well Standards to the LACDHS.
5.3	**Hazards and Fire Safety**	**MM 3-11** The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable interested parties both on- and off-site to easily access information relevant to potential Valley Fever risk. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebec, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.
5.3	**Hazards and Fire Safety**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 3-11** The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information in both English and Spanish regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable interested parties both on- and off-site to easily access information relevant to potential Valley Fever risk, including information relevant to potential Valley Fever risks to pets, horses, and other animals that may be present at or around the Project site during construction activities. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebec, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.4	**Water Quality**	**MM 4-1** The Project shall implement Low Impact Development (LID) and water quality control Best Management Practices (BMPs) that will achieve the following LID performance standard: *LID BMPs shall be selected and sized to retain the volume of storm water runoff produced from the higher of the 85th percentile or ¾ inch, 24-hour storm depth as determined from the Los Angeles County 85th Percentile 24-hr Rainfall Isohyetal Map (February 2004) (LID design volume). When it has been demonstrated that 100 percent of the LID design volume cannot be feasibly infiltrated within the Project, then the volume shall be harvested and reused. If that volume cannot be harvested and reused within 96 hours, then biofiltration shall be provided for 1.5 times the portion of the LID design volume that is not retained. Runoff from roadways shall be retained or biofiltered in retention or biofiltration BMPs sized to capture the design storm volume or flow, per the guidance in the U.S. Environmental Protection Agency's (USEPA's) Managing Wet Weather with Green Infrastructure: Green Streets. LID BMPs may be parcel-based or regional facilities.* Compliance with the LID performance standards shall be confirmed by the County based on a Drainage System Engineering and Planning Report to be submitted with each Tentative Map application. The Report shall describe applicable water quality control and LID BMPs and shall utilize approved Los Angeles County methodologies to demonstrate compliance with the LID performance standards. To the extent feasible, incorporate permeable pavement, groundcovers, and/or other measures to increase infiltration.
5.4	**Water Quality**	**MM 4-2** The Project shall implement integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program which are available online at http://www.ipm.ucdavis.edu/. The integrated pest management program will be provided to the County in association with the Landscape Plan submitted to the County with each tentative tract map. The IPM and landscaping BMPs shall be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The BMPs shall include a Planting Plan that is consistent with the plant water use requirements of Section 3.~~3~~4 of the Centennial Specific Plan; with procedures for removing non- native vegetation and planting native vegetation; with fertilizer guidelines; and with the IPM approach for preventing or suppressing pest problems (i.e., insects and diseases). This shall be done through a combination of techniques including using pest-resistant plants; using biological controls; incorporating cultural practices; including habitat modification; and judiciously using pesticides. The IPM and landscaping BMPs shall, in addition to identifying IMP and landscaping BMP management and funding roles and responsibilities, monitoring, training, and timely IPM and BMP program review requirements to incorporate new technologies that may become available, address the following: • Pest identification. • Practices to prevent pest incidence and to reduce pest buildup. • Monitoring to examine vegetation and surrounding areas for pests to evaluate trends and to identify when controls are needed. • Establishment of action thresholds that trigger control actions.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		• Pest-control methods (cultural, mechanical, environmental, biological, and appropriate pesticides). • Pesticide management, which includes safety requirements (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); regulatory requirements; spill mitigation measures; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation). • <u>All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.</u>
5.4	**Water Quality**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 4-2** The Project shall implement integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program which are available online at http://www.ipm.ucdavis.edu/. The integrated pest management program will be provided to the County in association with the Landscape Plan submitted to the County with each tentative tract map. The IPM and landscaping BMPs shall be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The BMPs shall include a Planting Plan that is consistent with the plant water use requirements of Section 3.~~3~~4 of the Centennial Specific Plan; with procedures for removing non- native vegetation and planting native vegetation; with fertilizer guidelines; and with the IPM approach for preventing or suppressing pest problems (i.e., insects and diseases). This shall be done through a combination of techniques including using pest-resistant plants; using biological controls; incorporating cultural practices; including habitat modification; and judiciously using pesticides. The IPM and landscaping BMPs shall, in addition to identifying IMP and landscaping BMP management and funding roles and responsibilities, monitoring, training, and timely IPM and BMP program review requirements to incorporate new technologies that may become available, address the following: • Pest identification. • Practices to prevent pest incidence and to reduce pest buildup. • Monitoring to examine vegetation and surrounding areas for pests to evaluate trends and to identify when controls are needed. • Establishment of action thresholds that trigger control actions. • Pest-control methods (cultural, mechanical, environmental, biological, and appropriate pesticides). • Pesticide management, which includes safety requirements (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); regulatory requirements; spill mitigation measures; groundwater and surface

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#	Environmental Factor	Mitigation
		water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation). • All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The ~~probation~~ prohibition shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs.
5.4	**Water Quality**	**MM 4-3** The Project shall, to the maximum extent feasible, retain, temporarily store and use native topsoil as topsoil cover in disturbed areas of the Project, and shall, in consultation with a qualified plant biologist, implement measures to encourage the germination of native plants in locations where native topsoil is used as a topsoil cover within the Project.
5.4	**Water Quality**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 4-3** The Project shall, to the maximum extent feasible, retain, temporarily store and use native topsoil as topsoil cover in disturbed areas of the Project, and shall, in consultation with a qualified plant biologist, implement measures to encourage the germination of native plants in locations where native topsoil is used as a topsoil cover within the Project. Measures to encourage germination of native plants may include: • Stockpile top soil at height no greater than 3 feet to retain native microorganisms • Upon re-spreading of top soil, ensure soil placement areas are de-compacted for a minimum depth of one foot • Conduct monthly weed removal following top soil placement in the first growing season and prior to seed setting to reduce competition for native plant species • Conduct annual weed control in the post growing season, but prior to seed setting to further reduce and maintain low competition for native plant species • Minimize disturbance of top soil to prevent new location for weed establishment • Avoid irrigation overspray and run-off from adjacent areas that could lead to increased weed establishment • Monitor and protect areas of native vegetation through signage and avoidance to the maximum extent feasible. • Minimize weed seed source by implementing weed control on an as-needed basis and prohibit planting of non-native invasive species identified by California Invasive Plant Council within adjacent areas.
5.4	**Water Quality**	**MM 4-4** The Project Applicant/Developer shall prepare, in consultation with a qualified biologist, a Restoration and Revegetation Monitoring Plan for the Project. The Restoration and Revegetation Monitoring Plan shall include appropriate metrics, as determined by the qualified biologist, for determining the success of Project revegetation efforts, including revegetation implemented in compliance with the approved Mitigation and Monitoring Plan for the Project. The Restoration and Revegetation Monitoring Plan shall be submitted to the County and updated as appropriate during the review and approval process for each tract map application.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.6	**Cultural and Tribal Resources**	**MM 6-1** The Project Applicant/Developer shall retain a qualified Archaeologist who shall oversee archaeological monitoring of topsoil grading and removals (including clearing, grubbing, and trenching) in the immediate vicinity of the following 25 archaeological sites that are within the grading footprint and ~~1~~2 site<u>s</u> in the open space area that ~~is~~ <u>are</u> immediately adjacent to the development impact area: CA-LAN-3201, CA-LAN-3202H, <u>CA-LAN-3217,</u> CA-LAN-3219H, CA-LAN-3227, CA-LAN-3230, CA-LAN-3232, CA-LAN-3233, CA-LAN-3234, CA-LAN-3236, CA-LAN-3237, CA-LAN-3238, CA-LAN-3239, CA-LAN-3240, CA-LAN-3241, CA-LAN-3242, CA-LAN-3243, CA-LAN-3244, CA-LAN-3245, CA-LAN-3246, CA-LAN-3247, CA-LAN-3248, CA-LAN-3250, CA-LAN-3251, CA-LAN-3252, CA-LAN-3253, and CA-LAN-3985H. <u>CA-LAN-3217 and</u> CA-LAN-3227 ~~is~~ <u>are</u> ~~the site~~ immediately adjacent to the grading footprint. Additionally, a Native American monitor representing the Tejon Indian Tribe shall be present during topsoil grading and removals in the vicinity of the 2~~6~~<u>7</u> above-listed archaeological sites. ~~T~~ <u>Prior to the issuance of grading permits, the</u> Project Applicant/Developer shall provide written evidence to the County that a qualified Archaeologist has been retained~~,~~ <u>to carry out all mitigation measures related to archeological and historical resources. A qualified Archaeologist is defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. The qualified Archaeologist</u> shall<u>:</u> be present at the pre-grading meeting; ~~shall~~ establish procedures for archaeological resource surveillance, including coordination with representatives of the Tejon Indian Tribe on the location and schedule of Native American monitoring; and ~~shall~~ establish (in cooperation with the Project Applicant/Developer and/or County as well as the Tejon Indian Tribe) procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of any artifacts found, as appropriate. The qualified Archaeologist shall develop and submit an Archaeological Resource Monitoring Plan to the County for sites in development areas. The qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be retained to attend pre-grade meetings and to monitor earth-moving activities, including clearing, grubbing and trenching, in the vicinity (i.e., the area of a site reasonably expected to contain archaeological resources plus a buffer of at least 10 meters [33 feet]) of any and/or all cultural resource sites. <u>For implementation of each tract map, if no subsurface Native American or archaeological remains are identified in the vicinity of an archaeological resources site during that initial grading, continuous monitoring will no longer be required but the Project Archaeologist and Native American monitor shall spot-check all additional subsurface excavations in the vicinity of an archaeological resources site at least once a week for the duration of grading and excavation activities or until the monitor deems site clear. The Project Archaeologist shall be responsible for coordinating the location and schedule of Native American monitors.</u> The Archaeologist and Native American monitor shall carefully inspect these areas to assess the potential for significant prehistoric or historic remains. If potentially significant archaeological resources are uncovered, <u>the qualified Archaeologist and Native American monitor shall halt or redirect ground-disturbing activities away from the vicinity, and</u> a subsurface test and/or evaluation shall be performed to assess the discovery. Further subsurface investigation or data recovery shall be undertaken if the resource is determined <u>by the Project Archaeologist to be</u> unique or historically significant (i.e., important for its prehistoric or historic information) and therefore eligible for the California Register of Historical Resources (CRHR).

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		The archaeological procedures required by the Archaeological Resource Monitoring Plan shall be incorporated as a note on the Grading Plan cover sheet. If additional or unexpected archaeological features are discovered, the qualified Archaeologist shall report such findings in writing to the County and/or the Tejon Indian Tribe. If archaeological resources are found to be of possible significance, the qualified Archaeologist shall determine appropriate actions, in cooperation with the County and the Tejon Indian Tribe, for further exploration and/or salvage in accordance with this mitigation measure. The Archaeologist shall submit a Follow-up Report to the County. The Follow-up Report shall include: the period of inspection; an analysis of any artifacts found; and the present repository of the artifacts. Recovered finds shall be offered to the County of Los Angeles and the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. The Project ~~Applicant/Developer shall retain a certified~~ Archaeologist ~~who~~ will perform a Phase II subsurface test-level investigation and surface collection for archaeological resource sites of undetermined CRHR eligibility discovered during monitoring. A Phase II Test-level Report shall be completed that evaluates the sites; includes a discussion of the sites' significance (depth, nature, condition, and extent of the resources); and contains recommendations for final mitigation and cost estimates (if required) to fully mitigate significant impacts. Should the Phase II subsurface test-level investigation and surface collection determine the ~~potential~~ presence of significant ~~subsurface~~ archaeological resources that are eligible for CRHR listing, then potential Project impacts to the eligible archaeological resources site shall be mitigated to a less than significant level through the implementation of one of the mitigation options discussed below~~.~~: a. Relocation of grading boundaries and fuel modification zones to completely avoid disturbance to the site(s) of eligible archaeological resources. ~~Should boundary relocation be infeasible~~ If it is determined that the relocation of grading boundaries and fuel modification zones in accordance with this subsection (a) is not feasible, then a qualified Archaeologist shall be present in the vicinity of eligible archaeological resources sites during grading and fuel modification brush clearance. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the South Central Coastal Information Center [SCCIC] at California State University, Fullerton. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) Fencing shall be erected outside the eligible archaeological resources sites to visually depict the areas to be avoided during construction. All eligible archaeological resources sites avoided in accordance with this subsection (a) shall be subject to the preservation requirements of MM 6-4. b. Per California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3)(A), grading boundary redesign and preservation in accordance with subsection (a) shall be the preferred means to avoid impacts to

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		eligible archaeological resources. However, consistent with CEQA Guidelines Section 15126(b)(3)(C), ~~I~~if it is determined that avoidance and/or preservation of any eligible archaeological resources sites in accordance with subsection (a) are not feasible, then prior to grading in the vicinity of such eligible archaeological resources sites, Phase III data recovery (salvage excavations) shall be conducted for ~~these~~ such eligible archaeological sites or any other eligible sites within the potential impact area of development that cannot be avoided. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) When Phase III data recovery is undertaken, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the eligible archaeological resource, shall be prepared by a qualified Archaeologist prior to any excavation being undertaken. The Phase III work shall provide sufficient scientific information to fully mitigate the impacts of development on these sites to a level considered less than significant and shall be performed in accordance with the standards of the State Historic Preservation Office (SHPO). Excavated assemblages shall be offered to the County and/or the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. Final mitigation shall be carried out based upon the recommendations in the Phase II Test Level Report, and the County shall make a determination as to the site's disposition based on the recommendations of the qualified Archaeologist. Possible determinations include, but are not limited to, preservation, salvage, partial salvage, or no mitigation necessary.
5.6	**Cultural and Tribal Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 6-1** The Project Applicant/Developer shall retain a qualified Archaeologist who shall oversee archaeological monitoring of topsoil grading and removals (including clearing, grubbing, and trenching) in the immediate vicinity of the following 25 archaeological sites that are within the grading footprint and 2 sites in the open space area that are immediately adjacent to the development impact area: CA-LAN-3201, CA-LAN-3202H, CA-LAN-3217, CA-LAN-3219H, CA-LAN-3227, CA-LAN-3230, CA-LAN-3232, CA-LAN-3233, CA-LAN-3234, CA-LAN-3236, CA-LAN-3237, CA-LAN-3238, CA-LAN-3239, CA-LAN-3240, CA-LAN-3241, CA-LAN-3242, CA-LAN-3243, CA-LAN-3244, CA-LAN-3245, CA-LAN-3246, CA-LAN-3247, CA-LAN-3248, CA-LAN-3250, CA-LAN-3251, CA-LAN-3252, CA-LAN-3253, and CA-LAN-3985H. CA-LAN-3217 and CA-LAN-3227 are immediately adjacent to the grading footprint. Additionally, a Native American monitor representing the Tejon Indian Tribe shall be present during topsoil grading and removals in the vicinity of the 27 above-listed archaeological sites.

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CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		Prior to the issuance of grading permits, the Project Applicant/Developer shall provide written evidence to the County that a qualified Archaeologist has been retained to carry out all mitigation measures related to archeological and historical resources. A qualified Archaeologist is defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. The qualified Archaeologist shall: be present at the pre-grading meeting; establish procedures for archaeological resource surveillance, including coordination with representatives of the Tejon Indian Tribe on the location and schedule of Native American monitoring; and establish (in cooperation with the Project Applicant/Developer and/or County as well as the Tejon Indian Tribe) procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of any artifacts found, as appropriate. The qualified Archaeologist shall develop and submit an Archaeological Resource Monitoring Plan to the County for sites in development areas. The qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be retained to attend pre-grade meetings and to monitor earth-moving activities, including clearing, grubbing and trenching, in the vicinity (i.e., the area of a site reasonably expected to contain archaeological resources plus a buffer of at least 10 meters [33 feet]) of any and/or all cultural resource sites. For implementation of each tract map, if no subsurface Native American or archaeological remains are identified in the vicinity of an archaeological resources site during that initial grading, continuous monitoring will no longer be required but the Project Archaeologist and Native American monitor shall spot-check all additional subsurface excavations in the vicinity of an archaeological resources site at least once a week for the duration of grading and excavation activities or until the monitor deems site clear. The Project Archaeologist shall be responsible for coordinating the location and schedule of Native American monitors. The Archaeologist and Native American monitor shall carefully inspect these areas to assess the potential for significant prehistoric or historic remains. If potentially significant archaeological resources are uncovered, the qualified Archaeologist and Native American monitor shall halt or redirect ground-disturbing activities away from the vicinity, and a subsurface test and/or evaluation shall be performed to assess the discovery. Further subsurface investigation or data recovery shall be undertaken if the resource is determined by the Project Archaeologist to be unique or historically significant (i.e., important for its prehistoric or historic information) and therefore eligible for the California Register of Historical Resources (CRHR). The archaeological procedures required by the Archaeological Resource Monitoring Plan shall be incorporated as a note on the Grading Plan cover sheet. If additional or unexpected archaeological features are discovered, the qualified Archaeologist shall report such findings in writing to the County and/or the Tejon Indian Tribe. If archaeological resources are found to be of possible significance, the qualified Archaeologist shall determine appropriate actions, in cooperation with the County and the Tejon Indian Tribe, for further exploration and/or salvage in accordance with this mitigation measure. The Archaeologist shall submit a Follow-up Report to the County. The Follow-up Report shall include: the period of inspection; an analysis of any artifacts found; and the present repository of the artifacts. Recovered finds shall be offered to the County of Los Angeles and the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. The Project Archaeologist will perform a Phase II subsurface test-level investigation and surface collection for archaeological resource sites of undetermined CRHR eligibility discovered during monitoring. A Phase II Test-level Report shall be completed that evaluates the sites; includes a discussion of the sites' significance (depth, nature, condition, and extent of the resources); and contains recommendations for final mitigation and cost estimates (if required) to fully mitigate significant impacts. Should the Phase II subsurface test-level investigation and surface collection determine the presence of significant archaeological resources that are eligible for CRHR listing, then potential Project impacts to the eligible archaeological resources site shall be mitigated to a less than significant level through the implementation of one of the mitigation options discussed below: a. Relocation of grading boundaries and fuel modification zones to completely avoid disturbance to the site(s) of eligible archaeological resources. If it is determined that the relocation of grading boundaries and fuel modification zones in accordance with this subsection (a) is not feasible, then a qualified Archaeologist shall be present in the vicinity of eligible archaeological resources sites during grading and fuel modification brush clearance. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the South Central Coastal Information Center [SCCIC] at California State University, Fullerton. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) Fencing shall be erected outside the eligible archaeological resources sites to visually depict the areas to be avoided during construction. All eligible archaeological resources sites avoided in accordance with this subsection (a) shall be subject to the preservation requirements of MM 6-4. b. Per California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3)(A), grading boundary redesign and preservation in accordance with subsection (a) shall be the preferred means to avoid impacts to eligible archaeological resources. However, consistent with CEQA Guidelines Section 15126(b)(3)(C), if it is determined that avoidance and/or preservation of any eligible archaeological resources sites in accordance with subsection (a) are not feasible, then prior to grading in the vicinity of such eligible archaeological resources sites, Phase III data recovery (salvage excavations) shall be conducted for such eligible archaeological sites or any other eligible sites within the potential impact area of development that cannot be avoided. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) When Phase III data recovery is undertaken, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the eligible archaeological resource, shall be prepared by a qualified Archaeologist prior to any excavation being undertaken. The Phase III work shall provide sufficient scientific information to fully mitigate the impacts of development on these sites to a level considered less than

TABLE 1-2
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#	Environmental Factor	Mitigation
		significant and shall be performed in accordance with the standards of the State Historic Preservation Office (SHPO). Excavated assemblages shall be offered to the County and/or the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. Final mitigation shall be carried out based upon the recommendations in the Phase II Test Level Report, and the Natural History Museum of Los Angeles County shall make a determination as to the site's disposition based on the recommendations of the qualified Archaeologist. Possible determinations include, but are not limited to, preservation, salvage, partial salvage, or no mitigation necessary.
5.6	**Cultural and Tribal Resources**	**MM 6-2** Prior to ground disturbing activities, ~~A~~archaeological sites CA-LAN-3201, CA-LAN-3206, CA-LAN-3217, CA-LAN-3227, CA-LAN-3240, and CA-LAN-3242 shall be surrounded with high visibility construction fencing with a buffer of approximately 50 feet around each site to ensure that the archaeological sites are completely avoided during construction-related activities. A qualified Archaeologist shall work with surveying teams and the Construction Supervisor to fence the area to be avoided prior to the commencement of grading.
5.6	**Cultural and Tribal Resources**	**MM 6-3** Prior to the issuance of grading permits, the ~~The~~ Project Applicant/Developer shall ~~retain~~ provide written evidence to the County that a qualified Archaeologist has been retained to carry out all mitigat~~e~~ion measures related ~~impacts~~ to eligible archaeological sites within the development impact area. A qualified Archaeologist is defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. ~~Additionally, and~~ A qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be present during ground-disturbing activities (i.e, topsoil grading and removals) in the vicinity of the following three ~~below-listed~~ eligible archaeological sites~~.~~: CA-LAN-3201; CA-LAN-3240; CA-LAN-3242. Impacts to these three eligible sites ~~(CA-LAN-3201, CA-LAN-3240, and CA-LAN-3242)~~ shall be mitigated to a less than significant level through the implementation of one of the mitigation options described below: a. Relocation of grading boundaries and fuel modification zones to completely avoid disturbance to the site(s). ~~Should boundary relocation be infeasible~~ If it is determined that the relocation of grading boundaries and fuel modification zones in accordance with this subsection (a) is not feasible with respect to eligible archaeological resources sites CA-LAN-3201, CA-LAN-3240 and/or CA-LAN-3242, then a qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be present in the vicinity of any such eligible archaeological resources site during grading and fuel modification brush clearance to monitor all activities and ensure that archaeological resources are not impacted. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) Temporary construction ~~F~~fencing shall be erected outside ~~the~~ any such eligible archaeological resources site~~s~~ to visually depict the areas to be avoided

TABLE 1-2
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#	Environmental Factor	Mitigation
		during construction, in accordance with MM 6-2. Any temporary fencing materials (i.e., plastic web, chain link, etc.) placed during construction should not become permanent. Any permanent fencing erected in accordance with MM 6-4 to protect the sites should be visually pleasing and consistent with the overall aesthetic experience of the community of Centennial. All eligible archaeological resources sites avoided in accordance within this subsection (a) shall be subject to the preservation requirements of MM 6-4. b. Per California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3)(A), grading boundary redesign and preservation in place in accordance with subsection (a) shall be the preferred means to avoid impacts to eligible archaeological resources. However, consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is determined that ~~If~~ avoidance and/or preservation of any eligible archaeological resources sites in accordance with subsection (a) is ~~are~~ not feasible, then prior to grading in the vicinity of such archaeological resources sites, Phase III data recovery (salvage excavations) shall be conducted for ~~these~~ such archaeological resources sites or any other eligible sites within the potential impact area of development that cannot be avoided. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) When Phase III data recovery is undertaken, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the eligible archaeological resource, shall be prepared by a qualified Archaeologist prior to any excavation being undertaken. The Phase III work shall provide sufficient scientific information to fully mitigate the impacts of development on these sites and shall be performed in accordance with the standards of the SHPO. Excavated finds shall be offered to the County and/or the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. Final mitigation shall be carried out based upon the recommendations in the Phase II Test-Level Report, and the County shall make a determination as to the site's disposition based on the recommendations of the qualified Archaeologist and the Native American monitor representing the Tejon Indian Tribe. Possible determinations include, but are not limited to, preservation, salvage, partial salvage, or no mitigation necessary.

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#	Environmental Factor	Mitigation
5.6	**Cultural and Tribal Resources**	**MM 6-4** ~~The Project Applicant/Developer~~ A qualified Archaeologist meeting the requirements of the Secretary of the Interior's Standards for professional archaeology shall develop and implement an Archaeological Resources Site-Protection Program aimed to protect and preserve identified CRHR-eligible archaeological resources avoided in accordance with subsection (a) of MM 6-1 and/or MM 6-3, as well as any identified archaeological resources site located within the Project site's open space areas that is of known eligibility for CRHR listing and which are vulnerable to disturbance during Project construction and/or operation. Identified archaeological resources sites located within the Project site's open space that are of unknown eligibility for CRHR listing and which are vulnerable to disturbance shall also be protected under the Archaeological Resources Site-Protection Program in accordance with this MM 6-4, provided that no such site shall be subject to this MM 6-4 if a Phase II archaeological investigation performed by a qualified Archaeologist in accordance with Secretary of the Interior Standards determines that such site is not unique and is thus ineligible for CRHR listing. Th~~is~~e Archaeological Resources Site-Protection P~~p~~rogram shall be prepared by the qualified monitoring Archaeologist familiar with the resources present within the Project boundaries, ~~and~~ shall be approved by the County, and shall include implementation of one or more of the following: a. Fencing and/or other access-restriction methods shall be placed around the archaeologically sensitive areas of the Project site to inhibit human access. This ~~is especially~~ subsection (a) shall be applicable to sites CA-LAN-3217 and CA-LAN-3227, unless the qualified Archaeologist determines that such sites are more appropriately protected in accordance with subsections (b) or (c) of this MM 6-4~~.~~; or b. Non-invasive plant species with thorns (e.g., prickly pear cactus [*Opuntia* spp.]) or other deterrent characteristics shall be planted in areas close to known resources in order to discourage human presence; this is generally applicable to the majority of sites to be preserved in areas of native vegetation~~.~~; or c. Known eligible resources shall be capped with a layer of chemically inactive soil/sediment, in consultation with a qualified Archaeologist. This ~~is especially~~ subsection (c) shall be applicable to sites CA-LAN-3201, ~~CA-LAN-3206,~~ CA-LAN-3240, and CA-LAN-3242, to the extent such sites are avoided in accordance with subsection (a) of MM 6-3, unless the qualified Archaeologist determines that any such site is more appropriately protected in accordance with subsections (a) or (b) of this MM 6-4. This subsection (c) shall be applicable to site CA-LAN-3206, unless, pursuant to the County-approved Archaeological Resources Site-Protection Program required by this MM 6-4, it is determined that such site is not vulnerable to disturbance. ~~The above-mentioned mitigation~~ This MM 6-4 shall be implemented prior to the completion of construction activities and shall be overseen by the County and/or the Tejon Indian Tribe. The qualified Archaeologist shall prepare a written statement documenting appropriate site-protection measures for submittal to the County. Additionally, a Native American monitor representing the Tejon Indian Tribe shall be present during all initial surface grubbing, initial ground surface grading, and any excavation greater than one-half foot in depth. ~~For implementation of each tract map, if no subsurface Native American or archaeological remains are identified during that initial grading, continuous monitoring will no longer be required but the Native American monitor shall spot-check all additional subsurface excavations at least once a week for the duration of grading and excavation activities or until monitor deems site clear. The Project Archaeologist shall be responsible for coordinating the location and schedule of Native American monitors.~~

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#	Environmental Factor	Mitigation
5.6	**Cultural and Tribal Resources**	**MM 6-5** For the exposed paleontological resources discovered during the Paleo Environmental Associates (PEA) 2009 study (as detailed in the document entitled *Paleontologic Resource Inventory and Impact Assessment Technical Report prepared in support of Centennial Specific Plan, western Antelope Valley, northern Los Angeles County, California*) and any paleontological resources uncovered during grading or excavation activities in or out of the presence of a Monitor, grading activities will be stopped and diverted to a part of the site reasonably away from the find (highly dependent on the size and complexity of the resource), and a qualified Paleontologist shall (1) ascertain the significance of the resources; (2) establish protocol with the Project Applicant/Developer to protect (or mitigate impacts to) such resources; (3) ascertain the presence of additional resources; and (4) provide additional monitoring of the site, if the Monitor deems it appropriate.
5.6	**Cultural and Tribal Resources**	**MM 6-6** A Paleontological Treatment and Monitoring Plan (PTMP) shall be developed by a qualified Paleontologist retained by the Project Applicant/Developer. The PTMP shall be reviewed and approved by the County. This plan shall include a protocol for examining, evaluating, and (if necessary) salvaging known fossil localities identified during the PEA (2009) study (as detailed in the document entitled *Paleontologic Resource Inventory and Impact Assessment Technical Report prepared in support of Centennial Specific Plan, western Antelope Valley, northern Los Angeles County, California*); a grading observation schedule shall be maintained when grading occurs within sedimentary rock units so that the Paleontologist may identify and evaluate fossil resources within the Project site. This qualified Paleontologist shall be retained to attend pre-grade meetings and to monitor deep earth-moving activities (including grading, cutting, and trenching) at the site. Paleontological monitoring shall be conducted by a qualified Paleontologist during grading and other excavation work. Recommended hours for monitoring activities shall be established by the qualified Paleontologist and shall be outlined in the PTMP. It shall be the responsibility of the qualified Paleontologist to demonstrate, to the satisfaction of the County, the appropriate level of monitoring necessary based on the tentative map-level grading plans. The qualified Paleontologist shall carefully inspect PTMP-identified areas in order to assess the potential for significant fossil remains. If potential paleontological resources are uncovered, a subsurface evaluation will be performed to assess the discovery. Further subsurface investigation will be undertaken if the resource is determined unique or important for its paleontological information. Because of the potential for producing small fragments of vertebrate microfossils, the Paleontologist shall conduct reasonable, periodic screening of sands from cuts in these units. Such material may be removed in bulk and screened off site for further analysis.
5.6	**Cultural and Tribal Resources**	**MM 6-7** The qualified Paleontologist retained by the Project Applicant/Developer shall coordinate with appropriate construction contractor personnel to provide information concerning the protection of paleontological resources. Contractor personnel shall be informed that unauthorized fossil collecting is prohibited. The contractor's heavy equipment operators shall be briefed on procedures to be followed in the event that fossil remains and a fossil site are encountered during earth-moving activities (grading or blasting). The briefing shall be presented to new contractor personnel as necessary. Names and telephone numbers of the Monitor and other appropriate mitigation program personnel shall be provided to appropriate contractor personnel and to the County.

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#	Environmental Factor	Mitigation
5.6	**Cultural and Tribal Resources**	**MM 6-8** The qualified Paleontologist shall initiate and coordinate recovery operations with the Project Applicant/Developer, and the County of Los Angeles for any significant fossil localities identified in the Paleo Environmental Associates 2009 document entitled *Paleontologic Resource Inventory and Impact Assessment Technical Report prepared in support of Centennial Specific Plan, western Antelope Valley, northern Los Angeles County, California* as well as if significant fossils are exposed during any Project-related grading pursuant to the PTMP. To initiate recovery operations, the Paleontologist shall be allowed to divert or direct grading in the area of exposure to facilitate evaluation and, if identified as potentially significant, to recover significant fossils. The qualified Paleontologist shall notify the Construction Foreman of the discovery of fossil resources and shall discuss recovery methods and the timeline needed to evaluate the find. If a fossil discovery occurs during grading operations when the Paleontologist is not present, grading shall be diverted a reasonable distance away from the area until the qualified Paleontologist can survey the area, conduct recovery operations, and make an assessment on the significance of the find.
5.6	**Cultural and Tribal Resources**	**MM 6-9** A formal museum storage agreement shall be developed between the Project Paleontologist and an accredited institution. Any fossils and their contextual stratigraphic data that are collected during development shall be prepared and identified by a qualified Paleontologist. Excavated significant fossil finds shall be donated with funding for stabilization, identification, and curation on a first right-of-refusal basis to an appropriate, accredited institution that has a retrievable collection system and an educational and research interest in the materials (e.g., the Natural History Museum of Los Angeles County). A final report prepared by the qualified Paleontologist that details the discovery, recovery, laboratory analysis, and findings and disposition of specimens shall be submitted to the County.
5.6	**Cultural and Tribal Resources**	**MM 6-10** In accordance with *California Code of Regulations* (Title 14, Section 15064.5[e]), in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the Los Angeles County Coroner must be notified of the discovery (*California Health and Safety Code,* Section 7050.5) and all activities in the immediate area of the find or in any nearby area reasonably suspected to overlie adjacent human remains must cease until appropriate and lawful measures have been implemented. If the Coroner determines that the remains are not recent, but rather of Native American origin, the Coroner shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours to permit the NAHC to determine the Most Likely Descendent (MLD) of the deceased Native American. The designated MLD may make recommendations to the Project Applicant/Developer or the person responsible for the excavation work, for means of treating or reassignment of the human remains and any associated grave goods with appropriate dignity, as provided in *California Public Resources Code,* Section 5097.98. If any of the following occurs, the Project Applicant/Developer shall rebury the Native American remains and the associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance: (1) the NAHC is unable to identify an MLD; (2) the MLD fails to make a recommendation within 48 hours of being notified of the discovery; or (3) the Project Applicant/Developer rejects the recommendation of the MLD and mediation by the NAHC fails to provide acceptable measures.

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#	Environmental Factor	Mitigation
5.7	**Biological Resources**	**MM 7-1** Prior to issuance of grading permits in areas of the Project site that may disturb California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, or adobe yampah populations, focused surveys of mitigation lands shall have been completed to confirm compliance with the 2:1 mitigation ratio for the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah. Surveys will be conducted in accordance with current California Native Plant Society (CNPS) protocol and will occur during the appropriate time of year. The Survey Report shall be submitted to the County and the California Department of Fish and Wildlife (CDFW) for their review. In addition to rare plant species populations that have previously been found in the Mitigation Preserve, newly detected populations will be preserved and managed for long-term preservation. These populations will provide baseline information for management efforts described below and will provide information to help determine habitat suitability in areas where propagation of rare plants may be considered. The Project Applicant shall prepare and implement a Special Status Plant Species Restoration Plan covering the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah that shall specify the following: (1) identification of and suitability analyses for the enhancement area; (2) procedures for the collection and temporary storage of seed (all available seed from every impacted occurrence shall be collected); (~~2~~ 3) planting procedures, including soil preparation and irrigation; (~~3~~ 4) a schedule and action plan to maintain and monitor enhanced, restored, and/or created populations; (~~4~~ 5) methods to control plant densities (of competing plants) to promote the establishment of California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah; ~~and~~ (~~5~~ 6) a list of County-approved success criteria (e.g., germination rates, growth, plant cover) to compare to the density of existing populations; (7) for creation or enhancement area(s), monitoring to confirm successful implementation of the 2:1 mitigation ratio; and (8) contingency measures to further create or enhance plantings in creation or enhancement areas where monitoring results do not show successful 2:1 mitigation, which shall remain in effect until such time as the 2:1 mitigation ratio has been achieved. The Project Applicant shall develop the Special Status Plant Species Restoration Plan and the County and CDFW shall approve it prior to any vegetation clearing or grading on the site. ~~Adoption of this plan shall be used as the performance standard. An overview of the plan objectives is provided in the Biological Resource Mitigation Program to be submitted and approved by the County prior to issuance of grading permits.~~ Prior to the commencement of vegetation clearing and/or grading activities, the Project Applicant shall contract a qualified firm to harvest California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah seeds from the impacted populations on the Project site. The seeds shall be collected in the manner and time described in the Special Status Plant Species Restoration Plan. The harvested seed shall be used for the enhancement, restoration, or creation of these species' populations to be preserved in open space areas on the Project site. Additionally, prior to implementation of the Plan, a focused survey for the special status species impacted (listed above) shall occur in the preserve areas to document existing populations. The previously documented populations of California androsace, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah occurring in the designated on-site mitigation areas (north of State Route [SR] 138 and south of SR-138), and Mitigation Areas 1, 2, 3 shall be preserved in perpetuity. These existing areas shall be (in order

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#	Environmental Factor	Mitigation
		of priority) preserved, enhanced, expanded, ~~or~~ restored, or created ~~or new areas shall be created in suitable habitat~~ in order to compensate at a 2:1 ratio for the thousands of individual special status plants that will be lost due to the Project. Those portions of the crownscale and Mojave spineflower populations that are located within and along the western edge of the open space polygon located approximately 500 feet east of Cement Plant Road and approximately 650 feet north of the SR-138 shall be protected. No temporary or permanent disturbance (including fuel modification) shall occur in the identified occurrence points or polygons; these occurrence points or polygons shall be flagged by a qualified Biologist prior to the start of Project activities in the area. In addition, the post-construction hydrology that supports these protected populations shall be consistent with the pre-Project hydrologic condition. The supporting area consists of the adjacent slope, which drains to the protected plant populations and consists of approximately 300 feet to the north and north northwest. Additional protective measures are included in MM 7-17. Planting of California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah shall be performed in accordance with the specifications in the Special Status Plant Species Restoration Plan, which will also indicate the target densities for each of these species so that the new populations will support at least as many individuals of each species as were impacted.
5.7	**Biological Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 7-1** Prior to issuance of grading permits in areas of the Project site that may disturb California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, or adobe yampah populations, focused surveys of mitigation lands shall have been completed by a qualified biologist(s) to confirm compliance with the 2:1 mitigation ratio for the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah. Surveys will be conducted in accordance with current California Native Plant Society (CNPS) protocol and will occur during the appropriate time of year. The Survey Report shall be submitted to the County and the California Department of Fish and Wildlife (CDFW) for their review. In addition to rare plant species populations that have previously been found in the Mitigation Preserve, newly detected populations will be preserved and managed for long-term preservation. These populations will provide baseline information for management efforts described below and will provide information to help determine habitat suitability in areas where propagation of rare plants may be considered. The Project Applicant shall prepare and implement a Special Status Plant Species Restoration Plan covering the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah that shall specify the following: (1) identification of and suitability analyses for the enhancement area; (2) procedures for the collection and temporary storage of seed (all available seed from every impacted occurrence shall be collected); (3) planting procedures, including soil preparation and irrigation; (4) a schedule and action plan to maintain and monitor enhanced, restored, and/or created populations; (5) methods to control plant densities (of competing plants) to promote the establishment of California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan

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#	Environmental Factor	Mitigation
		scorzonella, and adobe yampah; (6) a list of County-approved success criteria (e.g., germination rates, growth, plant cover) to compare to the density of existing populations; (7) for creation or enhancement area(s), monitoring to confirm successful implementation of the 2:1 mitigation ratio; and (8) contingency measures to further create or enhance plantings in creation or enhancement areas where monitoring results do not show successful 2:1 mitigation, which shall remain in effect until such time as the 2:1 mitigation ratio has been achieved and maintained for one full growing season. The Project Applicant shall develop the Special Status Plant Species Restoration Plan and the County and CDFW shall approve it prior to any vegetation clearing or grading on the site. Prior to the commencement of vegetation clearing and/or grading activities, the Project Applicant shall contract a qualified firm to harvest California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah seeds from the impacted populations on the Project site. The seeds shall be collected in the manner and time described in the Special Status Plant Species Restoration Plan. The harvested seed shall be used for the enhancement, restoration, or creation of these species' populations to be preserved in open space areas on the Project site. Additionally, prior to implementation of the Plan, a focused survey for the special status species impacted (listed above) shall occur in the preserve areas to document existing populations. The previously documented populations of California androsace, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah occurring in the designated on-site mitigation areas (north of State Route [SR] 138 and south of SR-138), and Mitigation Areas 1, 2, 3 shall be preserved in perpetuity. These existing areas shall be (in order of priority) preserved, enhanced, expanded, restored, or created in order to compensate at a 2:1 ratio for the thousands of individual special status plants that will be lost due to the Project. Those portions of the crownscale and Mojave spineflower populations that are located within and along the western edge of the open space polygon located approximately 500 feet east of Cement Plant Road and approximately 650 feet north of the SR-138 shall be protected. No temporary or permanent disturbance (including fuel modification) shall occur in the identified occurrence points or polygons; these occurrence points or polygons shall be flagged by a qualified Biologist prior to the start of Project activities in the area. In addition, the post-construction hydrology that supports these protected populations shall be consistent with the pre-Project hydrologic condition. The supporting area consists of the adjacent slope, which drains to the protected plant populations and consists of approximately 300 feet to the north and north northwest. Additional protective measures are included in MM 7-17. Planting of California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah shall be performed in accordance with the specifications in the Special Status Plant Species Restoration Plan, which will also indicate the target densities for each of these species so that the new populations will support at least as many individuals of each species as were impacted.

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#	Environmental Factor	Mitigation
5.7	**Biological Resources**	**MM 7-2** <u>All grubbing/grading within a phase of construction shall be scheduled and implemented to facilitate the voluntary movement of localized wildlife towards intact adjacent habitat. Islands of habitat should not be created during site disturbance unless they are to be retained as un-impacted following the Project buildout.</u> A pre-construction/grading survey of all areas proposed for construction/grading activities that contain potentially suitable habitat for silvery legless lizard, coast horned lizard, <u>and</u> two-striped garter snake~~, and American badger~~ shall be conducted by a qualified Biologist. Surveys will consist of 1 pass-through by a qualified Wildlife Biologist walking 50-meter belt transects across areas to be impacted while visually searching for the species listed above. Surveys will be conducted no more than three days prior to the disturbance of the surveyed area. If any of these species or other wildlife species that can be easily moved are observed within the construction/grading zone, the Biologist (who must have a valid California Scientific Collecting Permit) shall relocate them to a suitable area outside the construction zone. Suitable areas would include appropriate habitats within the proposed open space areas in the northwestern portion of the Project site and would be identified in a Wildlife Relocation Plan (described below) prior to surveys but before construction begins. Areas adjacent to Quail Lake and on the Project site potentially supporting western pond turtle breeding habitat shall not be disturbed during the breeding season for the turtles (April through August). No Project activities shall occur within ~~300~~ <u>400</u> feet from the edge of Quail Lake, due to potential for nesting in those areas. <u>Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate burrowing owl pre-construction surveys and avoidance and mitigation measures as identified below.</u> <u>*Burrowing Owl Pre-Construction Surveys*</u> <u>The project biologist shall conduct pre-construction take-avoidance surveys no more than 30 days prior to ground-disturbing activities within each construction area. Focused burrowing owl surveys shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (March 2012). Breeding season surveys shall include at least four survey passes completed between February 15 and July 15, with at least one visit between February 15 and April 15, and a minimum of three survey visits (at least 3 weeks apart) between April 15 and July 15, including at least one visit after June 15. Non-breeding season surveys shall include at least four visits spread evenly throughout the non-breeding season. The surveys shall be conducted in suitable burrowing owl habitat within 150 meters (492 feet) of the project footprint. Surveys shall be conducted by walking 20-meter transects. Because burrowing owls can recolonize a site after a few days, time lapses between project activities trigger subsequent take avoidance surveys, including, but not limited to an additional survey within 24 hours of ground-disturbing activities. Once surveys are completed, the project biologist shall prepare a survey report on the survey methods and results.</u> <u>*Burrowing Owl Avoidance and Mitigation Measures*</u> <u>Submit for DRP and CDFW approval and subsequently implement a Burrowing Owl Exclusion Plan, which includes four avoidance and relocation strategy tiers and associated mitigation requirements set forth in the CDFW Staff</u>

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#	Environmental Factor	Mitigation
		Report on Burrowing Owl Mitigation (CDFG 2012): Tier 1 – Avoidance Buffers; Tier 2 – Passive Relocation; Tier 3 – Prevention of Recolonization of Development Areas; and Tier 4 – Active Relocation (Optional). Site monitoring shall be required prior to, during, and after exclusions of burrowing owls from their burrows. Excluded burrowing owls shall be monitored and documented using artificial or natural borrows on adjoining Mitigation Preserve lands or other open space. Avoidance buffers shall be established in accordance with the buffer distances described in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012), which range from 50 to 500 meters, depending on the season and level of disturbance. The buffers may be reduced, but only after consultation with and approval from CDFW. ~~Pre-construction burrowing owl and Swainson's hawk surveys shall be conducted in all potentially suitable habitat areas prior to initial site preparation. Methods employed shall be consistent with standard and appropriate protocols for both species within the appropriate season of the year prior to construction. Burrowing owl pre-construction surveys shall be conducted prior to the start of construction/ground-breaking activities. Surveys will be conducted following the California Department of Fish and Wildlife's (CDFW's) 2012 burrowing owl survey protocol. These surveys shall be conducted weekly beginning 30 days prior to the start of construction with the final survey occurring 1 day prior to construction.~~ ~~If pre-construction surveys locate an active Swainson's hawk nest on the Project site, then no construction activities will occur within ½ mile of the nest between March 1 and September 15. Furthermore, a Swainson's hawk Monitoring and Mitigation Plan shall be prepared within 90 days after locating an active Swainson's hawk nest in consultation with the County and the CDFW.~~ Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate Swainson's hawk pre-construction surveys and avoidance and mitigation measures as identified below. *Swainson's hawk pre-construction surveys* Pre-construction surveys for Swainson's hawk shall be conducted during the two survey periods prior to construction by the Project Lead Biologist following the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000). These methods include surveying for active nests within a 0.5-mile radius of all Project activities prior to construction activities. *Swainson's hawk avoidance measures* If active Swainson's hawk nests (defined as nests used during one or more of the last 5 years) are found during these surveys, the Project Proponent shall utilize the CDFW *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks* (Buteo swainsoni) *in the Central Valley of California* for addressing the species as modified below. During initial ground disturbance construction, no intensive disturbances (e.g., heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities) or other Project-related activities that may

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#	Environmental Factor	Mitigation
		cause nest abandonment or forced fledging shall occur within 0.5-mile of an active nest between January 1 and September 15, unless take authorization is obtained and provides otherwise. The buffer zone may be decreased to 0.25-mile around nests for subsequent construction (i.e., in areas where disturbance—such as heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities—is not a normal occurrence during the nesting season). Active nest trees (where the nest is intact and has been used in the last 5 years) shall not be removed unless there is no practicable way of avoiding them. Encroachment of construction within the 0.5-mile buffer and removal of active nesting trees shall only be undertaken subject to consultation with CDFW and issuance of If an active nest tree must be removed, a California Fish and Game Code Section 2081 Incidental Take Permit, and associated conditions, if any are required. The tree removal period shall be limited to between October 1 and December 31. *Swainson's hawk monitoring during construction* If construction or other Project-related activities that may cause nest abandonment or forced fledging are necessary within the buffer zone, prior acquisition of an Incidental Take Permit shall be required. Monitoring of the nest site by the Project Lead Biologist is required to determine whether the nest is abandoned. If the nest is abandoned and if the nestlings are still alive, the master developer shall fund the recovery and hacking (i.e., the controlled release of captive-reared young) of the nestling(s). Existing activities such as agricultural activities, commuter traffic, and routine facility maintenance activities within 0.25-mile of an active nest shall not be prohibited. The Wildlife Relocation Plan shall describe: (1) all areas potentially suitable for receiving relocated animals and (2) methods that shall be used in the relocation process. Methods shall include appropriate species-specific handling techniques, including adherence to the Amphibian Task Force Fieldwork Code of Practice, ~~and appropriate hygienic methods~~ to prevent the spread of pathogens. The Plan shall also identify thresholds for the number of individuals of each species that shall be allowed to be placed in any particular area. The Wildlife Relocation Plan shall be prepared by a qualified biologist ~~the Project Applicant/Developer~~ and submitted to the CDFW prior to Project implementation for review and comment. The plan shall be approved by the County prior to issuance of the first grading permit. County and CDFW approval of the Plan shall indicate that the performance standards have been met. The Plan shall be implemented prior to grading an area for which the pre-construction survey identified one or more of these species. Although, implementation of the mitigation plan may have some impact on wildlife, it is expected to be negligible relative to the project as a whole and expected to me a net positive effect as required. Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate golden eagle pre-construction surveys and avoidance measures as identified below. *Golden eagle pre-construction surveys* Pre-construction surveys for golden eagle shall be conducted prior to construction activities. Surveys for active nests will be conducted by the Project Lead Biologist in all potentially suitable habitat areas within a 0.5-mile radius

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#	Environmental Factor	Mitigation
		of all Project activities. Methods employed shall be consistent with standard and appropriate protocols for golden eagle and within the appropriate season of the year prior to construction. *Golden eagle avoidance measures* If active golden eagle nests are found during these surveys, no intensive disturbances (e.g., heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities) or other Project-related activities that may cause nest abandonment or forced fledging shall occur during initial ground disturbance construction within 0.50 mile of an active nest between March 1 and September 15. The buffer zone may be decreased to 0.25 mile around nests for subsequent construction (i.e., in areas where disturbance—such as heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities—is not a normal occurrence during the nesting season). Active nest trees (where the nest is intact and has been used in the last year) shall not be removed. For the American badger specifically, the following pre-construction survey and avoidance measure protocols shall be implemented. *American Badger Pre-Construction Surveys and Avoidance Conditions* Pre-construction winter/non-natal surveys for American badger shall be required for any construction activities commencing between November 1 and February 15. Surveys shall be conducted within potentially suitable habitat, within 100 feet of disturbance zones, no more than 14 days prior to construction activities to determine whether American badger winter dens are present within disturbance zone or within 100 feet of the disturbance zone boundary. If Project activities are delayed or suspended for more than 14 days, the project-construction surveys shall be repeated. If an American badger winter or non-natal den is occupied within the disturbance zone or within 100 feet of the disturbance zone, then the den location shall be clearly marked with fencing or flagging, in a manner that does not isolate the badger from intact adjacent habitat or prevent the badger from accessing the den, to avoid inadvertent impacts on the den. The den shall be monitored by a qualified biologist to confirm normal activities during construction. If it is not practicable to avoid the wintering or non-natal den during construction activities, CDFW will be contacted. Construction activities shall be allowed to proceed when the den is vacated. Pre-construction natal den surveys for American badger shall be required for any construction activities commencing between March 15 and July 31. Pre-construction surveys shall be conducted within potentially suitable habitat, within 200 feet of the disturbance zone, by the project biologist, no earlier than 14 days prior to ground-disturbing construction activities to determine whether American badger natal dens are present within the project disturbance zone or within 200 feet of the disturbance zone. If active natal dens are located within these areas during pre-construction surveys, construction activities shall be postponed. If natal dens are detected during construction, construction activities shall be halted within 200 feet of the natal den. This buffer may be reduced based on the location of the den or type of construction activity, based on

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#	Environmental Factor	Mitigation
		the direction of the project biologist and CDFW has agreed in writing. Construction activities shall not preclude the ability of the documented badgers to disperse to on-site open space or off-site habitat when the natal den is vacated (i.e., habitat suitable for dispersal must be maintained until dispersal occurs). Construction will be postponed or halted in these areas until it is determined by the project biologist that the young are no longer dependent on the natal den. To avoid inadvertent impacts during construction and to ensure that construction activities are at least 200 feet from active natal dens, any active natal dens within the survey area shall be clearly marked with fencing or flagging in a manner that does not isolate the badger from sufficient intact adjacent habitat, prevent the badger from accessing the den, or inhibiting normal behavioral activities (e.g., foraging and dispersing from the site) by the mother and pups. Construction activities shall be allowed to proceed when the den is vacated. Pre-construction surveys for the ring-tailed cat shall be conducted throughout the Project disturbance area in the appropriate season within the year prior to disturbance. If results are negative, Project activities will proceed without further restrictions in regard to this species. If detected, the applicant shall consult with CDFW and modify Project activities at that time to ensure complete avoidance and no take of ring-tailed cat will occur.
5.7	**Biological Resources**	**MM 7-3** For all grading and construction activities, the Project Applicant/Developer shall retain a qualified Biologist (with selection reviewed by the County) to ensure that incidental construction impacts on special status wildlife species are avoided or minimized. The Biologist shall relocate silvery legless lizard, coast horned lizard, two-striped garter snake~~, American badger,~~ and any other special status wildlife species that can be moved which would otherwise be destroyed or adversely affected by construction and/or site-preparation activities. Responsibilities of the Construction Biological Monitor shall include: a. Attendance at the pre-construction meeting to ensure that timing and location of construction activities do not conflict with other mitigation requirements (e.g., seasonal surveys for nesting birds). The meeting shall be conducted with the Contractor and other key construction personnel to describe the importance of restricting work to designated areas. b. Discussion with the Contractor of procedures to minimize harm/harassment of wildlife that may be encountered during construction. C. Review/designation of the construction area with the Contractor in accordance with the Final Grading Plan. Haul roads, access roads, and on-site staging and storage areas shall be sited in grading areas to minimize degradation of habitat adjacent to these areas. If activities outside these limits are necessary, they shall be evaluated by the Biologist to ensure no special status species or habitats will be affected. d. A field review that is conducted to stake designated construction limits (to be set by the Surveyor). Any construction activity areas immediately adjacent to riparian areas or other special status resources (such as large trees or bird nests) may be flagged or temporarily fenced by the Monitor at his/her discretion. e. Periodic visits to the site during construction to coordinate and monitor compliance with the above provisions. f. Submittal of a brief report to the County and CDFW discussing any conflicts or errors resulting in impacts to special status resources within 48 hours of the incident. At the conclusion of construction of each planning area,

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#	Environmental Factor	Mitigation
		submittal of a Final Report discussing the results of the activities and any recommendations for improving the process. Submission of this report shall be the performance standard. In addition, a Biological Monitor will be on site during all initial vegetation removal and will employ salvage methods to minimize direct impacts to common wildlife species. Where feasible, the biological monitor will attempt to ensure wildlife are out of potential direct impact. ~~If a wildlife species is in harm's way and has not moved on its own, the Biologist will attempt to scare them away from the area. If wildlife does not move, and where feasible, the wildlife species will be relocated to suitable habitat.~~ In order to further reduce impacts to special status wildlife, restrictions shall be placed on the Contractor. These restrictions are related to hours of operation and blasting requirements. Responsibilities of the Construction Contractor shall include: a. All Project-related activities during construction shall be restricted to daylight hours. Night work and associated lighting shall not be permitted during and night work shall be prohibited throughout the Project site to reduce the potential adverse effect on special status species. b. Vehicle and equipment access within the Project site shall be restricted to existing roads and overland travel shall be minimized and confined to areas where development will occur to the greatest extent feasible. c. If blasting is required, applicable federal, State, and local requirements would be observed, and any necessary permits and authorizations would be obtained. d. Best Management Practices Guidelines developed by the Institute of Makers of Explosives (IME) would be implemented. e. To avoid impacts to special-status-biological resources, blasting would occur during the rough-grading activities of construction phase of the Project only between the hours of 10:00 am and 4:00 pm. f. To avoid potential affects to birds, blasting would occur outside the nesting bird season (i.e. blasting shall occur only between September 15 and January 1). No blasting shall occur within 1 mile of the winter perch for bald eagle during the winter season (October 15 to March 15). g. Prior to blasting, a blasting monitoring team including the Project biologist and one acoustician would be formed. The Project biologist would assess and provide guidance related to the criteria for impact on any nearby noise sensitive species. The acoustician should have a minimum of five years of acoustical measurement experience and would be responsible for the blast noise and vibration measurements. h. Blasts should be measured with a calibrated Type 1 sound level meter set to the fast or impulse integration response. If possible, the low frequency cut off should be set as low as possible, ideally 2 Hz or lower. Peak sound levels should be measured at a known distance from blast between the blast site and the noise sensitive species habitat (identified by the Project biologist). If the Project biologist sees fit, the low frequency cut off requirements may be waived or adjusted to address the sensitive species in the area. If measured peak levels exceed the criteria, blasts shall be altered in a way to reduce the impact. Such mitigation efforts may include: Reducing the

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#	Environmental Factor	Mitigation
		explosive material, altering the packing and placement of the explosive material, or changing the location of the blasting efforts. i. The biologist has the authority to stop blasting efforts or advise the blast team on the method of mitigation.
5.7	**Biological Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 7-3** For all grading and construction activities, the Project Applicant/Developer shall retain a qualified Biologist (with selection reviewed by the County) to ensure that incidental construction impacts on special status wildlife species are avoided or minimized. The Biologist shall relocate silvery legless lizard, coast horned lizard, two-striped garter snake and any other special status wildlife species that can be moved which would otherwise be destroyed or adversely affected by construction and/or site-preparation activities. Responsibilities of the Construction Biological Monitor shall include: a. Attendance at the pre-construction meeting to ensure that timing and location of construction activities do not conflict with other mitigation requirements (e.g., seasonal surveys for nesting birds). The meeting shall be conducted with the Contractor and other key construction personnel to describe the importance of restricting work to designated areas. b. Discussion with the Contractor of procedures to minimize harm/harassment of wildlife that may be encountered during construction. C. Review/designation of the construction area with the Contractor in accordance with the Final Grading Plan. Haul roads, access roads, and on-site staging and storage areas shall be sited in grading areas to minimize degradation of habitat adjacent to these areas. If activities outside these limits are necessary, they shall be evaluated by the Biologist to ensure no special status species or habitats will be affected. d. A field review that is conducted to stake designated construction limits (to be set by the Surveyor). Any construction activity areas immediately adjacent to riparian areas or other special status resources (such as large trees or bird nests) may be flagged or temporarily fenced by the Monitor at his/her discretion. e. Periodic visits to the site during construction to coordinate and monitor compliance with the above provisions. f. Submittal of a brief report to the County and CDFW discussing any conflicts or errors resulting in impacts to special status resources within 48 hours of the incident. At the conclusion of construction of each planning area, submittal of a Final Report discussing the results of the activities and any recommendations for improving the process. Submission of this report shall be the performance standard. In addition, a Biological Monitor will be on site during all initial vegetation removal and will employ salvage methods to minimize direct impacts to common wildlife species. Where feasible, the biological monitor will attempt to ensure wildlife are out of potential direct impact.

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#	Environmental Factor	Mitigation
		In order to further reduce impacts to special status wildlife, restrictions shall be placed on the Contractor. These restrictions are related to hours of operation and blasting requirements. Responsibilities of the Construction Contractor shall include: a. All Project-related activities during construction shall be restricted to daylight hours. Night work and associated lighting ~~shall not be permitted during and night work~~ shall be prohibited throughout the Project site to reduce the potential adverse effect on special status species. b. Vehicle and equipment access within the Project site shall be restricted to existing roads and overland travel shall be minimized and confined to areas where development will occur to the greatest extent feasible. c. If blasting is required, applicable federal, State, and local requirements would be observed, and any necessary permits and authorizations would be obtained. d. Best Management Practices Guidelines developed by the Institute of Makers of Explosives (IME) would be implemented. e. To avoid impacts to special-status-biological resources, blasting would occur during the rough-grading activities of construction phase of the Project only between the hours of 10:00 am and 4:00 pm. f. To avoid potential affects to birds, blasting would occur outside the nesting bird season (i.e. blasting shall occur only between September 15 and January 1). No blasting shall occur within 1 mile of the winter perch for bald eagle during the winter season (October 15 to March 15). g. Prior to blasting, a blasting monitoring team including the Project biologist and one acoustician would be formed. The Project biologist would assess and provide guidance related to the criteria for impact on any nearby noise sensitive species. The acoustician should have a minimum of five years of acoustical measurement experience and would be responsible for the blast noise and vibration measurements. h. Blasts should be measured with a calibrated Type 1 sound level meter set to the fast or impulse integration response. If possible, the low frequency cut off should be set as low as possible, ideally 2 Hz or lower. Peak sound levels should be measured at a known distance from blast between the blast site and the noise sensitive species habitat (identified by the Project biologist). If the Project biologist sees fit, the low frequency cut off requirements may be waived or adjusted to address the sensitive species in the area. If measured peak levels exceed the criteria, blasts shall be altered in a way to reduce the impact. Such mitigation efforts may include: Reducing the explosive material, altering the packing and placement of the explosive material, or changing the location of the blasting efforts. i. The biologist has the authority to stop blasting efforts or advise the blast team on the method of mitigation.

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#	Environmental Factor	Mitigation
5.7	**Biological Resources**	**MM 7-4** All open space preservation areas adjacent to active construction sites shall be denoted with wildlife-friendly fencing installed and maintained during construction to ensure that construction activities remain within the development footprint. Construction area temporary signage shall not have holes (or holes shall be covered or filled within the top four inches) to prevent raptor talon entanglement. Construction fencing and signage will be overseen by the Project Biologist.
5.7	**Biological Resources**	**MM 7-5** Within the year prior to, and within the appropriate season, focused surveys for the following special status species shall be repeated: arroyo toad, Tehachapi slender salamander, California red-legged frog (concurrent with two-striped garter snake and western pond turtle focused surveys), western spadefoot, mountain plover, southwestern willow flycatcher, western yellow-billed cuckoo, and least Bell's vireo. Surveys shall be conducted within all areas of potentially suitable habitat and in accordance with the approved CDFW or U.S. Fish and Wildlife Species (USFWS) protocol for that species. Western spadefoot pre-constructions surveys and avoidance measures shall be implemented as follows: *Western spadefoot pre-construction surveys* Prior to approval of a Grading Permit, the applicant shall provide to the County evidence verified by the Project Biologist that the area proposed to be graded, including a 300-foot buffer area, has been surveyed for suitable western spadefoot breeding habitat. If suitable breeding habitat is identified, the verification shall include a map of the delineated areas, including the 300-foot buffer, which are to be avoided. Surveys shall be conducted within 60 days prior to construction during a time of year when the species can be detected above ground at suitable breeding sites. Suitable breeding habitat is defined as areas of temporarily ponded water, including within creeks and within the valley floor uplands. Suitable breeding sites should support ponded water for at least three weeks. To ensure that diseases are not conveyed between work sites by the Project Biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force will be followed at all times. *Western spadefoot avoidance measures* If western spadefoot is detected within the Project footprint, measure "(i)" shall be implemented with appropriate review and concurrence from CDFW. If western spadefoot is detected outside the Project footprint, but within 300 feet of the Project footprint boundary, measure "(ii)" shall be implemented. Prior to implementation of avoidance measures, the Project Biologist shall confer with CDFW. If western spadefoot is detected (including egg masses and larvae) in water within the Project footprint and cannot be permanently avoided (e.g., by placing a resource avoidance area over the site), suitable breeding habitat shall be created within suitable natural sites in open space outside of the Project footprint under the direction of the Project Biologist. The amount of occupied breeding habitat to be impacted by the Project shall be replaced at a 2:1 ratio. The habitat creation location shall be in suitable habitat within on-site open space and as far away as feasible from residential and commercial development and roads. The created breeding habitat shall be designed such that it supports standing water for no longer than three months following winter rains so that aquatic predators (e.g., fish,

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#	Environmental Factor	Mitigation
		bullfrogs, and crayfish) cannot become established. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the impacted breeding site as feasible. No site preparation or construction activities shall be permitted within 300 feet of the vicinity of the impacted breeding site until the design and construction of the pool habitat in preserved areas of the site have been completed and all detected western spadefoot tadpoles, egg masses, and adults are moved to the created breeding habitat. The Project Biologist shall monitor the relocation site for a cumulative total of five years in which environmental conditions are conducive for western spadefoots to successfully complete the breeding cycle (i.e., adequate rain for pools to hold water for a sufficient period). Monitoring shall be conducted during and immediately following peak breeding season such that surveys can be conducted for adults as well as for egg masses, larval, and metamorphic western spadefoot. Success criteria for the monitoring program shall include verifiable evidence of western spadefoot reproduction at the relocation site during five years with suitable breeding conditions. If western spadefoot is detected (including egg masses and larvae) in water within 300 feet of the Project footprint boundary, but not within the Project footprint itself, an exclusion fence shall be constructed along the Project boundary between the construction footprint and the occupied breeding site to prevent western spadefoots from moving into and aestivating within the construction footprint. The exclusion fencing shall consist of 16-inch metal flashing, or an equivalent material, which shall be buried at least 6 inches below the ground surface, extending at least 8 inches above the ground. The fencing shall cover a sufficient length of the boundary to inhibit western spadefoots from entering the Project footprint without entrapping aestivating western spadefoot. The necessary length and appropriate location of the exclusion fence relative to the occupied breeding site shall be determined by the Project Biologist. No construction activities involving heavy equipment generating noise, ground vibration, and/or dust shall be allowed within 300 feet of occupied breeding sites until western spadefoots have metamorphized and are no longer present in the breeding pool, as determined by the Project Biologist. Acceptable Project activities (e.g., quiet and/or low impact activities) within 300 feet of the occupied breeding site shall be allowed at the discretion of the Project Biologist. Preconstruction surveys and avoidance measures for the least Bell's vireo and southwestern willow flycatcher, specifically shall be as follows: *Least Bell's vireo and southwestern willow flycatcher pre-construction surveys* In the season prior to construction, within all potentially suitable habitat within 0.5 mile of proposed construction areas, the Project Biologist shall conduct focused surveys for least Bell's vireo and southwestern willow flycatcher. Least Bell's vireo surveys will follow the currently accepted Least Bell's Vireo Survey Guidelines (USFWS 2001). Surveys for southwestern willow flycatcher will be conducted using the methods outlined in A Natural History Summary and Survey Protocol for the Southwestern Willow Flycatcher, issued by the U.S. Geological Survey (USGS)

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#	Environmental Factor	Mitigation
		and U.S. Department of the Interior and approved by the U.S. Fish and Wildlife Service (USFWS) (Sogge et al. 2010). Surveys for least Bell's vireo and southwestern willow flycatcher will be conducted concurrently. *Least Bell's vireo and southwestern willow flycatcher avoidance measures* If active nests are found, clearing and construction within 0.5 mile of the nest shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the Project Biologist, and there is no evidence of a second attempt at nesting. If no active nests are observed, construction may proceed. If active nests are found, work may proceed provided that construction activity is located at least 0.5 mile from active nests (or as authorized through take permits). This buffer may be adjusted provided noise levels do not exceed 60 dBA hourly L_{eq} at the edge of the nest site as determined by a qualified biologist in coordination with a qualified acoustician. If the noise meets or exceeds the 60 dBA L_{eq} threshold, or if the biologist determines that the construction activities are disturbing nesting activities, the biologist shall have the authority to halt the construction and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between the nest site and the construction activities, and working in other areas until the young have fledged. If noise levels still exceed 60 dBA L_{eq} hourly at the edge of nesting territories and/or a no-construction buffer cannot be maintained, construction shall be deferred in that area until the nestlings have fledged. All active nests shall be monitored on a weekly basis until the nestlings fledge. The qualified biologist shall be responsible for documenting the results of the surveys and the ongoing monitoring and for reporting these results to CDFW and USFWS.
5.7	**Biological Resources**	**MM 7-6** Construction Monitoring - The Project Applicant~~/Developer~~ shall retain a ~~qualified~~ CDFW/USFWS-approved "Authorized Biologist ~~with knowledge of California condors,~~" to ~~monitor~~ be on-call during all construction activities. If condors are observed foraging or landing in the Project area~~. The resumes of the proposed Biologist(s) will be provided to the CDFW for concurrence. This Biologist(s) will be referred to as the "Authorized Biologist" hereinafter. During clearing and grubbing of construction areas~~, the Authorized Biologist shall ~~be present at all times. During mass grading, construction sites shall be monitored on a daily basis, and the Authorized Biologist will~~ have the authority to stop all construction activities until appropriate corrective measures have been ~~completed~~ implemented. If condors are observed landing in the Project area, the Applicant shall avoid further construction within 500 feet of the sighting until the animals have left the area, or as otherwise authorized by CDFW and USFWS. If the condors are nesting within 0.5-mile of any Project area, no construction activities shall occur within this 0.5-mile buffer until the condors leave, or as otherwise directed by CDFW and USFWS. All condor sightings in the Project area ~~will~~ shall be reported to CDFW and USFWS within 24 hours of the sighting. ~~To further protect California condors potentially foraging in the Project area over the long term from negative interactions with humans and/or artificial structures, the~~ Cattle Carcass Relocation - The Project Applicant~~/Developer~~ shall remove dead cattle that are found ~~or reported~~ within 1,000 feet of the boundary of a residential or commercial development within 24 hours. ~~Dead cattle shall be relocated to a predetermined location.~~ The Approved Biologist will

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#	Environmental Factor	Mitigation
		select locations ~~where carcasses shall be placed shall be~~ a minimum of 1,000 feet from ~~a~~ development ~~area boundary. Appropriate locations~~ areas for ~~transfer~~ relocation of carcasses ~~include open grasslands and oak/grassland areas where condors can readily detect carcasses and easily land and take off without encountering physical obstacles such as powerlines and other utility structures~~. The proposed locations would be ~~selected and~~ approved by the CDFW and USFWS. ~~Pursuant to this measure, a~~ A telephone number for reporting dead cattle shall be provided ~~and actively maintained. Any cattle carcasses transferred to the relocation areas shall be reported to the USFWS Condor Group~~ by the Applicant. Utility Hazards - All surfaces on new antennae and phone/utility towers shall be designed, installed, and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching. Whenever possible, utility towers and antennae should be self-supporting (i.e. not use guy wires), and be as visible as possible (using sold panel siding or dense/wide lattice work). Condor Educational Curriculum - The Applicant shall provide a Condor Educational Curriculum that includes the life history of the California condor, how to identify condors, TRC hunting rules and regulations, prohibited behaviors related to condors such as hunting with lead ammunition, and the legal consequences of inadvertently or otherwise illegally shooting or harming California condors. The information will also identify types of microtrash that could be ingested by adult breeding condors and describe measures to eliminate microtrash and provide information on how to report roadkill for removal. In addition, these rules, regulations, and prohibitions shall be listed within CC&Rs. Microtrash - During construction, the ~~area~~ Applicant shall ~~be~~ ensure that all Project areas are kept clean of debris ~~(e.g., cable, trash, and construction materials). The Project Applicant/Developer shall collect all~~ including microtrash and litter ~~(i.e., anything shiny, such as broken glass), vehicle fluids, and food waste from the Project area on a daily basis~~. Workers ~~shall~~ will be trained on the issue of microtrash: what constitutes microtrash, its potential effects on California condors, and how to avoid the deposition of microtrash. In addition, the Applicant will ensure that routine community maintenance activities include regular efforts to eliminate microtrash on and near all work sites, recreational events, roads, and adjacent open space areas. If it is determined that condors are ingesting microtrash in the Project area, the Applicant, CDFW, and USFWS shall evaluate potential remedies to reduce, and, if possible, eliminate microtrash ingestion. Such remedies may include increased education and awareness to residents, guests, staff, and workers regarding the dangers of microtrash, increased monitoring of events and activities that are potential sources of microtrash, and more frequent collection of microtrash. Condor Deterrent Activities - If the Authorized Biologist deems it necessary, USFWS California condor hazing methods that do not rise to the level of "Take" under the ESA (Service 2014) will be employed. Only the Authorized Biologist, with approval from the USFWS, will conduct hazing and only when such actions are warranted. If the Authorized Biologist is not immediately available, a subset of less aggressive hazing methods, such as yelling, stomping, leashed

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#	Environmental Factor	Mitigation
		dog barking or low pressure water spray, may be used when a clear escape route for the condors is identified and upon guidance from USFWS. Condor Tracking – The Applicant will provide the USFWS with twenty-five (25) GPS satellite tracking transmitters (total cost not to exceed $150,000.00) prior to grading plan approval. This will allow the USFWS to more quickly identify the immediate location of birds that are not moving relative to the ground, which usually indicates that an injury, illness, or death has occurred. The ability to track the movements and locations of individual condors can aid in the monitoring of the overall effectiveness of measures to minimize and mitigate the indirect impact of microtrash by locating possible areas where microtrash was ingested. It can also aide in identifying the location where condors were shot if such an incident were to occur.
5.7	**Biological Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 7-6** Construction Monitoring - The Project Applicant shall retain a CDFW/USFWS-approved "Authorized Biologist," to be on-call during all construction activities. If condors are observed foraging or landing in the Project area, the Authorized Biologist shall have the authority to stop all construction activities until appropriate corrective measures have been implemented. If condors are observed landing in the Project area, the Applicant shall avoid further construction within 500 feet of the sighting until the animals have left the area, or as otherwise authorized by CDFW and USFWS. If the condors are nesting within 0.5-mile of any Project area, no construction activities shall occur within this 0.5-mile buffer until the condors leave, or as otherwise directed by CDFW and USFWS. All condor sightings in the Project area shall be reported to CDFW and USFWS within 24 hours of the sighting. Cattle Carcass Relocation - The Project Applicant shall remove dead cattle that are found within 1,000 feet of the boundary of a residential or commercial development within 24 hours. The Approved Biologist will select locations a minimum of 1,000 feet from development areas for relocation of carcasses. The proposed locations would be approved by the CDFW and USFWS. A telephone number for reporting dead cattle shall be provided by the Applicant. Utility Hazards - All surfaces on new antennae and phone/utility towers shall be designed, installed, and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching. Whenever possible, utility towers and antennae should be self-supporting (i.e. not use guy wires), and be as visible as possible (using ~~sold~~ solid panel siding or dense/wide lattice work). Condor Educational Curriculum - The Applicant shall provide a Condor Educational Curriculum that includes the life history of the California condor, how to identify condors, TRC hunting rules and regulations, prohibited behaviors related to condors such as hunting with lead ammunition, and the legal consequences of inadvertently or otherwise illegally shooting or harming California condors. The information will also identify types of microtrash that could be ingested by adult breeding condors and describe measures to eliminate microtrash and provide information on how to report roadkill for removal. In addition, these rules, regulations, and prohibitions shall be listed within CC&Rs.

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#	Environmental Factor	Mitigation
		Microtrash - During construction, the Applicant shall ensure that all Project areas are kept clean of debris including microtrash and litter. Workers will be trained on the issue of microtrash: what constitutes microtrash, its potential effects on California condors, and how to avoid the deposition of microtrash. In addition, the Applicant will ensure that routine community maintenance activities include regular efforts to eliminate microtrash on and near all work sites, recreational events, roads, and adjacent open space areas. If it is determined that condors are ingesting microtrash in the Project area, the Applicant, CDFW, and USFWS shall evaluate potential remedies to reduce, and, if possible, eliminate microtrash ingestion. Such remedies may include increased education and awareness to residents, guests, staff, and workers regarding the dangers of microtrash, increased monitoring of events and activities that are potential sources of microtrash, and more frequent collection of microtrash. Condor Deterrent Activities - If the Authorized Biologist deems it necessary, USFWS California condor hazing methods that do not rise to the level of "Take" under the ESA (Service 2014) will be employed. Only the Authorized Biologist, with approval from the USFWS, will conduct hazing and only when such actions are warranted. If the Authorized Biologist is not immediately available, a subset of less aggressive hazing methods, such as yelling, stomping, leashed dog barking or low pressure water spray, may be used when a clear escape route for the condors is identified and upon guidance from USFWS. Condor Tracking – The Applicant will provide the USFWS with twenty-five (25) GPS satellite tracking transmitters (total cost not to exceed $150,000.00) prior to grading plan approval. This will allow the USFWS to more quickly identify the immediate location of birds that are not moving relative to the ground, which usually indicates that an injury, illness, or death has occurred. The ability to track the movements and locations of individual condors can aid in the monitoring of the overall effectiveness of measures to minimize and mitigate the indirect impact of microtrash by locating possible areas where microtrash was ingested. It can also aide in identifying the location where condors were shot if such an incident were to occur.
5.7	**Biological Resources**	**MM 7-7** The Project shall incorporate avoidance and additional open space buffer features for <u>each of the two</u> ~~this~~ <u>known</u> tricolored blackbird nesting <u>areas on and adjacent to the Project site</u> ~~area~~. Permanent impacts will be restricted to a distance of 400 feet from the nesting area excluding small impact areas associated with infrastructure and utilities along SR-138 immediately south of Quail Lake. The nesting area will be delineated by a qualified Ornithologist based on all available data (three years of site-specific data shall be used). Temporary impacts (i.e., construction noise) within <u>a ¼ mile</u> ~~400 feet~~ <u>of active nesting areas</u> shall be restricted to the non-breeding season. The breeding season for this species shall be considered April 1 through July 1. <u>The applicant shall consult with CDFW and may obtain an Incidental Take permit if determined appropriate.</u> ~~The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat. Potentially suitable areas for enhancement and preservation include lower Oso Canyon proximate to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support~~

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		~~breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source.~~
5.7	**Biological Resources**	**MM 7-8** ~~Project construction activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season, if feasible, which generally runs from February 1–August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. "Take" means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (California Fish and Game Code, Section 86), and includes take of eggs or young resulting from disturbances that cause abandonment of active nests. Depending on the avian species present, a qualified Biologist may determine that a change in the breeding season dates is warranted.~~ ~~If avoidance of the avian breeding season is not feasible, a qualified Biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning 30 days prior to the initiation of Project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of Project activities. If a protected native bird is found, the Project Applicant/Developer shall delay all Project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, Project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified Biological Monitor, must be postponed until the nest is vacated; the juveniles have fledged; and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the Project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. The Project Applicant/Developer shall provide the Department of Regional Planning with the results of the recommended protective measures described above to document compliance with applicable State and federal laws pertaining to the protection of native birds.~~ ~~If the Biological Monitor determines that a narrower buffer between the Project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the Project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.~~ ~~The Biological Monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the Project footprint (i.e., outside the demarcated buffer); to ensure that the flagging/stakes/fencing is being maintained; and to minimize the likelihood that active nests are abandoned or fail due to Project activities. The Biological Monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if Project activities damage active avian nests.~~

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#	Environmental Factor	Mitigation
		The Project Biologist shall conduct pre-construction nesting bird surveys no earlier than seven days prior to any Project-related construction/ground disturbance activities within each construction area and a 500-foot buffer that occurs during the nesting/breeding season of special-status bird species potentially nesting on the site, with the exception of the special-status bird species addressed under separate subheadings below (including burrowing owl, golden eagle, and Swainson's hawk). The pre-construction surveys shall be conducted between January 1 and September 15, or as determined by the Project Biologist. If construction activities are delayed for more than 14 consecutive days, the surveys shall be repeated. The purpose of the pre-construction nesting bird surveys will be to determine whether occupied nests are present in the disturbance zone or within 500 feet of the disturbance zone boundary. If occupied nests are found, then limits of construction to avoid occupied nests shall be established by the Project Biologist in the field with flagging, fencing, fencing, or other appropriate barriers. The following minimum no-disturbance buffers will be required: 250 feet around active non-listed passerine nests and 500 feet around active non-listed raptor nests. Construction personnel shall be instructed on the sensitivity of nest areas. Project-related activities will not occur within the no-disturbance buffers. The Project Biologist shall serve as a construction monitor during those periods when construction activities are to occur near active nest areas to avoid inadvertent impacts to these nests. The Project Biologist may adjust the 250-foot or 500-foot setback at his or her discretion depending on the species, the behavioral baseline conditions determined through passive monitoring, and the location of the nest (e.g., if the nest is well-protected in an area buffered by dense vegetation). Once a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, construction may proceed in the setback areas. Monitoring reports shall include information regarding active nests and status of nests.
5.7	**Biological Resources**	**MM 7-9** ~~A qualified Biologist (retained by the Project Applicant/Developer with selection reviewed by the County) shall conduct a field survey no earlier than 20 days prior to any grading activity that would occur during the breeding season (i.e., April 1 through August 31) of native bat species that potentially utilize the site. This should be done to determine if active roosts of special status bats (such as pallid bat) are present in the applicable habitats on the site (e.g., woodlands). If active roosts are found, construction within 200 feet shall be postponed or halted until the roost is vacated and juveniles are self-sufficient, as determined by the Biologist.~~ Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate pre-construction bat surveys for bat roosts for pallid bat, western mastiff bat, western red bat, Townsend's big-eared bat as identified below. a) Pre-Construction Surveys: No earlier than one year prior to the commencement of construction activities for each construction area, a pre-construction survey shall be conducted by qualified project biologists to establish areas of roosts occupancy of special-status bats (including maternity roosts, non-maternity roosts, and winter hibernacula) are present in the Project disturbance zone and within 300 feet of the Project disturbance zone boundary. The number of required project biologists and number of survey nights will be based on the size of the construction area to assure that the whole of the construction area can be adequately surveyed. The surveys shall consist of:

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		i. Two spring surveys (April through June) and two winter surveys (November through January); ii. Each survey consists of one dusk emergence Each survey consists of one dusk emergence survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat in the construction area; iii. For each survey areas, conduct all three survey types within one 24-hour period; iv. Construction areas too large to be adequately assessed in one survey, as determined by the Project biologist, shall be divided into multiple smaller survey areas. iv. Focus visual inspections on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering); and v. Use bat detectors, bat call analysis and visual observations during all dusk emergence and pre-dawn re-entry surveys. Data collection for each survey shall include the following information: i. Whether bats are, or have been, present at roosts on the Project site; ii. Assemblage of species using the site for roosting; iii. Type of roost (i.e., maternity roost, day roost, night roost, feeding perch, mating roost, satellite roost, transitional roost or winter hibernaculum); iv. Location, ambient temperature, internal dimensions and the aspect and orientation of the roost; v. Spatial and temporal distribution of bat roosting activity; vi. Flight paths, exit and entrance points; vii. Number of bats, time and duration of use observed during roost surveys; viii. Photographs; and ix. Identification of any survey constraints. x. If roosts are detected during pre-construction surveys, the following avoidance measures will be implemented unless relocation and/or take is authorized under California Endangered Species Act (CESA), as required by applicable law. b) Avoidance Measures Fencing Installation i. For Maternity Roosts: If an active maternity roost is identified in these areas, the maternity roost will not be directly or indirectly disturbed by prohibiting clearing and grubbing adjacent to the roost site, prohibiting lighting use near the roost site where it would shine on the roost or interfere with bats entering or leaving the roost, prohibiting the bird netting and prohibiting the operation of internal combustion equipment, such as generators, pumps and vehicles within 300 feet of the roost site until the

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		maternity roost is vacated and juveniles have fledged, as determined by the project biologist. The rearing season for native bat species in California is approximately April 1 through August 31. ii. For Hibernacula or Non-Maternity Roosts: If non-breeding bat roosts (hibernacula or non-maternity roosts) are found within the disturbance zone, the following shall be implemented: a. Avoid direct and indirect impacts to roosting sites by prohibiting all project-related activities within 100 feet of the roost. b. Additionally, within 300 feet of the roost, prohibit clearing and grubbing adjacent to the roost site and lighting use near the roost site where it would shine on the roost or interfere with bats entering or leaving the roost. Prohibit the operation of internal combustion equipment, such as generators, pumps and vehicles, and the use of bird netting. c. If avoidance of roost sites is infeasible, maintain portions of the features that provide naturalized habitat to the greatest extent possible and improve existing roost sites and/or provide new roost sites on buildings or on the Project site. Implement these measures only after consultation with CDFW. d. New roost sites must be in place prior to the initiation of Project-related activities to allow enough time for bats to relocate. e. Design and locate new and enhanced roost sites to be compatible with the bats' search image and habitat requirements (i.e., thermal regulation, interior size, ventilation, etc.). Design new and enhanced roost sites in consultation with CDFW. f. Exclude bats from directly affected work areas selectively and only to the extent necessary to prevent morbidity or mortality to the colony. Use one-way bat exclusion devices, installed in a bat-safe way, to exclude bats and then use steel wool or other method to block the entrance, after the bats have gone. Exclude bats only after consultation with CDFW, at a time that is compatible with the species' normal behavior patterns (i.e., breeding, feeding, hibernating, etc.). In general, exclusions shall not occur during the maternity/pup-rearing season or during the hibernation season, as determined by conditions at the Project site.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

<table>
<tr><th>#</th><th>Environmental Factor</th><th>Mitigation</th></tr>
<tr><td>5.7</td><td>Biological Resources</td><td>MM 7-10 The Project Applicant/Developer shall preserve grasslands, including native perennial grassland and associated wildflower field vegetation types, at a minimum 2:1 ratio within the ~~approximate 27,408-acre~~ Mmitigation Ppreserve (see Table A). The Project would impact 6,416 acres of grasslands; therefore, a total of 12,832 acres of grassland mitigation acreage is required to bring impacts to a less than significant level.

TABLE A
GRASSLAND MITIGATION ACREAGES

<table>
<tr><th>Mitigation Area</th><th>Grasslands</th><th>Total Acreage</th></tr>
<tr><td colspan="3">On-Site Mitigation Preserve ~~Unimpacted/SEA~~</td></tr>
<tr><td>On-Site Mitigation Preserve ~~Unimpacted/SEA~~</td><td>1,989</td><td>~~3,861~~ 3,866</td></tr>
<tr><td>Subtotal
(Total On-Site Mitigation Area)</td><td>1,989</td><td>~~3,861~~ 3,866</td></tr>
<tr><td colspan="3">Off-Site Mitigation Preserve ~~Open Space~~</td></tr>
<tr><td>Area 1</td><td>~~1,641~~ 1,734</td><td>6,417</td></tr>
<tr><td>Area 2</td><td>~~1,602~~ 1,597</td><td>2,556</td></tr>
<tr><td>Area 3</td><td>~~3,059~~ 0</td><td>4,183</td></tr>
<tr><td>Area 4</td><td>~~4,429~~ 706</td><td>7,319</td></tr>
<tr><td>Area 5</td><td>~~643~~ 0</td><td>643</td></tr>
<tr><td>Area 6</td><td>~~1,012~~ 1,005</td><td>2,429</td></tr>
<tr><td>Area 7</td><td>7,877</td><td>15,668</td></tr>
<tr><td>Subtotal
(Total Off-site Mitigation Area)</td><td>~~12,386~~ 12,919</td><td>~~23,547~~ 39,213</td></tr>
<tr><td>Total Mitigation Area</td><td>~~14,375~~ 14,908**</td><td>~~27,408~~ 43,079</td></tr>
<tr><td colspan="3">~~SEA: Significant Ecological Area~~

**Goal for 2:1 Grassland Mitigation is 12,832 Acres</td></tr>
</table>

Mitigation for loss of those areas modeled as native perennial grassland will provide similar habitat quality as that which was lost. The result shall be native perennial grassland and wildflower field values that are equal to or greater than the overall ecological functions and values of those lost as a result of Project implementation. Preservation shall include dedication and long-term management working towards the goal of a self-sustaining system. Long-term</td></tr>
</table>

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		management will include focused major problematic non-native species eradication (e.g., feral pigs) where feasible. Preservation will occur on open space lands on the Project site and on other lands within Tejon Ranch. As outlined in Table A above, the ~~14,375~~ 14,908 acres of grassland preservation will occur in open space areas on site and in the ~~six~~ seven other areas. A full description of these areas is in PDF 7-2. Many of these grassland areas have been part of the expansive grassland studies conducted for the Project over the course of several years. Detailed plot analysis and modeling show the high level of similarity between these preserved grasslands and the grasslands within the Project impact area. In addition, the grasslands are contiguous with other preserved open space in the region and support other important biological functions (e.g., drainages and local wildlife movement pathways). As a result, the preserved grassland is part of a more watershed-level preservation allowing for long-term sustainment and a total value that is greater than the sum of its parts. The preservation phasing through conservation easements shall be based on the percentage of total area of impact per phase of development, regardless of specific resource impacts. The specific location of the acreage to be dedicated within a particular phase will be chosen to maximize the replacement of resource values lost during that phase of construction while maintaining as much contiguous acreage as possible. In order to preserve an adequate quantity of grassland, lands outside the County of Los Angeles, within the County of Kern, would be used for mitigation. As each phase is proposed, a percentage of the mitigation preserve (which is equivalent to the percentage of that phase's impacts) shall be dedicated concurrent with the entitlement approval of that phase. Management of the Mitigation Preserve shall be in accordance with the Ranch-wide Management Plan (RWMP), which incorporates Best Management Practices for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions (see RWMP Vol. II Sections 5.1 and 5.2). The RWMP includes standards for management of the grassland areas that will preserve the grasslands in perpetuity. The RWMP shall include a Figure depicting the Mitigation Preserve lands used to meet this 2:1 preserve ratio. The ~~open space~~ Mitigation P~~p~~reserve, including the grasslands within it, shall be preserved in perpetuity to offset Project impacts on native grasslands and wildflower fields prior to issuance of a grading permit for the Project site. The phasing of mitigation has been previously described. The preservation and management of these grasslands through the ~~Native Perennial Grassland and Wildflower Field Mitigation Plan~~ RWMP will sufficiently offset and fully mitigate the impacts on native grasslands and wildflower fields associated with the Project.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

<table>
<tr><th>#</th><th>Environmental Factor</th><th>Mitigation</th></tr>
<tr><td>5.7</td><td>Biological Resources</td><td>

The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.

MM 7-10 The Project Applicant/Developer shall preserve grasslands, including native perennial grassland and associated wildflower field vegetation types, at a minimum 2:1 ratio within the Mitigation Preserve (see Table A). The Project would impact 6,416 acres of grasslands; therefore, a total of 12,832 acres of grassland mitigation acreage is required to bring impacts to a less than significant level.

TABLE A
GRASSLAND MITIGATION ACREAGES

Mitigation Area	Grasslands	Total Acreage
On-Site Mitigation Preserve		
On-Site Mitigation Preserve	1,989	3,866
Subtotal (Total On-Site Mitigation Area)	*1,989*	*3,866*
Off-Site Mitigation Preserve		
Area 1	1,734	6,417
Area 2	1,597	2,556
Area 3	0	4,183
Area 4	706	7,319
Area 5	0	643
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Area 7	7,877	15,668
Subtotal (Total Off-site Mitigation Area)	*12,919*	*39,213*
Total Mitigation Area	**14,908****	**43,079**
**~~Goal for~~ 2:1 Grassland Mitigation requirement is 12,832 Acres		

Mitigation for loss of those areas modeled as native perennial grassland will provide similar habitat quality as that which was lost. The result shall be native perennial grassland and wildflower field values that are equal to or greater than the overall ecological functions and values of those lost as a result of Project implementation. Preservation shall include dedication and long-term management working towards the goal of a self-sustaining system. Long-term

</td></tr>
</table>

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		management will include focused major problematic non-native species eradication (e.g., feral pigs) where feasible. Preservation will occur on open space lands on the Project site and on other lands within Tejon Ranch. As outlined in Table A above, the 14,908 acres of grassland preservation will occur in open space areas on site and in the seven other areas. A full description of these areas is in PDF 7-2. Many of these grassland areas have been part of the expansive grassland studies conducted for the Project over the course of several years. Detailed plot analysis and modeling show the high level of similarity between these preserved grasslands and the grasslands within the Project impact area. In addition, the grasslands are contiguous with other preserved open space in the region and support other important biological functions (e.g., drainages and local wildlife movement pathways). As a result, the preserved grassland is part of a more watershed-level preservation allowing for long-term sustainment and a total value that is greater than the sum of its parts. The preservation phasing through conservation easements shall be based on the percentage of total area of impact per phase of development, regardless of specific resource impacts. The specific location of the acreage to be dedicated within a particular phase will be chosen to maximize the replacement of resource values lost during that phase of construction while maintaining as much contiguous acreage as possible. In order to preserve an adequate quantity of grassland, lands outside the County of Los Angeles, within the County of Kern, would be used for mitigation. As each phase is proposed, a percentage of the mitigation preserve (which is equivalent to the percentage of that phase's impacts) shall be dedicated concurrent with the entitlement approval of that phase. Management of the Mitigation Preserve shall be in accordance with the Ranch-wide Management Plan (RWMP), which incorporates Best Management Practices for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions (see RWMP Vol. II Sections 5.1 and 5.2). The RWMP includes standards for management of the grassland areas that will preserve the grasslands in perpetuity. The RWMP shall include a Figure depicting the Mitigation Preserve lands used to meet this 2:1 preserve ratio. The Mitigation Preserve, including the grasslands within it, shall be preserved in perpetuity to offset Project impacts on native grasslands and wildflower fields prior to issuance of a grading permit for the Project site. The phasing of mitigation has been previously described. The preservation and management of these grasslands through the RWMP will sufficiently offset and fully mitigate the impacts on native grasslands and wildflower fields associated with the Project.
5.7	**Biological Resources**	**MM 7-11** This measure prescribes mitigation for other special status vegetation types including mixed oak woodland, oak trees, and other riparian and wetland vegetation types. Each of these three vegetation types is discussed separately (native grassland and wildflower fields are addressed in MM 7-10). *Mixed Oak Woodlands* The Project Applicant/Developer shall create mixed oak woodlands to achieve resulting vegetation/habitat values. Since there would be approximately 6.2 acres of oak woodland impacts, mitigation will result in the preservation of a minimum of 6.2 acres of mixed oak woodland and creation of a minimum of 6.2 acres of mixed oak woodland, which

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		will include the establishment[3415] of 322 oak trees completed as part of oak tree replacement in accordance with the County of Los Angeles oak tree permit requirements (see Oak Trees Section below). Oak trees established in created oak woodlands will be credited towards both oak woodland and oak tree mitigation requirements. If Project impacts are reduced through a reduction in Project disturbance limits in oak woodland areas, required mitigation acreage will be reduced accordingly. In accordance with mitigation options outlined in Section 21083.4 of the *California Public Resources Code* (PRC), replacement of oak woodlands shall consist of no greater than ½ of the oak woodland mitigation requirement. Therefore, half of the 6.2 oak woodland impact acreage will be mitigated via the alternate option of preservation. The combined acreage of oak woodland preserved both on site (unimpacted~~/~~ Significant Ecological Area [SEA]) and within the off-site mitigation areas is ~~3,102~~ 3,090 acres and is expected to substantially exceed the required 50 percent of mitigation as preservation. Mitigation through creation is typically implemented on lands with minimal habitat value (e.g., ruderal vegetation, graded slopes) rather than in areas with a substantial component of existing native vegetation. However, evidence of lack of naturally occurring recruitment on site indicates that the existing woodlands are likely to be eventually replaced by non-woodland vegetation. Based on the lack of naturally occurring replacement trees, it is anticipated that oak woodland planting is necessary to sustain the oak woodlands. Therefore, the goal of oak resource mitigation efforts will be to create and enhance oak woodlands. To maximize potential for success, oak woodlands will be created within and adjacent to the same areas where oak woodlands currently exist. This method will create future generations of oak trees and oak woodland on the site in these areas. Details of the oak woodland mitigation program are described below in items 1–10. 1. To mitigate for impacts to oak woodland and oak trees, site-specific native acorns will be collected. Acorns will be collected within the watershed area of the Project site to ensure that acorns collected are of a similar genetic stock to those existing on the site. Some acorns will be planted and maintained in containers, and others will be stored and planted directly on site within the Oak Mitigation Areas. 2. To maximize oak woodland biological values and the potential for long-term success, some locally collected oak acorns will be planted directly into the ground. These acorns will be planted in appropriate locations in the Oak Mitigation Areas. The locations identified for acorn planting will be reviewed by the County Forester. 3. Container plants will be propagated and maintained from locally collected acorns. In this way, more established container plants will be available for mitigation efforts, and they will contain the most suitable genetic variability appropriate for the region to increase mitigation success. The preferred method of propagation will include the establishment of a temporary nursery on the Project site. The nursery will include partial shade areas to reduce water loss and a constant water supply to supplement planted trees. Using the acorns collected from within the

[3415] In Biology, "establish", in this sense, refers to vegetation (including seeds) that has been planted and is becoming a healthy, surviving plant with as much chance to survive as plants that have existed for a long period of time.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		watershed area of the Project site, container plantings will be cultivated at this location. Development of trees on site will ensure that they are acclimated to the typical weather conditions at their eventual permanent location. If necessary, and in consultation with the County Forester, acorns collected from the site may be stored or propagated and maintained under contract with a reputable native plant nursery off site. 4. To provide overstory, midstory, and understory tree/plant coverage, some container plants and oak trees, grown from locally collected acorns, will be installed in addition to the application of native seed mixes. Since studies indicate that the younger the planting is, the more likely the chance is for successful establishment and long term viability[8] locally collected acorns as well as locally collected, nursery-cultivated young oak trees (one-gallon or five-gallon containers of oaks) would be planted on site. The oak woodland planting and seeding palettes will include a diversity of locally-collected native shrubs, subshrubs, grasses, forbs, and ferns, to provide a beneficial mosaic of understory vegetation. 5. The oak mitigation program will include the extensive salvage (from the impacted oak habitat areas) and placement of coarse woody debris, brush piles, and boulders (as available) to immediately provide (a) suitable micro-habitats for the establishment of plant species with particular shade and moisture requirements (e.g., ferns) and (b) improved habitat resources (e.g., cover) for wildlife species. 6. Irrigation will be provided to the oak plantings in a manner that simulates natural rain events; i.e., infrequent, deep watering. Irrigation will be suspended during periods of substantial rainfall, and irrigation will be terminated at the earliest possible date (depending on seasonal weather patterns) in coordination with the County Forester, to optimize the drought resiliency and proper root development of the planted oaks. Additionally, all irrigation must be terminated for a minimum of five years before the oak mitigation areas will be eligible for final approval/sign-off. ~~5~~ 7. The Project Applicant/Developer will provide an annual report to the County that will include an accounting of each of the following in the mitigation areas: (a) the number of acorns planted; (b) the number of germinated acorns (whether planted or natural) protected; (c) the number of new oak trees planted in mitigation areas, including the species of each tree planted; (d) the caliper of each new tree planted and/or protected; (e) the acreage of woodlands created and/or conserved in the mitigation areas. ~~6~~ 8. Creation of structurally diverse oak woodland habitat within and contiguous to existing oak woodlands will be accomplished by planting locally collected oak acorns, plus yearly sowings of additional locally collected acorns, as well as, temporary irrigation, weed abatement, pest deterrence, and/or other maintenance tasks as needed to facilitate oak seedling germination and survival. ~~7~~ 9. Prior to Project grading, locally collected acorns will be planted and grown. Once trees reach a diameter of one inch just above ground surface (i.e., basal height) within the Oak Tree/Oak Woodland Mitigation Areas, they will be appropriated as "mitigation trees" to be used for oak woodland and oak tree permit mitigation purposes with approval from the County Forester as part of the oak woodland and oak tree permit mitigation process and will

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		be credited as a mitigation tree if the tree is determined to be healthy by the Los Angeles County Forester at the end of the monitoring period. ~~8~~ 10. The required 12.4 acres of mixed oak woodland creation will occur within 473 acres of existing oak woodland (primary area) and 716 acres of adjacent low quality non-native grassland (secondary area, if needed) on the western portion of the Project site. Additional suitable areas may also be identified within reduced grading footprints following final detailed tract map production to the satisfaction of the County Forester. Mitigation planting areas will be refined within the proposed mitigation areas through a multi-variable query of existing Geographical Information System (GIS) data sets, and intensive field analysis to precisely identify suitable planting locations (e.g., localized soil types, microtopography). Created oak woodlands will have an approximate average density of 80 appropriately sized oak trees per acre at the end of the monitoring period (or other density as directed by the County Forester), while staying within the mitigation areas. The contiguity of the created woodland habitat within or adjacent to existing oak woodlands will be ecologically beneficial, and will also improve the logistics of restoration installation, maintenance, and monitoring, compared to a fragmented habitat creation program. These methods will help to ensure the success of created oak woodlands to replace the existing woodlands over time. ~~9~~ 11. In order to implement the creation of habitat on the site and to ensure the persistence of the overall biological functions and values over time, the Project Applicant/Developer shall submit an Oak Woodland Habitat Mitigation Plan to the County for approval prior to the issuance of a grading permit for each tract map or combination of tract maps. The mitigation approach described in the Plan shall comply with Section 21083.4 of the *California Public Resources Code* (PRC), which was enacted by California Senate Bill (SB) 1334. County approval of the Plan shall be required prior to the initiation of any clearing or grading on the site that affects any oak woodland vegetation. The Oak Woodland Habitat Mitigation Plan shall be developed by a qualified Restoration Specialist, to be retained by the Project Applicant/Developer, and shall be subject to County approval. The objective of the Oak Woodland Habitat Mitigation Plan will be to preserve 6.2 acres of existing oak woodland and to create 6.2 acres of oak woodland. The Oak Woodland Habitat Mitigation Plan serves the purpose of satisfying the conditions of Section 21083.4 of the *California Public Resources Code*. ~~10~~ 12. Implementation of the Oak Woodland Mitigation Plan will be the responsibility of the Project Applicant/Developer or its designated party; the Plan shall specify, the following: a. **Planting Management Program:** A Planting Management Program shall be prepared for review by the County Forester that will outline three planting seasons and will include (i) the first planting season, year 0, being the acorn and sun tolerant ground covers; (ii) the second planting season occurring at approximately year 5, introducing sun/shade tolerant species; and (iii) the third planting season at year 10 with the introduction of more shade tolerate understory species, including the use of reference sites.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		~~a.~~ **b. Personnel:** The responsibilities and qualifications of personnel required to implement and supervise the plan will be specified. The responsibilities of the Landowner, County staff, Specialists, and Maintenance Personnel that will supervise and implement the plan will also be included. ~~b.~~ **c. Site Selection:** The mitigation site(s) will be determined in coordination with the project applicant/Developer and the County. The site(s) will be located in open space areas that will be managed in perpetuity through a conservation easement, open space dedication, performance bond, management at the Tejon Ranch Conservancy, or other method approved by the County Forester. ~~c.~~ **d. Native Species Seed Collection, Site Preparation, and Planting Implementation:** Under the supervision of the County Forester, site preparation will include (i) protection of existing native species; (ii) trash and weed removal; (iii) native species salvage and reuse (i.e., duff); (iv) soil treatments (i.e., imprinting, and/or decompacting); (v) erosion-control measures (i.e., rice or willow wattles); (vi) native seed mix application; and (vii) procedures for native seed collection from the site, including acorns of native oak species. ~~d.~~ **e. Schedule:** Restoration/revegetation sites will be established between October 1 and January 30. Seeding and planting of container plants will take place immediately after preparation of the mitigation sites and will take place under the supervision of the County Forester. ~~e.~~ **f. Maintenance Plan and Guidelines:** The Maintenance Plan, to be approved by the County, will include (i) weed control; (ii) herbivory control (e.g., feral pigs); (iii) trash removal; (iv) irrigation system maintenance; (v) maintenance training; (vi) replacement planting; and (vii) a vehicle washing program to capture invasive propagules. The Maintenance Plan will also indicate who is responsible for each of these listed tasks. ~~f.~~ **g. Monitoring Plan:** The monitoring plan, to be implemented for a 15-year period, and to be approved by the County, will include (i) qualitative monitoring (i.e., photographs and general observations); (ii) yearly quantitative monitoring (i.e., randomly placed transects to assess vegetation type coverage and systematically assess all mitigation oak trees); (iii) performance criteria as approved by the County; and (iv) annual reports that will be submitted to the County for five consecutive years after initial planting (or longer if the County requires) and following plan approval. The Plan shall be prepared by a qualified Restoration Specialist and approved by the County prior to any clearing or grading for any tract map that affects any oak woodland vegetation. ~~g.~~ **h. Long-Term Preservation:** Long-term preservation of the mitigation site(s) will be outlined in the Restoration Plan to ensure that they are not impacted by future development. An open space dedication, conservation easement, performance bond, management by the Tejon Ranch Conservancy, or other County-approved method will be used to ensure long-term preservation.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		~~h.~~ i. **Growth/Vegetation Standards:** Growth/vegetation standards will be developed by a qualified Biologist in accordance with County and regulatory agency requirements. *Oak Trees* The mitigation approach for replacing lost oak trees shall comply with the County of Los Angeles Oak Tree Ordinance (CLAOTO) requirements. The goal of this program is to replace impacted oak trees at a ratio of 3:1 for non-heritage oaks and 10:1 for heritage oaks in accordance with the County's oak tree permit requirements. This would result in the establishment of 322 oak trees. However, if Project impacts are reduced through a reduction in Project disturbance limits within oak woodland areas, required tree numbers will be reduced accordingly. Mitigation trees are typically planted on lands with minimal habitat value (e.g., ruderal vegetation, graded slopes) rather than in areas with a substantial component of existing native vegetation. To maximize potential for success, oak trees will be planted in the same areas where oak woodlands currently exist. This method will create future generations of oak trees and oak woodland on the site in these areas and will be done as described in Numbers 1–10 under the "Mixed Oak Woodlands" portion above. Additionally, quantitative tree monitoring data for all mitigation trees (whether for County of Los Angeles Oak Tree Ordinance [CLAOTO] mitigation or oak woodland mitigation) will be submitted to the County Forester yearly and, for convenience, will be included as an appendix to the annual report required in 10(f)(ii) above. *Other Riparian and Wetland* In addition, the Project Applicant/Developer shall create, enhance, and/or restore all impacted riparian and wetland vegetation types that are not considered jurisdictional by permitting resource agencies (i.e., those not mitigated through regulatory permit conditions) at a 1:1 ratio. This applies to areas mapped as alluvial scrub; riparian herb; rush riparian grassland; southern arroyo willow riparian; southern willow scrub; unvegetated wash; willow riparian forest; willow riparian woodland; alkali meadow; Baltic rush; and seeps and ephemeral ponds. These areas shall be included in the Streambed and Wetland Habitat Creation and Enhancement Plan discussed in MM 7-12, which shall be approved by the County prior to issuance of grading permits. Consultation with representatives from the Angeles National Forest regarding oak and grasslands mitigation activities in SEA 17 shall occur prior to the commencement of oak tree planting in SEA 17.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.7	**Biological Resources**	**MM 7-12** Prior to any fill of or alteration to drainage tributaries, wetlands, and/or riparian vegetation on the Project site, the Project Applicant/Developer shall obtain the appropriate regulatory agency permits and/or agreements from the U.S. Army Corps of Engineers (USACE), the California Department of Fish and Wildlife (CDFW), and the applicable Regional Water Quality Control Board (RWQCB). The Project Applicant/Developer shall comply with all construction mitigation measures specified in the EIR, regulatory agency permits, and/or agreements. Pursuant to the permit requirements, the Project Applicant/Developer will develop a Storm Water Pollution Prevention Plan (SWPPP) that incorporates Best Management Practices (BMPs) for reducing or eliminating construction-related pollutants in the site runoff. The Project is subject to the following Mitigation Performance Standards: As anticipated to be required by USACE, CDFW, and Regional Water Quality Control Board (RWQCB) regulatory permits, the Project Applicant/Developer shall create, enhance, and/or restore acreage to ensure that net habitat values are at least equal to those lost from Project implementation. Mitigation ratios are typically specified in the regulatory permits. However, if mitigation is conducted prior to impacts taking place, mitigation ratios can be pro-rated; this type of mitigation pro-rating allows time to evaluate if created, enhanced, and/or restored habitat values are at least equal to those that will eventually be lost from Project implementation. Under this scenario, it can be verified that the restoration/creation goals have been accomplished or are proceeding satisfactorily. The extent of drainages and wetlands that would be preserved under the Project will provide opportunities to expand and enhance the drainages, wetlands, and riparian vegetation throughout the Mitigation Preserve ~~on the Project site~~. As discussed previously, a wetland functional assessment of the drainages and other aquatic features in the Project site was conducted by Glenn Lukos Associates in 2006 and 2009 in order to characterize and evaluate the functions of the site's drainages and riparian habitats (GLA 2009a). An update to that functional assessment was conducted in 2015 (BonTerra Psomas 2015a). Overall, aquatic resources on the site were evaluated in terms of Functional Capacity Units (FCU), which indicate more specifically the mitigation level necessary to restore riparian functions after Project implementation by providing a measure of the ability of a wetland area to perform typical wetland functions. The purpose of the mitigation is to replace lost habitat value, as measured in FCU (or other acceptable functional value units) rather than based on a standard acreage ratio. Alternatively, a more traditional mitigation ratio approach may be employed using following rates: a. Wetland Waters: 2:1, including 1:1 restoration and 1:1 enhancement, of wetland waters. b. Streams: i. 1:1 preservation of ephemeral and/or intermittent streams for permanent impacts to ephemeral non-wetland waters of the state (non-riparian) ii. 1:1 preservation of intermittent streams for permanent impacts to intermittent non-wetland waters of the state (non-riparian)

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		iii. 1:1 restoration of intermittent streams for temporary impacts to intermittent non-wetland waters of the state (non-riparian) c. Riparian Vegetation: 2:1, including 1:1 restoration and 1:1 enhancement of riparian vegetation. Mitigation will include a combination of on-site and off-site preservation of jurisdictional resources; on-site and off-site enhancement/restoration of preserved jurisdictional resources in order to increase overall functional capacity; and the creation (expansion) of riparian/wetland habitats along degraded drainages, including Oso Creek and two of its tributaries in addition to the three other drainages (including the main drainage located along and immediately north of State Route [SR] 138). The direct and indirect loss in on-site functional units will be mitigated through passive enhancement of open space areas, active enhancement of 6.5 acres of wetland, and creation of approximately 78.4 acres of wetland/riparian habitat (GLA 2009a). Following implementation of mitigation, the Project provides approximately 4,748.5 FCUs. Therefore, the proposed mitigation will result in a functional gain of 327.5 FCUs, thereby ensuring a net increase in functionality in the post-Project condition (GLA 2009a). In summary, implementation of the proposed jurisdictional resource mitigation will actually result in a net gain in the measurable functional capacity and therefore, the habitat values, of the on-site and off-site drainages and other aquatic features.[3416] To implement the creation/restoration/enhancement of streambed/wetland habitats on the site, the Project Applicant/Developer shall develop a Streambed and Wetland Habitat Creation and Enhancement Plan commensurate with regulatory agency permits and/or agreements. The purpose of this plan is to demonstrate the feasibility of creating the required mitigation acreage and to ensure that the overall biological functions and values are increased. The plan shall be developed by a qualified Restoration Specialist and shall be submitted ~~to the County for approval~~ and approved by the County and CDFW, and RWQCB prior to grading that would impact jurisdictional waters or wetlands. The Streambed and Wetland Habitat Creation and Enhancement Plan shall specify the following for each tentative tract map area: • **Statement of Impacts:** A statement of impacts and avoidance shall be prepared, including temporary and permanent impacts. • **Personnel:** Responsibilities and qualifications of the personnel required to implement and supervise the plan will be specified. The responsibilities of the Landowner, Specialists, and Maintenance Personnel that will supervise and implement the plan will also be included. • **Site Selection:** Identification of preservation, enhancement and/or creation sites on Mitigation Preserve shall be included. A summary of location of preserved wetlands and/or waters required to achieve applicable preservation performance standards shall also be included. The sites for mitigation will be determined through

[3416] For information about the functional values of the impacted jurisdictional resources and proposed mitigation areas, see GLA 2009b in Appendix 5.7-B.

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		coordination between the project applicant/Developer, the USACE, the CDFW, the applicable RWQCB, and the County. • **Site Preparation and Planting Implementation:** Site preparation will include: (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting and/or decompacting); (5) fencing, grading and contouring to improve topographic heterogeneity and floodplain benching, erosion-control measures (i.e., rice or willow wattles); (6) seed mix application and quantities; and (7) procedures for seed collection from existing habitat on the site. Implementation procedures such as mulching will also be included. • **Schedule:** Establishment of restoration/revegetation sites will be conducted between October 1 and January 30. Seeding and planting of container plants will take place immediately after preparation of the restoration sites. • **Maintenance Plan/Guidelines:** The maintenance plan will include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; (6) replacement planting; ~~and~~ (7) vehicle washing program to capture invasive propagules; and (8) pest management. • **Monitoring Plan:** The monitoring plan will include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) vegetation performance success criteria, as approved by the USACE, the CDFW, and the applicable RWQCB [including success for species richness: (≥10), native vegetative cover (≥70 percent) and invasive species (≤5 percent)]; (4) biannual reports (i.e., two reports the first year) for the first year will be submitted to the USACE, the CDFW, the applicable RWQCB; and (5) annual reports, which will be submitted to all three agencies and the County for an additional four years after initial planting. The monitoring is planned for five years, but may be shorter or longer depending upon the performance of the mitigation sites. • **Long-Term Preservation:** Long-term preservation of the mitigation sites will be outlined in the mitigation plan to ensure that they are not impacted by future development. An open space dedication, conservation easement, performance bond, management by the Tejon Ranch Conservancy, or other County-approved method will be used to ensure long-term preservation. • **Performance Standards:** A statement of mitigation performance standard being met (functional value or acreage ratio) shall be included. These will be developed by conducting a biological functions and values assessment (using an accepted method such as Hydrogeomorphic Modeling [HGM]) to establish a baseline for the overall biological value of the affected streambeds and riparian areas on the site. Revegetation will be considered successful at five years if the percent cover and species diversity of the restored and/or created habitat areas are similar to percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing, restored, and created habitat areas [for species richness (≥10), native vegetative cover (≥70 percent) and invasive species (≤5 percent)]. Contingency measures shall also be described in the event that mitigation efforts are not successful. • **Temporary Impacts**: standards for minimizing and restoring temporary impacts, which include recontouring and erosion control for intermittent channels and reseeding requirements for riparian vegetation areas.

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#	Environmental Factor	Mitigation
		• **Cattle Exclusion Methods:** Measures to exclude cattle from habitat creation areas and enhancement areas (where applicable) shall be identified and described. • **Funding:** The funding source(s) for all proposed mitigation actions shall be identified. The Streambed and Wetland Habitat Creation and Enhancement Plan shall be subject to approval by the County, the USACE, the CDFW, and the applicable RWQCB for impacts within the respective jurisdictional areas of these agencies. If pro-rated mitigation ratios are used, it shall be demonstrated that the mitigation performance standards have been accomplished. The accomplishment shall be verified by the USACE, the CDFW, and the applicable RWQCB based on the performance standards established above prior to the County's issuance of a grading permit. Implementation of these mitigation measures may serve the dual purpose of satisfying the conditions (or a portion of the conditions) of the agreements/permits of the USACE, the CDFW, and the applicable RWQCB.
5.7	**Biological Resources**	**MM 7-13** The Project Applicant/Developer shall develop a Landscaping Plan for review and approval by the County Biologist~~,~~ The Landscaping Plan shall be (1) prepared by a qualified biologist; (2) submitted to the County for approval with each tentative map; (3) provided to builders; (4) provided to future project occupants as described in the Specific Plan; and (5)~~, which~~ includes a plant palette composed of non-invasive species that are adapted to the conditions found on the Project site and do not require high irrigation rates. The Landscaping Plan will also include a list of invasive plant species prohibited from being planted on the Project site. In addition, retail sales of these invasive plant species will be prohibited at any businesses (nurseries) located within the Project site. Landscape plans shall encourage planting of local natives typical of native vegetation within ten miles of the Project site. The Homeowners Association shall supply future residents of the Project site with the list of invasive plant species from the Landscaping Plan that will be prohibited from being planted on the Project site and educational materials that emphasize the importance of adhering to the list. A list of local native plants shall be provided to homeowners.
5.7	**Biological Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 7-13** The Project Applicant/Developer shall develop a Landscaping Plan for review and approval by the County Biologist. The Landscaping Plan shall be (1) prepared by a qualified biologist; (2) submitted to the County for approval with each tentative map; (3) provided to builders; (4) provided to future project occupants as described in the Specific Plan; and (5) includes a plant palette composed of non-invasive species that are adapted to the conditions found on the Project site and do not require high irrigation rates. The Landscaping Plan will also include a list of invasive plant species prohibited from being planted on the Project site. In addition, retail sales of these invasive plant species will be prohibited at any businesses (nurseries) located within the Project site. Landscape plans shall encourage planting of local natives typical of native vegetation within ten miles of the Project site. The Homeowners Association shall supply future residents of the Project site with the list of invasive plant species from the Landscaping Plan that will be prohibited from being planted on the Project site and educational materials that emphasize the importance of adhering to the list. The prohibition shall be clearly described and distributed to home

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#	Environmental Factor	Mitigation
		buyers through their home purchase contacts and CC&Rs. A list of local native plants and educational materials shall be provided to homeowners and shall be posted on the community intranet.
5.7	**Biological Resources**	**MM 7-14** The designated SR-138 underpass shall be located where the highway crosses the Project's western border near the current intersection with Cement Plant Road. The width of the underpass shall be 100 feet as it passes under SR-138 and shall flare out on both sides of the highway as it moves away from SR-138 to a 150-foot width in the Project open space adjacent to the highway. These specifications are expected to allow some local wildlife to safely pass between open space areas on opposite sides of the highway. In addition, a 50-foot open space buffer will be incorporated on the eastern and western sides of Cement Plant Road; this buffer shall be from the southern side of the bridge that spans the California Aqueduct to the nearest open space polygon that meets the property edge. The undeveloped 50-foot buffer shall run parallel with the Aqueduct along its southern bank. This buffer may be temporarily disturbed during construction, but shall be retained as greenspace to increase connectivity for local wildlife between open space areas and potential Aqueduct crossing locations.
5.7	**Biological Resources**	**MM 7-15** Waste and recycling receptacles that discourage foraging by wildlife species adapted to urban environments shall be installed by the Project Applicant/Developer in common areas (i.e., any area where public trash receptacles would be placed, such as parks, sidewalks, community centers, and walking trails) throughout the Project site. Common, residential, and commercial areas will all be served with wildlife resistant trash receptacles. Documentation of the completion of this measure shall be submitted to the County prior to occupation of housing units. The Homeowners Association shall supply an educational pamphlet to future residents of the Project site regarding: the importance of not feeding wildlife; information stating that trash (containing food) and microtrash that could potentially attract condors should not be accessible to wildlife; the necessity of keeping the ground free of fallen fruit from trees; and instructions about not leaving pet food outside. Additionally, in order to minimize impacts on native wildlife, the use of rodenticides on the Project site shall be prohibited. All vertical open pipes used for fence posts, property line stakes, signs, roof veneration, chimneys, vault toilets, and similar structures and metal fence stakes used on the Project site shall be capped. Capping can be accomplished using bolts or other materials to avoid raptor talons becoming entrapped within the bolt holes of metal fence stakes.
5.7	**Biological Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 7-15** Waste and recycling receptacles that discourage foraging by wildlife species adapted to urban environments shall be installed by the Project Applicant/Developer in common areas (i.e., any area where public trash receptacles would be placed, such as parks, sidewalks, community centers, and walking trails) throughout the Project site. Common, residential, and commercial areas will all be served with wildlife resistant trash receptacles. Documentation of the completion of this measure shall be submitted to the County prior to occupation of housing units. The Homeowners Association shall post the information on the community intranet and shall supply an educational

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#	Environmental Factor	Mitigation
		pamphlet to future residents of the Project site regarding: the importance of not feeding wildlife; information stating that trash (containing food) and microtrash that could potentially attract condors should not be accessible to wildlife; the necessity of keeping the ground free of fallen fruit from trees; and instructions about not leaving pet food outside. Additionally, in order to minimize impacts on native wildlife, the use of rodenticides on the Project site shall be prohibited. The prohibition shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs. All vertical open pipes used for fence posts, property line stakes, signs, roof veneration, chimneys, vault toilets, and similar structures and metal fence stakes used on the Project site shall be capped. Capping can be accomplished using bolts or other materials to avoid raptor talons becoming entrapped within the bolt holes of metal fence stakes.
5.7	**Biological Resources**	**MM 7-16** All landscaping materials (including organic mulches) for common/public areas (i.e., parks and intervening unpaved areas which are not a part of any homeowner's parcel) shall be inspected and certified by landscape suppliers as being "free" of Argentine ants prior to planting. Additionally, container plants and other landscaping materials to be installed within common/public areas within 200 feet of the open space areas shall be inspected by a qualified restoration specialist for the presence of Argentine ants. Plants or other materials with Argentine ants shall be rejected. Upon initiating landscaping within a development area, quarterly monitoring shall be initiated for Argentine ants along the development/construction–open space interface at sentinel locations where invasions could occur (e.g., where moist microhabitats that attract Argentine ants may be created). A qualified biologist shall determine the monitoring locations. Ant pitfall traps will be placed in these sentinel locations and operated on a quarterly basis to detect invasion by Argentine ants. If Argentine ants are detected during monitoring, direct control measures will be implemented immediately to help prevent the invasion from worsening. These direct controls may include but are not limited to nest/mound insecticide treatment, or available natural control methods being developed. A general reconnaissance of the infested area would also be conducted to identify and correct the possible source of the invasion, such as uncontrolled urban runoff, leaking pipes, or collected water. Each site visit shall be followed up with a summary monitoring report sent electronically to Applicant indicating the status of the site. Monthly monitoring reports, as needed, shall be submitted to CDFG and the County of Los Angeles). Monitoring reports shall include remedial recommendations and issue resolution discussions when necessary. Monitoring and control of Argentine ants would occur for a 5-year period. After the first 5 years, the Homeowners Association or other entity will be responsible for controlling Argentine ants. Additionally, to further guard against Argentine ants, the Homeowners Association shall discourage irrigated landscape planting through distribution of educational information and other feasible methods to reduce the potential for importing Argentine ants. To preclude the invasion of Argentine ants into preserved populations of round leaved filaree and crownscale and their associated buffers, controls will be implemented using an integrated pest management (IPM) approach. The controls include (1) Providing "dry zones" between development and round leaved filaree and crownscale populations, where typical soil moistures are maintained at levels below about 10% soil saturation, which will deter the establishment of nesting colonies of ants; and providing dry zone buffers of sufficient width to reduce the potential for Argentine ant

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#	Environmental Factor	Mitigation
		activity within core habitat areas; (2) Where feasible, and/or appropriate, dry areas such as parking lots and roadways shall be built adjacent to the boundaries of these populations; (3) designing adjacent areas to slope away from the preserved populations to avoid runoff entering the area; (4) Pedestrian pathways placed next to preserve populations shall consist of decomposed granite or other gravel to minimize the holding of moisture, thereby preventing establishment of suitable habitat for Argentine ant colonies; (5) Ensuring that all landscape container plants ~~installed within 200 feet of preserved populations~~ are ant free prior to installation to reduce the chance of colonies establishing in areas close to the preserved populations; (6) Maintaining natural hydrological conditions in the preserved populations areas, including the buffers, through project design features for roadways, French drains, irrigation systems, underground utilities, drainage pipes and fencing, storm drains, and any other BMP measures that apply to surface water entering the preserved populations areas; (7) Using drought resistant plants in fuel modification zones and minimizing irrigation to the extent feasible. Similarly, to preclude the invasion of Argentine ants into Mitigation Preserve lands, "dry zones" of a minimum of 350 feet shall be established between development and the Mitigation Preserve. Soil moistures shall be maintained at levels below about 10 percent soil saturation within dry zones to deter the establishment of nesting colonies of ants. All landscaping materials to be used in these zones shall be inspected and certified as "free" of Argentine ants prior to planting. Additionally, these materials shall be inspected by a qualified restoration specialist for the presence of Argentine ants. Plants or other materials with Argentine ants shall be rejected. To prevent the establishment of invasive aquatic wildlife such as the American bullfrog (*Lithobates catesbeianus*) and the African clawed frog (*Xenopus laevis*), all Project flood control and other water retention features shall be monitored seasonally and following rain fall events to confirm pooling does not persist for more than 15 days. If such pooling beyond 15 days is detected, including, for example, in artificially created fishing/casting ponds which can only be constructed following issuance of a conditional use permit and further environmental review, the constructed pond location shall be checked routinely for presence of aquatic invasive wildlife by a qualified biologist until the unexpected pooling no longer persists. If detected, eradication measures to remove all invasive aquatic wildlife shall be implemented by the qualified biologist and may include one or more techniques, including trapping, pithing, and pellet shooting.

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#	Environmental Factor	Mitigation
5.7	**Biological Resources**	**MM 7-17** The Project Applicant/Developer shall implement a public awareness program (prior to the first occupancy permit) in an effort to restrict public access to the riparian and open space areas on the Project site to designated trails and to prevent unleashed domestic animals from entering these areas. The program's educational materials shall discuss the presence of native animals (e.g., coyote, bobcat, and mountain lion), indicate that those native animals could prey on pets, indicate that no actions shall be taken against native animals should they prey on pets allowed outdoors, and indicate that pets must be leashed while using the designated trail system and/or in any areas within or adjacent to open space. The educational materials shall also discuss the impacts pets can have on native birds. Control of stray and feral cats and dogs will be conducted in open space areas on an as-needed basis. Feral cats and dogs may be trapped and deposited with the local Society for the Prevention of Cruelty to Animals or the Los Angeles County Department of Animal Control. This program shall include signs that identify the boundaries of ecologically sensitive areas (including the avoided special status plant populations described in MM 7-1); the use of temporary, wildlife-friendly fencing around sensitive areas that appear to be receiving a high level of disturbance until the disturbance is reversed; and promotion of public education and awareness of such areas. In addition to signage being located along the boundaries of the Mitigation Preserve, signage denoting the boundaries of ecologically sensitive areas and other pertinent information shall be included along the Pacific Crest Trail where it overlaps the Mitigation Preserve. The Project Applicant/Developer shall be responsible for the initial development of the public awareness program and installation of interpretive signs and wildlife-friendly fencing. The Homeowners Association, the Project Applicant/Developer, or an acceptable Land Manager/Agency (as approved by the County) shall be responsible for maintaining this program, including signs and wildlife-friendly fencing. Only passive recreational activities shall be permitted within the designated natural open space areas and shall be restricted to trails. Some areas may allow slightly greater impacts if designated as picnic and/or camping areas. Domestic cats shall be prohibited from free-roaming (i.e., be allowed outdoors), and shall be required to have a microchip. All dogs shall be required to be leashed while in the designated natural open space areas, and bags for removing pet excrement will be provided at trail entrances and other appropriate locations. In addition, all dogs and cats shall be required to be neutered or spayed; all dogs shall be required to have a microchip; and potential owners shall show evidence prior to entry into the Centennial Development, as required by Los Angeles County Code (Section 10.20.350). These restrictions/features and their purpose will be described within educational material and distributed to new homeowners and made available to all homeowners as needed.

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#	Environmental Factor	Mitigation
5.7	**Biological Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 7-17** The Project Applicant/Developer shall implement a public awareness program (prior to the first occupancy permit) in an effort to restrict public access to the riparian and open space areas on the Project site to designated trails and to prevent unleashed domestic animals from entering these areas. The program's educational materials shall discuss the presence of native animals (e.g., coyote, bobcat, and mountain lion), indicate that those native animals could prey on pets, indicate that no actions shall be taken against native animals should they prey on pets allowed outdoors, and indicate that pets must be leashed while using the designated trail system and/or in any areas within or adjacent to open space. The educational materials shall also discuss the impacts pets can have on native birds. Control of stray and feral cats and dogs will be conducted in open space areas on an as-needed basis. Feral cats and dogs may be trapped and deposited with the local Society for the Prevention of Cruelty to Animals or the Los Angeles County Department of Animal Control. This program shall include signs that identify the boundaries of ecologically sensitive areas (including the avoided special status plant populations described in MM 7-1); the use of temporary, wildlife-friendly fencing around sensitive areas that appear to be receiving a high level of disturbance until the disturbance is reversed; and promotion of public education and awareness of such areas. In addition to signage being located along the boundaries of the Mitigation Preserve, signage denoting the boundaries of ecologically sensitive areas and other pertinent information shall be included along the Pacific Crest Trail where it overlaps the Mitigation Preserve. The Project Applicant/Developer shall be responsible for the initial development of the public awareness program and installation of interpretive signs and wildlife-friendly fencing. The Homeowners Association, the Project Applicant/Developer, or an acceptable Land Manager/Agency (as approved by the County) shall be responsible for maintaining this program, including signs and wildlife-friendly fencing. Only passive recreational activities shall be permitted within the designated natural open space areas and shall be restricted to trails. Some areas may allow slightly greater impacts if designated as picnic and/or camping areas. Domestic cats shall be prohibited from free-roaming (i.e., be allowed outdoors), and shall be required to have a microchip. All dogs shall be required to be leashed while in the designated natural open space areas, and bags for removing pet excrement will be provided at trail entrances and other appropriate locations. In addition, all dogs and cats shall be required to be neutered or spayed; all dogs shall be required to have a microchip; and potential owners shall show evidence prior to entry into the Centennial Development, as required by Los Angeles County Code (Section 10.20.350). These restrictions/features and their purpose will be described within educational material and distributed to new homeowners ~~and~~, shall be posted on the community intranet, made available to all homeowners as needed, and shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs.

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5.7	**Biological Resources**	**MM 7-18** Common area landscaping and restoration methods shall follow protocols to reduce the potential for the introduction of pathogens and pests into the Project site and to reduce the spread of pathogens and pests outside the Project site (should they inadvertently be introduced). Protocols for reducing the potential for introduction of pathogens and pests into the site via plant foliage/soil from nurseries supplying the material shall include the following anti-contamination procedures: sanitizing all containers, tools, and footwear (boots, pots, clippers, soil scoops, shovels) in soil potting areas; sanitizing all transplanting and prep tables; sanitizing plant storage locations (e.g., benches); sanitizing plant transportation devices (e.g., carts); sanitizing floor surfaces where plants are stored on a regular basis; and using anti-splash watering methods for particularly susceptible plant species. Field installation crews shall sanitize all tools and footwear during landscaping and restoration activities prior to using them or entering the site and shall install plants in a way that minimizes conditions that support pathogens and pests (e.g., minimizing standing water). All plant materials brought onto the site will be inspected by landscape/restoration personnel familiar with signs of pathogen and pest infestation. Should pathogens or pests be detected, the infected material shall be bagged, secured, and disposed of off-site to a contained location. Long-term control methods shall include monitoring to examine vegetation and surrounding areas for pests to evaluate trends and to identify when controls are needed; establishing action thresholds that trigger control actions; and implementing pest control methods—cultural, mechanical, environmental, and biological—and appropriate pesticides.
5.7	**Biological Resources**	**MM 7-19** Prior to vegetation clearing or grading, additional surveys shall be performed to confirm that all oak trees within the impact and buffer areas are recorded. The Project Applicant/Developer will be required to comply with all mitigation measures stipulated in the County-issued Oak Tree Permit pursuant to the County of Los Angeles Oak Tree Ordinance (CLAOTO) and the *County of Los Angeles Oak Woodlands Conservation Management Plan* (OWCMP). Trees would be planted pursuant to the Oak Woodland Restoration Plan discussed in MM 7-11.
5.7	**Biological Resources**	**MM 7-20** All oak tree driplines within 50 feet of land clearing (including brush clearing) or areas to be graded shall be enclosed with temporary fencing for the duration of the clearing or grading activities. Fencing shall extend to the root protection zone (RPZ) (that area at least 15 feet from the trunk or half again as large as the distance from the trunk to the dripline, whichever is greater). No parking or storage of equipment, solvents, or chemicals that could adversely affect the trees shall be allowed within 25 feet of the trunk at any time. Fence removal shall occur only after the Project Biologist confirms the health of preserved trees. All upslope grading and drainage shall be engineered to minimize resultant erosion, soil compaction, or drainage into preserved oak tree areas. Whenever possible, utilities shall be designed to avoid crossing under the canopies of preserved trees unless the utilities are installed by drilling under the root zones (where feasible) in order to avoid impacts associated with cutting roots. Feasibility of drilling under trees will be based on soil conditions. Utilities will be clustered whenever possible to lessen impacts to oak RPZs.

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5.7	**Biological Resources**	**MM 7-21** In order to ensure that no direct impacts to Significant Ecological Area (SEA) 17 occur, brush clearance zones shall be contained within the current Project impact boundary and no overlap with the adjacent SEA 17 shall occur. Vegetation management for fire abatement purposes is not authorized in SEA areas. An Implementation Plan, including fire risk abatement measures (including but not limited to vegetation management) required to comply with State and County fire prevention and response legal requirements, shall be submitted as part of the tentative tract map for portions of the Project site that border an SEA or mitigation preserve area. The Plan shall include: (a) a summary of applicable State and County fire risk abatement requirements; (b) a prohibition on the use of vegetation clearance within SEA 17 or mitigation preserve areas. The Plan shall be submitted to the County for approval with the first tentative map, and shall be updated to include new or modified State or County fire risk abatement requirements as part of each subsequent tentative tract map submittal. ~~The Plan shall include this prohibition on vegetation clearance within these biologically sensitive areas.~~
5.7	**Biological Resources**	**MM 7-22** If a golf course is developed as part of Project implementation, the Project Applicant/Developer shall prepare a Golf Course Management Plan that requires any golf course developed on the site to incorporate the design and management measures consistent ~~be built and managed in accordance~~ with the Audubon Cooperative Sanctuary Program for Golf Courses (or equivalent), which is a cooperative effort between the United States Golf Association and Audubon International that is designed to promote ecologically sound land management and to conserve natural resources (see Final EIR Appendix 5.7-E). The Plan shall be submitted to the County for approval with any tentative map that includes a golf course.
5.7	**Biological Resources**	**MM 7-23** Notwithstanding any provision of the Centennial Specific Plan to the contrary, land designated by the Centennial Specific Plan as On-Site Mitigation Preserve, Off-Site Mitigation Preserve, Disturbed Green Space, and Undisturbed Green Space shall only be used in a manner consistent with the following land use restrictions: On-Site Mitigation Preserve: Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values. Off-Site Mitigation Preserve: Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be

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#	Environmental Factor	Mitigation
		restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values. Disturbed Green Space: Uses within Disturbed Green Space shall be restricted to one or more of the following: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. Undisturbed Green Space: Uses within Undisturbed Green Spaces shall be restricted to one or more of the following: continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.
5.7	**Biological Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 7-23** Notwithstanding any provision of the Centennial Specific Plan to the contrary, land designated by the Centennial Specific Plan as On-Site Mitigation Preserve, Off-Site Mitigation Preserve, Disturbed Green Space, and Undisturbed Green Space shall only be used in a manner consistent with the following land use restrictions: On-Site Mitigation Preserve: Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Ranch-wide ~~Mitigation Preserve~~ Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values. Off-Site Mitigation Preserve: Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and

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CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Ranch-wide ~~Mitigation Preserve~~ Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Ranch-wide ~~Mitigation Preserve~~ Management Plan strictly for resource management values. Disturbed Green Space: Uses within Disturbed Green Space shall be restricted to one or more of the following: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. Undisturbed Green Space: Uses within Undisturbed Green Spaces shall be restricted to one or more of the following: continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.
5.10	**Traffic, Access and Circulation**	**MM 10-1** The Project shall provide internet infrastructure and a community intranet with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. The intranet shall also provide education about greenhouse gas (GHG) emissions; GHG reduction opportunities; energy and water conservation opportunities; financial incentives (e.g., rebates and low-interest loans) for energy-efficiency improvements; and energy-efficiency technology systems, including those suitable for large commercial and industrial users.
5.10	**Traffic, Access and Circulation**	**MM 10-2** The Project Applicant/Developer shall submit a traffic study that addresses site access and local circulation in accordance with the County of Los Angeles Department of Public Works Traffic Impact Analysis Report Guidelines. The Project Applicant/Developer shall retain a Traffic Engineer or Civil Engineer licensed in the State of California to perform the traffic study to the satisfaction of the County.
5.10	**Traffic, Access and Circulation**	**MM 10-3** The Project Applicant/Developer shall seek to enter into a ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement for Land Development Impacts to California State Transportation Facilities with Caltrans and shall comply with the terms the ~~CTIP agreement~~ Traffic Mitigation Agreement if approved and implemented. Compliance with the ~~CTIP~~ Traffic Mitigation Agreement shall constitute compliance with the mitigation measures for the Project's traffic impacts on the State highway system. Any required improvements that result from direct Project impacts (i.e., not from cumulative impacts), and are required on Caltrans-owned facilities, shall be implemented

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CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		through a ~~CTIP~~ Traffic Mitigation Agreement. Any required improvements that result from cumulative traffic impacts may be implemented through payment of fair share fees.
5.10	**Traffic, Access and Circulation**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 10-3** The Project Applicant/Developer shall seek to enter into a Traffic Mitigation Agreement for Land Development Impacts to California State Transportation Facilities ~~with~~ by and between the Project Applicant/Developer and Caltrans, and during the term of such agreement shall comply with the terms ~~the Traffic Mitigation Agreement if approved and implemented~~ and conditions thereof. Compliance with the Traffic Mitigation Agreement shall constitute compliance with the mitigation measures for the Project's traffic impacts on the State highway system. Any required improvements that result from direct Project impacts (i.e., not from cumulative impacts), and are required on Caltrans-owned facilities, shall be implemented through a Traffic Mitigation Agreement. Any required improvements that result from cumulative traffic impacts may be implemented through payment of fair share fees.
5.10	**Traffic, Access and Circulation**	**MM 10-4** The Project Applicant/Developer will work with the County and/or Caltrans to establish a Traffic Mitigation Fee Program or an assessment district (an example of such is the Bridge and Thoroughfare District pursuant to *California Government Code*, Sections 66484 et seq.) or other equivalent program. Such a program or assessment district will mitigate vehicular trips related to new development accessing the SR-138 corridor between I-5 and SR-14 by establishing a fair share contribution from such new development to ensure the SR-138 needed improvements are fully funded. These fees shall be used for the needed improvements and may include the cost of engineering, soils analysis, right-of-way acquisition, demolition, relocation, construction, inspection, and other related expenses.
5.10	**Traffic, Access and Circulation**	**MM 10-5** The Project Applicant/Developer shall submit Traffic Management Plans to the County for review and approval. The Traffic Management Plans shall describe traffic-control measures that shall be implemented to maintain traffic flow in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans shall identify the following: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan shall be implemented during all stages of Project construction that generate traffic impacts.
5.10	**Traffic, Access and Circulation**	**MM 10-6** *(Supplemental Traffic Study MM-1)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement to improve SR-138 to a four lane expressway from I-5 to 240th Street West and to a limited access four lane conventional highway from 240th Street West to 190th Street West, with right-of-way reserved for a six-lane expressway between ~~I-5~~ Gorman Post Road and 300th Street West, or comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

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#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	**MM 10-7** *(Supplemental Traffic Study MM-2)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the following intersection improvements at Specific Plan Westerly Access and SR-138: • Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions. • Construct intersection to include: two NB left-turn lanes, three NB through lanes and one NB right-turn lane. • In the SB direction, construct two left turn lanes, three through lanes and ~~one free-flow~~ two right-turn lanes. • In the EB direction, construct three left-turn lanes and one right-turn lane. • In the WB direction, construct two left-turn lanes and ~~a free-flow~~ two right-turn lanes. • Install traffic signal. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.
5.10	**Traffic, Access and Circulation**	**MM 10-8** *(Supplemental Traffic Study MM-3)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Specific Plan Central Access and SR-138: • Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions. • In the NB and SB directions, construct two left-turn lanes, three through lanes and one right-turn lane. • In the EB direction, construct two left-turn lanes and one right-turn lane. • In the WB direction, construct two left-turn lanes and ~~a free-flow~~ two right-turn lanes. • Install traffic signal and include SB and NB right-turn overlap phasing. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

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#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	**MM 10-9** *(Supplemental Traffic Study MM-4)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 300th Street West and SR-138: • Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions • Construct two left-turn lanes and one right-turn lane in the EB direction and two left-turn lanes and dual right-turn lanes in the WB direction. • In the NB direction, construct two left-turn lanes, three through lanes, and one right-turn lane. • In the SB direction, construct two left turn lanes, three through lanes and one ~~free-flow~~ right-turn lane. • Install traffic signal and include WB right-turn overlap phasing. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.
~~**5.10**~~	~~**Traffic, Access and Circulation**~~	~~**MM 10-10** *(Traffic Study MM-5)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 290th Street West and SR-138:~~ ~~• Widen SR-138 to a four-lane highway from westerly project entrance to 290th Street West, with auxiliary lanes between intersections, resulting in three through lanes in the WB and EB directions.~~ ~~• Additional intersection improvements include: two EB left-turn lanes, one WB right-turn lane, two SB left-turn and two SB right-turn lanes.~~ ~~• Install traffic signal.~~ ~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

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#	Environmental Factor	Mitigation
~~**5.10**~~	~~**Traffic, Access and Circulation**~~	**MM 10-10~~11~~** *(Supplemental Traffic Study MM-6)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Margalo Drive and SR-138: • Widen SR-138 to a four-lane ~~highway~~ expressway from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions~~. • Additional intersection improvements include: ~~one~~ two EB left turn lanes~~,~~ ~~and~~ one WB right-turn lane, one SB left-turn lane, and two SB right-turn lanes. • Install traffic signal. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.
5.10	**Traffic, Access and Circulation**	**MM 10-11~~12~~** *(Supplemental Traffic Study MM-7)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Three Points and SR-138: • Widen SR-138 to a four-lane ~~highway~~ expressway from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs~~ resulting in ~~three~~ two through lanes in the WB and EB directions. • Additional improvements include adding one NB left-turn lane~~,~~ ~~and~~ one SB left turn lane and one SB right turn lane. Or contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.
5.10	**Traffic, Access and Circulation**	**MM 10-12~~13~~** *(Supplemental Traffic Study MM-8)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 250~~245~~th Street West and SR-138: • Widen SR-138 to a four-lane expressway ~~highway~~ from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs~~ resulting in ~~three~~ two through lanes in the WB and EB directions. • Additional improvements include adding one ~~NB left-turn lane and one~~ SB left turn lane, one EB left-turn lane, one WB U-turn lane and one dedicated ~~EB~~ WB right-turn lane. • Install traffic signal. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

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#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	**MM 10-13~~14~~** *(Supplemental Traffic Study MM-9)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 210th ~~230th~~ Street West and SR-138: • Widen SR-138 to a four-lane limited access conventional highway from 240th ~~290th~~ Street West to 190th Street West. • Additional improvements include one SB left-turn lane, one ~~SB~~ NB ~~right~~ left-turn lane, ~~and~~ one EB left-turn lane, one EB right-turn lane, and one WB left-turn lane. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.
~~**5.10**~~	~~**Traffic, Access and Circulation**~~	~~**MM 10-15** *(Traffic Study MM-10)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 190th Street West and SR-138:~~ ~~• Widen SR-138 to a four-lane highway from 290th Street West to 190th Street West with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions.~~ ~~• Additional improvements include adding one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left turn lane and one dedicated EB right-turn lane.~~ ~~• Install traffic signal.~~ ~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~
5.10	**Traffic, Access and Circulation**	**MM 10-14~~16~~** *(Supplemental Traffic Study MM-11)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 170th Street West and SR-138: • Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection. • Additional improvements include one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left-turn lane. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

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#	Environmental Factor	Mitigation
~~**5.10**~~	~~**Traffic, Access and Circulation**~~	~~**MM 10-17** *(Traffic Study MM-12)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 110th Street West and SR-138:~~ ~~• Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.~~ ~~• Additional improvements include: one EB left-turn lane, one WB left-turn lane, two NB left-turn lanes, one SB left-turn lane and two SB right-turn lanes.~~ ~~• Install traffic signal.~~ ~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~
5.10	**Traffic, Access and Circulation**	**MM 10-15~~18~~** *(Supplemental Traffic Study MM-13)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 90th Street West and SR-138: • Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection. • Additional improvements include: ~~one~~ two EB left-turn lanes, one EB right-turn lane, one WB left-turn lane, one WB right-turn lane, one NB left-turn lane and one SB left-turn lane. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.
5.10	**Traffic, Access and Circulation**	**MM 10-16~~19~~** *(Supplemental Traffic Study MM-14)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 60th Street West and SR-138: • Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection. • Additional improvements include: one EB left-turn lane, one EB right-turn lane, one WB left-turn lane, one WB right-turn lane, one NB left-turn lane and one SB left-turn lane. • Install traffic signal. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

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#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	**MM 10-17~~20~~** *(Supplemental Traffic Study MM-15)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at ~~30th Street West~~ the SR-14 and SR-138 interchange: • ~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.~~ • ~~Additional improvements include adding one EB left-turn lane and one WB left-turn lane.~~ • Install traffic signals at the NB off-ramp and the SB off-ramp. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.
5.10	**Traffic, Access and Circulation**	**MM 10-18~~21~~** *(Traffic Study MM-16)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138: • Addition of one auxiliary lane at the connector ramp from westbound SR-138 to southbound I-5 for existing plus Project conditions.
5.10	**Traffic, Access and Circulation**	**MM 10-19~~22~~** *(Traffic Study MM-17 and MM-34)* To provide adequate capacity at The Old Road at I-5 SB Ramps/Sedona intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the addition of a second southbound left-turn lane from The Old Road to the I-5 Southbound On-Ramp.
5.10	**Traffic, Access and Circulation**	**MM 10-20~~23~~** *(Supplemental Traffic Study MM-18)* To mitigate the increase of side-street delay for the existing adjacent off-site areas and for planned on-site side streets along SR-138, the Project Applicant/Developer shall either (1) comply with the terms of the ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement or (2) dedicate right-of-way within the project site at each site access location to accommodate the ultimate intersection or interchange configuration to be determined by the Northwest Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~ at the following SR-138 intersections: • Westerly Access • Central Access • 300th Street West • ~~290th Street West~~

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#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	**MM 10-21** *(Supplemental Traffic Study MM-22)* To provide adequate on- and off-site capacity to accommodate up to 10 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall comply with the terms of the Traffic Mitigation Agreement for the following SR-138 intersection improvements for site access: • Westerly Access: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one shared NB through/right lane, one SB left-turn lane, and one shared SB through/right lane. Install traffic signal. • Central Access: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one NB through lane, one NB right-turn lane, one SB left-turn lane, one SB through lane, and one SB right-turn lane. Install traffic signal. • 300th Street West: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one shared NB through/right lane, one SB left-turn lane, and one shared SB through/right lane. Install traffic signal. • 190th Street West: Provide one EB left-turn lane, one EB through lane, one WB through lane, one WB right-turn lane, one SB left-turn lane, and one SB right lane.
5.10	**Traffic, Access and Circulation**	**MM 10-2224** *(Supplemental Traffic Study MM-19)* To provide adequate on- and off-site capacity to accommodate up to 75 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the widening of SR-138, including: • Addition of ~~an auxiliary~~ one additional lane in each direction (six lane~~s~~ ~~total~~ freeway) from I-5 to Gorman Post Road • Addition of two additional lanes in each direction (six lane expressway) from Gorman Post Road to 300th Street West • Addition of one additional lane in each direction (four lane expressway) from 300th Street West to 240th Street West • Addition of one additional lane in each direction (four lane limited access conventional highway) from 240th Street West to the SR-14 interchange
5.10	**Traffic, Access and Circulation**	**MM 10-2325** *(Supplemental Traffic Study MM-20)* To provide adequate on- and off-site capacity to accommodate 100 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the widening of SR-138, including: • Addition of ~~an auxiliary~~ a second additional lane in each direction (six lanes total) from 300th Street West to approximately ½ mile east of 250th ~~245th~~ Street West

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#	Environmental Factor	Mitigation
		• Construct additional intersection turn lanes at the following SR-138 intersections: o Westerly Project Access o 300th Street West o Margalo Drive o Three Points Road o 60th Street West
5.10	**Traffic, Access and Circulation**	**MM 10-2426** *(Traffic Study MM-21 and MM-26)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards RTP/SCS improvement projects on SR-58 between I-5 in Kern County and I-15 in San Bernardino County, as verified by the County in consultation with the Kern COG and Caltrans. Improvements could include development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors.
~~**5.10**~~	~~**Traffic, Access and Circulation**~~	~~**MM 10-27** *(Traffic Study MM-22)* To provide adequate capacity on SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for the SR-138 improvements to a limited access facility with grade-separated interchanges, consistent with the County's analysis of the AVAP, or fair share participation and/or contribution to the SR-138 improvements (freeway/expressway or expressway/limited access conventional highway) being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~
~~**5.10**~~	~~**Traffic, Access and Circulation**~~	~~**MM 10-28** *(Traffic Study MM-23)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the CTIP or (2) contribute fair share funding towards the following planned improvements to I-5.~~ ~~• I-5 between Fort Tejon and Grapevine Road and between SR-138 and Lake Hughes Road interchanges: Strengthening and widening the inside and outside shoulders of I-5.~~
5.10	**Traffic, Access and Circulation**	**MM 10-2529** *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs. The Project Applicant/Developer, through the required implementation of the Mobility Plan, shall: • Reinforce and serve the Land Use Plan; • Provide future residents, visitors and employees with multiple modes of transit/non-single occupancy vehicle (non-SOV) accessibility for internal and external trips ~~by future residents and visitors~~;

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#	Environmental Factor	Mitigation
		• Provide options to reduce vehicle trips and emissions by linking effective travel demand management with transportation systems and parking policies; • Provide residents and employees on the Project site with multiple modes of transportation options (i.e., walk, bike, public transit, private auto, car share, bike share, etc.); • Provide for 80 percent on average, but no less than 50 percent of each Village's residential units to be located within one-half mile of a Village C~~c~~enter that includes retail and service uses; • Provide parks within a 5-minute walk (0.25 mile) of 80 percent of all residential units; • Provide a transit route easement no less than 25 feet wide in the Centennial Commerce District connecting the Town Center, Business Park, and Industrial/Civic areas and also northerly connecting to the Village Five Core; • Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than ~~single-occupancy automobile~~ SOV use ~~by 30 percent in relation to standard ITE generation rates for the overall Project~~; ~~and~~ • Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs ~~single-occupancy automobiles by 20 percent~~.; • Require TMA implementation of a program to coordinate with automotive dealers on the Project site to promote CNG, electric, and hybrid electric vehicles~~.~~; • Require TMA oversight of requirement for service fleet vehicles for agencies or businesses located on-site to be alternative fuel vehicles to the maximum extent feasible, as determine by the Project Applicant/Developer~~.~~; and • Require TMA implementation of a combination of measures to provide adequate temporary bike parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure. The Circulation Plan sets forth requirements for roadway classifications; intersection controls; and traffic calming measures. Where approved by the California Department of Transportation (Caltrans) and the County and where maintenance and durability costs are comparable to traditional materials, use "cool" pavement materials, which reduce heat island effect.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.***

MM 10-25 *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs.

The Project Applicant/Developer, through the required implementation of the Mobility Plan, shall:

- Reinforce and serve the Land Use Plan;
- Provide future residents, visitors and employees with multiple modes of transit/non-single occupancy vehicle (non-SOV) accessibility for internal and external trips;
- Provide options to reduce vehicle trips and emissions by linking effective travel demand management with transportation systems and parking policies;
- Provide residents and employees on the Project site with multiple modes of transportation options (i.e., walk, bike, public transit, private auto, car share, bike share, etc.);
- Provide for 80 percent on average, but no less than 50 percent of each Village's residential units to be located within one-half mile of a Village Center that includes retail and service uses;
- Provide parks within a 5-minute walk (0.25 mile) of 80 percent of all residential units;
- Provide a transit route easement no less than 25 feet wide in the Centennial Commerce District connecting the Town Center, Business Park, and Industrial/Civic areas and also northerly connecting to the Village Five Core;
- Require TMA implementation of a combination of transit and transportation measures to ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than SOV use<u>, including on-demand pooled car or multi-passenger vehicle service</u>;
- Require TMA implementation of a combination of transit and transportation measures to ensure that a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs<u>, which shall include requiring the TMA to provide am and pm peak hour demand-based multi-passenger transit services for Project residents and employees that link the Project to the nearest Metrolink station and commuter transit hub to the south (currently Santa Clarita) and the east (currently Palmdale), and to the north (Tejon Mountain Village, Tejon Commerce Center, and Grapevine), and to other commuter destinations as warranted by consumer demand</u>;

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		• Require TMA implementation of a program to coordinate with automotive dealers on the Project site to promote battery electric, or hydrogen fuel cell (collectively "electric") vehicles; at minimum, this program shall include preferences for dealers offering bulk discounts or other financial incentives; • Require TMA oversight of requirement for service fleet vehicles for agencies or businesses located on-site to be electric vehicles to the maximum extent feasible, as determine by the Project Applicant/Developer in consultation with the County, or other future vehicle technologies as may be developed and comply with California's air quality, greenhouse gas, and climate change mandates, and which meet the performance and affordability needs of Project employees and residents as determined by the Project Applicant/Developer in consultation with the County (collectively, "Future Vehicle Fleet" or "FVF"); and • Require TMA implementation of a combination of measures to provide adequate temporary bike or personal electric vehicle (e.g., scooter) parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure. The Circulation Plan sets forth requirements for roadway classifications; intersection controls; and traffic calming measures. Where approved by the California Department of Transportation (Caltrans) and the County and where maintenance and durability costs are comparable to traditional materials, use "cool" pavement materials, which reduce heat island effect.
5.10	**Traffic, Access and Circulation**	**MM 10-26~~30~~** *(Traffic Study MM-24)* Each component of the Mobility Plan incorporates Transportation Demand Management (TDM) features to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and thereby reduce pollutant emissions. Related to this is the creation and ongoing operation of a Transportation Management Association (TMA) to fund and manage the operation of ongoing transportation programs, including but not limited to transit and on-demand services. The key TDM elements that are inherent in the overall Mobility Plan are: • Sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas; • Small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations; • Pedestrian environments incorporated with public streets; • Transit route easement connecting the residential and commerce areas; • Parking behind buildings to encourage walking in retail areas along street frontage; and • Parks within 0.25 mile of 80 percent of all residential units.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	**MM 10-27~~31~~** *(Traffic Study MM-25)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards the following planned improvements to I-5: • I-5 between Lake Hughes and Parker: Addition of one auxiliary lane in each direction. • I-5 between Parker Road and SR-14: Addition of one HOV or HOT lane in each direction.
5.10	**Traffic, Access and Circulation**	**MM 10-28~~32~~** *(Traffic Study MM-27)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138: • Addition of two auxiliary lanes at the connector ramp from westbound SR-138 to southbound I-5 for ~~Year 2035~~ cumulative buildout conditions.
5.10	**Traffic, Access and Circulation**	**MM 10-29~~33~~** *(Traffic Study MM-28)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138: • Addition of two auxiliary lanes at the connector ramp mainline before the northbound I-5 to eastbound SR-138 connector ramp
5.10	**Traffic, Access and Circulation**	**MM 10-30~~34~~** *(Traffic Study MM-29)* To provide adequate capacity at the SR-14/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at SR-14/SR-138: • Construction of one auxiliary lane and a second off-ramp lane for the SR-14 northbound off ramp to SR-138.
5.10	**Traffic, Access and Circulation**	**MM 10-31~~35~~** *(Traffic Study MM-30)* To provide adequate capacity at the SR-14/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at SR-14/SR-138: • Construction of a second lane on the SR-14 southbound on-ramp from SR-138.
5.10	**Traffic, Access and Circulation**	**MM 10-32~~36~~** *(Supplemental Traffic Study MM-31)* To provide adequate capacity at the SR-14 SB Ramps and SR-138 interchange, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the reconfiguration of the interchange to include two eastbound through lanes and ~~three~~ two westbound through lanes~~. In the southbound direction, add a second right-turn lane;~~ and install a traffic signal ~~and include right-turn overlap phasing~~ or (2) contribute fair share funding for intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

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CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	**MM 10-33~~37~~** *(Supplemental Traffic Study MM-32)* To provide adequate capacity at SR-14 NB Ramps and SR-138 interchange, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the reconfiguration of the interchange to include two eastbound through lanes and two westbound through lanes ~~and, in the northbound direction, add two left-turn lanes~~ and a traffic signal or (2) contribute fair share funding for intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.
5.10	**Traffic, Access and Circulation**	**MM 10-34~~38~~** *(Traffic Study MM-33)* To provide adequate capacity at Lake Hughes Road at I-NB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the addition of one lane to the northbound off-ramp and restripe the configuration to include one left-turn, one shared left/right-turn lane, and one dedicated right-turn lane.
5.10	**Traffic, Access and Circulation**	**MM 10-35~~39~~** *(Traffic Study MM-35)* To provide adequate capacity at the Magic Mountain Parkway at I-5 SB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the restriping of the southbound off-ramp to provide two left-turn lanes, one shared left-turn/through lane, and one right-turn lane.
5.10	**Traffic, Access and Circulation**	**MM 10-36~~40~~** *(Traffic Study MM-36)* To provide adequate capacity at the Magic Mountain Parkway at I-5 NB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the conversion of the shared through/right-turn lane to a shared left/through/right-turn lane.
5.10	**Traffic, Access and Circulation**	**MM 10-37~~41~~** *(Traffic Study MM-37)* To provide adequate capacity at the Valencia Road at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the striping of a third westbound through lane.
5.10	**Traffic, Access and Circulation**	**MM 10-38~~42~~** *(Traffic Study MM-38)* To provide adequate capacity at the Valencia Road at I-5 NB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the traffic signal modification to add a northbound right-turn overlap phase.
5.10	**Traffic, Access and Circulation**	**MM 10-39~~43~~** *(Traffic Study MM-39)* To provide adequate capacity at the McBean Parkway at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the restriping of the dedicated westbound right-turn lane to a shared through/right-turn lane.
5.10	**Traffic, Access and Circulation**	**MM 10-40~~44~~** *(Traffic Study MM-40)* To provide adequate capacity at the Calgrove Road at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward adding a second eastbound through lane and a de-facto right-turn lane and a second through lane in the westbound direction.

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CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.10	**Traffic, Access and Circulation**	**MM 10-~~41~~45** *(Traffic Study MM-41)* To provide adequate capacity at the Calgrove Road at I-5 NB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward restriping to add a westbound de facto right-turn lane.
5.11	**Air Resources**	**MM 11-1** The Project's plans and specifications shall require stationary sources to comply with the parameters stated in Stationary Source Types, Size Limits, and Quantity Estimates, which is included as Attachment A to the Project's Mitigation Monitoring and Reporting Program. Should there be a need for a stationary source exceeding the prescribed limits, the Project Applicant/Developer shall apply for source-specific permit from the Antelope Valley Air Quality Management District (AVAQMD) or South Coast Air Quality Management District (SCAQMD), as applicable.
5.11	**Air Resources**	**MM 11-2** The Project's plans and specifications shall include the following measures to minimize nitrogen oxide (NOx) and volatile organic compound (VOC) emissions during construction: • All off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency (USEPA) Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). Any emissions-control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If Tier 4 Final equipment is not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. • Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach. These policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). • Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). If the Project Applicant/Developer determines that 2010 model year or newer diesel trucks cannot be obtained, trucks that meet USEPA 2007 model year NOx emissions requirements shall be required. If 2010 model year or newer diesel trucks are not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. • A copy of each unit's certified tier specification, BACT documentation, and CARB or District operating permit shall be provided to the County at the first occurrence of mobilization of each applicable unit of equipment.

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		• Construction contractors shall ensure construction equipment is properly serviced and maintained to the manufacturer's standards. • Construction contractors shall limit non-essential idling of construction equipment to no more than five consecutive minutes. • Construction contractors shall use Super-Compliant Architectural/Industrial (AIM) Coatings to the extent that they are commercially available and certified to meet the applicable requirements of Antelope Valley Air Quality Management District Rule 1113 and South Coast Air Quality Management District Rule 1113.
5.11	**Air Resources**	**MM 11-3** The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954.
5.11	**Air Resources**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 11-3** The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. These requirements shall be posted on the community intranet and shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs.
5.11	**Air Resources**	**MM 11-4** The Project's plans and specifications for non-residential buildings shall demonstrate that the following features have been incorporated into the building designs. Proof of compliance shall be provided to the County prior to the issuance of occupancy permits. • For buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupant. • Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to ~~15~~ 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces. • ~~Facilities~~ Electric Vehicle Charging Spaces (EV Space), as defined by CALGreen Code Section 202, shall be installed to support future installation of ~~e~~Electric ~~v~~Vehicle Supply Equipment (EVSE), as defined by CALGreen

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

<table>
<tr><th>#</th><th>Environmental Factor</th><th>Mitigation</th></tr>
<tr><td></td><td></td><td>
Code Section 202, ~~charging~~ at each non-residential building with ~~3~~ 10 or more parking spaces. Installation of each EV Space shall be consistent with Sections A5.106.5.3 and A5.106.5.3.1, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code. The EV Space facilities shall meet Section 406.9 (Electric Vehicle) of the *California Building Code* and as follows:
<table>
<tr><th>Total Number of Actual Parking Spaces</th><th>Tier 1 Number of Required EV Spaces</th></tr>
<tr><td>0-9</td><td>0</td></tr>
<tr><td>10-25</td><td>2</td></tr>
<tr><td>26-50</td><td>3</td></tr>
<tr><td>51-75</td><td>5</td></tr>
<tr><td>76-100</td><td>7</td></tr>
<tr><td>101-150</td><td>10</td></tr>
<tr><td>151-200</td><td>14</td></tr>
<tr><td>>200</td><td>8 percent of total spaces rounded up to nearest whole number</td></tr>
</table>
~~**Single charging space requirements.** When only a single charging space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1. The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.~~

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles (EV) at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Provide raceways from the electrical service panel to the designated parking areas which are required to be installed at the time of construction.
</td></tr>
</table>

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

<table>
<tr><th>#</th><th>Environmental Factor</th><th>Mitigation</th></tr>
<tr><td>5.11</td><td>Air Resources</td><td>
The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.

MM 11-4 The Project's plans and specifications for non-residential buildings shall demonstrate that the following features have been incorporated into the building designs. Proof of compliance shall be provided to the County prior to the issuance of occupancy permits.

• For buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupant.
• Preferential parking for <u>electric vehicles, other FVF vehicles,</u> <s>low-emitting, fuel-efficient,</s> and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces.
• Electric Vehicle Charging Spaces (EV Space), as defined by CALGreen Code Section 202, shall be installed to support future installation of Electric Vehicle Supply Equipment (EVSE), as defined by CALGreen Code Section 202, at each non-residential building with 10 or more parking spaces. Installation of each EV Space shall be consistent with Sections A5.106.5.3 and A5.106.5.3.1, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code. The EV Space facilities shall meet Section 406.9 (Electric Vehicle) of the *California Building Code* and as follows:

<table>
<tr><th>Total Number of Actual Parking Spaces</th><th>Tier 1 Number of Required EV Spaces</th></tr>
<tr><td>0-9</td><td>0</td></tr>
<tr><td>10-25</td><td>2</td></tr>
<tr><td>26-50</td><td>3</td></tr>
<tr><td>51-75</td><td>5</td></tr>
<tr><td>76-100</td><td>7</td></tr>
<tr><td>101-150</td><td>10</td></tr>
<tr><td>151-200</td><td>14</td></tr>
<tr><td>>200</td><td>8 percent of total spaces rounded up to nearest whole number</td></tr>
</table>
</td></tr>
</table>

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles (EV) at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Provide raceways from the electrical service panel to the designated parking areas which are required to be installed at the time of construction. **Increased EVSE Installations.** Changes to EVSE parking shall be allowed to the extent allowed under state laws, and the duration of vehicular occupancy of EV spaces may be restricted as authorized by state law to allow charging of multiple vehicles each day. Demand for EV Space facilities shall be monitored biennially by the TMA, additional EV parking spaces shall be made available at lots where demand exceeds supply. The TMA biennial survey shall also consider future transportation technology and practices, including for example changes in vehicular electric charging technology, other FVF changes, or other transportation practices and services changes (e.g., with lower-automobile ownership rates leading to reduced parking demand and/or reduced private ownership of vehicles requiring daily electric charging).
5.11	**Air Resources**	**MM 11-5** The Project's plans and specifications for residential buildings shall demonstrate that the following features have been incorporated. • Visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles. • Exterior electrical receptacles and natural gas or propane hookups. • Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by Section 22.52.1225B of the County Code, whichever is more stringent. The requirements under the Residential Voluntary Measures of the CALGreen Code are as follows: **Short-term bicycle parking.** Provide permanently anchored bicycle racks within 100 feet of the visitor's entrance, readily visible to passers-by, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. **Long-term bicycle parking for multifamily buildings.** Provide on-site bicycle parking for at least one bicycle per every two dwelling units. Acceptable parking facilities shall be conveniently reached from the street and may include, but not limited to: 1. Covered, lockable enclosures with permanently anchored racks for bicycles. 2. Lockable bicycle rooms with permanently anchored racks. 3. Lockable, permanently anchored bicycle lockers. **Long-term bicycle parking for hotel and motel buildings.** Provide one on-site bicycle parking space for every 25,000 square feet, but not less than two. Acceptable parking facilities shall be conveniently reached from the street and may include, but not be limited to:

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#	Environmental Factor	Mitigation
		1. Covered, lockable enclosures with permanently anchored racks for bicycles. 2. Lockable bicycle rooms with permanently anchored racks. 3. Lockable, permanently anchored bicycle lockers.
5.11	**Air Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 11-5** The Project's plans and specifications for residential buildings shall demonstrate that the following features have been incorporated. • Visitor parking shall include preferentially located parking spaces for <u>electric</u> ~~alternative-fueled~~ vehicles. • Exterior electrical receptacles and natural gas or propane hookups. • Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by Section 22.52.1225B of the County Code, whichever is more stringent. The requirements under the Residential Voluntary Measures of the CALGreen Code are as follows: **Short-term bicycle parking.** Provide permanently anchored bicycle racks within 100 feet of the visitor's entrance, readily visible to passers-by, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. **Long-term bicycle parking for multifamily buildings.** Provide on-site bicycle parking for at least one bicycle per every two dwelling units. Acceptable parking facilities shall be conveniently reached from the street and may include, but not limited to: 1. Covered, lockable enclosures with permanently anchored racks for bicycles. 2. Lockable bicycle rooms with permanently anchored racks. 3. Lockable, permanently anchored bicycle lockers. **Long-term bicycle parking for hotel and motel buildings.** Provide one on-site bicycle parking space for every 25,000 square feet, but not less than two. Acceptable parking facilities shall be conveniently reached from the street and may include, but not be limited to: 1. Covered, lockable enclosures with permanently anchored racks for bicycles. 2. Lockable bicycle rooms with permanently anchored racks. 3. Lockable, permanently anchored bicycle lockers. **<u>Bicycle parking areas may also be used by small electric vehicles such as scooters.</u>**

TABLE 1-2
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#	Environmental Factor	Mitigation
5.11	**Air Resources**	**MM 11-6** The Project's plans and specifications for parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, shall demonstrate that the following features have been incorporated into the parking facility. • The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles. • Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 ~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations when a demand is demonstrated~~. Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV Space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows: **Single charging space requirements.** When only a single EV ~~charging s~~Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure. **Multiple charging spaces required.** When multiple EV ~~charging s~~Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction. • For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent. • Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for nonresidential land uses or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

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#	Environmental Factor	Mitigation
5.11	**Air Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 11-6** The Project's plans and specifications for parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, shall demonstrate that the following features have been incorporated into the parking facility. • The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric~~, natural gas, or similar low-emitting technology)~~ vehicles. • Five percent of the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202. Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and the design and installation of each EV Space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows: **Single charging space requirements.** When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure. **Multiple charging spaces required.** When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction. • For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent. • Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for nonresidential land uses or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

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#	Environmental Factor	Mitigation
5.11	**Air Resources**	**MM 11-7** The Project's plans and specifications for business park or water reclamation facility land uses shall demonstrate that buffer areas adjacent to proposed business parks in compliance with the Air Quality Analysis for Stationary Sources Allowed by the Centennial Specific Plan, (see Appendix 5.11-B of this EIR) have been incorporated into the design plans. The buffer areas shall prohibit uses that are potential sources of toxic air contaminants and shall prohibit uses that include sensitive receptors, except as allowed through written evidence that the sensitive use would not be exposed to Toxic Air Contaminants with pollutant concentrations resulting in a cancer risk greater than or equal to 10 in 1 million for health risks and 1.0 for non-cancer chronic and acute hazard indices (HIs).
5.11	**Air Resources**	**MM 11-8** Prior to approval of any tract map that includes an air quality sensitive use (e.g., residence, school, hospital, daycare center) within a designated business park, the Project Applicant/Developer shall provide written evidence to the County that the sensitive use would not be exposed to Toxic Air Contaminants with pollutant concentrations resulting in a cancer risk greater than or equal to 10 in 1 million for health risks and 1.0 for non-cancer chronic and acute hazard indices (HIs).
5.11	**Air Resources**	**MM 11-9** The Project's plans and specifications shall demonstrate that all distribution centers are within the business park areas south of State Route (SR) 138 and are located at least 1,000 feet from existing sensitive receptors and lands designated for sensitive land uses. Distribution centers shall not be allowed in other areas within the Project site.
5.11	**Air Resources**	**MM 11-10** The Project's plans and specifications shall demonstrate that any land uses involving the public congregation of sensitive receptors (e.g. residential, schools, hospital, daycare center) are not within 150 feet of the near edge of the SR-138 traffic lanes.
5.11	**Air Resources**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 11-10** The Project's plans and specifications shall demonstrate that any land uses involving the public congregation of sensitive receptors (e.g. residential, schools, hospital, daycare center) are not within ~~150~~ 250 feet of the near edge of the SR-138 traffic lanes.
5.11	**Air Resources**	**MM 11-11** Prior to the approval of any tract map that includes an air quality sensitive receptor (e.g. residential, day care, schools, hospital) located within 500 feet of the SR-138 and/or any "high volume roadway" (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), the Project Applicant/Developer shall provide to the Air Pollution Control District(s) with jurisdiction over the mapped area a dispersion analysis prepared in accordance with each applicable Air District's methodological requirements to calculate the health risks from vehicle emissions from SR-138 and/or high volume roadway, as relevant. If the study concludes that ~~health risks would be significant at the location of a proposed sensitive receptor~~ any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices (or future more stringent thresholds as may be adopted by the applicable Air District(s) and approved by the County for use on projects subject to the County's lead agency authority under the California Environmental Quality Act) (District TAC Thresholds), then the applicant shall submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following

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#	Environmental Factor	Mitigation
		review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of District TAC Thresholds, shall be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan, TAC exposure reduction measures shall be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed District TAC Thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map. ~~effective design measures must be implemented into the structures to mitigate for interior air quality, such as ventilation systems that include MERV13 filters or equivalent protections against TACs from vehicle emissions. Confirmation of compliance shall be provided to the County prior to occupancy that include sensitive receptors within 500 feet of the SR-138.~~
5.11	**Air Resources**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 11-11** Prior to the approval of any tract map that includes an air quality sensitive receptor (e.g. residential, day care, schools, hospital) located more than 250 feet, but less than or equal to 500 feet, of the SR-138 and/or within 500 feet ~~of the SR-138 and/or~~ of any "high volume roadway" (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), the Project Applicant/Developer shall provide to the Air Pollution Control District(s) with jurisdiction over the mapped area a dispersion analysis prepared in accordance with each applicable Air District's methodological requirements to calculate the health risks from vehicle emissions from SR-138 and/or high volume roadway, as relevant. If the study concludes that any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices (or future more stringent thresholds as may be adopted by the applicable Air District(s) and approved by the County for use on projects subject to the County's lead agency authority under the California Environmental Quality Act) (District TAC Thresholds), then the applicant shall submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of District TAC Thresholds, shall be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan, TAC exposure reduction measures shall be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed District TAC Thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map.

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#	Environmental Factor	Mitigation
5.12	**Noise**	**MM 12-1** For residences, hotels and motels, schools, and places of worship ~~adjacent to~~ within 500 feet from the centerline of a collector road with a buildout forecast of 10,000 average daily trips (ADT) or greater, a limited secondary road with a buildout forecast of 6,500 ADT or greater, or any higher classification road, the Project Applicant/Developer shall submit to the County an Acoustical Study prepared in accordance with Section 1207.12 of the County Building Code. The Acoustical Study shall demonstrate that exterior noise levels at areas where residents would reasonably be expected to spend more than one hour (e.g., backyards) would not exceed 65 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL). The Acoustical Study shall also verify, including during construction and before Certificate of Occupancy (CofO) issuance, that the buildings have been properly designed to comply with a CNEL requirement of 45 dBA for habitable interior living areas, classrooms, and rooms used for patient care and worship. The design features required to achieve the noise standard shall include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the roadway; noise barriers; building orientation relative to the roadway; interior living space (bedroom, common area) orientation; sound-rated windows; upgraded exterior wall and/or roof construction; insulation batts; and forced air ventilation.
5.12	**Noise**	**MM 12-2** For each business park use, school, community use area, park and recreation area, animal control facility, utility, County maintenance facility, commercial development, or manufacturing/industrial development, the Project Applicant/Developer shall submit an Acoustical Study verify that the Project has been properly designed to comply with the County of Los Angeles's Noise Ordinance standards at the nearby sensitive properties (both on and off site). The design features required to achieve the noise standard shall include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the sensitive receptors; noise barriers; building orientation relative to the sensitive receptor; sound-rated windows; and upgraded exterior wall and/or roof construction. All stationary and point sources of noise shall adhere to the requirements of the County Code, including but not limited to Section 12.08.390, Exterior Noise Standards, Section 12.08.460, Loading and Unloading Operations, and Section 12.08.530, Residential Air-Conditioning or Refrigeration Equipment.
5.12	**Noise**	**MM 12-3** To ensure that construction noise is minimized, in addition to meeting all requirements of Section 12.08 of the *County of Los Angeles Code,* the following measures shall be implemented during construction: • All construction equipment, including internal combustion engines and stationary equipment (used for construction purposes) shall be equipped with noise-reducing features such as, but not limited to improved mufflers, intake silencers, ducts, engine enclosures, and acoustical shields or shrouds. All equipment items must have the manufacturers' recommended noise abatement measures, such as mufflers, engine enclosures, and engine vibration isolators, intact and operational. • Stationary equipment (e.g., generators, air compressors, concrete pumps) located within 450 feet of residences or schools shall have noise abatement (e.g., engine enclosures or equipment placed behind barriers) to limit the noise level at the sensitive receptor to an average sound level (Leq) of 60 dBA or less. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors, to the greatest extent feasible. The construction contractor shall locate pile drivers, or other machinery capable of causing strong vibrations or load noises, such that the rear of the vibratory pile driver or

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#	Environmental Factor	Mitigation
		machinery faces toward the noise sensitive receptor when the machine is being utilized, to the greatest extent feasible. • Equipment and material staging areas and equipment maintenance areas shall be located at least 500 feet from sensitive noise receivers, if feasible. • Construction activities should be timed to minimize noise impact on exposed areas, by sequencing the use of equipment with relatively low noise levels versus during noise sensitive periods, routing truck traffic and controlling construction traffic activity to minimize vehicle idling, gear shifting, and accelerating under load, to the greatest extent feasible. • Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction should be hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Construction contracts shall specify that notices shall be sent out to all residences located within 1,000 feet of the Project site at least 15 days prior to commencements of construction. The notices shall include the construction schedule and a telephone number where complaints can be registered with the noise disturbance coordinator. A sign, legible at a distance of 50 feet, shall also be posted at the construction sites throughout construction which includes the same details as the notices. • A "noise disturbance coordinator" shall be established at all construction sites. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. • The construction contractor shall establish a training program for equipment operators to instruct them in methods of operating their equipment to minimize environmental noise, and to inform them of all applicable State and County noise regulations, including the requirements contained in these mitigation measures.
5.12	**Noise**	**MM 12-4** The Project Applicant/Developer shall submit a vibration analysis to the County demonstrating that the pile installation has been designed to limit vibrations to 0.01 peak particle velocity (ppv) inch per second (in/sec) or less at occupied buildings. Design features may include alternate methods of installation that result in reduced vibrations such as pile driving cushions or jetting instead of drilling.

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#	Environmental Factor	Mitigation	
5.12	**Noise**	**MM 12-5**	For the Project site areas adjacent to 300th Street West, 290th Street West, and Malinda Avenue, the Project Applicant/Developer shall provide information to County demonstrating that plans and specifications require that (1) vibratory rollers shall not be used within 300 feet of occupied residences or that vibratory rollers used within 300 feet of occupied residences shall be operated in the static mode and (2) large bulldozers and scrapers shall not be operated within 150 feet of occupied residences. Alternatively, the Project Applicant/Developer shall provide information to County demonstrating that plans and specifications require that vibratory rollers, large bulldozers, large scrapers, and similar heavy equipment shall be operated to comply with the requirements of Section 12.08.560 of the County Code and that vibrations at residential properties would not exceed 0.01 inch per second (in/sec).
5.12	**Noise**	**MM 12-6**	The Project Applicant/Developer shall provide to each prospective purchaser or tenant with a notice and statement of acknowledgment that shall be executed by the prospective purchaser, lessee, or tenant that the Centennial property will be undergoing continuing development and, depending on relative location, noise from construction activities may be heard. The form and method of distribution of said notice and statement of acknowledgment shall be as approved by the County. Subsequent to Project buildout, this mitigation measure would no longer apply.
5.12	**Noise**	**MM 12-7**	In the event that blasting is necessary in order to fracture non-rippable rock, the Project Applicant/Developer shall prepare a Blasting Plan to be submitted and approved by the County of Los Angeles Fire Department in order to obtain a blasting permit; evidence of this approval shall be submitted to the County of Los Angeles Department of Regional Planning in order to obtain an Explosives Permit. The Blasting Plan shall be prepared in accordance with the United States Department of Interior, Office of Surface Mining (USOSM) standards and shall include, but not be limited to, the following: a. A pre-blast survey. b. The site and location of planned blasting and hours of operation (blasting to be conducted during the daylight hours only). c. Notification of blasting activities to all property owners within one-half mile of the blasting area. This notification shall describe the expected period and frequency that the blasting shall occur and give a contact phone number for any questions or complaints. All complaints shall be responded to in a method deemed satisfactory to the County of Los Angeles Department of Regional Planning. d. The types and amounts of explosives. e. Warning system information. f. Methods of transportation and handling of explosives. g. Minimum acceptable weather conditions. h. Procedures for handling, setting, wiring, and firing explosives. i. Procedures for clearing and controlling access to blast danger. j. Procedures for handling misfires and other unusual occurrences.

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#	Environmental Factor	Mitigation
		k. An Emergency Action Plan. l. Material safety data sheet for all explosives or other hazardous materials expected to be used. m. Procedures to ensure compliance with local, State and federal laws. n. Requirements and procedures for vibration monitoring near existing structures during blasting events.
5.13	**Visual Resources**	**MM 13-1** The Project's plans and specifications shall demonstrate the implementation of measures to preserve existing rock outcroppings that are visible from off-site locations along the SR-138. In addition, the County shall review all final development plans (e.g., landscape, lighting, architectural plans)—as provided by the Project Applicant/Developer—to ensure that the development standards for each land use have been implemented to minimize the visual alteration of the site and to create an aesthetically pleasing development.
5.13	**Visual Resources**	**MM 13-2** The Project shall implement the following components of the Green Development Program to minimize potentially adverse visual impacts: • Site the highest density residential uses in areas adjacent to commercial centers and permit residential uses in commercial centers through the Mixed Use Overlay to place larger populations within key centers, encouraging pedestrian activity and a reduction in vehicle trips. • Preserve oak woodlands, savannahs, and other sensitive habitat areas near Oso Canyon and at the foot of the San Gabriel Mountains southerly of SR-138. • Exterior lighting shall not cause unacceptable light trespass and shall be fully shielded. • Outdoor lighting shall be turned off using automatic control devices or systems between the hours of 10:00 PM and sunrise of the following day in commercial, business park, and mixed use areas, unless required by the County Building Code. If the property operates beyond 10:00 PM, then outdoor lighting shall be turned off 1 hour after the operation ends for the day. • Outdoor lighting for safety and security reasons is allowed after 10:00 PM only if fully shielded motion sensors are used to turn off lighting after 10:00 PM and the sensors turn the lighting off automatically no more than 10 minutes after the area is vacated or at least 50 percent of the total lumen levels are reduced or 50 percent of the total outdoor light fixtures are turned off between 10:00 PM and sunrise. • Outdoor lighting in residential and open space areas that are over 15 feet in height shall have an output no greater than 400 lumens. • The maximum height of outdoor lighting fixtures shall be: o 20 feet in Residential and Open Space areas o 30 feet in Commercial, Mixed Use, and Public areas o 35 feet in Business Park areas • Prohibit the use of outdoor lighting that includes drop-down lenses, mercury vapor lights, ultraviolet lights, search lights, laser lights and any outdoor lighting that flashes, blinks, alternates or moves unless mandated for

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#	Environmental Factor	Mitigation
		health and safety reasons by a public agency. • Outdoor light fixtures in outdoor recreational areas shall be mounted, aimed, and fully shielded so that light beams fall onto activity areas and no unacceptable light trespass occurs on surrounding areas or properties. Outdoor lighting shall only provide the minimum necessary to illuminate recreational activities areas and shall be no more than 75 feet high. Preferably, these fixtures shall also use high pressure sodium or metal halide lamps. • Outdoor advertising signs, business signs and roof and freestanding signs that are lighted shall be fully shielded. Externally mounted light fixtures shall be mounted on the top of the sign and shall be oriented downward. Externally mounted bulbs or lighting tubes for signs shall not be visible from adjoining properties or public rights-of-way, unless such bulbs or tubes are filled with neon, argon, krypton or other self-illuminating substance.
5.13	**Visual Resources**	**MM 13-3** The existing off-site 66 kV electric lines that extend from SR-138 beginning at approximately the Old Ridge Route to 290th Street West, shall be relocated south of the Business Park area or may be placed underground,.
5.13	**Visual Resources**	**MM 13-4** Structures proposed along the Pacific Crest National Scenic Trail (PCT) shall be screened by a block wall along the rear of the structures abutting the trail and a 34-foot-wide landscaped setback shall be provided that would contain the conceptual PCT realignment.
5.13	**Visual Resources**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 13-4** Structures proposed along the Pacific Crest National Scenic Trail (PCT) shall be screened by a block wall <u>or comparable screening</u> along the rear of the structures abutting the trail and a 34-foot-wide landscaped setback shall be provided that would contain the conceptual PCT realignment.
5.13	**Visual Resources**	**MM 13-5** Security lighting used for construction areas, equipment, and building materials staging areas shall be directed away from SR-138, 300th Street West, 290th Street West, and existing residences east of 300th Street West and east of 290th Street West and Malinda Avenue. Screening of construction security lighting at construction staging areas shall be implemented, as feasible. Construction equipment and materials staging areas shall be located as far as feasible from surrounding adjacent residences and lights shall be directed away from adjacent on-site residences that are occupied, as each development phase is built.

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5.13	**Visual Resources**	**MM 13-6** An Exterior Lighting Plan shall be prepared in coordination with a qualified Biologist, be reviewed by an Electrical Engineer who is registered in the State of California, and then approved by the County prior to the submittal of each building permit. The Lighting Plan shall apply to all proposed structures and for development areas that border natural open space resources. The Lighting Plan shall be consistent with County Rural Outdoor Lighting District requirements for the Antelope Valley and shall provide guidelines for the outdoor lighting to be used throughout the Project site. Final lighting orientation and design shall be approved by the County. The Lighting Plan shall include, but not be limited to, the following: a. All lighting within 300 feet of natural open space areas shall only be implemented where needed for safety and shall be directed away from these areas and shielded so that light is not directed into open space and riparian areas. Where possible, these safety lights shall be motion sensor activated with infrared light sensors to prevent daytime lighting. b. Mercury vapor and halide lighting shall not be used on the perimeter of the developed areas or adjacent to designated open space. c. Illumination levels should be compatible with the character and use of surrounding development as determined by national lighting organizations. The Illuminating Engineering Society of North America publishes recommendations for the lighting industry that include illumination levels for outdoor lighting. d. Low-pressure sodium lighting fixtures or flashing lights shall not be used except in emergency situations. e. Exterior lighting standards and fixtures shall be located and designed to minimize direct glare beyond the site boundaries. Lighting shall be fully shielded and directed downwards to confine light spread solely within necessary locations. Illumination or glare from the exterior lighting system onto adjacent properties or streets should be minimized. f. Security lighting fixtures shall not project above the roof line of the building on which they are mounted. g. Where applicable, time-control devices shall be utilized on exterior lighting sources. h. Street, parking lot, and structural lighting fixtures shall provide adequate illumination for safety and comfort of vehicular and pedestrian traffic while minimizing light spillover.

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#	Environmental Factor	Mitigation
5.14	**Parks and Recreation**	**MM 14-1** The Project shall implement the following components of the Green Development Program to provide healthy outdoor parks and recreational resources on the Project site: • Provide a functional system of community trails, greenway trails, and natural corridors to serve as recreational opportunities and as alternative means of transportation to reduce vehicular traffic. • Provide "complete streets" throughout the community to provide alternative modes of transport (walking, biking, low-speed vehicles (LSVs) such as neighborhood electric scooters, bikes and other low-speed electric vehicles (NEVs). • Incorporate sidewalks (separated by a parkway from streets) and trees to be the main street elements to create a walking environment, promoting pedestrian activity. • Provide Class I – IV bike lanes throughout the Project to ensure a variety of alternative transportation options. • Provide permanently anchored bicycle racks within 200 feet of visitors' entrance of nonresidential buildings, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of two-bike capacity rack. • For new nonresidential buildings with over 10 tenant-occupants or for additions or alterations that add 10 or more tenant vehicular parking spaces, provide secure bicycle parking spaces at a rate of 5 percent of tenant parking being added, with a minimum of one space. • For residential buildings, provide permanently anchored bicycle racks within 100 feet of the visitor's entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity with a minimum of one two-bike capacity rack. • Nonresidential buildings within the Business Park and Commercial areas with 75,000 or more square feet of gross floor area shall provide locker rooms and shower facilities. • For multifamily buildings, provide on-site bicycle parking for at least one bicycle per every two dwelling units • Include planned green space, which are integrated pockets of open space (including greenways, tree stands, hillsides, and community parks) with minimal developed amenities. Planned green space reduces evapotranspiration; allows natural percolation of runoff from adjacent lands; reduces the heat island effect; and adds aesthetic value to a site. Planned green space can provide habitat as well as linkages to other habitat areas.
5.14	**Parks and Recreation**	**MM 14-2** The Project Applicant/Developer shall implement the Parks and Recreation Plan as set forth in Chapter 3.12 of the *Centennial Specific Plan* to provide visually appropriate parks and recreational amenities to the Project site.
5.14	**Parks and Recreation**	**MM 14-3** The Project Applicant/Developer shall construct 163 acres of parks consistent with the Park Overlay requirements of the Centennial Specific Plan, which includes acreage to meet the County's Parkland Dedication Ordinance requirements. In addition, the Project Applicant/Developer will fund the cost of constructing and equipping the public parks within the Project, pursuant to a park Development Agreement, a statutory Development Agreement pursuant to Section 65864 et seq. of the *California Government Code*, or other condition of approval.

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#	Environmental Factor	Mitigation
		For purposes of this measure, and as applied to all future Tentative Maps, the County shall deem all parks that are 3.0 acres or more in size as public parks, so long as each park site meets County standards for site suitability. The Project shall provide public parks to be developed in accordance with the schematic designs approved by the County. Neighborhood and community parks shall contain various types of improvements that may include, but not be limited to, parking lot, walkways, plazas and other forms of hardscape, shade trellis, security lighting, trash enclosures, locking gates, fencing, open turf sports fields, basketball courts, multi-purpose ballfields, tennis courts, children's play areas, picnic areas (picnic tables with pads), shade structures/pavilions, restrooms with drinking fountains, recreation building, office and storage space/service yards, trees, landscaping (including plant material, grading, drainage, and irrigation), and park entry monuments.
5.14	**Parks and Recreation**	**MM 14-4** The Project shall provide public parkland in compliance with the County of Los Angeles Parkland Dedication Ordinance/Quimby Act, with all acreage figures stated as "net" (three percent slope, maximum). Additionally, public parks shall be dedicated to the County in a developed condition, in accordance with the schematic designs recommended by the County and/or as approved by the Regional Planning Commission and/or the County Board of Supervisors as part of approval of each tract map as each phase of development occurs throughout the Project site with amenities consistent with County-approved plans. Developed public parks shall also be credited with an equivalency acreage correlating with the current Representative Land Value for the applicable Park Planning Area (currently Park Planning Area 48). All public parks must comply with County's Park Design Guidelines and Standards, Public Parks.
5.14	**Parks and Recreation**	**MM 14-5** The Project shall provide public and private recreation amenities that equate to the acreage requirements of the County of Los Angeles General Plan local parkland standard (4 acres for every 1,000 persons in the unincorporated County). For purposes of monitoring compliance with the General Plan standard, whenever either a Tentative Map or a Final Map is submitted for the County's review and clearance, those maps shall have a table that provides a breakdown of acreage per lot for the following categories: (1) Public Park acreage (maximum slope 3 percent or less); (2) Public Park Acreage Equivalency (which shall be based upon estimated Public Park Improvement Values derived from Total Project Cost Estimates required at the time of map clearance and the Parkland Dedication Ordinance/Quimby Ordinance in effect at the time the map is submitted); (3) Private Park acreage, including pocket parks; (4) Greenway and County multi-use (hiking, equestrian, and mountain biking) trail acreage; (5) Community Recreation Facility acreage; and (6) Private Recreation Facility acreage.
5.14	**Parks and Recreation**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 14-5** The Project shall provide public and private recreation amenities that equate to the acreage requirements of the County of Los Angeles General Plan local parkland standard (4 acres for every 1,000 persons in the unincorporated County).* For purposes of monitoring compliance with the General Plan standard, whenever either a Tentative Map or a Final Map is submitted for the County's review and clearance, those maps shall have a table that provides a breakdown of acreage per lot for the following categories: (1) Public Park acreage (maximum slope 3 percent or less);

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#	Environmental Factor	Mitigation
		(2) Public Park Acreage Equivalency (which shall be based upon estimated Public Park Improvement Values derived from Total Project Cost Estimates required at the time of map clearance and the Parkland Dedication Ordinance/Quimby Ordinance in effect at the time the map is submitted); (3) Private Park acreage, including pocket parks; (4) Greenway and County multi-use (hiking, equestrian, and mountain biking) trail acreage; (5) Community Recreation Facility acreage; and (6) Private Recreation Facility acreage. *_Note:_ Independent of this measure, an additional 96 acres of designated park space (increasing identified parkland to 6 acres per 1,000 persons) has been voluntarily agreed to by the Project applicant as a component of the Development Agreement. _See_ Item 7.1 (entitled "Commitment to Provide Additional Regional Park Land") in Exhibit G of the Development Agreement.
5.15	**Education**	**MM 15-1** The Project Applicant/Developer shall designate one K-5 and five K–8 school sites in the Project area in accordance with the conceptual land use plan or alternate location(s) that shall be agreed upon by the authorized school districts.
5.15	**Education**	**MM 15-2** The Project Applicant/Developer shall demonstrate to the County that they have an executed agreement with all school districts that operate within the boundaries of the Project site. The Transportation Management Association shall coordinate with local schools and school districts to establish and maintain a Safe Routes to School program to facilitate students walking and biking to schools.
5.15	**Education**	**MM 15-3** The Project Applicant/Developer shall designate one high school site in the Project area in accordance with the conceptual land use plan or alternate location(s) that shall be agreed upon by the authorized school district.
5.16	**Fire and Law Enforcement Services**	**MM 16-1** At buildout, the Los Angeles County Fire Department (LACFD) fire stations shall be located such that response times to the Project site shall be 5 minutes or less for fire service responses and 8 minutes or less for the advanced life support (paramedic) unit responses within the Project site.
5.16	**Fire and Law Enforcement Services**	**MM 16-2** The Project Applicant/Developer shall pay developer fees in effect at the time of construction permit approval, in accordance with the LACFD Developer Fee Program until such time the Project Applicant/Developer has conveyed an approved, operational fire station to the LACFD. As an alternative to fee payment, the Developer Fee Program allows the LACFD and the Project Applicant/Developer to agree on a program whereby the Project Applicant/Developer would provide land and would construct and equip the fire stations required for the Project in exchange for a credit towards the Project's fee payments.
5.16	**Fire and Law Enforcement Services**	**MM 16-3** The Project Applicant/Developer shall provide land, convey title, and shall construct and equip, to the specifications and requirements of the LACFD, for up to four new Fire Stations to the LACFD. The approved final plans and specifications for the Project shall identify locations of the fire stations. The LACFD shall have final approval over the fire station site locations. The timing for the construction of the on-site fire stations shall be established by the LACFD dependent upon the phasing of development, with the first on-site fire station operational no later than the time the 1,000th dwelling unit is built on site.

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#	Environmental Factor	Mitigation	
5.16	**Fire and Law Enforcement Services**	**MM 16-4**	The Project Applicant/Developer shall pay Law Enforcement Facilities Mitigation Fee (LEFMF) to the Los Angeles County Sheriff's Department (LASD) pursuant to the requirements established in County Ordinance No. 2008-0033. The amount of fees to be paid will be determined based on the established fee in Section 22.74.030 of the County Code. The Project incorporates a temporary "store front" sub-station, followed by construction of a permanent LASD Station included on the Project site, in lieu of a portion of the LEFMF, as allowed under Section 22.74.090 (Consideration in Lieu of Fee) of the County Code. Costs associated with the construction of the temporary "store front" sub-station and permanent LASD Station would be credited against the LEFMF. Prior to completion of the permanent LASD Station, the "store front" sub-station may be located on site in Village 1 on the north side of the SR-138. This temporary sub-station shall be properly outfitted in accordance with applicable occupancy requirements of the LASD for such "store front" facilities and shall be operational prior to the approval of the first certificate of occupancy for the first phase of Project development. The Centennial Land Use Plan identifies a conceptual location for one LASD Station in the Business Park area on the Project site north of the SR-138. The permanent LASD Station shall be constructed immediately following completion of the first phase of development. The LASD shall have final approval over the temporary sub-station and permanent LASD Station site locations.
5.17	**Other Public Services**	**MM 17-1**	The *Los Angeles County Code* (Chapter 22.72 of Title 22) ("Library Ordinance") imposes a Library Facilities Mitigation Fee on new residential development projects in the unincorporated areas of the County of Los Angeles served by the County Library (the "Library Facilities Mitigation Fee"). The Library Facilities Mitigation Fee that is in effect for the designated County Library planning area is charged upon approval of each residential building permit and is based on the estimated reasonable cost of providing the projected library facility needs in the applicable library planning area. The Project is located within Planning Area 2: Antelope Valley and, as of the date of this EIR, the Library Facilities Mitigation Fee is $844.00 per residential building permit (based upon the County Library's mitigation fee per building permit amount established on October 27, 1998, and last updated on July 1, 2015). The Project provides for the development of a maximum of 19,333 residential dwelling units. Based on the current fee, the total Library Facilities Mitigation Fee that would be due from the Project Applicant/Developer (or its successors in interest) is $16,317,052. Consistent with the Library Ordinance, the amount of the Library Facilities Mitigation Fee that shall apply to the Project shall be the fee payable on the date the County issues each building permit for a residential dwelling unit. The amount of the Library Facilities Mitigation Fee may be increased from time to time pursuant to Section 22.72.040 of the County Code and State law; provided, however, the Library Facilities Mitigation Fee applicable to residential dwellings within the Project shall be no more than the amount of the Library Facilities Mitigation Fee applicable to residential dwellings outside of the Project but within Planning Area 2. The aggregate Library Facilities Mitigation Fees payable for all of the residential dwelling units within the Project for which building permits have been issued shall be referred to herein as the "Project-Wide Fee Total." The ordinance allows that in lieu of the payment of Library Facilities Mitigation Fees, the Project Applicant/Developer shall fulfill the obligations required by the mitigation measures in this EIR, to satisfy the requirements of the Library Ordinance.

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#	Environmental Factor	Mitigation	
5.17	**Other Public Services**	**MM 17-2**	Section 22.72.090 of the Library Ordinance permits the County Librarian to accept substitute consideration in lieu of the Library Facilities Mitigation Fee if the proposed substitute consideration (such as land, facility construction, and/or materials) (i) has a value that is equal to or greater than the applicable Library Facilities Mitigation Fee that is otherwise due; (ii) is in the form acceptable to the County Librarian; and (iii) is within the scope of the applicable library facilities project. Because the Library Facilities Mitigation Fee only allows for an incremental accumulation of funds for future library facilities as building permits are issued and fees are collected pursuant to Section 22.72.060 of the County of Los Angeles Code, the County Library will implement a strategy that will better serve the residents of Centennial by ensuring that the timing and scope of public library facilities will meet the demands of the community. Centennial desires to cooperate with the County Library in meeting its goals and also seeks certainty with respect to the amount and timing of the Project's financial commitment to the County Library. Therefore, the parties' objectives will be satisfied if, in lieu of the Project Applicant/Developer's payment of Library Facilities Mitigation Fees at the time residential building permits are pulled in accordance with Section 22.72.060 of the County Code, the Project Applicant/Developer will instead set aside the land and contribute the funds required to build and equip a turnkey Permanent Facility, all in accordance with the terms and conditions of the Development Agreement. As discussed in MM 17-1, the Project Applicant/Developer's provision of such land and funding will, in accordance with the required mitigation measures, be credited against Library Facilities Mitigation Fees that would otherwise be due.
5.17	**Other Public Services**	**MM 17-3**	The Project Applicant/Developer shall dedicate to the County Library up to 2.62 acres within Village 3 of the Project (the "Dedicated Land") for public library purposes or other location for the permanent facility mutually agreed upon by the County Librarian and the Project Applicant/Developer. The Project Applicant/Developer shall receive a credit against unpaid Library Facilities Mitigation Fees in an amount equal to the fair market value of all Dedicated Land as of the date of the dedication to the County of Los Angeles for County Library purposes. The Dedicated Land shall be conveyed to the County concurrently with the filing and recordation of the final map within which the Dedicated Land is located. If the County Library desires to increase the size of the Dedicated Land, it shall make such request of the Project Applicant/Developer no later than the date that the County approves the tentative map for the proposed subdivision in which the Dedicated Land is located. the Project Applicant/Developer agrees to increase the size of the Dedicated Land upon the County's request provided: (i) the County cooperates with the Project Applicant/Developer in any related land use boundary changes, transfers or conversions necessary to accommodate the larger library site, subject to the requirements of CEQA and (ii) the County either pays the fair market value for such land with either (A) U.S. funds or (B) a dollar-for-dollar credit against unpaid Library Facilities Mitigation Fees, so long as the Project-Wide Fee Total has not already been offset pursuant to MM 17-4 through MM 17-7. "Fair market value" for the land described in this paragraph shall be determined based on the value of such land had it been entitled for institutional office purposes and the property had a maximum floor area ratio (FAR) of 0.25. If the County Library at any time changes the use of the Dedicated Land from that of a County-owned public library facility, then the Dedicated Land will revert back to Centennial.

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#	Environmental Factor	Mitigation
5.17	**Other Public Services**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 17-3** The Project Applicant/Developer shall dedicate to the County Library one (1) site of up to 2.62 acres within Village 3 of the Project (the "Dedicated Land") for public library purposes or other location for the permanent facility mutually agreed upon by the County Librarian and the Project Applicant/Developer. The Project Applicant/Developer shall receive a credit against unpaid Library Facilities Mitigation Fees in an amount equal to the fair market value of all Dedicated Land as of the date of the dedication to the County of Los Angeles for County Library purposes. The Dedicated Land shall be conveyed to the County concurrently with the filing and recordation of the final map within which the Dedicated Land is located. If the County Library desires to increase the size of the Dedicated Land, it shall make such request of the Project Applicant/Developer no later than the date that the County approves the tentative map for the proposed subdivision in which the Dedicated Land is located. T~~t~~he Project Applicant/Developer agrees to increase the size of the Dedicated Land upon the County's request provided: (i) the County cooperates with the Project Applicant/Developer in any related land use boundary changes, transfers or conversions necessary to accommodate the larger library site, subject to the requirements of CEQA and (ii) the County either pays the fair market value for such land with either (A) U.S. funds or (B) a dollar-for-dollar credit against unpaid Library Facilities Mitigation Fees, so long as the Project-Wide Fee Total has not already been offset pursuant to MM 17-4 through MM 17-7. ~~"Fair market value" for the land described in this paragraph shall be determined based on the value of such land had it been entitled for institutional office purposes and the property had a maximum floor area ratio (FAR) of 0.25.~~ If the Dedicated Land is not used for a County Library ~~at any time changes the use~~ within ten (10) years of the land's conveyance, or if the Dedicated Land ~~from that of~~ is not fully used for a ~~County-owned public~~ library ~~facility~~ or another use by the County that is mutually approved by the County and Project Applicant/Developer, then the Dedicated Land (or portion thereof) will revert back to ~~Centennial~~ the Project Applicant/Developer.
5.17	**Other Public Services**	**MM 17-4** The Project Applicant/Developer shall provide plans and specifications with a one or two-story, turn-key public library building (the "Permanent Facility") on the Dedicated Lands. The Permanent Facility may be constructed in phases. The size and scope of the Permanent Facility will be determined by the County Librarian in consultation with the Project Applicant/Developer provided, however, that the Project Applicant/Developer's maximum financial contribution shall not exceed the Project-Wide Fee Total, less any offsets pursuant to Mitigation Measures 17-4, 17-6, and 17-7 in this EIR. The sizing, design and programming of the Permanent Facility, including the influence of technology on library services, will be agreed upon by representatives from County Library and the Project Applicant/Developer. A report shall be prepared by an independent library consultant selected by the County Library that will solicit input from the community with respect to the types of library services desired at the Permanent Library Facility. The consultant's report shall be paid for by the Project Applicant/Developer and the Project Applicant/Developer shall receive a credit against the Project-Wide Fee Total for the Project Applicant/Developer's payment of such costs. The Permanent Facility and Permanent Library furniture, fixture, and equipment (FF&E, as defined below) will be substantially similar in quality and materials to the Quartz Hill branch of the County Library on November 2016. The design of the Permanent Library will be performed by an architect mutually selected by the

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#	Environmental Factor	Mitigation
		Project Applicant/Developer and the County Librarian. The Permanent Facility must comply with all requirements of the County Library's Low Voltage Specifications in effect on the date the design contract for the Permanent Facility is fully executed. The County Library shall be responsible for all costs of design and construction of the Permanent Library in excess of the Project Applicant/Developer's Library Facilities Mitigation Fee obligations hereunder. If, after application of the fee credits against Library Facilities Mitigation Fees to which the Project Applicant/Developer is entitled, there is insufficient funds to construct the Permanent Facility and purchase the Permanent Library FF&E, the Project Applicant/Developer shall not be required to fund construction of the Permanent Facility until additional and sufficient funds are authorized by the County to construct the Permanent Facility and to procure the Permanent Library FF&E. The Permanent Facility will be completed and operational on a date agreed to between the County Librarian and the Project Applicant, subject to force majeure and events within the control of the County (such as, for example, the County's failure to pay any funding shortfalls if credits against the Project-Wide Fee Total are exhausted). The size of the Permanent Facility will be proportionately reduced in size and materials if the County approves less than the 19,333 residential units proposed for the Centennial Project.
5.17	**Other Public Services**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 17-4** The Project Applicant/Developer shall provide plans and specifications with a one or two-story, turn-key public library building (the "Permanent Facility") on the Dedicated Lands. The Permanent Facility may be constructed in phases. The size and scope of the Permanent Facility will be determined by the County Librarian in consultation with the Project Applicant/Developer provided, however, that the Project Applicant/Developer's maximum financial contribution shall not exceed the Project-Wide Fee Total, less any offsets pursuant to Mitigation Measures 17-4, 17-6, and 17-7 in this EIR. The sizing, design and programming of the Permanent Facility, including the influence of technology on library services, will be agreed upon by representatives from County Library and the Project Applicant/Developer. A report shall be prepared ~~by an independent library consultant selected by~~ in connection with the ~~County Library~~ preparation of the architectural design parameters that will solicit input from the community with respect to the types of library services desired at the Permanent Library Facility. The consultant's report shall be paid for by the Project Applicant/Developer and the Project Applicant/Developer shall receive a credit against the Project-Wide Fee Total for the Project Applicant/Developer's payment of such costs. The Permanent Facility and Permanent Library furniture, fixture, and equipment (FF&E, as defined below) will be substantially similar in quality and materials to the Quartz Hill branch of the County Library on November 2016. The design of the Permanent Library will be performed by an architect mutually selected by the Project Applicant/Developer and the County Librarian. The Permanent Facility must comply with all requirements of the County Library's Low Voltage Specifications in effect on the date the design contract for the Permanent Facility is fully executed. The County Library shall be responsible for all costs of design and construction of the Permanent Library in excess of the Project Applicant/Developer's Library Facilities Mitigation Fee obligations hereunder. If, after application of the fee credits against Library Facilities Mitigation Fees to which the Project Applicant/Developer is entitled, there is insufficient funds to construct the Permanent Facility and purchase the Permanent Library FF&E, the Project

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#	Environmental Factor	Mitigation	
			Applicant/Developer shall not be required to fund construction of the Permanent Facility until additional and sufficient funds are authorized by the County to construct the Permanent Facility and to procure the Permanent Library FF&E. The Permanent Facility will be completed and operational on a date agreed to between the County Librarian and the Project Applicant, subject to force majeure and events within the control of the County (such as, for example, the County's failure to pay any funding shortfalls if credits against the Project-Wide Fee Total are exhausted). The size of the Permanent Facility will be proportionately reduced in size and materials if the County approves less than the 19,333 residential units proposed for the Centennial Project.
5.17	**Other Public Services**	**MM 17-5**	The Project Applicant/Developer agrees to install furniture, fixtures and equipment ("Permanent Library FF&E") and purchase library materials in connection with the Permanent Facility, provided that the Project Applicant/Developer's financial contribution toward the cost of the Permanent Library FF&E and library materials shall not exceed the Project-Wide Fee Total when taken together with all other Project Applicant/Developer expenses then credited against the Project-Wide Fee Total. The County Library shall be responsible for all costs of Permanent Library FF&E and library materials in excess of the Project-Wide Fee Total. The Permanent Library FF&E specifications will be provided by the County Library. Any FF&E purchased shall remain the property of the County Library.
5.17	**Other Public Services**	**MM 17-6**	The Project Applicant/Developer shall provide plans and specifications that demonstrate on-site parking for library patrons at a ratio of 4 parking spaces per 1,000 gross square feet of library space. The parking lot shall also include two spaces adjacent to the staff entrance of the library for County library service vehicles. Parking may be shared with adjacent uses with the consent of the County Library.
5.17	**Other Public Services**	**MM 17-7**	If the Project Applicant/Developer has satisfied its obligations in Mitigation Measures 17-1 through 17-6, above, and the Project Applicant/Developer continues to pull building permits within the Project, then the Project Applicant/Developer (or its successors in interest) shall pay any Library Facilities Mitigation Fees still owing as construction permits are issued, which shall be expended by the County Library for the benefit of the Permanent Facility on library materials, FF&E, facility enhancements or library programs as determined by the County Librarian.
5.17	**Other Public Services**	**MM 17-8**	No later than December 1 and July 1 of each calendar year, the Project Applicant/Developer shall deliver to the County Library a report in writing providing the number of residential building permits actually issued to date. Within 30 days from the date the report is received, the County Library will deliver, or cause to deliver, to the Project Applicant/Developer a report on the revised Project-Wide Fee Total.
5.17	**Other Public Services**	**MM 17-9**	The Project Applicant/Developer shall be responsible for implementing the following construction waste reduction requirements to ensure that 100 percent of soil is diverted during grading activities, and that at least ~~70~~ 75 percent of nonhazardous construction and demolition waste is diverted from landfill disposal. During all construction phases, wastes would be managed with the use of recycling bins for various debris materials which would be sent to existing recycling and/or processing facilities in accordance with all provisions of the County Construction and Demolition Debris Ordinance. This would include submitting and implementing a Recycling and Reuse Plan to Public Works in connection with obtaining a building or grading permit.

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5.17	**Other Public Services**	**MM 17-10** The Project shall incorporate the Solid Waste Management Plan (Section 3.7 of the Centennial Specific Plan) and the Property Owner/Developer shall be responsible for implementation of the following operational waste reduction requirements to ensure that at least 75 percent of operational waste is diverted from landfill disposal: • The Property Owner/Developer shall process an on-site contract with a waste management company and/or recyclers, and/or self-haul to waste and recycling facilities to properly recycle, divert, and dispose of solid waste generated on-site. Throughout the Project's operation, the waste hauler shall be required by contract to maintain records showing the diversion of not less than 75 percent of the operational waste generated by the Project. • The waste management contract will establish dedicated cans for green waste and a Green Waste Recycling Plan that must be adhered to by landscape maintenance companies as part of the CC&Rs. The CC&Rs will require the use of mulching mowers or mowers with mulching blades for common lawn area, use of California Air Resources Board- (CARB) approved or electric maintenance equipment; placing three to five inches of mulch in common areas' planting beds each year as part of the Landscape Maintenance Plan for all non-residential and multi-family buildings; and diverting organic wastes to a mulching and composting facility or anaerobic digestion facility. • The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal and on recycling and composting will be provided to Property Owners. • Household hazardous wastes and less commonly disposed materials (such as electronics and appliances) shall have seasonal pickup (at least two times a year) and residents would be notified of upcoming events. • Semi-annual "exchange days" shall be organized, publicized, and paid for by the Master Homeowners Association (HOA). • The Project Applicant/Master Developer shall set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station (MRF/TS) that includes a household hazardous waste permanent collection and reuse center and allows for mulching/composting operations. The site shall be located in a suitable location with the capacity to manage the nonhazardous solid waste and household hazardous waste generated by the Centennial Development Project at buildout. The Project Applicant/Master Developer shall prepare and grade the site, and install basic mainline infrastructure fronting the property prior to the issuance of any occupancy permits associated with the first phase of project implementation. The Master Developer shall continually encourage a waste management company to build these facilities on this build ready site. The CC&R for the future MRF/TS site shall require the land to be set aside for the MRF/TS in perpetuity. • The Smart Gardening Learning Center specifications will be provided by County Public Works. • Parking for the Learning Center and the MRF/TS may be shared with adjacent uses with the consent of the property owners and County Public Works.

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#	Environmental Factor	Mitigation
5.17	**Other Public Services**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 17-10** The Project shall incorporate the Solid Waste Management Plan (Section 3.7 of the Centennial Specific Plan) and the Property Owner/Developer shall be responsible for implementation of the following operational waste reduction requirements to ensure that at least 75 percent of operational waste is diverted from landfill disposal, which shall be posted on the community intranet, and shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs: • The Property Owner/Developer shall process an on-site contract with a waste management company and/or recyclers/composters, and/or self-haul to waste and recycling facilities to properly recycle, divert, compost, and dispose of solid waste generated on-site. Throughout the Project's operation, the waste hauler shall be required by contract to maintain records showing the diversion of not less than 75 percent of the operational waste generated by the Project. • The waste management contract will establish dedicated cans for green waste and a Green Waste Recycling Plan that must be adhered to by landscape maintenance companies as part of the CC&Rs. The CC&Rs will require the use of mulching mowers or mowers with mulching blades for common lawn area, use of California Air Resources Board- (CARB) approved or electric maintenance equipment; placing three to five inches of mulch in common areas' planting beds each year as part of the Landscape Maintenance Plan for all non-residential and multi-family buildings; and diverting organic wastes to a mulching and composting facility or anaerobic digestion facility. • The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal and on recycling and composting will be provided to Property Owners. • Household hazardous wastes and less commonly disposed materials (such as electronics and appliances) shall have seasonal pickup (at least two times a year) and residents would be notified of upcoming events. • Semi-annual "exchange days" shall be organized, publicized, and paid for by the Master Homeowners Association (HOA). • The Project Applicant/Master Developer shall set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station (MRF/TS) that includes a household hazardous waste permanent collection and reuse center and allows for mulching/composting operations. The site shall be located in a suitable location with the capacity to manage the nonhazardous solid waste and household hazardous waste generated by the Centennial Development Project at buildout. The Project Applicant/Master Developer shall prepare and grade the site, and install basic mainline infrastructure fronting the property prior to the issuance of any occupancy permits associated with the first phase of project implementation. The Master Developer shall continually

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#	Environmental Factor	Mitigation
		encourage a waste management company to build these facilities on this build ready site. The CC&R for the future MRF/TS site shall require the land to be set aside for the MRF/TS in perpetuity. • The Smart Gardening Learning Center specifications will be provided by County Public Works. • Parking for the Learning Center and the MRF/TS may be shared with adjacent uses with the consent of the property owners and County Public Works.
5.18	**Water Resources**	**MM 18-1** In addition to complying with the water efficiency and conservation set forth in Divisions 4.3 and 5.3 of the California Green Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent, the Project Applicant/Developer shall implement the measures listed below. **Meter Water Use.** Install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site. **Reduce Potable Water Use with On-Site Recycled Water.** Install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater. Recycled water shall be used to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation demand in 50 percent of the total very low and low density residential lot landscaped area. **Water Efficient Appliances**. Require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star®, or other applicable standards. **Water Efficient Irrigation**. Require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses. Water Smart/Evapotranspiration-based controllers shall be used. Low water use plants and shrubs shall be used in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance. **Water Budget Based Water Rates**. Require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District). The water budget based rates shall incorporate and be designed to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: 1. Indoor Water Use Standards (a) Residential indoor water use – 55 gallons per capita per day (b) Commercial indoor water use – 200 gallons per day per thousand square feet

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#	Environmental Factor	Mitigation
		(c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias) (d) Institutional indoor water use – 50 gallons per day per thousand square feet (e) Hotel indoor water use – 125 gallons per day per room. 2. Outdoor Water Use Standards (a) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site (b) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site
5.18	**Water Resources**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 18-1** In addition to complying with the water efficiency and conservation set forth in Divisions 4.3 and 5.3 of the California Green Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent, the Project Applicant/Developer shall implement the measures listed below. **Meter Water Use.** Install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site. **Reduce Potable Water Use with On-Site Recycled Water.** Install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater. Recycled water shall be used to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation demand in 50 percent of the total very low and low density residential lot landscaped area. **Water Efficient Appliances**. Require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star®, or other applicable standards. **Water Efficient Irrigation**. Require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses. Water Smart/Evapotranspiration-based controllers shall be used. Low water use plants and shrubs shall be used in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance. **Water Budget Based Water Rates**. Require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District). The water budget based rates shall incorporate and

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#	Environmental Factor	Mitigation
		be designed to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: 1. Indoor Water Use Standards (a) Residential indoor water use – 55 gallons per capita per day (b) Commercial indoor water use – 200 gallons per day per thousand square feet (c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias) (d) Institutional indoor water use – 50 gallons per day per thousand square feet (e) Hotel indoor water use – 125 gallons per day per room. 2. Outdoor Water Use Standards (a) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site (b) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site 3. Water meters shall be required to measure potable water use and may be required to measure recycled water usage at commercial, recreational, and institutional uses; and to monitor single family home lots via sample home survey selection criteria.
5.18	**Water Resources**	**MM 18-2** The Project Applicant/Developer shall submit to the County Water Use Reports prepared by a qualified specialist to the satisfaction of the County to verify that projected water use efficiencies are being achieved (1) at the end of the 5th year following first occupancy or occupancy of the 4,000th dwelling unit, whichever occurs later and (2) at the end of the 10th year following first occupancy or occupancy of the 10,000th dwelling unit, whichever occurs later. In the event that a Water Use Report indicates that consumption exceeds projected levels, response measures must be implemented to ensure that available supplies will be sufficient to meet future demand. No further development will be approved until additional measures are implemented to achieve the required efficiencies and/or provide additional water supplies, as confirmed by the Project Water Purveyor. No subsequent Tentative Maps shall be approved until the Project Water Purveyor has demonstrated to the satisfaction of the County that the implementation of specific water demand and supply response measures will ensure that available supplies will meet future Project demand.
5.19	**Wastewater Collection**	**MM 19-1** The Project Applicant/Developer shall provide documentation to the County that it has completed all required procedures and has paid all applicable fees associated with establishing the Project Water Purveyor, or an alternate qualified public utility district, as the operator of the WRFs.

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#	Environmental Factor	Mitigation
5.19	**Wastewater Collection**	**MM 19-2** The Project Applicant/Developer shall demonstrate that the Project has either been annexed into an existing qualified public utility district (e.g. Golden Valley Municipal Water District) or that a new public utility district (e.g. Project Water Purveyor) has been created to serve the Project. The Project Water Purveyor or alternate qualified public utility district shall be responsible for the design, construction, and operation of the wastewater facilities, and shall ensure compliance with all applicable standards and regulations, including all Lahontan RWQCB and Title 22 requirements of the California Code of Regulations. Wastewater treatment facilities, effluent facilities, and sewer lift stations shall be designed with emergency backup power sources and spill containment features, which shall be provided to the satisfaction of the Lahontan RWQCB.
5.19	**Wastewater Collection**	**MM 19-3** The Project shall incorporate the Wastewater Management Plan (*Centennial Specific Plan*, Section 3.5), and the Project Applicant/Developer shall prepare a Facilities Report, a Pump Station Feasibility Report, and a Sewer Area Study consistent with County Policies and Requirements.
5.19	**Wastewater Collection**	**MM 19-4** The Project Applicant/Developer shall provide the County with plans and specifications that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards that demonstrate that the WRF West shall serve the Project site west of the West Branch of the California Aqueduct. The facility shall be located on an approximate 3-acre site and shall treat an average flow of approximately 0.34 million gallon per day. Biosolids shall be hauled to a suitable landfill or used for conversion into fertilizer products.
5.19	**Wastewater Collection**	**MM 19-5** The Project Applicant/Developer shall provide the County with plans and specifications that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards that demonstrate that the WRF East shall serve the Project site east of the West Branch of the California Aqueduct. WRF East will be located near the northeasterly corner of the Project and shall treat an average flow of 4.28 million gallons per day. Biosolids shall be hauled to a suitable landfill or used for conversion into fertilizer products. Lined seasonal recycled water storage ponds shall be implemented as required to temporarily store recycled water during times of low demand. The ponds shall implement feasible and applicable wastewater treatment facility best management practices for mosquito and health vector recommended in the California Department of Public Health's 2012 *Best Management Practices for Mosquito Control in California: Recommendations of the California Department of Public Health and the Mosquito and Vector Control Association of California.*
5.19	**Wastewater Collection**	**MM 19-6** Recycled water from Project Wastewater Reclamation Facilities that is used in a manner that could accidentally recharge groundwater shall meet the groundwater quality objectives in the Lahontan Basin Plan for nitrate as nitrogen, or 10 milligrams per liter based on the California state drinking water standard as referenced in the Lahontan Basin Plan for groundwater quality objectives of 45 milligrams per liter of nitrate as nitrate.

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#	Environmental Factor	Mitigation
5.19	**Wastewater Collection**	**MM 19-7** The Project Applicant/Developer shall provide an evaluation of alternate disinfection measures, including the use of ultraviolet disinfection, for water treatment at the eastern wastewater reclamation facility (WRF East) and the western wastewater reclamation facility (WRF West), and provide a recommendation regarding the most efficient and effective means of disinfection to the Lahontan Regional Water Quality Control Board (Lahontan RWQCB) for review. The WRF East and WRF West shall be designed to the satisfaction of the Lahontan RWQCB, with appropriate disinfection measures to ensure that any incidental recharge from the use of recycled water will not adversely affect receiving groundwater.
5.20	**Dry Utilities**	**MM 20.2-1** The Project Applicant/Developer shall coordinate with Southern California Edison (SCE) to ensure that there are no prolonged disruptions to the existing transmission lines that extend through the Project study area and to coordinate in the design and implementation of future electrical service and facilities (e.g., transmission lines, access road) in the Project study area. This will ensure that: (1) no prolonged service disruptions during the extension and upgrading of these services would arise; (2) the nature, design, and timing of electrical system improvements are in accordance with all SCE requirements; and (3) the improvements are adequate to serve the proposed land uses and are available for the first occupied land uses.
5.20	**Dry Utilities**	**MM 20.2-2** The Project Applicant/Developer shall provide the County with plans and specifications that demonstrate a future substation shall be constructed in the eastern half of the Project site to serve Project development in the easterly portion of the Project site. To provide adequate capacity for electrical services for the Project, SCE would select one or both of the following two options to implement: (1) reconfigure the Bailey Substation or (2) upgrade the Gorman Substation and retrofit the existing overhead power lines. An electrical ~~generation and distribution~~ infrastructure system shall be constructed as part of the main utility corridors for dry utilities. The timing of construction, as well as specific facility location and sizing, shall be coordinated with SCE.
5.20	**Dry Utilities**	**MM 20.3-1** The Project Applicant/Developer shall coordinate with the Southern California Gas Company (SoCalGas) in the design and implementation of future natural gas service and facilities in the Project study area to ensure that (1) no prolonged service disruptions during the extension and upgrade of these services would arise; (2) the nature, design, and timing of natural gas system improvements are in accordance with SoCalGas requirements; and (3) the improvements are adequate to serve the Project, to be in place for the first occupied land uses.
5.20	**Dry Utilities**	**MM 20.3-2** The Project Applicant/Developer shall install, bond for, or otherwise provide on-site natural gas facilities in coordination with SoCalGas.
5.20	**Dry Utilities**	**MM 20.3-3** An additional regulator station shall be constructed by SoCalGas to loop the distribution system for increased reliability. The timing for development of this station shall be determined by SoCalGas through an assessment of the system's operational needs. The timing for construction of this facility, as well as the specific location and sizing, shall be coordinated with SoCalGas.

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#	Environmental Factor	Mitigation
5.20	**Dry Utilities**	**MM 20.4-1** The Project Applicant/Developer shall coordinate with AT&T in the design and implementation of future telecommunications service and facilities within the Project study area to ensure that: (1) no prolonged service disruptions during the extension and upgrading of these services would arise; (2) the nature, design, and timing of telecommunications system improvements are in accordance with AT&T requirements; and (3) the improvements are adequate to serve the proposed land uses.
5.20	**Dry Utilities**	**MM 20.5-1** The Project Applicant/Developer shall coordinate with the Cable Television Service Provider in the design and implementation of future communication service and facilities within the Project study area to ensure that (1) no prolonged service disruptions during the extension and upgrading of these services would arise; (2) the nature, design, and timing of cable system improvements are in accordance with the Cable Service Provider's requirements; and (3) the improvements are adequate to serve the proposed land uses. The cable service connections shall be available at the property lines.
5.21	**Climate Change**	**MM 21-1** The Project Applicant/Developer shall provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation. "Anticipated electrical energy demand" shall be determined on the basis of the anticipated loads for each building as shown in the reports submitted at the time of building permit application pursuant to the Building Energy Efficiency Standards of Title 24. "On-site renewable energy generation" includes, but is not limited to, solar, wind, geothermal, biofuel and hydroelectric systems. These systems shall be installed in connection with the development of one or more of the following: residential units, nonresidential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity.
5.21	**Climate Change**	**MM 21-2** The Project's plans and specifications shall demonstrate compliance with California Green Building Standards (CALGreen) Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings. Therefore, the energy efficiency of these buildings would exceed 2016 Title 24 requirements by 15 percent. Low rise buildings are three stories or less. The Project shall incorporate the Green Development Program (*Centennial Specific Plan*, Appendix 2A), and the Project Applicant/Developer shall be responsible for the implementation of this requirement, which may include energy reduction measures such as use of high performance glazing, radiant heat roof barriers, insulation of all pipes, programmable thermostats, fluorescent and LED bulbs, solar access, sealed ducts, strategic placement of trees and other shading devices. All single-family homebuyers shall have the option to include a photovoltaic array system.
5.21	**Climate Change**	**MM 21-3** The Project's plans and specifications shall demonstrate compliance with CALGreen voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings (e.g. hotel, high-rise residential), thereby exceeding the 2016 Title 24 energy efficiency requirements for these buildings by 10 percent. The Project shall incorporate the Green Development Program (Centennial Specific Plan, Appendix 2A), and the Project Applicant/Developer shall be responsible for the implementation of this requirement, which may include energy reduction measures such as high performance glazing, radiant heat roof barriers, high-efficient HVAC with hot-gas reheat, insulation of all pipes, programmable thermostats, fluorescent and LED bulbs, solar access, sealed ducts, zero use of CFC refrigerants in commercial buildings, strategic placement of trees, and other shading devices. Commercial structures shall include passive solar

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		design techniques, such as a north-south panel orientation on buildings, and shall install operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, thereby reducing use of interior climate controls.
5.21	**Climate Change**	**MM 21-4** The Project Applicant/Developer shall require in contract specifications, that contractors limit construction equipment idling to 3 minutes and include a program to ensure that equipment operators comply with the 3-minute limit.
5.21	**Climate Change**	**MM 21-5** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. The Project Applicant/Developer shall provide the proposed plan for compliance with this provision prior to obtaining a permit for the pool.
5.21	**Climate Change**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 21-5** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that <u>all</u> ~~a minimum of 70 percent of~~ public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. The Project Applicant/Developer shall provide the proposed plan for compliance with this provision prior to obtaining a permit for the pool.
5.21	**Climate Change**	**MM 21-6** Deeds, CC&Rs or similar legal documents shall contain the following requirement: The owners of all single-family and multi-family residential units shall be required, upon resale, to present to the buyer a written energy audit checklist prepared by a qualified third party at the time the seller provides the buyer with the Real Estate Transfer Disclosure Statement required by California Civil Code, Section 1102 et seq. The energy audit checklist shall certify that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. All residential pool covers shall be removable, and shall not be automatic retractable covers. The CC&Rs of the master homeowners association or other applicable association shall require compliance with the provisions of this measure and shall provide notice to individual owners of the resale energy audit checklist requirement. The master homeowners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure.

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5.21	**Climate Change**	**MM 21-7** Deeds, CC&Rs, or similar legal documents shall contain the following requirement: For nonresidential buildings, within ninety (90) days after the end of the first full calendar year following the issuance of the certificate of occupancy and within ninety (90) days after each five year period thereafter, the owner or tenant in possession thereof shall submit to the master commercial owners association or other applicable association a report prepared by the owner or a qualified, independent third party that evaluates whether all major building systems such as heat furnace, air conditioner, and other mechanical fixtures are working within the design standards established for each system. The master commercial owners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure.
5.21	**Climate Change**	**MM 21-8** Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements, or equivalent, shall be ~~exclusively~~ offered by residential builders. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners.
5.21	**Climate Change**	**MM 21-9** The Project Applicant/Developer shall provide plans and specifications to the County that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards, demonstrating that the Project's wastewater reclamation facilities (WRFs) shall include equipment to capture and reuse biogas for energy production.
5.21	**Climate Change**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 21-9** The Project Applicant/Developer shall provide plans and specifications to the County that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards, demonstrating that the Project's wastewater reclamation facilities (WRFs) shall ~~include equipment to~~ capture and reuse biogas for energy production.
5.21	**Climate Change**	**MM 21-10** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential or multi-family buildings shall be constructed with recycled water infrastructure to serve common areas for these facilities, except where prohibited by law. To the extent recycled water is produced within the Project and available, recycled water shall be used for landscape irrigation within those common areas. Compliance with these measures shall be established prior to the of a construction permits for nonresidential and multi-family facilities and at the time of County approval of final landscaping plans submitted by the Project Applicant/Developer after final map recordation for homeowners association common areas. Covenants, conditions and restrictions (CC&Rs) shall require the owners of such common areas to maintain, repair and replace irrigation systems and plantings in accordance with County approved plans.

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5.21	**Climate Change**	**MM 21-11** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with 2016 CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code.
5.21	**Climate Change**	**MM 21-12** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that single or multi-family residential buildings shall be constructed with kitchen faucets and appliances that comply with 2016 CALGreen code residential voluntary measures specified in Sections A4.303.1 and A4.303.3 of the code.
5.21	**Climate Change**	**MM 21-13** The outdoor residential (single-family and multi-family) water budget for water budget based ratemaking shall be based on having no more than 25 percent turf grass allowed in landscaped areas of single-family detached residential front yards and multi-family residential common areas.
5.21	**Climate Change**	**MM 21-14** Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan (see Appendix 3-H of the Centennial Specific Plan).
5.21	**Climate Change**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 21-14** Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan (see Appendix 3-H of the Centennial Specific Plan).* **Note:* Independent of this measure, the Project Applicant/Developer has voluntarily agreed to a higher affordability percentage than imposed by this measure as part of the Development Agreement. *See* Item 11 (entitled "Affordable Home Ownership and Rental Housing Program") in Exhibit G of the Development Agreement.
5.21	**Climate Change**	**MM 21-15** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction.
5.21	**Climate Change**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 21-15** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the

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#	Environmental Factor	Mitigation
		most applicable code at the time of construction. The Project Applicant/Developer shall provide a further credit of $500 to 50 percent of future homeowners (as requested by homeowner) to pay for the type of charging device then in use for electric vehicles or, with County approval, to pay for other energy conservation uses. The availability of this EV incentive benefit shall be disclosed and promoted at the time of initial sale of single family homes and shall thereafter be promoted by the TMA on its website.
5.21	**Climate Change**	**MM 21-16** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that "alternative energy fueling stations" shall be installed as follows. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel. An electric charging station shall allow for simultaneous charging of two electric vehicles. • Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least seventeen ~~20~~ (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first ~~twenty~~ seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty~~ seventeen (~~20~~ 17) residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station. • Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station.
5.21	**Climate Change**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 21-16** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating compliance with the Electric Vehicle Supply (EVS) charging station measures specified in MM 11-4. If and to the extent subsequently approved by the County, compliant with state laws, and resulting in no new significant impacts to the environment following County review and approval, EVS charging stations may be replaced by "alternative energy fueling stations" which may include other types of electric vehicle charging technology (e.g., operating at higher or lower voltages), or alternative vehicular fuel technology that results in zero or near zero (as defined by CARB) GHG emission such as hydrogen fuel cells, biofuels, or other qualifying fuel technologies. ~~that "alternative energy fueling stations" shall be installed as follows. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel.~~ An electric charging station shall allow for simultaneous charging of two electric vehicles.

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		• Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least seventeen (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first seventeen (17) residential units and an additional alternative energy vehicle fueling station for each additional seventeen (17) residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station. • Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station.
5.21	**Climate Change**	**MM 21-17** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs for non-residential buildings: • Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for nonresidential land uses. • Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code.
5.21	**Climate Change**	**MM 21-18** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs or specifications for multi-family residential buildings: • Visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles. • Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by County Code Section 22.52.1225B, whichever is more stringent.
5.21	**Climate Change**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 21-18** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs or specifications for multi-family residential buildings: • Visitor parking shall include preferentially located parking spaces for ~~alternative-fueled~~ electric vehicles. • Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by County Code Section 22.52.1225B, whichever is more stringent.

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#	Environmental Factor	Mitigation
5.21	**Climate Change**	**MM 21-19** For parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility: • The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles. • Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 ~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated.~~ Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows: **Single charging space requirements**. When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure. **Multiple charging spaces required**. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electrical vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction. • For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code or as required by County Code Section 22.52.1225B, whichever is more stringent.

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5.21	**Climate Change**	***The following further edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 21-19** For parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility: • The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric~~, natural gas, or similar low-emitting technology)~~ vehicles. • Five percent of the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows: **Single charging space requirements**. When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure. **Multiple charging spaces required**. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electrical vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction. For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code or as required by County Code Section 22.52.1225B, whichever is more stringent.

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CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.21	**Climate Change**	**MM 21-20** The Project Applicant/Developer shall ensure that the implementation of the Green Development Program takes into account compliance with the following regulations. 1) Regulations that are quantified inputs into the CalEEMod analysis, resulting in GHG Reductions: a) Pavley Motor Vehicle Standards (AB 1493) b) Low Carbon Fuel Standard (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.) c) Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations d) Renewable Portfolio Standard (SB X1 2 and SB 350) e) Solid Waste Diversion (AB 341) f) Statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15) g) Model Water Efficient Landscape Ordinance (MWELO) (California Code of Regulations, Title 23, Division 2, Chapter 2.7) h) Los Angeles Tree Planting Ordinance (Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.) i) Los Angeles County Green Building Standards Code (Los Angeles County Code, Title 31, Chapter 1, Sections 100 et seq.) j) California Water Code (California Code of Regulations, Division 6, Part 2.10, Sections 10910–10915) k) Los Angeles County Community Climate Action Plan 2) Regulations that are not quantified inputs into the CalEEMod analysis, but should be considered for incorporation as appropriate: a) EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles (75 FR 25324–25728 and 77 FR 62624–63200) and for medium- and heavy-duty vehicles (76 FR 57106–57513) b) Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 5, Section 95801 et seq.) c) Advanced Clean Cars Program (California Code of Regulations, Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts); Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts); Chapter 4.4 (parts); Chapter 8 (parts). d) Under Inflated Vehicle Tires (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.) e) Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.)

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		f) Management of High Global Warming Potential Refrigerants for Stationary Sources (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.) g) Small Containers of Automotive Refrigerant (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.) h) High-Global Warming Potential Greenhouse Gases in Consumer Products (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 2) i) CALGreen Code as Adopted by the Building Standards Commission (California Code of Regulations, Title 24, Part 11 Emergency Building Standard DSA-SS EF-02/15) j) Natural Gas Cooking Stoves and Fireplaces (SCAQMD Rule 445)
5.21	**Climate Change**	***The following edit was identified subsequent to publication of the Final EIR in May 2018 and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.*** **MM 21-20** The Project Applicant/Developer shall ensure that the implementation of the Green Development Program ~~takes into account compliance with the~~ that complies with all applicable legal requirements, including but not limited to the following regulations (as may be amended): 1) Regulations that are quantified inputs into the CalEEMod analysis, resulting in GHG Reductions: a) Pavley Motor Vehicle Standards (AB 1493) b) Low Carbon Fuel Standard (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.) c) Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations d) Renewable Portfolio Standard (SB X1 2 and SB 350) e) Solid Waste Diversion (AB 341) f) Statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15) g) Model Water Efficient Landscape Ordinance (MWELO) (California Code of Regulations, Title 23, Division 2, Chapter 2.7) h) Los Angeles Tree Planting Ordinance (Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.) i) Los Angeles County Green Building Standards Code (Los Angeles County Code, Title 31, Chapter 1, Sections 100 et seq.) j) California Water Code (California Code of Regulations, Division 6, Part 2.10, Sections 10910–10915)

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
		k) Los Angeles County Community Climate Action Plan 2) Regulations that are not quantified inputs into the CalEEMod analysis, but should be considered for incorporation as appropriate: a) EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles (75 FR 25324–25728 and 77 FR 62624–63200) and for medium- and heavy-duty vehicles (76 FR 57106–57513) b) Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 5, Section 95801 et seq.) c) Advanced Clean Cars Program (California Code of Regulations, Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts); Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts); Chapter 4.4 (parts); Chapter 8 (parts). d) Under Inflated Vehicle Tires (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.)
5.21	**Climate Change**	**MM 21-21** The Project Applicant/Developer shall require contractors to use locally available and recycled building materials, provided such materials meet all applicable Building Code and other requirements, and are readily available and comparably priced to assure that such materials do not increase the cost and decrease the affordability of housing or community infrastructure.
5.21	**Climate Change**	**MM 21-22** The Project parking lots shall be designed to reduce vehicle queuing and improve pedestrian safety. Parking lot access designs shall include self-enforcement features for reducing the speeds on driveways, such as speed bumps or curved driveways. The parking lots shall include clearly marked pedestrian pathways connecting building entrances to parking, sidewalk, and transit drop-off/pick-up locations.

Section 3 – Environmental Setting

The fourth and fifth sentences in the third paragraph on page 3-5 are hereby revised as follows:

> Approximately 4.2 ~~ten~~ percent of the Project site is within the Gorman Drainage Area and the Los Angeles RWQCB (Region 4). However, ~~90~~ 95.8 percent of the Project site is located within the jurisdiction of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB), which has been designated "Region 6" by the SWRCB (see Exhibit 5.2-1, Regional Water Quality Control Board Boundaries).

Section 4 – Project Description

The second to last sentence of the second paragraph under Section 4.2, Project Location, on page 4-2 is hereby revised as follows:

> The Project site's eastern boundary is ~~290th~~ 285th Street West. The Project site extends for approximately seven miles between its western boundary (west of Quail Lake) and its eastern boundary ~~near 290th Street West~~.

The following text is hereby added after the first paragraph under the "Open Space (OS)" heading on page 4-24:

> CENTENNIAL OPEN SPACE DEFINITIONS
>
> Mitigation Preserve: The Mitigation Preserve encompasses 43,079 acres of land to be preserved and managed in perpetuity for biological resources values. The Preserve consists of an On-site Mitigation Preserve, comprised of approximately 3,866 acres within the Project boundaries, but outside of the development footprint, and an Off-site Mitigation Preserve made up of 39,213 acres within adjacent and nearby off-site lands. These mitigation lands provide sufficient land and biological resource values to implement mitigation strategies to fully mitigate for Project biological resource impacts.
>
> On-site Mitigation Preserve
>
> The On-site Mitigation Preserve is divided into two areas. The southern on-site mitigation area includes 968 acres located immediately south of the development footprint along south side of SR-138. The northern on-site mitigation area consists of 2,898 acres located to the north and west of the development footprint on the west side of the aqueduct. All of the lands within the on-site portion of the Mitigation Preserve are within Los Angeles County SEA No. 17.
>
> Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as

hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Off-site Mitigation Preserve

The Off-site Mitigation Preserve is divided into seven areas. Area 1 consists of 6,417 acres located adjacent to and immediately east of the southeastern corner of the Project site. Area 2 consists of 2,556 acres located adjacent and contiguous to the northwestern portions of the Project site. Nearly all of the land within these two preserve areas also occurs within SEA No. 17. Area 3 consists of 4,183 acres; this mitigation area is located in Kern County, immediately north of the Project site. Area 4 consists of 7,319 acres located on the northern slope of the Antelope Valley, northeast of both Area 3 and the Project site. Area 5 consists of 643 acres and is a square-shaped parcel located in Kern County on the northern slope of the Antelope Valley, immediately east of Area 4 and northeast of the Project site. Area 6 consists of 2,429 acres and is located in Kern County on the northern slope of the Antelope Valley, farthest to the northeast of the Centennial Project site. Area 7 (two distinct portions) consists of a combined 15,668 acres located in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and boarders Area 6 to the north. The combined off-site Mitigation Preserve area amounts to 39,213 acres of mitigation lands. Cumulatively, both on and off-site, the Mitigation Preserve encompasses 43,079 acres of Project mitigation lands. The majority of three of these areas, Areas 3, 4, and 5 are the subject of conservation easements, therefore, although available for mitigation including enhancement, restoration, and creation, are not available for mitigation acreage value as preservation.

Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have

a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Green Space

Disturbed Green Space consists of areas within the project boundary that are impacted and will need to be mitigated. Disturbed Green Space will be amenities for the Project and could include one or more of the following uses: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. No Mitigation credit has been taken into account for the Project impacts from the Green Spaces. While Green Spaces could be impacted initially, the concept of these areas is to restore it for community amenities and visual aesthetics between neighborhoods of development.

Undisturbed Green Space consists of areas within the project boundary that are not impacted and require no mitigation. There is no project mitigation credit taken for preserving these areas. To preserve these areas and to make sure there is no future mitigation needed, the uses are restricted to the following: Continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

The following further edit was identified subsequent to publication of the Final EIR, and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The following text is hereby revised added after the first paragraph under the "Open Space (OS)" heading on page 4-24:

CENTENNIAL OPEN SPACE DEFINITIONS

Mitigation Preserve: The Mitigation Preserve encompasses 43,079 acres of land to be preserved and managed in perpetuity for biological resources

values. The Preserve consists of an On-site Mitigation Preserve, comprised of approximately 3,866 acres within the Project boundaries, but outside of the development footprint, and an Off-site Mitigation Preserve made up of 39,213 acres within adjacent and nearby off-site lands. These mitigation lands provide sufficient land and biological resource values to implement mitigation strategies to fully mitigate for Project biological resource impacts.

On-site Mitigation Preserve

The On-site Mitigation Preserve is divided into two areas. The southern on-site mitigation area includes 968 acres located immediately south of the development footprint along south side of SR-138. The northern on-site mitigation area consists of 2,898 acres located to the north and west of the development footprint on the west side of the aqueduct. All of the lands within the on-site portion of the Mitigation Preserve are within Los Angeles County SEA No. 17.

Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the ~~Mitigation Preserve~~ Ranch-wide Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan strictly for resource management values.

Off-site Mitigation Preserve

The Off-site Mitigation Preserve is divided into seven areas. Area 1 consists of 6,417 acres located adjacent to and immediately east of the southeastern corner of the Project site. Area 2 consists of 2,556 acres located adjacent and contiguous to the northwestern portions of the Project site. Nearly all of the land within these two preserve areas also occurs within SEA No. 17. Area 3 consists of 4,183 acres; this mitigation area is located in Kern County, immediately north of the Project site. Area 4 consists of 7,319 acres located on the northern slope of the Antelope Valley, northeast of both Area 3 and the Project site. Area 5 consists of 643 acres and is a square-shaped parcel located in Kern County on the northern slope of the Antelope Valley, immediately east

of Area 4 and northeast of the Project site. Area 6 consists of 2,429 acres and is located in Kern County on the northern slope of the Antelope Valley, farthest to the northeast of the Centennial Project site. Area 7 (two distinct portions) consists of a combined 15,668 acres located in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and boarders Area 6 to the north. The combined off-site Mitigation Preserve area amounts to 39,213 acres of mitigation lands. Cumulatively, both on and off-site, the Mitigation Preserve encompasses 43,079 acres of Project mitigation lands. The majority of three of these areas, Areas 3, 4, and 5 are the subject of conservation easements, therefore, although available for mitigation including enhancement, restoration, and creation, are not available for mitigation acreage value as preservation.

Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the ~~Mitigation Preserve~~ Ranch-wide Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan strictly for resource management values.

Green Space

Disturbed Green Space consists of areas within the project boundary that are impacted and will need to be mitigated. Disturbed Green Space will be amenities for the Project and could include one or more of the following uses: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. No Mitigation credit has been taken into account for the Project impacts from the Green Spaces. While Green Spaces could be impacted initially, the concept of these areas is to restore it for community amenities and visual aesthetics between neighborhoods of development.

Undisturbed Green Space consists of areas within the project boundary that are not impacted and require no mitigation. There is no project mitigation credit taken for preserving these areas. To preserve these areas and to make

sure there is no future mitigation needed, the uses are restricted to the following: Continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

The third full paragraph on page 4-41 is hereby revised as follows:

The draft NW SR-138 EIR/EIS, TAR and ICE Report ~~do~~ did not identify a preferred alternative and Caltrans deferred the selection of a preferred alternative to the Final EIR/EIS. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 includes a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. Caltrans has also reserved the right to determine the specific preferred intersection control based on the traffic and safety data at the time the improvements occur. Thus, depending on the timing of the implementation of the realigned SR-138; and the timing of the implementation of the Project; the ultimate connection requirements for Project roads to SR-138 may need additional future design analysis in conjunction with future phases of development. All construction activities within Caltrans right-of-way would be closely coordinated with Caltrans, subject to their review and design standards, and subject to their approval. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The second sentence of the last paragraph on page 4-43 is hereby revised as follows:

> As a result of this effort, all ~~3,861~~ 3,866 acres of the County of Los Angeles' San Andreas Significant Ecological Area (SEA 17) that fall within the Project site boundaries are avoided.

The first three paragraphs on page 4-44 are hereby revised as follows:

> The Project requires that some drainage corridors be modified to incorporate necessary flood-control or water quality features; whenever possible, these modifications will incorporate "naturalized features" to blend the improvements into the natural appearance of unmodified areas. In addition, implementation of the Project would avoid or minimally impact riparian resources along sensitive drainages. Of the 12,323 acres within the Project site, approximately 5,624 acres would be included in the Open Space land use designation. Of the 5,624 acres of designated Open Space, approximately 5,116 acres (42 percent of the total Project site) are intended to (1) remain in their original natural condition; (2) be restored; and/or (3) be enhanced by weed abatement, fencing, and native species planting, among other means. Of this amount, approximately ~~3,861~~ 3,866 acres are designated as SEA 17 to be preserved in perpetuity within the Project site boundaries.
>
> Additionally, approximately ~~23,547~~ 39,213 acres of off-site areas would be set aside for preservation to mitigate impacts to biological resources, as discussed further in Section 4.7, Off-Site Project Features and depicted in Exhibit 4-12, Centennial Project – Off-Site Mitigation Preserve. The Developer would provide a conservation easement for both the ~~3,861~~ 3,866 on-site preserved acres and the ~~23,547~~ 39,213 off-site preserved acres to ensure preservation of the total ~~27,412~~ 43,079-acre ~~open space~~ Mitigation P~~p~~reserve in perpetuity. Importantly, contained within this ~~23,547~~ 39,213 acres of off-site preservation are approximately ~~8,935~~ 8,913 acres of SEA 17 lands, which contain high-value biological resources.
>
> Therefore, when considering the amount of preserved on-site and off-site lands (i.e. ~~27,412~~ 43,079 acres) compared to the total disturbed/developed areas within the Project site boundaries based on the Grading Plan (i.e., 7,751 acres), almost ~~3.5~~ 5.6 times as much land would be preserved as would be developed.

The "Grassland Mitigation Plan" section on page 4-44 is hereby revised as follows:

> **Grassland Mitigation (Ranch-wide Management Plan)**
>
> The lands designated as Open Space (OS) on-site are generally divided into two large areas: the northwest portion of the Project site and the southeastern portion of the site. The area in the northwestern part of the site is comprised primarily of Oso Canyon, which includes a blueline stream and

foothills/canyons with slopes of 25 percent or greater. The southeastern portion of the site contains similar vegetation and associated biological resources.

Grazing would occur within the OS designation. Grazing operations would be directed under the provisions of the ~~Grassland Mitigation Plan, which is a component of the Mitigation Preserve Management Plan and/or~~ the Ranch-~~W~~wide Management Plan (RWMP) (~~which is being prepared by the Tejon Ranch Conservancy~~); grazing would include temporary and long-term activities, possibly in perpetuity if determined necessary to maintain grassland values based on the ~~Grassland Mitigation Plan~~ RWMP (refer to Mitigation Measure [MM] 7-10 in Section 5.7, Biological Resources). The ~~Grassland Mitigation Plan~~ RWMP would preserve and manage existing native grasslands to ensure their sustainment in perpetuity. The Plan is intended to be a dynamic program that allows for incorporation of new restoration and enhancement treatments over time to determine the optimum methods of treatment for management and restoration of native grassland communities.

The last three sentences of the first paragraph under "Other Relevant Plans" on page 4-45 are hereby revised as follows:

Additionally, the Project ~~Open Space~~ Mitigation Preserve includes areas of off-site preservation lands within Tejon Ranch lands. Areas 1 and 2 are located within Los Angeles County and include a total of 8,973 acres, as depicted in Exhibit 4-12, Centennial Project – Off-Site Mitigation Preserve. In total, the Off-site Mitigation Preserve includes ~~23,547~~ 39,213 acres of off-site property that will be used to mitigate for Project-related biological impacts.

The last sentence of the text under "Project Open Space Areas" on page 4-45 is hereby revised as follows:

Of the 12,323 acres within the Project site, approximately 5,624 acres would be included in the Open Space land use designation, and approximately ~~3,861~~ 3,866 of the open space acres are designated as SEA 17 to be preserved in perpetuity within the Project site boundaries.

The first and second sentences in the third paragraph on page 4-54 are hereby revised as follows:

Approximately ~~93~~ 95.8 percent of the Project site is within the jurisdiction of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB); this area is not covered by an MS4 Permit due to the lack of development in the area. The remaining approximately ~~7~~ 4.2 percent of the Project site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB); an MS4 permit has been approved by the Los Angeles RWQCB and is applicable to the portion of the site under the Los Angeles RWQCB's jurisdiction.

The text on page 4-55 is hereby revised as follows:

> The Project includes a domestic (potable) water supply system, including water treatment, storage and distribution systems (collectively, "Potable Water System"). The design, construction, and operation of the Potable Water System would be required to comply with standards set by the California Division of Drinking Water (DDW) and Los Angeles County Department of Public Works. The project site is currently not within the boundaries of a retail water purveyor. As noted above, Centennial Founders, LLC has requested the GVMWD Board of Directors to consider annexing the Project area and operating the Project's proposed potable water, water recycling, and wastewater facilities. If approved by the County, e~~E~~ither the GVMWD or a PUD will provide service to the Project.
>
> After completion of the proposed annexation, the Project's water and wastewater systems would be owned and operated by the PUD, including the wastewater collection, treatment, and recycled water systems. Additionally, annexation of the Project area could allow PUD to own and maintain facilities and structures used to address flood control, drainage, and water quality issues. Annexation of the Project into the PUD service area would require approval by the Los Angeles County Local Agency Formation Commission (LAFCO) and would occur after the certification of this EIR.
>
> If the PUD does not annex the Project site, a Community Services District (CSD), or other agency approved by the County (the Maintenance Entity) and agreed to by the Project Applicant/Developer will be established, that will own, operate, and maintain the water, sewer, recycled water and storm drain facilities (including the water quality treatment and hydromodification control facilities) on the Project site. The Maintenance Entity will be funded through a rate-payer system imposing fees on the Project properties/service customers.
>
> Whether the potable water, recycled water, water quality, sewer, sewer treatment plant, and flood control systems and services are owned and/or provided by GVMWD, a PUD, a CSD, the County or a combination of the aforementioned, the Los Angeles County Department of Public Works must approve each arrangement prior to approval of the tentative map to ensure that the systems and services provided to the public are setup in a manner that is sustainable and financially viable over time.

The fourth full paragraph on page 4-59 is hereby revised as follows:

> Construction of WRF East would occur first and would be operational upon site occupancy. The facility would be expanded in phases, as required to treat the wastewater flows generated by occupied land uses. WRF East, intended to serve the wastewater treatment and wastewater reclamation (i.e., production of recycled water) needs for the initial phase of development on the Project

site east of the Aqueduct and would have ~~a design capacity~~ an average daily flow of approximately 4.28 mgd. This facility is proposed for development on a site near the northeastern corner of the Project site, just west of 300th Street West, as shown on Exhibit 4-14.

The second full paragraph on page 4-60 is hereby revised as follows:

WRF West would serve the subsequent phase of Project development located to the west of the Aqueduct; it would have an approximate ~~capacity~~ average daily flow of 0.34 mgd and is proposed to be located on an approximate 3.0-acre site, also shown on Exhibit 4-14. Recycled water from WRF West would be pumped directly to the Zone C recycled water tank located nearby, west of the Aqueduct. WRF West would be constructed of concrete and steel materials that would generally be at or below grade, with a few structures (e.g., administrative/lab facilities, secondary treatment digesters, sludge centrifuges, and filtration facilities) having maximum heights of approximately 30 to 40 feet. Security fencing and night lighting would be provided along the perimeter of the WRF West site.

The last sentence of the last full paragraph on page 4-64 is hereby revised as follows:

The Centennial Substation would be located in the vicinity west of 300th ~~to 310th~~ Street West ~~either north or south~~ within Village 6, north of SR-138, as described further below (refer to Exhibit 4-21).

The third and fourth sentences of the last partial paragraph on page 4-64 are hereby revised as follows:

The Centennial Substation would be located in the ~~in the~~ vicinity west of 300th ~~to 310th~~ Street West ~~either north or south~~ within Village 6, north of SR-138. The Centennial Substation would be an unmanned, 66/12~~/6.9~~ kV, 28 Mega Volt Ampere (MVA), Substation Automated Station (SAS) Automated Station.

The second full paragraph on page 4-65 is hereby revised as follows:

The existing 66 kV lines (overhead or underground) along SR-138 would be extended to the proposed Centennial Substation site. This substation would convert the incoming 66 kV to outgoing 12 kV~~/6.9 kV~~, which would then be distributed to the Project site. The extension of the 66 kV facilities would either be in or out of the proposed roadways. SCE would require easements or joint-use easements for these facilities. The 12 kV~~/6.9 kV~~ distribution facilities would be extended underground within the roadways. Transmission and distribution lines over the rest of the Centennial site are discussed below.

The last paragraph on page 4-65 is hereby revised as follows:

> The existing 66-kV lines (overhead or underground) along SR-138 would be extended to the proposed Centennial Substation site. This substation would convert the incoming 66 kV to outgoing 12 kV~~/6.9 kV~~, which would then be distributed to the Project site. The extension of the 66-kV facilities would either be in or out of the proposed roadways. SCE would require easements or joint-use easements for these facilities. The 12-kV~~/6.9 kV~~ distribution facilities would be extended underground within the roadways. Transmission and distribution lines over the rest of the Centennial site are discussed below.

The second to last sentence of the second full paragraph on page 4-67 is hereby revised as follows:

> The Centennial Substation discussed above would be required in the area west of 300th ~~to 310th~~ Street West ~~along~~ within Village 6, north of SR-138.

The second sentence under "Material Conservation and Efficiency" on page 4-73 is hereby revised as follows:

> For example, The Project is required to divert 100 percent of soil during grading activities, and at least ~~70~~ 75 percent of non-hazardous construction and demolition waste, away from landfills to recycling or salvage or current County standards.

The third sentence of the second full paragraph on page 4-76 is hereby revised as follows, per the Developer Fee Detailed Fire Station Plan[3417]:

> A large station consists of an approximate ~~15,500~~ 13,000-sf building on an approximately 4.00-acre lot.

The first sentence of the first paragraph under "Fire Protection and Law Enforcement Services" on page 4-93 is hereby revised as follows:

> Fire services and emergency response for fire incidents during the initial development phases of the Project would be provided from Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person assessment engine company, which is an engine company with some limited paramedic capabilities.

[3417] County of Los Angeles Fire Department (LACFD). 2017 (September). Fiscal Year-End Report and Updated Developer Fee Detailed Fire Station Plan for the Consolidated Fire Protection District of Los Angeles County (3rd and 5th Districts) (3 Votes), *Attachment A*. Los Angeles, CA: the County. http://file.lacounty.gov/SDSInter/bos/supdocs/117857.pdf.

The last two sentences of the first paragraph under Section 4.7.4, Mitigation Areas, on page 4-101 are hereby revised as follows:

> Of this amount, approximately ~~3,861~~ 3,866 acres are designated as SEA 17 to be preserved in perpetuity within the Project site boundaries. A study of adjacent lands identified ~~6~~ 7 areas which, when combined with the approximately 5,116 acres of on-site open space mitigation areas, would provide sufficient land and biological resources to implement mitigation strategies to fully mitigate Project impacts related to biological resources.

The first sentence of the first paragraph under Section 4.7.4, Mitigation Areas, on page 4-101 is hereby revised as follows:

> Areas 1 and 2 are located in Los Angeles County, and Areas 3~~–6~~ through 7 are located in Kern County, northeast of the Project area.

The first three full paragraphs on page 4-102 are hereby revised as follows:

> In Kern County, Area 3 consists of 4,183 acres and Area 4 consists of 7,319 acres. Area 5 consists of 643 acres and is a square-shaped parcel, immediately east of Area 4 and northeast of the Project site. Area 6 consists of 2,429 acres and is located on the northern slope of the Antelope Valley, farthest to the northeast of the Centennial Project site. Area 7 consists of 15,668 acres and is split into two portions, where the first portion is located between Areas 3 and 4, and the second portion between Areas 4 and 6 as well as immediately north and adjacent to Area 6.
>
> The combined off-site ~~open space~~ Mitigation P~~p~~reserve area amounts to approximately ~~23,547~~ 39,213 acres of mitigation lands. As previously discussed in Section 4.5.7, these six areas would be preserved in perpetuity to allow for preservation and implementation of mitigation strategies.
>
> The Natural Resources/Open Space Management Plan includes both on-site and off-site mitigation areas. Approximately 5,116 acres of open space is available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation.

The first three full paragraphs on page 4-102 are hereby revised as follows:

> While it is anticipated that Appendix 1-D will be adopted by ordinance at this time, the County may decide to adopt Appendix 1-D by resolution at the time of Project approval. ~~Appendix~~ Appendices 1-B, ~~*Green Development Program*, and Appendix~~ 2-A, and 2-B, would be adopted by Resolution.

The following text is hereby inserted on page 4-104:

- ***Development Agreement.*** A Development Agreement (DA) is also anticipated to be sought as part of the initial project entitlements. Under state law, a DA is a voluntary agreement, adopted by ordinance, between the County and the project proponent. The purpose of a DA is to provide both the County and the developer with long-term contractual assurances that the project includes public benefits and can be built out as approved.

  While the final text of the DA can only be approved in the form of an ordinance by the Board of Supervisors. the County and the Applicant have identified a list of community benefits to be included in the DA as applicant obligations. These community benefits include (among other obligations) requirements to provide land within the Centennial project site at no cost to the County for the development and operation of a County municipal services building, a County consolidated maintenance yard, a material recovery facility and a County animal care facility. The community benefits also include the applicant's agreement to payment of funds for the construction of these facilities.

  The DA does not include any applicant obligations or County activities that would cause any physical changes to the environment that fall outside the boundaries of the area designated for future development within the Centennial project site. The DA likewise does not include any type of facility or land use that falls outside the scope of land uses that were identified in the Specific Plan and analyzed in the accompanying project EIR. Accordingly, implementation of the DA will not result in any significant new impacts to the environment, or worsen any previously-identified significant environmental impact, in relation to impacts already considered in the Draft EIR. The proposed DA does not require recirculation or supplemental environmental analyses under CEQA.

The text under "Ministerial Actions" and "Discretionary Actions" on pages 4-105 through 4-107 is hereby revised:

Ministerial Actions

The following actions are ministerial as they involve only (1) a determination that the proposed action conforms to the *Centennial Specific Plan;* (2) a determination of consistency with an approved Tentative Map, Final Map, Conditional Use Permit, or other approval issued pursuant to the *Centennial Specific Plan;* or (3) a determination that an application meets the standards required for that particular type of application as in Chapter 4 of the *Centennial Specific Plan* or the County Code. As stated above, each type of approval is followed by the corresponding *Centennial Specific Plan* section reference.

- Interpretations (Section ~~4.5.1.1.1~~ 4.5.1.1);

- Development standard equivalency (Section ~~4.5.1.1.2~~ 4.5.1.2);
- *Centennial Specific Plan* text and figure changes (Section ~~4.5.1.1.3~~ 4.5.1.3);
- ~~Affordable housing consistency (Section 4.5.1.1.4);~~
- ~~Residential signage consistency (Section 4.5.1.1.5);~~
- ~~Non-residential signage consistency (Section 4.5.1.1.6);~~
- Deviations from development standards (Section ~~4.5.2.1.1~~ 4.5.1.4);
- Exhibit map change that does not require a tentative map modification (Section ~~4.5.2.1.2~~ 4.5.1.5);
- Changes in the order or configuration of phasing on an approved tentative map (Section ~~4.5.2.1.3~~ 4.5.1.6);
- Minor ~~T~~ttransfers within ~~V~~villages (Section ~~4.5.2.1.4~~ 4.5.1.7);
- ~~Transfers of Park Use and Greenways (Section 4.5.2.1.5)~~
- ~~Land Use Equivalency Determination (Section 4.5.2.1.6)~~
- ~~Conceptual Land Use Plan and Development Standards (Section 4.5.4.1)~~
- ~~Existing uses (Section 4.5.5.1);~~
- ~~Ministerial interim use permit (Section 4.5.5.2.1).~~
- Use approvals (Section 4.5.1.8);
- Modifications to signs and sign programs (Section 4.5.1.9);
- Conversions (Section 4.5.1.10);
- Off-site haul routes (Section 4.5.1.11);
- Procedure (Section 4.5.1.12).

Discretionary Actions

The following actions require the exercise of discretion by the County or may propose a scope of development that has not been reviewed as part of the Centennial Specific Plan EIR. Future CEQA review of these discretionary actions shall be processed in accordance with CEQA, including Section 21166 of the *California Public Resources Code* and Sections 15162 and 15164 of the CEQA Guidelines (14 CCR). If the County determines that an additional CEQA document must be prepared in connection with such discretionary approval, future environmental analysis should tier from this EIR whenever feasible pursuant to Section 21093 of the *California Public Resources Code.* Each type of approval is followed by the corresponding *Centennial Specific Plan* section reference.

~~1) Land Uses Requiring "Substantial Conformance Review" (Section 4.5.3.1.1).~~

~~2) Conditional use permit modifications (Section 4.5.3.1.2).~~

3) Major ~~T~~transfers within ~~V~~villages (Section ~~4.5.3.1.3~~ 4.5.2.1).

~~4) Transfers of residential units and non-residential building square footage from Village to Village (Sections 4.5.3.1.4 and 4.5.3.1.5).~~

~~5) Conversions (Sections 4.5.3.1.6).~~

~~6) Off-site haul routes (Section 4.5.3.1.7).~~

~~7) Sign and sign programs (Section 4.5.3.1.8).~~

~~8) Parcel maps and minor land divisions (Section 4.5.4.2).~~

~~9) Tentative maps (Section 4.5.4).~~

~~10)Amended tentative maps (Section 4.5.4.3).~~

~~11)Revised tentative maps (Section 4.5.4.4).~~

~~12)Initial approval of exhibit maps (Section 4.5.4.5).~~

~~13)Discretionary interim use permit (Section 4.5.5.2.2).~~

~~14)Temporary use permit (Section 4.5.5.3).~~

15)Procedures (Section 4.5.2.2).

16)Conditional use permits (Section ~~4.5.5.4~~ 4.5.-4).

~~17)Land use/planning area boundary adjustments (Section 4.6.1).~~

~~18)Specific Plan amendment (Specific Plan Section 4.9).~~

~~19)Roadway realignments (Specific Plan Section 4.6.1).~~

Section 5.2 – Hydrology and Flood

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 2-2, which starts on page 5.2-49 of the Draft EIR, is hereby revised as follows:

MM 2-2 The Project shall implement hydrology and flood-control BMPs that will achieve the following hydrology and flood performance standards:

All project water conveyance facilities must be designed to provide capital flood protection. The "capital flood" is the runoff produced by a 50-year frequency design storm falling on a saturated watershed (i.e. soil moisture at field capacity). A 50-year frequency design storm has a probability of 1/50 of being equaled or exceeded in any year. BMPs must be implemented to ensure that, for the capital storm event, there is no increase in peak discharge rates and no increase in runoff volume offsite

compared with peak discharge rates and runoff volumes under existing, pre-development conditions. Compliance with the hydrology and flood performance standard shall be demonstrated by using a methodology approved Los Angeles County Department of Public Works for comparing project site pre- and post-development peak discharge rates and runoff volumes.

Compliance with the hydrology and flood performance standards shall be further confirmed by the County, based on a Drainage System Engineering and Planning Report submitted with each Project tract map application. The Drainage System Engineering and Planning Report shall describe applicable hydrology and flood-control BMPs and utilize approved Los Angeles County methodologies to demonstrate compliance with the hydrology and flood performance standards.

MMs 2-4 and 2-5 are hereby added after MM 2-3 on page 5.2-50 as follows:

MM 2-4 The Project shall comply with the California General Construction Permit issued by the State Water Resources Control Board (CAR000002, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-0006-DWQ) during all Project construction activity that meets or exceeds the applicable levels of land disturbance and other applicable coverage criteria in the California General Construction Permit notwithstanding the potential absence or presence of Waters of the United States in any Project construction location.

MM 2-5 The Project shall implement maintenance measures in consultation with a qualified biologist that encourage stabilized native grasses and/or deep rooting plants to minimize sediment transport within applicable post-construction facilities that incorporated Best Management Practices for hydrology and flood control facilities.

Section 5.3 – Hazards and Fire Safety

The third sentence of the third paragraph on page 5.3-9 is hereby revised as follows:

Quarterly Groundwater Monitoring Reports are prepared for the Lahontan RWQCB (copies of which are available ~~with the County of Los Angeles Department of Regional Planning~~ on the GeoTracker website[2]) to demonstrate containment of the plume and to track the success level in remediating the contaminants of concern (primarily halogenated volatile organic compounds [HVOCs]).

Additionally, a footnote is hereby added on page 5.3-9 as follows:

> [2] State Water Resources Control Board (SWRCB). 2017 (October, accessed). GeoTracker: Lebec Cement Plant – National Cement (Maintenance Shop) (SL206063824) (Site Maps / Documents; Monitoring Reports). Sacramento, CA: SWRCB. http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL206063824.

The following sentences located at the bottom of page 5.3-11 and the top of page 5.3-12, and the related footnotes on page 5.3-12, are hereby revised as follows:

> The two samples collected at a depth of six inches bgs were analyzed for total petroleum hydrocarbons, carbonchain (TPH-cc), and Title 22 metals;~~[2]~~ [3] the two samples collected at two feet bgs were analyzed for VOCs. In addition, all soil samples collected were field-screened for VOCs using a photoionization detector (PID).~~[3]~~ [4]
>
> ~~[2]~~ [3] Refers to the 16 metals listed in Title 22 of the *California Code of Regulations* ("Title 22 metals").
>
> ~~[3]~~ [4] A photoionization detector is a portable vapor and gas detector that detects a variety of organic compounds.

The first sentence of the second paragraph under "Environmental Setting" on page 5.3-33 is hereby revised as follows:

> The western and southeastern edges and eastern p~~P~~ortions of the Project site are designated as a VHFHSZ and the western and central portions are designated as a HFHSV, with the eastern edge designated as Moderate Fire Hazard Severity Zone (see Exhibit 5.3-2, Fire Hazard Severity Zones).

The second sentence of the first paragraph under "On-Site Impacts" on page 5.3-35 is hereby revised as follows:

> The majority of the Project area is within a VHFHSV and an HFHSV, which are subject to high fire hazards due to the presence of high brush, woodlands, and steep slopes. Areas within the Moderate Fire Hazard Severity Zone include the eastern edge of the Project site and areas farther east.

The following edit was identified in the Final EIR published May 2018. No further edits have been made to this text. An additional bullet is hereby added before the first bullet of MM 3-2 on page 5.3-26 of the Draft EIR as follows:

MM 3-2 To aid in the prevention of Valley Fever among construction crews on the Project site, the following measures shall be implemented by the Construction Contractor during all construction activities:

- <u>Have Tyvek™ coveralls/suits available in a range of sizes for construction worker use upon request. If used, require the worker to remove the Tyvek™ suit at the work site at the end of the day.</u>
- Hire crews from Los Angeles and/or Kern County populations, or other areas where Valley Fever is endemic, where possible, since it is more likely that they have been previously exposed to the fungus and are therefore immune.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 3-2, which starts on page 5.3-26 of the Draft EIR, is hereby revised as follows:

MM 3-2 To aid in the prevention of Valley Fever among construction crews on the Project site, the following shall be implemented by the Construction Contractor during all construction activities:

- Have Tyvek™ coveralls/suits available in a range of sizes for construction worker use upon request. If used, require the worker to remove the Tyvek™ suit at the work site at the end of the day.
- Hire crews from Los Angeles and/or Kern County populations, or other areas where Valley Fever is endemic, where possible, since it is more likely that they have been previously exposed to the fungus and are therefore immune.
- Prior to Project construction initiation, and for any personnel additions after initial Project construction initiation, the following California Department of Public Health (CDPH) materials on Valley Fever (or the most updated materials applicable to Los Angeles County) shall be distributed to worksite supervisors:
    - CDPH pamphlet entitled "Preventing Work-Related Coccidioidomycosis (Valley Fever)"

available at: http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf. (CDPH 2013a)

- Prior to Project construction initiation, and for any personnel additions after initial Project construction initiation, the following CDPH materials on Valley Fever (or the most updated materials applicable to Los Angeles County) shall be distributed to construction workers:
    - CDPH pamphlet entitled "Valley Fever Fact Sheet" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf. (CDPH 2013b)
    - CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf (CDPH 2013c).
    - CDPH pamphlet entitled "Fact Sheet Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf (CDPH 2013d).
- During rough grading and construction, the access way into the Project site from adjoining paved roadways shall be paved or treated with environmentally safe dust-control agents.
- <u>Provide evidence to the Department of Public Health that the Project Applicant/Developer has developed a "Valley Fever Training Handout," training, and schedule of sessions for education to be provided to all construction personnel. All evidence of the training session materials, training handout(s) and training schedule shall be submitted to the Department of Public Health within 24 hours of the first training session. Multiple training sessions may be conducted if different work crews will come to the Project site for different stages of construction; however, all construction personnel shall be provided training prior to beginning work. The evidence submitted to the Department of Public Health regarding the "Valley Fever Training Handout" and training sessions shall include the following:</u>

  - A sign-in sheet (to include the printed employee names, signature, and date) for all employees who attended the training session;
  - Distribution of a written flyer or brochure that includes educational information regarding the health effects of exposure to criteria pollutant emissions and Valley Fever (including the CDPH informational materials described in this mitigation measure);
  - Training on methods that may help prevent Valley Fever infection; and
  - Train employees how to use personal protective equipment, such as respiratory equipment, how to reduce exposure to pollutants, how to recognize symptoms of Valley Fever, and to promptly report any suspected systems to a work supervisor. Training shall also emphasize the benefits of wearing Tyvek suits in relation to Valley Fever exposure and explain that such protective clothing is available upon request. Proof that the demonstration is included in the training shall be submitted to the Department of Public Health.

- Provide construction workers separate, clean eating areas equipped with hand-washing facilities.
- Require crews to use masks or half-faced respirators equipped with a minimum N-95 protection factor and that are adequate to restrict inhalation of particulates during Project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations. Respirator equipment shall be readily available and shall be provided to employees during work.
- Require employees to be medically evaluated, fit-tested, and properly trained on the use of the required masks or respirators
- Provide High-Efficiency Particulate Air (HEPA) filters for heavy equipment with factory enclosed cabs capable of accepting the filters. Require contractors utilizing applicable heavy equipment to furnish proof to the Department of Regional Planning of worker training on

proper use of applicable heavy equipment cabs, such as turning on air conditioning prior to using the equipment.

- Provide communication methods, such as two-way radios, for use in enclosed heavy equipment cabs.
- Install equipment inspection stations at each construction equipment access/egress point. Examine construction vehicles and equipment or excess soil materials and clean, as necessary before equipment is moved off-site.
- When possible, position construction workers upwind or crosswind when digging a trench or performing other soil-disturbing tasks.
- Prohibit smoking at the worksite outside of designated smoking areas; designated smoking areas will be equipped with hand-washing facilities.
- Post Valley Fever warnings at on-site construction areas and restrict access to such areas by visitors without adequate training and respiratory protection.
- Audit and enforce compliance with applicable California Occupational Safety and Health Administration health and safety standards on the job site.

MMs 3-10 and 3-11 are hereby added after MM 3-9 on page 5.3-39 as follows:

MM 3-10 The Project Applicant/Developer shall be responsible for ensuring the destruction of the historic water well associated with the former homestead in the central portion of the site is completed in full compliance with the requirements of the California Department of Water Resources' Water Well Standards, including Chapter II, Part III, Section 23 (Requirements for Destroying Wells). The applicable Local Enforcement Agency for implementation of the DWR's Well Standards is the Los Angeles County Department of Health Services, Drinking Water Program (LACDHS). The Project Applicant/Developer shall present documentation that is has complied with the DWR Well Standards to the LACDHS.

MM 3-11 The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable

interested parties both on- and off-site to easily access information relevant to potential Valley Fever risk. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebec, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 3-11, which was added into the Final EIR and would follow MMs 3-9 and 3-10 on page 5.3-39 of the Draft EIR, is hereby revised as follows:

MM 3-11 The Project Applicant/Developer shall be responsible for the creation of a website on the proposed Centennial community internet that provides public information in both English and Spanish regarding dust-generating activities, to be maintained and updated as appropriate throughout the Centennial Project construction period. The purpose of the website would be to enable interested parties both on- and off-site to easily access information relevant to potential Valley Fever risk, including information relevant to potential Valley Fever risks to pets, horses, and other animals that may be present at or around the Project site during construction activities. The Project Applicant/Developer shall also be responsible for the preparation and one-time distribution to surrounding communities and to all schools located in the communities of Gorman, Lebec, and Frazier Park of a notice describing the availability of this website to provide awareness of the site and its contents.

Section 5.4 – Water Quality

Table 5.4-9 on page 5.4-62 is hereby revised as follows:

TABLE 5.4-9
COMPARISON OF NUTRIENT CONCENTRATIONS WITH WATER QUALITY CRITERIA FOR THE PROJECT

Parameter	Predicted Average Annual Concentration (mg/L)	Los Angeles Basin Plan Surface Water Quality Objectives (mg/L)	Lahontan Basin Plan Surface Water Quality Objectives (mg/L)
Total Phosphorus	0.3	Waters shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growth causes nuisance or adversely affects beneficial uses.	Waters shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growths cause nuisance or adversely affect the water for beneficial uses whereby discharges are not to cause excessive algae growth in receiving waters.
Total Nitrogen	3.2		
Nitrate-N + Nitrite-N	0.7	10[a]	10[b]
Total Ammonia	0.4	1.24[c~~b~~]	8.5[d~~c~~]

mg/L: milligrams per liter; ELS: early life stage ; pH: hydrogen potential; C: degrees Celsius; F: degrees Fahrenheit

[a] Waters shall not exceed 10 mg/L nitrogen as nitrate-nitrogen plus nitrite-nitrogen (NO3-N + NO2-N), 45 mg/L as nitrate (NO3), 10 mg/L as nitrate-nitrogen (NO3-N), or 1 mg/L as nitrite-nitrogen (NO2-N).

[b] Waters designated as MUN shall not contain concentrations of chemical constituents in excess of the maximum contaminant level (MCL) or secondary maximum contaminant level (SMCL) based upon drinking water standards specified in Title 22 of the California Code of Regulations. Waters shall not exceed 10 mg/L nitrogen as nitrate-nitrogen plus nitrite-nitrogen (NO3-N + NO2-N), 10 mg/L as nitrate-nitrogen (NO3-N), or 1 mg/L as nitrite-nitrogen (NO2-N).

[c~~b~~] 30-day average, ELS present, based on average pH (7.97) and average temperature of 25 °C.

[d~~c~~] Total Ammonia Water Quality Objective calculated using pH = 7.5 (log mean pH) and Temperature = 30°C (86°F), which is very conservative.

Source: Geosyntec Consultants 2016b

The following sentence in the Impact Summary on pages 5.4-66, 5.4-71, and 5.4-89 is hereby revised:

> Compliance with the LID performance standards and integrated pest management and landscaping BMP requirements will be reconfirmed ~~in drainage and landscape plans to be submitted to the County~~ in conjunction with each Project tract map review and approval process.

Table 5.4-12 on page 5.4-69 is hereby revised as follows:

> As discussed in Section 5.4.5, chloride and nitrate have a greater potential for infiltration because these constituents are more mobile and could reach groundwater by infiltration. Table 5.4-12 compares the predicted average

annual nitrate-N and chloride concentrations in Project post-development runoff with applicable groundwater quality objectives from the Los Angeles and Lahontan Basin Plans. As shown in Table 5.4-12, under developed conditions and including the proposed regional and distributed or parcel-specific LID BMPs, predicted average annual nitrate-N and chloride concentrations in Project runoff would be significantly below the nitrate-N groundwater quality objective in the Los Angeles Basin Plan ~~(no nitrate-N groundwater objective is included in the Lahontan Basin Plan)~~ and the Lahontan Basin Plan and the chloride groundwater objectives in both Basin Plans.

TABLE 5.4-12
COMPARISON OF ~~PREDICTED~~ NITRATE-N AND CHLORIDE CONCENTRATIONS WITH WATER QUALITY CRITERIA ~~GROUNDWATER QUALITY OBJECTIVES~~ FOR THE PROJECT SITE

Predicted Average Annual Concentration in Storm Water (mg/L)		Los Angeles Basin Plan Water Groundwater Quality Objectives (mg/L)		Lahontan Basin Plan Groundwater Quality Objectives (mg/L)[a]	
Nitrate-N	**Chloride**	**Nitrate-N**	**Chloride**	**Nitrate-N**	**Chloride**
0.7	17.3	10	~~100~~ 50	~~N/A~~ 10	250

mg/L: milligrams per liter~~; N/A: not applicable~~

[a] Waters designated as MUN shall not contain concentrations of chemical constituents in excess of the maximum contaminant level (MCL) or secondary maximum contaminant level (SMCL) based upon drinking water standards specified in Title 22 of the California Code of Regulations. Waters shall not exceed 10 mg/L nitrogen as nitrate-nitrogen plus nitrite-nitrogen (NO3-N + NO2-N), 10 mg/L as nitrate-nitrogen (NO3-N), or 1 mg/L as nitrite-nitrogen (NO2-N). ~~There is no Lahontan Basin Plan surface water quality objective for chloride in the Project site's receiving waters.~~

SEP Source: Geosyntec Consultants 2016b.

The following text is hereby added after the fourth paragraph on page 5.4-70:

A Salt and Nutrient Management Plan (SNMP) was developed for the Antelope Valley Groundwater Basin in May 2014. The baseline water quality analyses for the Antelope Valley Groundwater Basin included in the SNMP indicates that overall groundwater quality with respect to the SNMP constituents of concern is below the SNMP water quality management goals. These goals are consistent with the Regional Board's Basin Plan to protect the beneficial uses of the water. The analysis of future water quality (through 2035) indicates slowly increasing trends in the overall basin groundwater salt and nutrient quality that will remain below the SNMP water quality management goals. Therefore, no new implementation measures as part of the SNMP process are recommended at this time. Nevertheless, existing measures or practices are already in place to manage water quality, and frequent monitoring is recommended to assess trends in water quality.

The SNMP developed for the Antelope Valley Groundwater Basin in May 2014 proposes a monitoring plan to track the water quality in the basin. Results will be used to determine whether the concentrations of salt and nutrients over time are consistent with the SNMP predictions and the applicable SNMP water quality management goals. The monitoring program includes 32 municipal water supply wells that are currently monitored by the California Department of Public Health. The results from these existing monitoring programs will be downloaded from the State Board's Geotracker Groundwater Ambient Monitoring and Assessment (GAMA) database and included in the monitoring report prepared by the SNMP stakeholders or the appointed Antelope Valley Groundwater Basin Watermaster, if applicable. Imported, recycled, and treated potable water supply to the region will also be monitored and results included in the report. The Project must comply with all applicable requirements of the SNMP, including the identification or installation of appropriate groundwater monitoring wells in consultation with the SNMP stakeholders or the appointed Antelope Valley Groundwater Basin Watermaster, if applicable, to supplement the Antelope Valley SNMP monitoring program as necessary to implement the SNMP monitoring program in the Project area.

Salt and nutrient management implementation measures that are incorporated into the Project include:

- Municipal wastewater management. The proposed wastewater reclamation facilities (WRFs) s will incorporate tertiary treatment processes that include nitrification-denitrification treatment processes to control nitrate concentration in the effluent and recycled water. The WRFs will use ultraviolet light (UV) disinfection to reduce chloride concentrations as opposed to chlorination disinfection processes consistent with the Lahontan RWQCB and Title 22 requirements (see MM 19-2).
- Industrial waste management. The WRFs will implement industrial waste management measures (i.e., pretreatment program, educational outreach, and coordination with customers).
- Recycled water irrigation management. The implementation of recycled water is regulated by the Title 22 California Code of Regulations. Numerous BMPs and operating procedures will be followed when using recycled water for irrigation as required by Regional Board permits. These BMPs and operating procedures include water quality monitoring at the treatment plant; applying irrigation water at a rate that does not exceed the demand of the plants, with respect to water and nutrients; a site supervisor will be responsible for regulatory and permit compliance at all times; irrigation will not be allowed to occur at any time when unauthorized runoff may occur, such

as during times of rainfall or very low evapotranspiration, and any excessive overspray must be controlled.

- Low impact development techniques. As stormwater has low to no concentrations of salt and nutrients, the Project incorporates low impact development stormwater management techniques that promote groundwater recharge (see MM 4-1).
- Landscaping BMPs to limit nutrients in runoff. The Project will implement integrated pest management (IPM) and landscaping BMPs consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program. The IPM and landscaping BMPs will be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application (see MM 4-2).

Results of the monitoring will be used to determine whether additional implementation measures are necessary to maintain the SNMP water quality management goals. Monitoring report results that indicate ambient groundwater quality exceeding 50 percent of the baseline assimilative capacity or significant increases may require additional modeling and/or evaluation to determine what mitigation action, if any, is necessary and appropriate. Such measures, which would be implemented by appropriate regional authorities in conjunction with the SNMP, may include:

- Reducing the amount of salts added to groundwater via source water – modified wastewater treatment processes such as increased retention time or blending prior to use for irrigation.
- Reducing the amount of salts and nutrients added to water via anthropogenic sources – BMPs, public outreach, and land management guidelines.
- An ordinance or ban on water softeners that uses salts may result in reduced chloride and slightly reduced TDS concentrations in the wastewater and ultimately reduced concentrations in the recycled water produced.

The first paragraph of MM 4-2 on page 5.4-90 is hereby revised as follows:

MM 4-2 The Project shall implement integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program which are

available online at http://www.ipm.ucdavis.edu/. The integrated pest management program will be provided to the County in association with the Landscape Plan submitted to the County with each tentative tract map. The IPM and landscaping BMPs shall be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The BMPs shall include a Planting Plan that is consistent with the plant water use requirements of Section 3.3~~3~~4 of the Centennial Specific Plan; with procedures for removing non- native vegetation and planting native vegetation; with fertilizer guidelines; and with the IPM approach for preventing or suppressing pest problems (i.e., insects and diseases). This shall be done through a combination of techniques including using pest-resistant plants; using biological controls; incorporating cultural practices; including habitat modification; and judiciously using pesticides. The IPM and landscaping BMPs shall, in addition to identifying IMP and landscaping BMP management and funding roles and responsibilities, monitoring, training, and timely IPM and BMP program review requirements to incorporate new technologies that may become available, address the following:

The following text is hereby added as the last bullet of MM 4-2 on page 5.4-91:

- All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The last bullet of MM 4-2 on page 5.4-91 of the Draft EIR is hereby revised as follows:

- All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The ~~probation~~ prohibition shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.

MMs 4-3 and 4-4 are hereby added after MM 4-2 on page 5.4-91 as follows:

MM 4-3 The Project shall, to the maximum extent feasible, retain, temporarily store and use native topsoil as topsoil cover in disturbed areas of the Project, and shall, in consultation with a qualified plant biologist, implement measures to encourage the

germination of native plants in locations where native topsoil is used as a topsoil cover within the Project.

MM 4-4 The Project Applicant/Developer shall prepare, in consultation with a qualified biologist, a Restoration and Revegetation Monitoring Plan for the Project. The Restoration and Revegetation Monitoring Plan shall include appropriate metrics, as determined by the qualified biologist, for determining the success of Project revegetation efforts, including revegetation implemented in compliance with the approved Mitigation and Monitoring Plan for the Project. The Restoration and Revegetation Monitoring Plan shall be submitted to the County and updated as appropriate during the review and approval process for each tract map application.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 4-3 is hereby revised as follows:

MM 4-3 The Project shall, to the maximum extent feasible, retain, temporarily store and use native topsoil as topsoil cover in disturbed areas of the Project, and shall, in consultation with a qualified plant biologist, implement measures to encourage the germination of native plants in locations where native topsoil is used as a topsoil cover within the Project. Measures to encourage germination of native plants may include:

- Stockpile top soil at height no greater than 3 feet to retain native microorganisms
- Upon re-spreading of top soil, ensure soil placement areas are de-compacted for a minimum depth of one foot
- Conduct monthly weed removal following top soil placement in the first growing season and prior to seed setting to reduce competition for native plant species
- Conduct annual weed control in the post growing season, but prior to seed setting to further reduce and maintain low competition for native plant species
- Minimize disturbance of top soil to prevent new location for weed establishment
- Avoid irrigation overspray and run-off from adjacent areas that could lead to increased weed establishment
- Monitor and protect areas of native vegetation through signage and avoidance to the maximum extent feasible.
- Minimize weed seed source by implementing weed control on an as-needed basis and prohibit planting of non-native

invasive species identified by California Invasive Plant Council within adjacent areas.

Section 5.5 – Land Resources

Exhibit 5.5-1, following page 5.5-11, is hereby revised as follows:

~~F~~ L – Farmland of Local Importance

PDF 5-1 on page 5.5-12 is hereby revised as follows:

PDF 5-1 Project development would allow for continued grazing operations on portions of the Open Space preserve areas as a management tool for grassland conservation, subject to the specifications of the ~~Native Perennial Grassland and Wildflower Field Mitigation~~ Ranch-wide Management Plan ~~to be prepared as part of the Project implementation~~. Additionally, the Project would accommodate a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses).

The second full paragraph on page 5.5-13 is hereby revised as follows:

Also, the Project would accommodate a total of 50 acres of small-scale agriculture and agriculture-related uses, including, but not limited to community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, and commercial greenhouses (PDF 5-1). However, these activities may or may not occur within the 642 acres of the site currently designated as Prime Farmland. ~~In addition, Tejon Ranch will put an agricultural preservation easement of not less than 489 acres of Prime and Unique farmland outside of the Project site, but on the Tejon Ranch property.~~

Section 5.6 – Cultural and Tribal Resources

The last three full sentences of the first partial paragraph on page 5.6-2 are hereby revised as follows:

However, sites CA-LAN-3217 and CA-LAN-3227 ~~is~~ are immediately adjacent the development footprint. Because of ~~its~~ their proximity, the sites could suffer damage during grading activities. Therefore, MM~~s~~ 6.1, MM 6-2, and MM 6-4 would be implemented for th~~is~~ese sites, and potential direct impacts to sites CA-LAN-3217 and CA-LAN-3227 during construction would be reduced to a less than significant level.

The first sentence of the last full paragraph of page 5.6-46 is hereby revised as follows:

> As identified in Table 5.6-1 above, there are a total of 2~~6~~5 prehistoric and historic archaeological sites within the development footprint.

The last sentence of page 5.6-48 is hereby revised as follows:

> Implementation of the Project would result in a less than significant impact to the 2~~4~~2 sites within the development footprint that have been determined ineligible for CRHR or are not cultural resources, and no mitigation is required; however, as testing may not have recovered all significant materials, these sites and a reasonable radius around them will be monitored during grading.

The first partial paragraph, beginning with the second full sentence, and the following full paragraph on page 5.6-50 are hereby revised as follows:

> Because these 12 sites are outside the development footprint, direct impacts during grading and other construction activities are not expected. However, sites CA-LAN-3217 and CA-LAN-3227 ~~is~~ are immediately adjacent the development footprint. Because of ~~its~~ their proximity, the sites could suffer damage during grading activities. Because sites CA-LAN-3217 and CA-LAN-3227 ~~is~~ are assumed CRHR-eligible, this would be considered a potential significant direct impact. Therefore, MM 6-1 requires monitoring by a qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe (pursuant to AB 52 consultation as described above) when grading is in the vicinity of these sites (MM 6-1); MM 6-2 requires the sites to be fenced off during construction to ensure complete avoidance of the resource; and MM 6-4 provides further protective measures if necessary. ~~Excavated finds shall be offered to the County of Los Angeles and/or its designee (i.e., the Tejon Indian Tribe) on a first refusal basis (MM 6-1); the Tejon Indian Tribe can then make a determination whether the find is a significant tribal cultural resource and opt to accept the resource for curation in the Tejon Tribe's facility.~~ With implementation of MM 6-1, MM 6-2, and MM 6-4, potential direct impacts to sites CA-LAN-3217 and CA-LAN-3227 during construction would be reduced to a less than significant level.
>
> Long-term operation of the Project would result in potential indirect impacts to the 12 sites in the Project's open space area with unknown eligibility and the 1 site located in the open space areas that is known to be eligible (CA-LAN-3206) if it is determined that such sites are vulnerable to disturbance due to increased access, by residents and visitors, to these areas of the site compared to the existing condition, wherein the sites are located entirely on private property. Because archaeological excavation is considered an adverse effect on an archaeological resource, avoidance and preservation of resources without excavation would be the preferred method of managing these sites. Therefore, MM 6-4 requires preparation of an Archaeological Resources Site-Protection Program aimed to protect and preserve any identified

archaeological resources that may be vulnerable to disturbance, unless a Phase II archaeological investigation performed by a qualified archaeologist determines that such site is not unique and thus not eligible for listing on the CRHR. The Archaeological Resources Site-Protection Program must be approved by the County and must include several alternatives to restrict access to these sites (e.g., fencing, planting, and capping), thereby protecting and preserving these sites. With implementation of MM 6-2 and MM 6-4, potential indirect impacts to the 12 sites within the Project site open space area with unknown eligibility and the 1 site located in the open space areas that is known to be eligible (CA-LAN-3206) ~~site CA-LAN-3227 during grading/construction~~ would be reduced to a less than significant level.

MMs 6-1 through 6-4 on pages 5.6-54 through 5.6-59 are hereby revised as follows:

MM 6-1 The Project Applicant/Developer shall retain a qualified Archaeologist who shall oversee archaeological monitoring of topsoil grading and removals (including clearing, grubbing, and trenching) in the immediate vicinity of the following 25 archaeological sites that are within the grading footprint and ~~1~~2 sites in the open space area that ~~is~~ are immediately adjacent to the development impact area: CA-LAN-3201, CA-LAN-3202H, CA-LAN-3217, CA-LAN-3219H, CA-LAN-3227, CA-LAN-3230, CA-LAN-3232, CA-LAN-3233, CA-LAN-3234, CA-LAN-3236, CA-LAN-3237, CA-LAN-3238, CA-LAN-3239, CA-LAN-3240, CA-LAN-3241, CA-LAN-3242, CA-LAN-3243, CA-LAN-3244, CA-LAN-3245, CA-LAN-3246, CA-LAN-3247, CA-LAN-3248, CA-LAN-3250, CA-LAN-3251, CA-LAN-3252, CA-LAN-3253, and CA-LAN-3985H. CA-LAN-3217 and CA-LAN-3227 ~~is~~ are ~~the site~~ immediately adjacent to the grading footprint. Additionally, a Native American monitor representing the Tejon Indian Tribe shall be present during topsoil grading and removals in the vicinity of the 2~~6~~7 above-listed archaeological sites.

~~T~~ Prior to the issuance of grading permits, the Project Applicant/Developer shall provide written evidence to the County that a qualified Archaeologist has been retained~~;~~ to carry out all mitigation measures related to archeological and historical resources. A qualified Archaeologist is defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. The qualified Archaeologist shall: be present at the pre-grading meeting; ~~shall~~ establish procedures for archaeological resource surveillance, including coordination with representatives of the Tejon Indian Tribe on the location and schedule of Native American monitoring; and ~~shall~~ establish (in cooperation with the Project Applicant/Developer and/or County as well as the Tejon Indian

Tribe) procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of any artifacts found, as appropriate.

The qualified Archaeologist shall develop and submit an Archaeological Resource Monitoring Plan to the County for sites in development areas. The qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be retained to attend pre-grade meetings and to monitor earth-moving activities, including clearing, grubbing and trenching, in the vicinity (i.e., the area of a site reasonably expected to contain archaeological resources plus a buffer of at least 10 meters [33 feet]) of any and/or all cultural resource sites. For implementation of each tract map, if no subsurface Native American or archaeological remains are identified in the vicinity of an archaeological resources site during that initial grading, continuous monitoring will no longer be required but the Project Archaeologist and Native American monitor shall spot-check all additional subsurface excavations in the vicinity of an archaeological resources site at least once a week for the duration of grading and excavation activities or until the monitor deems site clear. The Project Archaeologist shall be responsible for coordinating the location and schedule of Native American monitors.

The Archaeologist and Native American monitor shall carefully inspect these areas to assess the potential for significant prehistoric or historic remains. If potentially significant archaeological resources are uncovered, the qualified Archaeologist and Native American monitor shall halt or redirect ground-disturbing activities away from the vicinity, and a subsurface test and/or evaluation shall be performed to assess the discovery. Further subsurface investigation or data recovery shall be undertaken if the resource is determined by the Project Archaeologist to be unique or historically significant (i.e., important for its prehistoric or historic information) and therefore eligible for the California Register of Historical Resources (CRHR).

The archaeological procedures required by the Archaeological Resource Monitoring Plan shall be incorporated as a note on the Grading Plan cover sheet. If additional or unexpected archaeological features are discovered, the qualified Archaeologist shall report such findings in writing to the County and/or the Tejon Indian Tribe. If archaeological resources are found to be of possible significance, the qualified Archaeologist

shall determine appropriate actions, in cooperation with the County and the Tejon Indian Tribe, for further exploration and/or salvage in accordance with this mitigation measure.

The Archaeologist shall submit a Follow-up Report to the County. The Follow-up Report shall include: the period of inspection; an analysis of any artifacts found; and the present repository of the artifacts. Recovered finds shall be offered to the County of Los Angeles and the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County.

The Project ~~Applicant/Developer shall retain a certified~~ Archaeologist ~~who~~ will perform a Phase II subsurface test-level investigation and surface collection for archaeological resource sites of undetermined CRHR eligibility discovered during monitoring. A Phase II Test-level Report shall be completed that evaluates the sites; includes a discussion of the sites' significance (depth, nature, condition, and extent of the resources); and contains recommendations for final mitigation and cost estimates (if required) to fully mitigate significant impacts. Should the Phase II subsurface test-level investigation and surface collection determine the ~~potential~~ presence of significant ~~subsurface~~ archaeological resources that are eligible for CRHR listing, then potential Project impacts to the eligible archaeological resources site shall be mitigated to a less than significant level through the implementation of one of the mitigation options discussed below~~.~~:

a. Relocation of grading boundaries and fuel modification zones to completely avoid disturbance to the site(s) of eligible archaeological resources. ~~Should boundary relocation be infeasible~~ If it is determined that the relocation of grading boundaries and fuel modification zones in accordance with this subsection (a) is not feasible, then a qualified Archaeologist shall be present

in the vicinity of eligible archaeological resources sites during grading and fuel modification brush clearance. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the South Central Coastal Information Center [SCCIC] at California State University, Fullerton. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) Fencing shall be erected outside the eligible archaeological resources sites to visually depict the areas to be avoided during construction. All eligible archaeological resources sites avoided in accordance with this subsection (a) shall be subject to the preservation requirements of MM 6-4.

b. Per California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3)(A), grading boundary redesign and preservation in accordance with subsection (a) shall be the preferred means to avoid impacts to eligible archaeological resources. However, consistent with CEQA Guidelines Section 15126(b)(3)(C), ~~I~~if it is determined that avoidance and/or preservation of any eligible archaeological resources sites in accordance with subsection (a) are not feasible, then prior to grading in the vicinity of such eligible archaeological resources sites, Phase III data recovery (salvage excavations) shall be conducted for ~~these~~ such eligible archaeological sites or any other eligible sites within the potential impact area of development that cannot be avoided. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) When Phase III data recovery is undertaken, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the eligible archaeological resource, shall be prepared by a qualified Archaeologist prior to any excavation being undertaken. The Phase III work shall provide sufficient scientific information to fully mitigate the impacts of development on these sites to a level considered less than significant and shall be performed in accordance with the standards of the State Historic Preservation Office (SHPO).

Excavated assemblages shall be offered to the County and/or the Tejon Indian Tribe on a first refusal basis. If the artifacts are

refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. Final mitigation shall be carried out based upon the recommendations in the Phase II Test-Level Report, and the County of Los Angeles Department of Regional Planning shall make a determination as to the site's disposition based on the recommendations of the qualified Archaeologist. Possible determinations include, but are not limited to, preservation, salvage, partial salvage, or no mitigation necessary.

MM 6-2 Prior to ground disturbing activities, ~~A~~archaeological sites CA-LAN-3201, CA-LAN-3206, CA-LAN-3217, CA-LAN-3227, CA-LAN-3240, and CA-LAN-3242 shall be surrounded with high visibility construction fencing with a buffer of approximately 50 feet around each site to ensure that the archaeological sites are completely avoided during construction-related activities. A qualified Archaeologist shall work with surveying teams and the Construction Supervisor to fence the area to be avoided prior to the commencement of grading.

MM 6-3 Prior to the issuance of grading permits, the ~~The~~ Project Applicant/Developer shall ~~retain~~ provide written evidence to the County that a qualified Archaeologist has been retained to carry out all mitigat~~e~~ion measures related ~~impacts~~ to eligible archaeological sites within the development impact area. A qualified Archaeologist is defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. ~~Additionally, and~~ A qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be present during ground-disturbing activities (i.e, topsoil grading and removals) in the vicinity of the following three ~~below-listed~~ eligible archaeological sites~~.~~: CA-LAN-3201; CA-LAN-3240; CA-LAN-3242. Impacts to these three eligible sites ~~(CA-LAN-3201, CA-LAN-3240, and CA-LAN-3242)~~ shall be mitigated to a less than significant level through the implementation of one of the mitigation options described below~~.~~:

a. Relocation of grading boundaries and fuel modification zones to completely avoid disturbance to the site(s). ~~Should boundary relocation be infeasible~~ If it is determined that the relocation of grading boundaries and fuel modification zones in accordance with this subsection (a) is not feasible with respect to eligible archaeological resources sites CA-LAN-3201, CA-LAN-3240 and/or CA-LAN-3242, then a qualified Archaeologist and a Native American monitor representing the Tejon Indian Tribe shall be present in the vicinity of any such eligible archaeological resources site during grading and fuel modification brush clearance to monitor all activities and ensure that archaeological resources are not impacted. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) Temporary construction ~~F~~fencing shall be erected outside ~~the~~ any such eligible archaeological resources site~~s~~ to visually depict the areas to be avoided during construction, in accordance with MM 6-2. Any temporary fencing materials (i.e., plastic web, chain link, etc.) placed during construction should not become permanent. Any permanent fencing erected in accordance with MM 6-4 to protect the sites should be visually pleasing and consistent with the overall aesthetic experience of the community of Centennial. All eligible archaeological resources sites avoided in accordance within this subsection (a) shall be subject to the preservation requirements of MM 6-4.

b. Per California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3)(A), grading boundary redesign and preservation in place in accordance with subsection (a) shall be the preferred means to avoid impacts to eligible archaeological resources. However, consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is determined that ~~If~~ avoidance and/or preservation of any eligible archaeological resources sites in accordance with subsection (a) is ~~are~~ not feasible, then prior to grading in the vicinity of such archaeological resources sites, Phase III data recovery (salvage excavations) shall be conducted for ~~these~~ such archaeological resources sites or any other eligible sites within the potential impact area of development that

cannot be avoided. (**NOTE:** confidential archaeological mapping is on file at the Natural History Museum of Los Angeles County and the SCCIC. Review of this material is restricted to qualified individuals and project proponents on a need to know basis.) When Phase III data recovery is undertaken, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the eligible archaeological resource, shall be prepared by a qualified Archaeologist prior to any excavation being undertaken. The Phase III work shall provide sufficient scientific information to fully mitigate the impacts of development on these sites and shall be performed in accordance with the standards of the SHPO.

Excavated finds shall be offered to the County and/or the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. Final mitigation shall be carried out based upon the recommendations in the Phase II Test-Level Report, and the County shall make a determination as to the site's disposition based on the recommendations of the qualified Archaeologist and the Native American monitor representing the Tejon Indian Tribe. Possible determinations include, but are not limited to, preservation, salvage, partial salvage, or no mitigation necessary.

MM 6-4 ~~The Project Applicant/Developer~~ A qualified Archaeologist meeting the requirements of the Secretary of the Interior's Standards for professional archaeology shall develop and implement an Archaeological Resources Site-Protection Program aimed to protect and preserve identified CRHR-eligible archaeological resources avoided in accordance with subsection (a) of MM 6-1 and/or MM 6-3, as well as any identified archaeological resources site located within the Project site's open space areas that is of known eligibility for CRHR listing and which are vulnerable to disturbance during Project construction and/or operation. Identified archaeological resources sites

located within the Project site's open space that are of unknown eligibility for CRHR listing and which are vulnerable to disturbance shall also be protected under the Archaeological Resources Site-Protection Program in accordance with this MM 6-4, provided that no such site shall be subject to this MM 6-4 if a Phase II archaeological investigation performed by a qualified Archaeologist in accordance with Secretary of the Interior Standards determines that such site is not unique and is thus ineligible for CRHR listing. Th~~is~~e Archaeological Resources Site-Protection P~~p~~rogram shall be prepared by the qualified monitoring Archaeologist familiar with the resources present within the Project boundaries, ~~and~~ shall be approved by the County, and shall include implementation of one or more of the following:

a. Fencing and/or other access-restriction methods shall be placed around the archaeologically sensitive areas of the Project site to inhibit human access. This ~~is especially~~ subsection (a) shall be applicable to sites CA-LAN-3217 and CA-LAN-3227, unless the qualified Archaeologist determines that such sites are more appropriately protected in accordance with subsections (b) or (c) of this MM 6-4~~.~~; or

b. Non-invasive plant species with thorns (e.g., prickly pear cactus [*Opuntia* spp.]) or other deterrent characteristics shall be planted in areas close to known resources in order to discourage human presence; this is generally applicable to the majority of sites to be preserved in areas of native vegetation~~.~~; or

c. Known eligible resources shall be capped with a layer of chemically inactive soil/sediment, in consultation with a qualified Archaeologist. This ~~is especially~~ subsection (c) shall be applicable to sites CA-LAN-3201, ~~CA-LAN-3206,~~ CA-LAN-3240, and CA-LAN-3242, to the extent such sites are avoided in accordance with subsection (a) of MM 6-3, unless the qualified Archaeologist determines that any such site is more appropriately protected in accordance with subsections (a) or (b) of this MM 6-4. This subsection (c) shall be applicable to site CA-LAN-3206, unless, pursuant to the County-approved Archaeological Resources Site-Protection Program required by this MM 6-4, it is determined that such site is not vulnerable to disturbance.

~~The above-mentioned mitigation~~ This MM 6-4 shall be implemented prior to the completion of construction activities and shall be overseen by the County and/or the Tejon Indian Tribe. The qualified Archaeologist shall prepare a written statement documenting appropriate site-protection measures for submittal to the County. Additionally, a Native American monitor representing the Tejon Indian Tribe shall be present during all initial surface grubbing, initial ground surface grading, and any excavation greater than one-half foot in depth. ~~For implementation of each tract map, if no subsurface Native American or archaeological remains are identified during that initial grading, continuous monitoring will no longer be required but the Native American monitor shall spot-check all additional subsurface excavations at least once a week for the duration of grading and excavation activities or until monitor deems site clear. The Project Archaeologist shall be responsible for coordinating the location and schedule of Native American monitors.~~

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The last paragraph of MM 6-1, which starts on page 5.6-56 of the Draft EIR, is hereby revised as follows:

Excavated assemblages shall be offered to the County and/or the Tejon Indian Tribe on a first refusal basis. If the artifacts are refused, the Project Applicant/Developer may retain said finds if written assurance is provided that they will be properly preserved in Los Angeles County, unless (1) said finds are of special significance or (2) a museum in the County of Los Angeles indicates a desire to study and/or display them, in which case the items shall be donated to the County or its designee. If the Project Applicant/Developer provides no such assurance, the County shall retain the artifacts and shall be subject to the same stipulations set forth in this mitigation measure for disposition of artifacts. Final mitigation shall be carried out based upon the recommendations in the Phase II Test Level Report, and the Natural History Museum of Los Angeles County shall make a determination as to the site's disposition based on the recommendations of the qualified Archaeologist. Possible determinations include, but are not limited to, preservation, salvage, partial salvage, or no mitigation necessary.

Section 5.7 – Biological Resources

The first sentence of the last paragraph on page 5.7-24 is hereby revised as follows:

Nomenclature for vegetation types in the areas described in the paragraph above generally follows that of The Vegetation Classification and Mapping

Program: *List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database* (CDFG ~~2010~~ 2003).

The second sentence of the first full paragraph on page 5.7-25 is hereby revised as follows:

The minimum mapping unit was set at approximately one acre, and patches of vegetation smaller than this were generally not mapped except for observed seeps~~, and~~ ephemeral ponds, and other unique stands.

The following revision is hereby made on page 5.7-35:

Coffeeberry Scrub (37.000.00)

This vegetation type is dominated by hoary coffeeberry (*Frangula ~~tomentella~~ californica* ssp. *cuspidata*) and oak gooseberry (*Ribes quercetorum*).

The following text is hereby added at the end of the second paragraph in the "Mammals" section on page 5.7-50:

The habitat value, and potential for sensitive bat species occurrence, was evaluated for the remnant "mineshaft" entrance northwest of Quail Lake. The site is shallow and exposed (approximately 6 feet deep by 4 feet tall by 5 ½ feet wide) and, accordingly, does not provide the type of habitat used by bats. No bats were observed, and there is no evidence of prior or current bat occupancy.

The first sentence of the last partial paragraph on page 5.7-62 is hereby revised as follows:

Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-~~W~~wide Management Plan (RWMP) (Final EIR Appendix 5.7-D) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

Table 5.7-5, Special Status Plant Species Table, on page 5.7-72 of the Draft EIR is hereby revised as follows:

Opuntia basilaris var. *treleasei* Bakersfield cactus	FE	SE	1B.1	Alluvial benches and fans in arid plains. ~~No suitable habitat is present on the site. Not expected to occur.~~ In 2013, a population was discovered approximately one mile from the survey area. Potentially suitable habitat occurs on the site. Potential to occur.	Not Observed

The first partial paragraph, beginning with the first full sentence, on page 5.7-113 is hereby revised as follows:

> The tricolored blackbird was observed nesting in large numbers along the north-central edge of the Project site and was also observed in Oso Creek (BonTerra Consulting 2008; Impact Sciences 2004a). These populations have not been incidentally detected during focused surveys since the original observations, possibly due to habitat degradation. Most recently, focused surveys for tricolored blackbird were conducted in 2015 and they were observed nesting off site along the northern shore of Quail Lake and at Holiday Lake, and these birds were observed foraging on the Project site (BonTerra Psomas 2015d).

The third sentence of the first full paragraph on page 5.7-116 is hereby revised as follows:

> ~~Unpublished data from Pete Bloom and Woodridge (2004) indicates that there has been recent recolonization of historic habitats in the Antelope Valley and population increases in the Owens Valley.~~ Recent surveys have suggested this species is recolonizing portions of its historic range in the Antelope (CDFW 2016b).

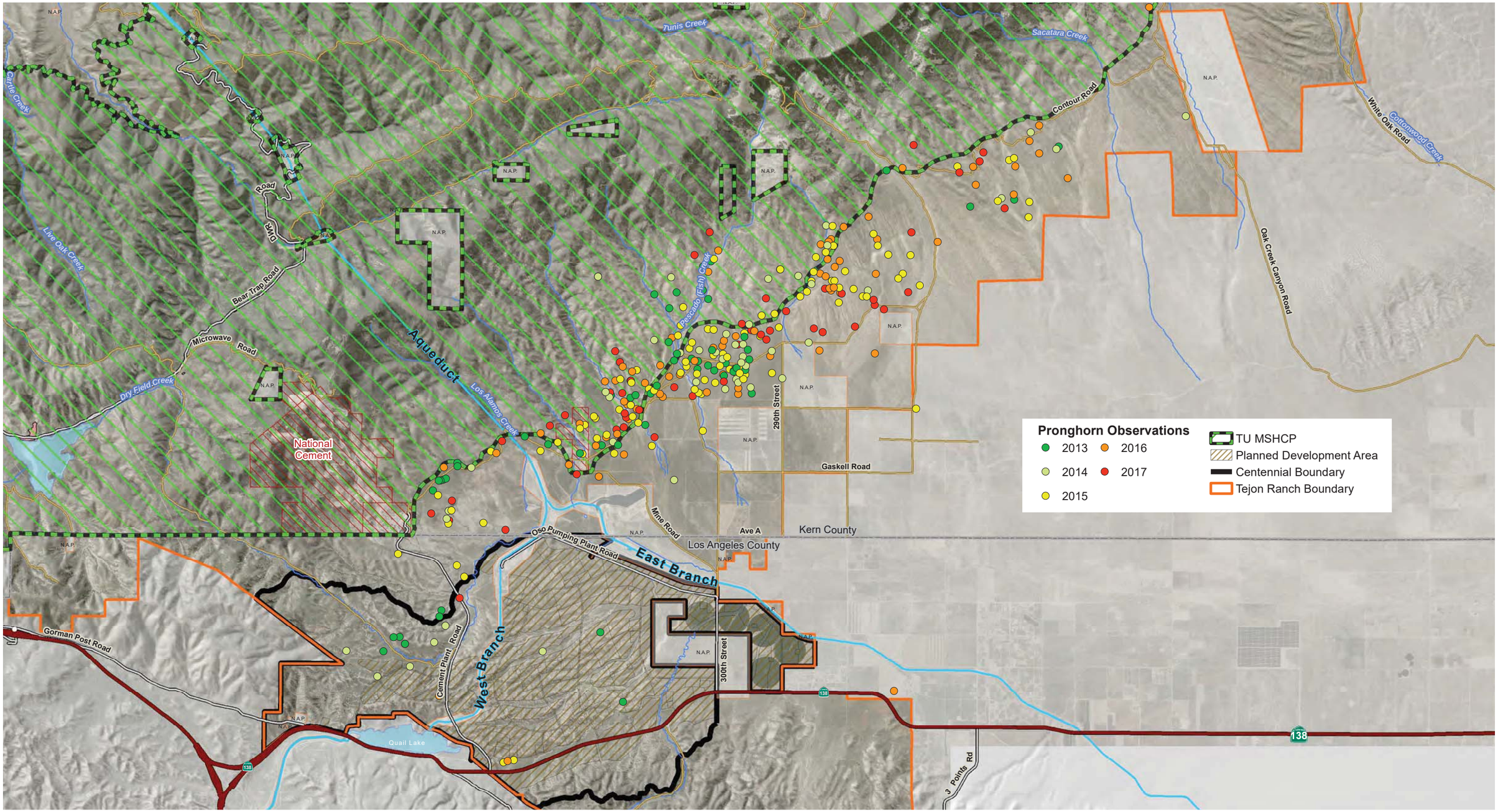
The following text is hereby added immediately following the seventh sentence of the first full paragraph on page 5.7-128:

> In the vicinity of the Project site, this species has been reported in the Fish Creek Area, Northrup Area, and upper Oso Canyon (Geivet 2009). Exhibit B.4-34, Pronghorn Observations on Tejon Ranch, illustrates the locations and distribution of pronghorn antelope observations on and near the Project site with Tejon Ranch.

The fourth sentence of the second full paragraph on page 5.7-133 is hereby revised as follows:

> Exhibit 5.7-9, Jurisdictional Drainage Features, depicts the location and extent of jurisdictional features on the Project site and has been modified to increase the size of features to facilitate viewing ability, and a footnote has been revised to indicate that some features appear larger than they really are.

The following revisions are hereby made to Table 5.7-10 on page 5.7-134:



"D:\Projects\3CEN\Centennial\GRAPHICS\Response_to_Comments\Ex_Tejon_Pronghorn_20171108.ai"

Source: Tejon Ranch Conservancy 2017

Pronghorn Observations on Tejon Ranch

Exhibit Response B.4-34

Not to Scale

Oso Canyon

NAP

NAP

Quail Lake

Tentrock Canyon

Project Boundary

CDFW/RWQCB Jurisdictional Drainage Feature

RWQCB Jurisdictional Isolated Water Feature

USACE Jurisdictional Drainage Feature

Non-Jurisdictional Ponded Feature

NAP Not A Part

Note: The drainage features displayed here are not represented at their actual size, they have been modified to be visible at the scale of this map.

Source: Glenn Lukos Associates 2009

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Jurisdictional Drainage Features

Exhibit 5.7-9

Centennial Project

N W E S

0.5 0.25 0 0.5 Miles

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TABLE 5.7-10
WITH MESA MEMO MODIFICATIONS (MAY 2017)
ONSITE JURISDICTIONAL WETLANDS AND WATERS SUMMARY

Agency with Jurisdiction		On Site	Off Site	Total Project Area (acres)
USACE*	acres	1.7	~~0.1~~ 0.0	~~**1.8**~~ **1.7**
	linear feet	~~21,896~~ 21,843	~~23~~ 0	~~**21,919**~~ **21,843**
CDFW	acres	~~165.3~~ 169.0	0.3	~~**165.6**~~ **169.3**
	linear feet	~~551,061~~ 562.276	~~2,273~~ 1.635	~~**553,334**~~ **563,911**
RWQCB	acres	~~148.9~~ 150.2	0.3	~~**149.2**~~ **150.5**
	linear feet	~~551,061~~ 562.276	~~2,273~~ 1.635	~~**553,334**~~ **563,911**

USACE: U.S. Army Corps of Engineers; CDFW: California Department of Fish and Wildlife; RWQCB: Regional Water Quality Control Board

* All of the USACE acreage consists of non-wetland waters

Source: BonTerra Psomas 2015a

The third paragraph of PDF 7-1 on pages 5.7-135 and 5.7-136 is hereby revised as follows:

> These areas combine to form an extensive regional mitigation preserve system of ~~27,408~~ 43,079 acres (see revised Exhibit 5.7-10, Mitigation Preserve). Detailed floral sampling was conducted within grasslands on the Project site including impact areas, as well as within the Mitigation Preserve (NRC 2006a, 2007a, 2007b, 2007c, 2008b). Generally, studies consisted of quadrat sampling (338 total quadrats) and analysis of data generated results on regional species composition, between-site species composition, and plant community-based analysis~~.~~ within grasslands on the Project site within the impact area and mitigation areas (NRC 2008b) and 2016, and 2017 site reconnaissance surveys over a period of ~~four~~ five days, within mitigation areas.

The first sentence of the fourth paragraph of PDF 7-1 on page 5.7-136 is hereby revised as follows:

> The proposed ~~27,408~~ 43,079-acre preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values which are described in each of the corresponding mitigation plans.

The following text is hereby added immediately following the sixth paragraph of PDF 7-1 on page 5.7-136:

> The Mitigation Preserve contains existing uses such as trails and access roads, as well as the proposed realignment of the Pacific Crest Trail. The uses mentioned here are consistent with the goals of the mitigation preserve. MM 7-17 includes a public awareness program which includes signage

Project Boundary
Mitigation Preserve
Tejon Ranch Conservation Area

Potential Restoration Type

Grassland
Oak Woodland
Riparian
Other

NAP Not A Part

Tejon Ranch

Area 1
Area 2
Area 3
Area 4
Area 5
Area 6
Area 7
Area 7

NAP

138
138

Old Ridge Route
Lancaster Rd
W Avenue D
170th Street West
Pine Canyon Rd
ngs Rd

5

Mitigation	Grassland	Total Acreage
On-site		
North	1,899	2,898
South	90	968
Subtotal (Total On-site Mitigation Area)	1,989	3,865
Off-site		
Area 1	1,734	6,417
Area 2	1,597	2,556
Area 3	3,059	4,183
Area 4	4,494	7,319
Area 5	643	643
Area 6	1,005	2,429
Area 7	7,877	15,668
Subtotal (Total Off-site Mitigation Area)	20,409	39,215
Total Area	**22,398**	**43,080**

Project Boundary
Off-Site Mitigation Preserve
On-Site Mitigation Preserve

Tejon Ranch

138

5

Map Overview

5 2.5 0 5 Miles

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Mitigation Preserve

Exhibit 5.7-10

Centennial Project

N W E S

2 1 0 2 Miles

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denoting sensitive areas. These project requirements are expected to minimize disturbances associated with trail usage and human activity within and adjacent to the Mitigation Preserve.

The second paragraph of PDF 7-2 on page 5.7-137 is hereby revised as follows:

Mitigation lands for impacts to biological resources would consist of approximately ~~3,861~~ 3,866 acres of unimpacted~~/~~ SEA lands on the site and ~~23,547~~ 39,213 acres within additional off-site areas, ~~including~~ consisting of areas on Tejon Ranch, referred to as Areas 1 through ~~6~~ 7. These mitigation lands comprise two on-site and ~~six~~ seven off-site areas which would provide sufficient land and biological resources to implement mitigation strategies to fully mitigate for Project impacts. ~~Two~~ The majority of three of these areas, Areas 3 ~~and,~~ 4, and 5, are the subject of the Wildlife Conservation Board conservation easements that expressly allow for such mitigation use of these lands. These areas, although available for mitigation activities that include enhancement, restoration, or creation, are not available for preserved mitigation acreage since the existing Conservation Easement already requires preservation (but allows mitigation use for enhancement, restoration, or creation).

The second sentence of the fourth paragraph of PDF 7-2 on page 5.7-137 is hereby revised as follows:

~~These lands~~ Within Area 1, 6,357 acres are located within Significant Ecological Area (SEA) No. 17 and support many resources including a relatively undisturbed north-to-south running riparian corridor that provides connectivity to the wildlands to the south of the site.

The following text is hereby added after the ninth paragraph of PDF 7-2 on page 5.7-138:

Area 7 consists of two distinct areas that comprise 15,668 acres total. Area 7 is in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and borders Area 6 to the north. Approximately half of Area 7 is dominated by undifferentiated grasslands, which are scattered throughout but mostly occurring in the southern half of this mitigation area. The other half of Area 7 is covered in various scrub types such as mixed chaparral, desert scrub, and sagebrush, and at higher elevations oak woodland, montane chaparral, montane hardwood-conifer forest, and pinyon-juniper forest. Several major northwest-to-southeast trending drainage features are found within Area 7 that contain riparian vegetation, oak woodland, and Joshua tree woodland.

The tenth paragraph of PDF 7-2 on page 5.7-138 is hereby revised as follows:

> The combined off-site Mmitigation Ppreserve area amounts to ~~23,547~~ 39,213 acres of mitigation lands. In total, the mitigation preserve system available for mitigation covers ~~27,408~~ 43,079 acres and includes both on- and off-site mitigation areas. Appropriate lands with grassland resources have been included in the Mitigation Preserve to ensure a 2:1 replacement ratio in areas outside the existing WCB conservation easements. Furthermore, enhancement activities may be implemented within, but may not be limited to, Mitigation Preserve Areas 3, 4, and 5.

The last two sentences of the second paragraph on page 5.7-142 are hereby revised as follows:

> Implementation of MM 7-1, proposed to mitigate for impacts to special status plants, would reduce the level of impact by promoting the distribution of this species in the Project region through the preservation and/or ~~propagation~~ enhancement of ~~new~~ existing populations and creation of new populations, if necessary, in the Mitigation Preserve. The expansion of the local population of this species is expected to increase its potential to be sustained in perpetuity.

The last two sentences of the first partial paragraph on page 5.7-143 are hereby revised as follows:

> Implementation of MM 7-1, to mitigate for impacts to special status plants, would reduce the level of impact by promoting the distribution of this species in the Project region through the preservation and/or ~~propagation~~ enhancement of ~~new~~ existing populations in the Mitigation Preserve. The expansion of the local population of this species is expected to increase its potential to be sustained in perpetuity.

The second paragraph, beginning with the fourth sentence, on page 5.7-148 is revised as follows:

> ~~All~~ Most adult California condors are wing-tagged and many are fitted with radio transmitters. ~~These birds have~~ The condor has been documented flying high over the area (with one reported landing), but foraging and breeding activities are conducted elsewhere and not on or in the vicinity of the Project site (Bloom 2009; BonTerra Psomas 2015d). Therefore, Project implementation is not expected to result in ~~any~~ impacts on the condor ~~these two species~~ and no mitigation is required. MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. The bald eagle may occur infrequently for foraging, and marginal breeding habitat occurs on-site or adjacent to Quail Lake. Due to the limited use expected, and available foraging habitat at Quail Lake, impacts to foraging habitat would be considered adverse but less than significant per State CEQA Guidelines. Potential breeding sites are located outside the impact area and

direct impacts to breeding bald eagles are not expected to occur; however, MM 7-8 is provided to ensure no direct impacts occur.

The third full sentence on the top of page 5.7-149 is hereby revised as follows:

The primary threat to this species is the loss of breeding habitats, which are not present on the Project site; therefore, these impacts are considered adverse but less than significant and no mitigation is required. As with other migratory birds, however, this species may occur as a breeder in the future and MM 7-2 is included to conduct pre-construction protocol surveys for the Swainson's hawk to confirm absence prior to disturbance.

The second full paragraph, beginning with the third sentence, on page 5.7-149 is hereby revised as follows:

The results of this focused survey documented relatively heavy use of the Project site for foraging purposes by tricolored blackbirds nesting off site at Quail Lake, and to a much lesser degree, Holiday Lake. No breeding was detected at Oso Creek or along the north-central edge of the Project site. Breeding has not been observed in either location since 2008, likely due to habitat degradation. In an effort to determine the Project's potential effect on tricolored blackbird nesting colony foraging lands of the region, an assessment of each of four known colonies was conducted (BonTerra Psomas 2015c).

The third full paragraph on page 5.7-149 is hereby revised as follows:

Due to the shifting of tricolored blackbird nesting locations from year to year, a subset of two or three of the available nesting locations may represent the entire regional breeding population. A substantial reduction of foraging lands surrounding this subset of nesting locations could result in considerable reduction of nesting success. A review of the Quail Lake and the on-site colony subset identified a potential post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In a given year, if these two areas were used for nesting, the reduced availability of suitable foraging land could result in substantial reduction in nesting success. However, the north pond has become unsuitable habitat, so the likelihood of its future use by tricolored blackbird is very low. Additionally, the species shifts breeding locations between sites, and there are also existing potentially suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the breeding colony for that season during construction. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance wetland areas, which will provide more breeding

habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide forage ranging species to continue to persist in the region. Based on the revised MMs 7-7, 7-10, and 7-12, the impacts to foraging habitat are less than significant.

The fifth sentence of the first full paragraph on page 5.7-150 is hereby revised as follows:

Temporary impacts (i.e., construction noise) within ¼ mile ~~400 feet~~ of active nesting areas shall be restricted to the non-breeding season.

The following edit is hereby made within the first paragraph on page 5.7-152:

The oak woodlands in western portions of the Project site may provide temporary roost sites for individual Townsend's big-eared bats. Maternity roosts are less likely due to the typically small size of tree cavities, but may occur. Potential foraging habitat is expected to be limited to edge habitats along streams and areas adjacent to and within the oak woodlands in western portions of the Project site outside the Project's impact footprint; therefore, Project implementation is not expected to impact the Townsend's big-eared bat and no mitigation is required.

The second paragraph on page 5.7-152 is hereby revised as follows:

This loss is small relative to the amount of foraging habitat available to these two species elsewhere in the region; therefore, the loss of potential foraging habitat for the pallid bat and western mastiff bat is considered to be adverse but less than significant and no mitigation is required. Similarly, regional bat populations in general would be impacted by the Project due to loss of foraging grounds and some suitable roosting sites. These losses represent a relatively small percentage of the total regional foraging and roosting opportunities, and regional bat populations would not be reduced to below self-sustaining levels. Furthermore, the Project's approximate 27,000-acre Mitigation Preserve provides long term sustainable resources for regional populations. Therefore, Project impacts on bat species in general is considered less than significant. The loss of individual pallid bats, however, may be considered significant under Section 15380 of the State CEQA Guidelines. Implementation of ~~MM 7-3 for biological monitoring during construction, MM 7-4 for clear demarcation of disturbance limits, and~~ MM 7-9 for pre-construction bat surveys and minimization and avoidance measures ~~are~~ is recommended to avoid taking of roosting individuals that may be present within the Project's impact footprint.

The first sentence of the third paragraph on page 5.7-153 is hereby revised as follows:

Although not classified as a special status species (CDFW 2017b), the relatively small population of reintroduced pronghorn antelope on the Project site is

considered of interest due to limited numbers and historical presence in the region.

The third sentence of the third paragraph on page 5.7-153 is hereby revised as follows:

Project implementation would reduce the amount of available foraging habitat and some opportunities for crossing SR-138 for this population.

The fifth full sentence in the first partial paragraph on page 5.7-160 is hereby revised as follows:

Implementation of MM 7-10 would reduce these impacts to less than significant levels through preservation of ~~14,375~~ 14,908 acres of on-site and off-site grasslands.

The first sentence of the first full paragraph on page 5.7-160 is hereby revised as follows:

The grassland mitigation is based on site-specific characteristics including, for example, the existence of native grasslands in the ~~27,408~~ 43,079-acre on-site (unimpacted~~/~~ SEA lands) and off-site preserve areas.

The fourth sentence of the second full paragraph on page 5.7-160 is hereby revised as follows:

Specifically, the Project proposes to preserve ~~14,375~~ 14,908 acres of grasslands within the ~~27,404~~ 43,079-acre on-site (unimpacted~~/~~ SEA lands) and off-site mitigation preserve, which is part of a larger 240,000-acre conservation area (including dedication and acquisition areas).

The last partial paragraph on page 5.7-162 is hereby revised as follows:

As shown in the table above and illustrated on Exhibit 5.7-13, Jurisdictional Drainage Feature Impacts, impacts to USACE-regulated "waters of the U.S." total 0.04 acre. Exhibit 5.7-13 has been modified to increase the size of features to facilitate viewing ability, and a footnote has been revised to indicate that some features appear larger than they really are.

The following paragraph is hereby added on page 5.7-163 after the paragraph starting with "Additionally" and before the paragraph starting with "Impacts" near the bottom of the page:

The Project's drainage masterplan is designed to ensure, as required by State mandate, that the quantity and quality of water leaving the Project is not greater than the pre-Project condition at the point of discharge. Additionally, although the Project results in reduced flows in some downstream areas, they are either very minor, such as in Oso Creek, or there are no aquatic/riparian resources supported downstream, such as the eastern drainages. Lastly, the timing of flows, both seasonally as well as pooling and flowing durations, are

Oso Canyon

NAP

NAP

Quail Lake

Tentrock Canyon

- Project Boundary
- Impact Area
- CDFW/RWQCB Jurisdictional Drainage Feature
- RWQCB Jurisdictional Isolated Water Feature
- USACE Jurisdictional Drainage Feature
- Non-Jurisdictional Ponded Feature
- **NAP** Not A Part

Note: The drainage features displayed here are not represented at their actual size, they have been modified to be visible at the scale of this map.

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Jurisdictional Drainage Feature Impacts

Exhibit 5.7-13

Centennial Project

N W E S

3,000 1,500 0 3,000 Feet

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not expected to defer substantially from pre-project conditions, as further addressed in Section 5.2, Hydrology and Flood, of the Draft EIR. As a result, off-site downstream drainages as well as the associated habitats and plant and wildlife species are not expected to be impacted to any measurable degree. Furthermore, those drainages that are proposed for a continuous series of in-channel hydraulic measures are considered impacted in their entirety.

The following text is hereby added immediately following the first sentence of the last, partial paragraph on page 5.7-163:

Impacts to the drainages, wetlands, and riparian vegetation on the Project are considered significant due to their protected status. It is noted this analysis considers graded/reengineered drainages as a permanent loss in terms of biological resource impacts, even though some functions may be restored in the post-Project drainage condition. Exhibit B.4-9, On-Site Open Space Areas, has been prepared to illustrate where most of the existing drainage corridors are retained as the general location of re-engineered drainages.

The following paragraph is hereby added after the last paragraph on page 5.7-166:

During grading and construction, implementation of environmentally safe dust control agents may be used on unpaved access roads that connect paved/developed roadways in completed phases of the Project to areas of disturbance from grading. Although the application of dust control agents would occur on disturbed access roads that would be devoid of vegetation, some wildlife may enter the construction area. Due to the lack of cover and forage, the frequency and number of animals is expected to be minimal and limited to more mobile species such as birds, large mammals, and some insects. Because MM 3-2 requires that the use of dust control agents be environmentally safe, and because the use of graded/disturbed construction areas by wildlife is anticipated to be minimal, impacts to wildlife would be less than significant.

The following text is hereby added immediately following the second sentence of the first full paragraph on page 5.7-172:

The SEA would remain intact, and the Project would not result in any fragmentation of this area (see Exhibit 5.7-15, Significant Ecological Areas). It is noted that under the Antelope Valley Area Plan, the SEA boundaries grew considerably, and in response, the Project disturbance areas shrunk in order to conform to SEA boundaries and West Economic Opportunity Areas. Exhibit B.4-48, Historical Disturbance Limits Comparison, illustrates the change in the disturbance footprint in the past and as currently proposed.

The following text is hereby inserted at the end of Section 5.7.6, Environmental Impacts, on page 5.7-173.

Quail Lake

Old Ridge Route

138

Current Disturbance Limits - 7,716 acres

Previous Disturbance Limits - 8,315 acres (May, 2008)

Aerial Source: ESRI, NAIP 2014

Historical Disturbance Limits Comparison

Centennial Project

Exhibit Response B.4-48

N W E S

3,000 1,500 0 3,000

Feet

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Impact of Climate Change on Biological Resources

Climate change is projected to be a powerful stressor, posing a risk of abrupt and irreversible regional-scale change in the composition, structure, and function of terrestrial, freshwater, and marine ecosystems (IPCC 2014). It may affect air temperature, precipitation, snowpack, streamflow, water availability, fire, and vegetation. In addition, marine environments may experience rising ocean temperature, sea level rise, ocean acidification, and upwelling. While climate models attempt to predict future changes, some of these results are already observable. The table below provides a list of observed impacts in North American attributed to climate change since the IPCC's fourth Assessment Report, published in 2007.

Observed Impacts in North America Attributed to Climate Change

Observed Impact	Confidence	Contribution from Climate Change
Shrinkage of glaciers	high	major
Decreasing amount of water in spring snowpack	high	major
Shift to earlier peak flow in snow-dominated rivers	high	major
Increased runoff	medium	minor
Phenology changes and species distribution shifts upward in elevation and northward	medium	major
Increased wildlife frequency in subarctic conifer forests and tundra	medium	major
Regional increases in tree mortality and insect infestations in forests	low	minor
Increase in wildfire activity, fire frequency and duration, and burnt area in forests	medium	minor
Changes in mussel beds along the west coast	high	major
Changed migration and survival of salmon in the northeast Pacific	high	major
Confidence in the validity of a finding is based on the type, amount, quality, and consistency of evidence (e.g., data, mechanistic understanding, theory, models, expert judgment) and the degree of agreement. Source: IPCC 2014		

These effects on the environment due to climate change may have a variety of direct and indirect effects on plant and wildlife species. Climate change, especially in conjunction with other stressors such as habitat modification, pollution, and invasive species, presents an increased risk of extinction for both terrestrial and aquatic species. This risk is expected to increase with both the magnitude and rate of climate change (IPCC 2014).

Statewide modelling predicts that alpine/subalpine forest, evergreen conifer forest cover, mixed evergreen woodland, and shrubland will decline while mixed evergreen forest and grassland are predicted to increase (Lenihan 2008). In southwestern California, the area of chaparral/coastal sage scrub is

projected to decrease by 38 to 44 percent and the area of grassland is projected to increase by 345 to 390 percent by 2070 (PRBO 2011). Sea level rise may affect coastal and estuarine habitats, potentially leading to the inundation and loss of tidal marshes (PRBO 2011).

Changes in vegetation communities can be exacerbated by changes in fire severity and frequency. The effect of climate change on fire in California is complex, with different climate models predicting either a decrease or increase in the probability of large fires in southern California. Drier conditions in one model projected a reduced fire risk while a wetter climate model predicted in increase in the probability of large fires (PRBO 2011). Fire may slow or limit the encroachment of woody vegetation into grasslands under less dry conditions, but hasten the transition from woody vegetation to grassland under drier conditions (Lenihan 2008). Fires may impact species through direct mortality and indirectly by modifying vegetation structure and composition.

In response to climate change's effects on the environment, terrestrial plant and wildlife species shift their geographic ranges and seasonal activities. This can lead to changing interactions among species, including competition and predator-prey dynamics. Species are expected to generally relocate upward in elevation and to higher latitudes; however, the response varies across species, with some are projected to move to lower elevations (Langham et al. 2015). National Audubon Society (2015) modeling predicts that 314 of the 588 North American bird species studied will lose more than 50 percent of their current geographic range by 2080. Warming has also been found to cause shifts in the abundance, geographic distribution, migration patterns, and timing of seasonal activities of marine species. This has been observed over recent decades and is projected to continue.

The second paragraph of MM 7-1 on page 5.7-174 is hereby revised as follows:

The Project Applicant shall prepare and implement a Special Status Plant Species Restoration Plan covering the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah that shall specify the following: (1) identification of and suitability analyses for the enhancement area; (2) procedures for the collection and temporary storage of seed (all available seed from every impacted occurrence shall be collected); (~~2~~ 3) planting procedures, including soil preparation and irrigation; (~~3~~ 4) a schedule and action plan to maintain and monitor enhanced, restored, and/or created populations; (4 5) methods to control plant densities (of competing plants) to promote the establishment of California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah; ~~and~~ (~~5~~ 6) a list of County-approved success criteria (e.g., germination rates, growth, plant cover) to compare to the density of existing populations; (7) for creation or enhancement area(s), monitoring to confirm

> successful implementation of the 2:1 mitigation ratio; and (8) contingency measures to further create or enhance plantings in creation or enhancement areas where monitoring results do not show successful 2:1 mitigation, which shall remain in effect until such time as the 2:1 mitigation ratio has been achieved. The Project Applicant shall develop the Special Status Plant Species Restoration Plan and the County and CDFW shall approve it prior to any vegetation clearing or grading on the site. ~~Adoption of this plan shall be used as the performance standard. An overview of the plan objectives is provided in the Biological Resource Mitigation Program to be submitted and approved by the County prior to issuance of grading permits.~~

The last sentence in the fourth paragraph of MM 7-1 on page 5.7-174 is hereby revised as follows:

> These existing areas shall be (in order of priority) preserved, enhanced, expanded, ~~or~~ restored, or created ~~or new areas shall be created in suitable habitat~~ in order to compensate at a 2:1 ratio for the thousands of individual special status plants that will be lost due to the Project.

The following text is hereby added at the end of the second to last paragraph of MM 7-1 on page 5.7-175:

> Additional protective measures are included in MM 7-17.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first two paragraphs of MM 7-1, which start on page 5.7-173, are hereby revised as follows:

> Prior to issuance of grading permits in areas of the Project site that may disturb California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, or adobe yampah populations, focused surveys of mitigation lands shall have been completed by a qualified biologist(s) to confirm compliance with the 2:1 mitigation ratio for the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah. Surveys will be conducted in accordance with current California Native Plant Society (CNPS) protocol and will occur during the appropriate time of year. The Survey Report shall be submitted to the County and the California Department of Fish and Wildlife (CDFW) for their review. In addition to rare plant species populations that have previously been found in the Mitigation Preserve, newly detected populations will be preserved and managed for long-term preservation. These populations will provide baseline information for management efforts described below and will provide information to help determine habitat suitability in areas where propagation of rare plants may be considered.

The Project Applicant shall prepare and implement a Special Status Plant Species Restoration Plan covering the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah that shall specify the following: (1) identification of and suitability analyses for the enhancement area; (2) procedures for the collection and temporary storage of seed (all available seed from every impacted occurrence shall be collected); (3) planting procedures, including soil preparation and irrigation; (4) a schedule and action plan to maintain and monitor enhanced, restored, and/or created populations; (5) methods to control plant densities (of competing plants) to promote the establishment of California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah; (6) a list of County-approved success criteria (e.g., germination rates, growth, plant cover) to compare to the density of existing populations; (7) for creation or enhancement area(s), monitoring to confirm successful implementation of the 2:1 mitigation ratio; and (8) contingency measures to further create or enhance plantings in creation or enhancement areas where monitoring results do not show successful 2:1 mitigation, which shall remain in effect until such time as the 2:1 mitigation ratio has been achieved and maintained for one full growing season. The Project Applicant shall develop the Special Status Plant Species Restoration Plan and the County and CDFW shall approve it prior to any vegetation clearing or grading on the site.

MM 7-2 on pages 5.7-175 and 5.7-176 is hereby revised as follows:

MM 7-2 All grubbing/grading within a phase of construction shall be scheduled and implemented to facilitate the voluntary movement of localized wildlife towards intact adjacent habitat. Islands of habitat should not be created during site disturbance unless they are to be retained as un-impacted following the Project buildout.

A pre-construction/grading survey of all areas proposed for construction/grading activities that contain potentially suitable habitat for silvery legless lizard, coast horned lizard, and two-striped garter snake~~, and American badger~~ shall be conducted by a qualified Biologist. Surveys will consist of 1 pass-through by a qualified Wildlife Biologist walking 50-meter belt transects across areas to be impacted while visually searching for the species listed above. Surveys will be conducted no more than three days prior to the disturbance of the surveyed area. If any of these species or other wildlife species that can be easily moved are observed within the construction/grading zone, the Biologist (who must have a valid California Scientific Collecting Permit) shall relocate them to a suitable area outside the construction zone. Suitable areas would include appropriate habitats within the proposed open space areas in the

northwestern portion of the Project site and would be identified in a Wildlife Relocation Plan (described below) prior to surveys but before construction begins.

Areas adjacent to Quail Lake and on the Project site potentially supporting western pond turtle breeding habitat shall not be disturbed during the breeding season for the turtles (April through August). No Project activities shall occur within ~~300~~ 400 feet from the edge of Quail Lake, due to potential for nesting in those areas.

Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate burrowing owl pre-construction surveys and avoidance and mitigation measures as identified below.

Burrowing Owl Pre-Construction Surveys

The project biologist shall conduct pre-construction take-avoidance surveys no more than 30 days prior to ground-disturbing activities within each construction area. Focused burrowing owl surveys shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (March 2012). Breeding season surveys shall include at least four survey passes completed between February 15 and July 15, with at least one visit between February 15 and April 15, and a minimum of three survey visits (at least 3 weeks apart) between April 15 and July 15, including at least one visit after June 15. Non-breeding season surveys shall include at least four visits spread evenly throughout the non-breeding season. The surveys shall be conducted in suitable burrowing owl habitat within 150 meters (492 feet) of the project footprint. Surveys shall be conducted by walking 20-meter transects. Because burrowing owls can recolonize a site after a few days, time lapses between project activities trigger subsequent take avoidance surveys, including, but not limited to an additional survey within 24 hours of ground-disturbing activities. Once surveys are completed, the project biologist shall prepare a survey report on the survey methods and results.

Burrowing Owl Avoidance and Mitigation Measures

Submit for DRP and CDFW approval and subsequently implement a Burrowing Owl Exclusion Plan, which includes four avoidance and relocation strategy tiers and associated mitigation requirements set forth in the CDFW Staff Report

on Burrowing Owl Mitigation (CDFG 2012): Tier 1 – Avoidance Buffers; Tier 2 – Passive Relocation; Tier 3 – Prevention of Recolonization of Development Areas; and Tier 4 – Active Relocation (Optional). Site monitoring shall be required prior to, during, and after exclusions of burrowing owls from their burrows. Excluded burrowing owls shall be monitored and documented using artificial or natural borrows on adjoining Mitigation Preserve lands or other open space.

Avoidance buffers shall be established in accordance with the buffer distances described in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012), which range from 50 to 500 meters, depending on the season and level of disturbance. The buffers may be reduced, but only after consultation with and approval from CDFW.

~~Pre-construction burrowing owl and Swainson's hawk surveys shall be conducted in all potentially suitable habitat areas prior to initial site preparation. Methods employed shall be consistent with standard and appropriate protocols for both species within the appropriate season of the year prior to construction. Burrowing owl pre-construction surveys shall be conducted prior to the start of construction/ground-breaking activities. Surveys will be conducted following the California Department of Fish and Wildlife's (CDFW's) 2012 burrowing owl survey protocol. These surveys shall be conducted weekly beginning 30 days prior to the start of construction with the final survey occurring 1 day prior to construction.~~

~~If pre-construction surveys locate an active Swainson's hawk nest on the Project site, then no construction activities will occur within ½ mile of the nest between March 1 and September 15. Furthermore, a Swainson's hawk Monitoring and Mitigation Plan shall be prepared within 90 days after locating an active Swainson's hawk nest in consultation with the County and the CDFW.~~

Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate Swainson's hawk pre-construction surveys and avoidance and mitigation measures as identified below.

Swainson's hawk pre-construction surveys

Pre-construction surveys for Swainson's hawk shall be conducted during the two survey periods prior to

construction by the Project Lead Biologist following the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000). These methods include surveying for active nests within a 0.5-mile radius of all Project activities prior to construction activities.

Swainson's hawk avoidance measures

If active Swainson's hawk nests (defined as nests used during one or more of the last 5 years) are found during these surveys, the Project Proponent shall utilize the CDFW *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks* (Buteo swainsoni) *in the Central Valley of California* for addressing the species as modified below. During initial ground disturbance construction, no intensive disturbances (e.g., heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities) or other Project-related activities that may cause nest abandonment or forced fledging shall occur within 0.5-mile of an active nest between January 1 and September 15, unless take authorization is obtained and provides otherwise.

The buffer zone may be decreased to 0.25-mile around nests for subsequent construction (i.e., in areas where disturbance—such as heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities—is not a normal occurrence during the nesting season). Active nest trees (where the nest is intact and has been used in the last 5 years) shall not be removed unless there is no practicable way of avoiding them. Encroachment of construction within the 0.5-mile buffer and removal of active nesting trees shall only be undertaken subject to consultation with CDFW and issuance of If an active nest tree must be removed, a California Fish and Game Code Section 2081 Incidental Take Permit, and associated conditions, if any are required. The tree removal period shall be limited to between October 1 and December 31.

Swainson's hawk monitoring during construction

If construction or other Project-related activities that may cause nest abandonment or forced fledging are necessary within the buffer zone, prior acquisition of an Incidental Take Permit shall be required. Monitoring of the nest site by

the Project Lead Biologist is required to determine whether the nest is abandoned. If the nest is abandoned and if the nestlings are still alive, the master developer shall fund the recovery and hacking (i.e., the controlled release of captive-reared young) of the nestling(s). Existing activities such as agricultural activities, commuter traffic, and routine facility maintenance activities within 0.25-mile of an active nest shall not be prohibited.

The Wildlife Relocation Plan shall describe: (1) all areas potentially suitable for receiving relocated animals and (2) methods that shall be used in the relocation process. Methods shall include appropriate species-specific handling techniques, including adherence to the Amphibian Task Force Fieldwork Code of Practice, ~~and appropriate hygienic methods~~ to prevent the spread of pathogens. The Plan shall also identify thresholds for the number of individuals of each species that shall be allowed to be placed in any particular area. The Wildlife Relocation Plan shall be prepared by a qualified biologist ~~the Project Applicant/Developer~~ and submitted to the CDFW prior to Project implementation for review and comment. The plan shall be approved by the County prior to issuance of the first grading permit. County and CDFW approval of the Plan shall indicate that the performance standards have been met. The Plan shall be implemented prior to grading an area for which the pre-construction survey identified one or more of these species. Although, implementation of the mitigation plan may have some impact on wildlife, it is expected to be negligible relative to the project as a whole and expected to me a net positive effect as required.

For the American badger specifically, the following pre-construction survey and avoidance measure protocols shall be implemented.

American Badger Pre-Construction Surveys and Avoidance Conditions

Pre-construction winter/non-natal surveys for American badger shall be required for any construction activities commencing between November 1 and February 15. Surveys shall be conducted within potentially suitable habitat, within 100 feet of disturbance zones, no more than 14 days prior to construction activities to determine whether American badger winter dens are present within disturbance zone or within 100 feet of the disturbance zone

boundary. If Project activities are delayed or suspended for more than 14 days, the project-construction surveys shall be repeated.

If an American badger winter or non-natal den is occupied within the disturbance zone or within 100 feet of the disturbance zone, then the den location shall be clearly marked with fencing or flagging, in a manner that does not isolate the badger from intact adjacent habitat or prevent the badger from accessing the den, to avoid inadvertent impacts on the den. The den shall be monitored by a qualified biologist to confirm normal activities during construction. If it is not practicable to avoid the wintering or non-natal den during construction activities, CDFW will be contacted. Construction activities shall be allowed to proceed when the den is vacated.

Pre-construction natal den surveys for American badger shall be required for any construction activities commencing between March 15 and July 31. Pre-construction surveys shall be conducted within potentially suitable habitat, within 200 feet of the disturbance zone, by the project biologist, no earlier than 14 days prior to ground-disturbing construction activities to determine whether American badger natal dens are present within the project disturbance zone or within 200 feet of the disturbance zone.

If active natal dens are located within these areas during pre-construction surveys, construction activities shall be postponed. If natal dens are detected during construction, construction activities shall be halted within 200 feet of the natal den. This buffer may be reduced based on the location of the den or type of construction activity, based on the direction of the project biologist and CDFW has agreed in writing. Construction activities shall not preclude the ability of the documented badgers to disperse to on-site open space or off-site habitat when the natal den is vacated (i.e., habitat suitable for dispersal must be maintained until dispersal occurs). Construction will be postponed or halted in these areas until it is determined by the project biologist that the young are no longer dependent on the natal den. To avoid inadvertent impacts during construction and to ensure that construction activities are at least 200 feet from active natal dens, any active natal dens within the survey area shall be clearly marked with fencing or flagging in a manner that does not isolate the badger from sufficient intact adjacent

habitat, prevent the badger from accessing the den, or inhibiting normal behavioral activities (e.g., foraging and dispersing from the site) by the mother and pups. Construction activities shall be allowed to proceed when the den is vacated.

Pre-construction surveys for the ring-tailed cat shall be conducted throughout the Project disturbance area in the appropriate season within the year prior to disturbance. If results are negative, Project activities will proceed without further restrictions in regard to this species. If detected, the applicant shall consult with CDFW and modify Project activities at that time to ensure complete avoidance and no take of ring-tailed cat will occur.

The second sentence of MM 7-3 on page 5.7-176 is hereby revised as follows:

> The Biologist shall relocate silvery legless lizard, coast horned lizard, two-striped garter snake~~, American badger,~~ and any other special status wildlife species that can be moved which would otherwise be destroyed or adversely affected by construction and/or site-preparation activities.

The last paragraph in MM 7-3 on page 5.7-177 of the Draft EIR is modified to clarify as follows:

> In addition, a Biological Monitor will be on site during all initial vegetation removal and will employ salvage methods to minimize direct impacts to common wildlife species. Where feasible, the biological monitor will attempt to ensure wildlife are out of potential direct impact. ~~If a wildlife species is in harm's way and has not moved on its own, the Biologist will attempt to scare them away from the area. If wildlife does not move, and where feasible, the wildlife species will be relocated to suitable habitat.~~

The following text is hereby added after the final paragraph of MM 7-3 on page 5.7-177:

In order to further reduce impacts to special status wildlife, restrictions shall be placed on the Contractor. These restrictions are related to hours of operation and blasting requirements. Responsibilities of the Construction Contractor shall include:

a. All Project-related activities during construction shall be restricted to daylight hours. Night work and associated lighting shall not be permitted during and night work shall be prohibited throughout the Project site to reduce the potential adverse effect on special status species.

b. Vehicle and equipment access within the Project site shall be restricted to existing roads and overland travel shall be minimized and confined to areas where development will occur to the greatest extent feasible.

c. If blasting is required, applicable federal, State, and local requirements would be observed, and any necessary permits and authorizations would be obtained.

d. Best Management Practices Guidelines developed by the Institute of Makers of Explosives (IME) would be implemented.

e. To avoid impacts to special-status-biological resources, blasting would occur during the rough-grading activities of construction phase of the Project only between the hours of 10:00 am and 4:00 pm.

f. To avoid potential affects to birds, blasting would occur outside the nesting bird season (i.e. blasting shall occur only between September 15 and January 1). No blasting shall occur within 1 mile of the winter perch for bald eagle during the winter season (October 15 to March 15).

g. Prior to blasting, a blasting monitoring team including the Project biologist and one acoustician would be formed. The Project biologist would assess and provide guidance related to the criteria for impact on any nearby noise sensitive species. The acoustician should have a minimum of five years of acoustical measurement experience and would be responsible for the blast noise and vibration measurements.

h. Blasts should be measured with a calibrated Type 1 sound level meter set to the fast or impulse integration response. If possible, the low frequency cut off should be set as low as possible, ideally 2 Hz or lower. Peak sound levels should be measured at a known distance from blast between the blast site and the noise sensitive species habitat (identified by the Project biologist). If the Project biologist sees fit, the low frequency cut off requirements may be waived or adjusted to address the sensitive species in the area. If measured peak levels exceed the criteria, blasts shall be altered in a way to reduce the impact. Such mitigation efforts may include: Reducing the explosive material,

altering the packing and placement of the explosive material, or changing the location of the blasting efforts.

i. The biologist has the authority to stop blasting efforts or advise the blast team on the method of mitigation.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The following text of MM 7-3 is hereby revised:

In order to further reduce impacts to special status wildlife, restrictions shall be placed on the Contractor. These restrictions are related to hours of operation and blasting requirements. Responsibilities of the Construction Contractor shall include:

a. All Project-related activities during construction shall be restricted to daylight hours. Night work and associated lighting ~~shall not be permitted during and night work~~ shall be prohibited throughout the Project site to reduce the potential adverse effect on special status species.

The first sentence of MM 7-4 on page 5.7-177 is hereby revised as follows:

All open space preservation areas adjacent to active construction sites shall be denoted with wildlife-friendly fencing installed and maintained during construction to ensure that construction activities remain within the development footprint.

MM 7-5 on page 5.7-177 is hereby revised as follows:

MM 7-5 Within the year prior to, and within the appropriate season, focused surveys for the following special status species shall be repeated: arroyo toad, Tehachapi slender salamander, California red-legged frog (concurrent with two-striped garter snake and western pond turtle focused surveys), western spadefoot, mountain plover, southwestern willow flycatcher, western yellow-billed cuckoo, and least Bell's vireo. Surveys shall be conducted within all areas of potentially suitable habitat and in accordance with the approved CDFW or U.S. Fish and Wildlife Species (USFWS) protocol for that species.

Western spadefoot pre-constructions surveys and avoidance measures shall be implemented as follows:

Western spadefoot pre-construction surveys

Prior to approval of a Grading Permit, the applicant shall provide to the County evidence verified by the Project

Biologist that the area proposed to be graded, including a 300-foot buffer area, has been surveyed for suitable western spadefoot breeding habitat. If suitable breeding habitat is identified, the verification shall include a map of the delineated areas, including the 300-foot buffer, which are to be avoided. Surveys shall be conducted within 60 days prior to construction during a time of year when the species can be detected above ground at suitable breeding sites. Suitable breeding habitat is defined as areas of temporarily ponded water, including within creeks and within the valley floor uplands. Suitable breeding sites should support ponded water for at least three weeks. To ensure that diseases are not conveyed between work sites by the Project Biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force will be followed at all times.

Western spadefoot avoidance measures

If western spadefoot is detected within the Project footprint, measure "(i)" shall be implemented with appropriate review and concurrence from CDFW. If western spadefoot is detected outside the Project footprint, but within 300 feet of the Project footprint boundary, measure "(ii)" shall be implemented. Prior to implementation of avoidance measures, the Project Biologist shall confer with CDFW.

If western spadefoot is detected (including egg masses and larvae) in water within the Project footprint and cannot be permanently avoided (e.g., by placing a resource avoidance area over the site), suitable breeding habitat shall be created within suitable natural sites in open space outside of the Project footprint under the direction of the Project Biologist. The amount of occupied breeding habitat to be impacted by the Project shall be replaced at a 2:1 ratio. The habitat creation location shall be in suitable habitat within on-site open space and as far away as feasible from residential and commercial development and roads. The created breeding habitat shall be designed such that it supports standing water for no longer than three months following winter rains so that aquatic predators (e.g., fish, bullfrogs, and crayfish) cannot become established. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the impacted breeding site as feasible. No site preparation or construction activities shall be permitted within 300 feet of the vicinity of

the impacted breeding site until the design and construction of the pool habitat in preserved areas of the site have been completed and all detected western spadefoot tadpoles, egg masses, and adults are moved to the created breeding habitat.

The Project Biologist shall monitor the relocation site for a cumulative total of five years in which environmental conditions are conducive for western spadefoots to successfully complete the breeding cycle (i.e., adequate rain for pools to hold water for a sufficient period). Monitoring shall be conducted during and immediately following peak breeding season such that surveys can be conducted for adults as well as for egg masses, larval, and metamorphic western spadefoot. Success criteria for the monitoring program shall include verifiable evidence of western spadefoot reproduction at the relocation site during five years with suitable breeding conditions.

If western spadefoot is detected (including egg masses and larvae) in water within 300 feet of the Project footprint boundary, but not within the Project footprint itself, an exclusion fence shall be constructed along the Project boundary between the construction footprint and the occupied breeding site to prevent western spadefoots from moving into and aestivating within the construction footprint. The exclusion fencing shall consist of 16-inch metal flashing, or an equivalent material, which shall be buried at least 6 inches below the ground surface, extending at least 8 inches above the ground. The fencing shall cover a sufficient length of the boundary to inhibit western spadefoots from entering the Project footprint without entrapping aestivating western spadefoot. The necessary length and appropriate location of the exclusion fence relative to the occupied breeding site shall be determined by the Project Biologist.

No construction activities involving heavy equipment generating noise, ground vibration, and/or dust shall be allowed within 300 feet of occupied breeding sites until western spadefoots have metamorphized and are no longer present in the breeding pool, as determined by the Project Biologist. Acceptable Project activities (e.g., quiet and/or low impact activities) within 300 feet of the occupied breeding site shall be allowed at the discretion of the Project Biologist.

Preconstruction surveys and avoidance measures for the least Bell's vireo and southwestern willow flycatcher, specifically shall be as follows:

Least Bell's vireo and southwestern willow flycatcher pre-construction surveys

In the season prior to construction, within all potentially suitable habitat within 0.5 mile of proposed construction areas, the Project Biologist shall conduct focused surveys for least Bell's vireo and southwestern willow flycatcher. Least Bell's vireo surveys will follow the currently accepted Least Bell's Vireo Survey Guidelines (USFWS 2001). Surveys for southwestern willow flycatcher will be conducted using the methods outlined in A Natural History Summary and Survey Protocol for the Southwestern Willow Flycatcher, issued by the U.S. Geological Survey (USGS) and U.S. Department of the Interior and approved by the U.S. Fish and Wildlife Service (USFWS) (Sogge et al. 2010). Surveys for least Bell's vireo and southwestern willow flycatcher will be conducted concurrently.

Least Bell's vireo and southwestern willow flycatcher avoidance measures

If active nests are found, clearing and construction within 0.5 mile of the nest shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the Project Biologist, and there is no evidence of a second attempt at nesting. If no active nests are observed, construction may proceed. If active nests are found, work may proceed provided that construction activity is located at least 0.5 mile from active nests (or as authorized through take permits). This buffer may be adjusted provided noise levels do not exceed 60 dBA hourly L_{eq} at the edge of the nest site as determined by a qualified biologist in coordination with a qualified acoustician.

If the noise meets or exceeds the 60 dBA L_{eq} threshold, or if the biologist determines that the construction activities are disturbing nesting activities, the biologist shall have the authority to halt the construction and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between

the nest site and the construction activities, and working in other areas until the young have fledged. If noise levels still exceed 60 dBA L_{eq} hourly at the edge of nesting territories and/or a no-construction buffer cannot be maintained, construction shall be deferred in that area until the nestlings have fledged. All active nests shall be monitored on a weekly basis until the nestlings fledge. The qualified biologist shall be responsible for documenting the results of the surveys and the ongoing monitoring and for reporting these results to CDFW and USFWS.

MM 7-6 on pages 5.7-177 and 5.7-178 is hereby be revised as follows:

MM 7-6 Construction Monitoring - The Project Applicant~~/Developer~~ shall retain a ~~qualified~~ CDFW/USFWS-approved "Authorized Biologist ~~with knowledge of California condors~~," to ~~monitor~~ be on-call during all construction activities. If condors are observed foraging or landing in the Project area~~. The resumes of the proposed Biologist(s) will be provided to the CDFW for concurrence. This Biologist(s) will be referred to as the "Authorized Biologist" hereinafter. During clearing and grubbing of construction areas~~, the Authorized Biologist shall ~~be present at all times. During mass grading, construction sites shall be monitored on a daily basis, and the Authorized Biologist will~~ have the authority to stop all construction activities until appropriate corrective measures have been ~~completed~~ implemented. If condors are observed landing in the Project area, the Applicant shall avoid further construction within 500 feet of the sighting until the animals have left the area, or as otherwise authorized by CDFW and USFWS. If the condors are nesting within 0.5-mile of any Project area, no construction activities shall occur within this 0.5-mile buffer until the condors leave, or as otherwise directed by CDFW and USFWS. All condor sightings in the Project area ~~will~~ shall be reported to CDFW and USFWS within 24 hours of the sighting.

~~To further protect California condors potentially foraging in the Project area over the long term from negative interactions with humans and/or artificial structures, the~~ Cattle Carcass Relocation - The Project Applicant~~/Developer~~ shall remove dead cattle that are found ~~or reported~~ within 1,000 feet of the boundary of a residential or commercial development within 24 hours. ~~Dead cattle shall be relocated to a predetermined location.~~ The Approved Biologist will select locations ~~where carcasses shall be placed shall be~~ a minimum of 1,000 feet from ~~a~~ development ~~area boundary. Appropriate locations~~ areas for

~~transfer~~ relocation of carcasses ~~include open grasslands and oak/grassland areas where condors can readily detect carcasses and easily land and take off without encountering physical obstacles such as powerlines and other utility structures~~. The proposed locations would be ~~selected and~~ approved by the CDFW and USFWS. ~~Pursuant to this measure, a~~ A telephone number for reporting dead cattle shall be provided ~~and actively maintained. Any cattle carcasses transferred to the relocation areas shall be reported to the USFWS Condor Group~~ by the Applicant.

Utility Hazards - All surfaces on new antennae and phone/utility towers shall be designed, installed, and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching. Whenever possible, utility towers and antennae should be self-supporting (i.e. not use guy wires), and be as visible as possible (using sold panel siding or dense/wide lattice work).

Condor Educational Curriculum - The Applicant shall provide a Condor Educational Curriculum that includes the life history of the California condor, how to identify condors, TRC hunting rules and regulations, prohibited behaviors related to condors such as hunting with lead ammunition, and the legal consequences of inadvertently or otherwise illegally shooting or harming California condors. The information will also identify types of microtrash that could be ingested by adult breeding condors and describe measures to eliminate microtrash and provide information on how to report roadkill for removal. In addition, these rules, regulations, and prohibitions shall be listed within CC&Rs.

Microtrash - During construction, the ~~area~~ Applicant shall ~~be~~ ensure that all Project areas are kept clean of debris ~~(e.g., cable, trash, and construction materials). The Project Applicant/Developer shall collect all~~ including microtrash and litter ~~(i.e., anything shiny, such as broken glass), vehicle fluids, and food waste from the Project area on a daily basis~~. Workers ~~shall~~ will be trained on the issue of microtrash: what constitutes microtrash, its potential effects on California condors, and how to avoid the deposition of microtrash.

In addition, the Applicant will ensure that routine community maintenance activities include regular efforts to eliminate

microtrash on and near all work sites, recreational events, roads, and adjacent open space areas.

If it is determined that condors are ingesting microtrash in the Project area, the Applicant, CDFW, and USFWS shall evaluate potential remedies to reduce, and, if possible, eliminate microtrash ingestion. Such remedies may include increased education and awareness to residents, guests, staff, and workers regarding the dangers of microtrash, increased monitoring of events and activities that are potential sources of microtrash, and more frequent collection of microtrash.

Condor Deterrent Activities - If the Authorized Biologist deems it necessary, USFWS California condor hazing methods that do not rise to the level of "Take" under the ESA (Service 2014) will be employed. Only the Authorized Biologist, with approval from the USFWS, will conduct hazing and only when such actions are warranted. If the Authorized Biologist is not immediately available, a subset of less aggressive hazing methods, such as yelling, stomping, leashed dog barking or low pressure water spray, may be used when a clear escape route for the condors is identified and upon guidance from USFWS.

Condor Tracking – The Applicant will provide the USFWS with twenty-five (25) GPS satellite tracking transmitters (total cost not to exceed $150,000.00) prior to grading plan approval. This will allow the USFWS to more quickly identify the immediate location of birds that are not moving relative to the ground, which usually indicates that an injury, illness, or death has occurred. The ability to track the movements and locations of individual condors can aid in the monitoring of the overall effectiveness of measures to minimize and mitigate the indirect impact of microtrash by locating possible areas where microtrash was ingested. It can also aide in identifying the location where condors were shot if such an incident were to occur.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The third paragraph of MM 7-6 is hereby revised as follows:

Utility Hazards - All surfaces on new antennae and phone/utility towers shall be designed, installed, and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching. Whenever possible,

utility towers and antennae should be self-supporting (i.e. not use guy wires), and be as visible as possible (using ~~sold~~ solid panel siding or dense/wide lattice work).

MM 7-7 on pages 5.7-178 and 5.7-179 is hereby revised as follows:

MM 7-7 The Project shall incorporate avoidance and additional open space buffer features for each of the two ~~this~~ known tricolored blackbird nesting areas on and adjacent to the Project site ~~area~~. Permanent impacts will be restricted to a distance of 400 feet from the nesting area excluding small impact areas associated with infrastructure and utilities along SR-138 immediately south of Quail Lake. The nesting area will be delineated by a qualified Ornithologist based on all available data (three years of site-specific data shall be used). Temporary impacts (i.e., construction noise) within a ¼ mile ~~400 feet~~ of active nesting areas shall be restricted to the non-breeding season. The breeding season for this species shall be considered April 1 through July 1. The applicant shall consult with CDFW and may obtain an Incidental Take permit if determined appropriate.

~~The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat. Potentially suitable areas for enhancement and preservation include lower Oso Canyon proximate to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source.~~

MM 7-8 on page 5.7-179 is hereby replaced in its entirety as follows:

MM 7-8 The Project Biologist shall conduct pre-construction nesting bird surveys no earlier than seven days prior to any Project-related construction/ground disturbance activities within each construction area and a 500-foot buffer that occurs during the nesting/breeding season of special-status bird species potentially nesting on the site, with the exception of the special-status bird species addressed under separate subheadings below (including burrowing owl, golden eagle, and Swainson's hawk). The pre-construction surveys shall be conducted between January 1 and September 15, or as determined by the

Project Biologist. If construction activities are delayed for more than 14 consecutive days, the surveys shall be repeated.

The purpose of the pre-construction nesting bird surveys will be to determine whether occupied nests are present in the disturbance zone or within 500 feet of the disturbance zone boundary.

If occupied nests are found, then limits of construction to avoid occupied nests shall be established by the Project Biologist in the field with flagging, fencing, fencing, or other appropriate barriers. The following minimum no-disturbance buffers will be required: 250 feet around active non-listed passerine nests and 500 feet around active non-listed raptor nests. Construction personnel shall be instructed on the sensitivity of nest areas. Project-related activities will not occur within the no-disturbance buffers. The Project Biologist shall serve as a construction monitor during those periods when construction activities are to occur near active nest areas to avoid inadvertent impacts to these nests. The Project Biologist may adjust the 250-foot or 500-foot setback at his or her discretion depending on the species, the behavioral baseline conditions determined through passive monitoring, and the location of the nest (e.g., if the nest is well-protected in an area buffered by dense vegetation). Once a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, construction may proceed in the setback areas. Monitoring reports shall include information regarding active nests and status of nests.

MM 7-9 on page 5.7-180 is hereby replaced in its entirety as follows:

MM 7-9 Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate pre-construction bat surveys for bat roosts for pallid bat, western mastiff bat, western red bat, Townsend's big-eared bat as identified below.

a) Pre-Construction Surveys: No earlier than one year prior to the commencement of construction activities for each construction area, a pre-construction survey shall be conducted by qualified project biologists to establish areas of roosts occupancy of special-status bats (including maternity roosts, non-maternity roosts, and winter hibernacula) are present in the Project disturbance zone and within 300 feet of the Project disturbance zone boundary. The number of required

project biologists and number of survey nights will be based on the size of the construction area to assure that the whole of the construction area can be adequately surveyed. The surveys shall consist of:

i. Two spring surveys (April through June) and two winter surveys (November through January);

ii. Each survey consists of one dusk emergence survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat in the construction area;

iii. For each survey areas, conduct all three survey types within one 24-hour period;

iv. Construction areas too large to be adequately assessed in one survey, as determined by the Project biologist, shall be divided into multiple smaller survey areas.

iv. Focus visual inspections on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering); and

v. Use bat detectors, bat call analysis and visual observations during all dusk emergence and pre-dawn re-entry surveys.

Data collection for each survey shall include the following information:

i. Whether bats are, or have been, present at roosts on the Project site;

ii. Assemblage of species using the site for roosting;

iii. Type of roost (i.e., maternity roost, day roost, night roost, feeding perch, mating roost, satellite roost, transitional roost or winter hibernaculum);

iv. Location, ambient temperature, internal dimensions and the aspect and orientation of the roost;

v. Spatial and temporal distribution of bat roosting activity;

vi. Flight paths, exit and entrance points;

vii. Number of bats, time and duration of use observed during roost surveys;

viii. Photographs; and

ix. Identification of any survey constraints.

x. If roosts are detected during pre-construction surveys, the following avoidance measures will be implemented unless relocation and/or take is authorized under California Endangered Species Act (CESA), as required by applicable law.

b) Avoidance Measures Fencing Installation

i. For Maternity Roosts: If an active maternity roost is identified in these areas, the maternity roost will not be directly or indirectly disturbed by prohibiting clearing and grubbing adjacent to the roost site, prohibiting lighting use near the roost site where it would shine on the roost or interfere with bats entering or leaving the roost, prohibiting the bird netting and prohibiting the operation of internal combustion equipment, such as generators, pumps and vehicles within 300 feet of the roost site until the maternity roost is vacated and juveniles have fledged, as determined by the project biologist. The rearing season for native bat species in California is approximately April 1 through August 31.

ii. For Hibernacula or Non-Maternity Roosts: If non-breeding bat roosts (hibernacula or non-maternity roosts) are found within the disturbance zone, the following shall be implemented:

a. Avoid direct and indirect impacts to roosting sites by prohibiting all project-related activities within 100 feet of the roost.

b. Additionally, within 300 feet of the roost, prohibit clearing and grubbing adjacent to the roost site and lighting use near the roost site where it would shine on the roost or interfere with bats entering or leaving the roost. Prohibit the operation of internal combustion equipment, such as generators, pumps and vehicles, and the use of bird netting.

c. If avoidance of roost sites is infeasible, maintain portions of the features that provide naturalized habitat to the greatest extent possible and improve existing roost sites and/or provide new roost sites on buildings or on the Project site. Implement these measures only after consultation with CDFW.

d. New roost sites must be in place prior to the initiation of Project-related activities to allow enough time for bats to relocate.

e. Design and locate new and enhanced roost sites to be compatible with the bats' search image and habitat requirements (i.e., thermal regulation, interior size, ventilation, etc.). Design new and enhanced roost sites in consultation with CDFW.

f. Exclude bats from directly affected work areas selectively and only to the extent necessary to prevent morbidity or mortality to the colony. Use one-way bat exclusion devices, installed in a bat-safe way, to exclude bats and then use steel wool or other method to block the entrance, after the bats have gone. Exclude bats only after consultation with CDFW, at a time that is compatible with the species' normal behavior patterns (i.e., breeding, feeding, hibernating, etc.). In general, exclusions shall not occur during the maternity/pup-rearing season or during the hibernation season, as determined by conditions at the Project site.

MM 7-10 on pages 5.7-180 through 5.7-182 is hereby revised as follows:

MM 7-10 The Project Applicant/Developer shall preserve grasslands, including native perennial grassland and associated wildflower field vegetation types, at a minimum 2:1 ratio within the ~~approximate 27,408-acre~~ M~~m~~itigation P~~p~~reserve (see Table A). The Project would impact 6,416 acres of grasslands; therefore, a total of 12,832 acres of grassland mitigation acreage is required to bring impacts to a less than significant level.

TABLE A
GRASSLAND MITIGATION ACREAGES

Mitigation Area	Grasslands	Total Acreage
On-Site Mitigation Preserve ~~Unimpacted/SEA~~		
On-Site Mitigation Preserve ~~Unimpacted/SEA~~	1,989	~~3,861~~ 3,866
Subtotal (Total On-Site Mitigation Area)	*1,989*	*~~3,861~~ 3,866*
Off-Site Mitigation Preserve ~~Open Space~~		
Area 1	~~1,641~~ 1,734	6,417
Area 2	~~1,602~~ 1,597	2,556
Area 3	~~3,059~~ 0	4,183
Area 4	~~4,429~~ 706	7,319
Area 5	~~643~~ 0	643
Area 6	~~1,012~~ 1,005	2,429
Area 7	7,877	15,668
Subtotal (Total Off-site Mitigation Area)	*~~12,386~~ 12,919*	*~~23,547~~ 39,213*
Total Mitigation Area	**~~14,375~~ 14,908****	**~~27,408~~ 43,079**
~~SEA: Significant Ecological Area~~		
**Goal for 2:1 Grassland Mitigation is 12,832 Acres		

Mitigation for loss of those areas modeled as native perennial grassland will provide similar habitat quality as that which was lost. The result shall be native perennial grassland and wildflower field values that are equal to or greater than the overall ecological functions and values of those lost as a result of Project implementation. Preservation shall include dedication and long-term management working towards the goal of a self-sustaining system. Long-term management will include focused major problematic non-native species eradication (e.g., feral pigs) where feasible. Preservation will occur on open space lands on the Project site and on other lands within Tejon Ranch.

As outlined in Table A above, the ~~14,375~~ 14,908 acres of grassland preservation will occur in open space areas on site and in the ~~six~~ seven other areas. A full description of these areas is in PDF 7-2. Many of these grassland areas have been part of the expansive grassland studies conducted for the Project over the course of several years. Detailed plot analysis and modeling show the high level of similarity between these preserved grasslands and the grasslands within the Project impact area. In

addition, the grasslands are contiguous with other preserved open space in the region and support other important biological functions (e.g., drainages and local wildlife movement pathways). As a result, the preserved grassland is part of a more watershed-level preservation allowing for long-term sustainment and a total value that is greater than the sum of its parts.

The preservation phasing through conservation easements shall be based on the percentage of total area of impact per phase of development, regardless of specific resource impacts. The specific location of the acreage to be dedicated within a particular phase will be chosen to maximize the replacement of resource values lost during that phase of construction while maintaining as much contiguous acreage as possible. In order to preserve an adequate quantity of grassland, lands outside the County of Los Angeles, within the County of Kern, would be used for mitigation. As each phase is proposed, a percentage of the mitigation preserve (which is equivalent to the percentage of that phase's impacts) shall be dedicated concurrent with the entitlement approval of that phase.

Management of the Mitigation Preserve shall be in accordance with the Ranch-wide Management Plan (RWMP), which incorporates Best Management Practices for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions (see RWMP Vol. II Sections 5.1 and 5.2). The RWMP includes standards for management of the grassland areas that will preserve the grasslands in perpetuity. The RWMP shall include a Figure depicting the Mitigation Preserve lands used to meet this 2:1 preserve ratio.

The ~~open space~~ Mitigation P~~p~~reserve, including the grasslands within it, shall be preserved in perpetuity to offset Project impacts on native grasslands and wildflower fields prior to issuance of a grading permit for the Project site. The phasing of mitigation has been previously described. The preservation and management of these grasslands through the ~~Native Perennial Grassland and Wildflower Field Mitigation Plan~~ RWMP will sufficiently offset and fully mitigate the impacts on native grasslands and wildflower fields associated with the Project.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.

No further edits have been made to this text. The Table A of MM 7-10 is hereby revised as follows:

TABLE A
GRASSLAND MITIGATION ACREAGES

Mitigation Area	Grasslands	Total Acreage
On-Site Mitigation Preserve		
On-Site Mitigation Preserve	1,989	3,866
Subtotal (Total On-Site Mitigation Area)	*1,989*	*3,866*
Off-Site Mitigation Preserve		
Area 1	1,734	6,417
Area 2	1,597	2,556
Area 3	0	4,183
Area 4	706	7,319
Area 5	0	643
Area 6	1,005	2,429
Area 7	7,877	15,668
Subtotal (Total Off-site Mitigation Area)	*12,919*	*39,213*
Total Mitigation Area	**14,908****	**43,079**
**~~Goal for~~ 2:1 Grassland Mitigation requirement is 12,832 Acres		

MM 7-11 on pages 5.7-182 through 5.7-187 is hereby revised as follows:

MM 7-11 This measure prescribes mitigation for other special status vegetation types including mixed oak woodland, oak trees, and other riparian and wetland vegetation types. Each of these three vegetation types is discussed separately (native grassland and wildflower fields are addressed in MM 7-10).

Mixed Oak Woodlands

The Project Applicant/Developer shall create mixed oak woodlands to achieve resulting vegetation/habitat values. Since there would be approximately 6.2 acres of oak woodland impacts, mitigation will result in the preservation of a minimum of 6.2 acres of mixed oak woodland and creation of a minimum of 6.2 acres of mixed oak woodland, which will include the establishment of 322 oak trees completed as part of oak tree replacement in accordance with the County of Los Angeles oak tree permit requirements (see Oak Trees Section below). Oak trees established in created oak woodlands will be credited towards both oak woodland and oak tree mitigation requirements. If Project impacts are reduced through a

reduction in Project disturbance limits in oak woodland areas, required mitigation acreage will be reduced accordingly.

In accordance with mitigation options outlined in Section 21083.4 of the *California Public Resources Code* (PRC), replacement of oak woodlands shall consist of no greater than ½ of the oak woodland mitigation requirement. Therefore, half of the 6.2 oak woodland impact acreage will be mitigated via the alternate option of preservation. The combined acreage of oak woodland preserved both on site (unimpacted~~/~~ Significant Ecological Area [SEA]) and within the off-site mitigation areas is ~~3,102~~ 3,090 acres and is expected to substantially exceed the required 50 percent of mitigation as preservation.

Mitigation through creation is typically implemented on lands with minimal habitat value (e.g., ruderal vegetation, graded slopes) rather than in areas with a substantial component of existing native vegetation. However, evidence of lack of naturally occurring recruitment on site indicates that the existing woodlands are likely to be eventually replaced by non-woodland vegetation. Based on the lack of naturally occurring replacement trees, it is anticipated that oak woodland planting is necessary to sustain the oak woodlands. Therefore, the goal of oak resource mitigation efforts will be to create and enhance oak woodlands. To maximize potential for success, oak woodlands will be created within and adjacent to the same areas where oak woodlands currently exist. This method will create future generations of oak trees and oak woodland on the site in these areas. Details of the oak woodland mitigation program are described below in items 1–10.

1. To mitigate for impacts to oak woodland and oak trees, site-specific native acorns will be collected. Acorns will be collected within the watershed area of the Project site to ensure that acorns collected are of a similar genetic stock to those existing on the site. Some acorns will be planted and maintained in containers, and others will be stored and planted directly on site within the Oak Mitigation Areas.
2. To maximize oak woodland biological values and the potential for long-term success, some locally collected oak acorns will be planted directly into the ground. These acorns will be planted in appropriate locations in the Oak Mitigation Areas. The locations identified for acorn planting will be reviewed by the County Forester.

3. Container plants will be propagated and maintained from locally collected acorns. In this way, more established container plants will be available for mitigation efforts, and they will contain the most suitable genetic variability appropriate for the region to increase mitigation success. The preferred method of propagation will include the establishment of a temporary nursery on the Project site. The nursery will include partial shade areas to reduce water loss and a constant water supply to supplement planted trees. Using the acorns collected from within the watershed area of the Project site, container plantings will be cultivated at this location. Development of trees on site will ensure that they are acclimated to the typical weather conditions at their eventual permanent location. If necessary, and in consultation with the County Forester, acorns collected from the site may be stored or propagated and maintained under contract with a reputable native plant nursery off site.

4. To provide overstory, midstory, and understory tree/plant coverage, some container plants and oak trees, grown from locally collected acorns, will be installed in addition to the application of native seed mixes. Since studies indicate that the younger the planting is, the more likely the chance is for successful establishment and long term viability locally collected acorns as well as locally collected, nursery-cultivated young oak trees (one-gallon or five-gallon containers of oaks) would be planted on site. The oak woodland planting and seeding palettes will include a diversity of locally-collected native shrubs, subshrubs, grasses, forbs, and ferns, to provide a beneficial mosaic of understory vegetation.

5. The oak mitigation program will include the extensive salvage (from the impacted oak habitat areas) and placement of coarse woody debris, brush piles, and boulders (as available) to immediately provide (a) suitable micro-habitats for the establishment of plant species with particular shade and moisture requirements (e.g., ferns) and (b) improved habitat resources (e.g., cover) for wildlife species.

6. Irrigation will be provided to the oak plantings in a manner that simulates natural rain events; i.e., infrequent, deep watering. Irrigation will be suspended during periods of substantial rainfall, and irrigation will be terminated at the earliest possible date (depending on seasonal weather

patterns) in coordination with the County Forester, to optimize the drought resiliency and proper root development of the planted oaks. Additionally, all irrigation must be terminated for a minimum of five years before the oak mitigation areas will be eligible for final approval/sign-off.

~~5~~ 7. The Project Applicant/Developer will provide an annual report to the County that will include an accounting of each of the following in the mitigation areas: (a) the number of acorns planted; (b) the number of germinated acorns (whether planted or natural) protected; (c) the number of new oak trees planted in mitigation areas, including the species of each tree planted; (d) the caliper of each new tree planted and/or protected; (e) the acreage of woodlands created and/or conserved in the mitigation areas.

~~6~~ 8. Creation of structurally diverse oak woodland habitat within and contiguous to existing oak woodlands will be accomplished by planting locally collected oak acorns, plus yearly sowings of additional locally collected acorns, as well as, temporary irrigation, weed abatement, pest deterrence, and/or other maintenance tasks as needed to facilitate oak seedling germination and survival.

~~7~~ 9. Prior to Project grading, locally collected acorns will be planted and grown. Once trees reach a diameter of one inch just above ground surface (i.e., basal height) within the Oak Tree/Oak Woodland Mitigation Areas, they will be appropriated as "mitigation trees" to be used for oak woodland and oak tree permit mitigation purposes with approval from the County Forester as part of the oak woodland and oak tree permit mitigation process and will be credited as a mitigation tree if the tree is determined to be healthy by the Los Angeles County Forester at the end of the monitoring period.

~~8~~ 10. The required 12.4 acres of mixed oak woodland creation will occur within 473 acres of existing oak woodland (primary area) and 716 acres of adjacent low quality non-native grassland (secondary area, if needed) on the western portion of the Project site. Additional suitable areas may also be identified within reduced grading footprints following final detailed tract map production to the satisfaction of the County Forester. Mitigation planting areas will be refined within the proposed mitigation areas through a multi-variable query of existing Geographical

Information System (GIS) data sets, and intensive field analysis to precisely identify suitable planting locations (e.g., localized soil types, microtopography). Created oak woodlands will have an approximate average density of 80 appropriately sized oak trees per acre at the end of the monitoring period (or other density as directed by the County Forester), while staying within the mitigation areas. The contiguity of the created woodland habitat within or adjacent to existing oak woodlands will be ecologically beneficial, and will also improve the logistics of restoration installation, maintenance, and monitoring, compared to a fragmented habitat creation program. These methods will help to ensure the success of created oak woodlands to replace the existing woodlands over time.

~~9~~ 11. In order to implement the creation of habitat on the site and to ensure the persistence of the overall biological functions and values over time, the Project Applicant/Developer shall submit an Oak Woodland Habitat Mitigation Plan to the County for approval prior to the issuance of a grading permit for each tract map or combination of tract maps. The mitigation approach described in the Plan shall comply with Section 21083.4 of the *California Public Resources Code* (PRC), which was enacted by California Senate Bill (SB) 1334. County approval of the Plan shall be required prior to the initiation of any clearing or grading on the site that affects any oak woodland vegetation. The Oak Woodland Habitat Mitigation Plan shall be developed by a qualified Restoration Specialist, to be retained by the Project Applicant/Developer, and shall be subject to County approval. The objective of the Oak Woodland Habitat Mitigation Plan will be to preserve 6.2 acres of existing oak woodland and to create 6.2 acres of oak woodland. The Oak Woodland Habitat Mitigation Plan serves the purpose of satisfying the conditions of Section 21083.4 of the *California Public Resources Code*.

~~10~~ 12. Implementation of the Oak Woodland Mitigation Plan will be the responsibility of the Project Applicant/Developer or its designated party; the Plan shall specify, the following:

a. **Planting Management Program:** A Planting Management Program shall be prepared for review by the County Forester that will outline three planting seasons and will include (i) the first planting season, year 0, being the acorn and sun tolerant ground covers; (ii) the second planting season occurring at approximately year 5, introducing sun/shade tolerant species; and (iii) the third planting season at year 10 with the introduction of more shade tolerate understory species, including the use of reference sites.

~~a.~~ **b. Personnel:** The responsibilities and qualifications of personnel required to implement and supervise the plan will be specified. The responsibilities of the Landowner, County staff, Specialists, and Maintenance Personnel that will supervise and implement the plan will also be included.

~~b.~~ **c. Site Selection:** The mitigation site(s) will be determined in coordination with the project applicant/Developer and the County. The site(s) will be located in open space areas that will be managed in perpetuity through a conservation easement, open space dedication, performance bond, management at the Tejon Ranch Conservancy, or other method approved by the County Forester.

~~c.~~ **d. Native Species Seed Collection, Site Preparation, and Planting Implementation:** Under the supervision of the County Forester, site preparation will include (i) protection of existing native species; (ii) trash and weed removal; (iii) native species salvage and reuse (i.e., duff); (iv) soil treatments (i.e., imprinting, and/or decompacting); (v) erosion-control measures (i.e., rice or willow wattles); (vi) native seed mix application; and (vii) procedures for native seed collection from the site, including acorns of native oak species.

~~d.~~ **e. Schedule:** Restoration/revegetation sites will be established between October 1 and January 30. Seeding and planting of container plants will take place immediately after preparation of the mitigation sites and will take place under the supervision of the County Forester.

~~e.~~ **f. Maintenance Plan and Guidelines:** The Maintenance Plan, to be approved by the County, will include (i) weed control; (ii) herbivory control (e.g., feral pigs); (iii) trash removal; (iv) irrigation system maintenance; (v) maintenance training; (vi) replacement planting; and (vii) a vehicle washing program to capture invasive propagules. The Maintenance Plan will also indicate who is responsible for each of these listed tasks.

~~f.~~ **g. Monitoring Plan:** The monitoring plan, to be implemented for a 15-year period, and to be approved by the County, will include (i) qualitative monitoring (i.e., photographs and general observations); (ii) yearly quantitative monitoring (i.e., randomly placed transects to assess vegetation type coverage and systematically assess all mitigation oak trees); (iii) performance criteria as approved by the County; and (iv) annual reports that will be submitted to the County for five consecutive years after initial planting (or longer if the County requires) and following plan approval. The Plan shall be prepared by a qualified Restoration Specialist and approved by the County prior to any clearing or grading for any tract map that affects any oak woodland vegetation.

~~g.~~ **h. Long-Term Preservation:** Long-term preservation of the mitigation site(s) will be outlined in the Restoration Plan to ensure that they are not impacted by future development. An open space dedication, conservation easement, performance bond, management by the Tejon Ranch Conservancy, or other County-approved method will be used to ensure long-term preservation.

~~h.~~ **i. Growth/Vegetation Standards:** Growth/vegetation standards will be developed by a qualified Biologist in accordance with County and regulatory agency requirements.

Oak Trees

The mitigation approach for replacing lost oak trees shall comply with the County of Los Angeles Oak Tree Ordinance (CLAOTO) requirements. The goal of this program is to replace impacted oak trees at a ratio of 3:1 for non-heritage oaks and 10:1 for heritage oaks in accordance with the County's oak tree

permit requirements. This would result in the establishment of 322 oak trees. However, if Project impacts are reduced through a reduction in Project disturbance limits within oak woodland areas, required tree numbers will be reduced accordingly.

Mitigation trees are typically planted on lands with minimal habitat value (e.g., ruderal vegetation, graded slopes) rather than in areas with a substantial component of existing native vegetation. To maximize potential for success, oak trees will be planted in the same areas where oak woodlands currently exist. This method will create future generations of oak trees and oak woodland on the site in these areas and will be done as described in Numbers 1–10 under the "Mixed Oak Woodlands" portion above. Additionally, quantitative tree monitoring data for all mitigation trees (whether for County of Los Angeles Oak Tree Ordinance [CLAOTO] mitigation or oak woodland mitigation) will be submitted to the County Forester yearly and, for convenience, will be included as an appendix to the annual report required in 10(f)(ii) above.

Other Riparian and Wetland

In addition, the Applicant shall create, enhance, and/or restore all impacted riparian and wetland vegetation types that are not considered jurisdictional by permitting resource agencies (i.e., those not mitigated through regulatory permit conditions) at a 1:1 ratio. This applies to areas mapped as alluvial scrub; riparian herb; rush riparian grassland; southern arroyo willow riparian; southern willow scrub; unvegetated wash; willow riparian forest; willow riparian woodland; alkali meadow; Baltic rush; and seeps and ephemeral ponds. These areas shall be included in the Streambed and Wetland Habitat Creation and Enhancement Plan discussed in MM 7-12, which shall be approved by the County prior to issuance of grading permits.

<u>Consultation with representatives from the Angeles National Forest regarding oak and grasslands mitigation activities in SEA 17 shall occur prior to the commencement of oak tree planting in SEA 17.</u>

MM 7-12 on pages 5.7-187 through 5.7-190 is hereby revised as follows:

MM 7-12 Prior to any fill of or alteration to drainage tributaries, wetlands, and/or riparian vegetation on the Project site, the Project Applicant/Developer shall obtain the appropriate regulatory agency permits and/or agreements from the U.S. Army Corps of Engineers (USACE), the California Department of Fish and

Wildlife (CDFW), and the applicable Regional Water Quality Control Board (RWQCB). The Project Applicant/Developer shall comply with all construction mitigation measures specified in the EIR, regulatory agency permits, and/or agreements. Pursuant to the permit requirements, the Project Applicant/Developer will develop a Storm Water Pollution Prevention Plan (SWPPP) that incorporates Best Management Practices (BMPs) for reducing or eliminating construction-related pollutants in the site runoff.

The Project is subject to the following Mitigation Performance Standards: As anticipated to be required by USACE, CDFW, and Regional Water Quality Control Board (RWQCB) regulatory permits, the Project Applicant/Developer shall create, enhance, and/or restore acreage to ensure that net habitat values are at least equal to those lost from Project implementation. Mitigation ratios are typically specified in the regulatory permits. However, if mitigation is conducted prior to impacts taking place, mitigation ratios can be pro-rated; this type of mitigation pro-rating allows time to evaluate if created, enhanced, and/or restored habitat values are at least equal to those that will eventually be lost from Project implementation. Under this scenario, it can be verified that the restoration/creation goals have been accomplished or are proceeding satisfactorily.

The extent of drainages and wetlands that would be preserved under the Project will provide opportunities to expand and enhance the drainages, wetlands, and riparian vegetation throughout the Mitigation Preserve ~~on the Project site~~.

As discussed previously, a wetland functional assessment of the drainages and other aquatic features in the Project site was conducted by Glenn Lukos Associates in 2006 and 2009 in order to characterize and evaluate the functions of the site's drainages and riparian habitats (GLA 2009a). An update to that functional assessment was conducted in 2015 (BonTerra Psomas 2015a). Overall, aquatic resources on the site were evaluated in terms of Functional Capacity Units (FCU), which indicate more specifically the mitigation level necessary to restore riparian functions after Project implementation by providing a measure of the ability of a wetland area to perform typical wetland functions.

The purpose of the mitigation is to replace lost habitat value, as measured in FCU (or other acceptable functional value units)

rather than based on a standard acreage ratio. Alternatively, a more traditional mitigation ratio approach may be employed using following rates:

a. Wetland Waters: 2:1, including 1:1 restoration and 1:1 enhancement, of wetland waters.

b. Streams:

   i. 1:1 preservation of ephemeral and/or intermittent streams for permanent impacts to ephemeral non-wetland waters of the state (non-riparian)

   ii. 1:1 preservation of intermittent streams for permanent impacts to intermittent non-wetland waters of the state (non-riparian)

   iii. 1:1 restoration of intermittent streams for temporary impacts to intermittent non-wetland waters of the state (non-riparian)

c. Riparian Vegetation: 2:1, including 1:1 restoration and 1:1 enhancement of riparian vegetation.

Mitigation will include a combination of on-site and off-site preservation of jurisdictional resources; on-site and off-site enhancement/restoration of preserved jurisdictional resources in order to increase overall functional capacity; and the creation (expansion) of riparian/wetland habitats along degraded drainages, including Oso Creek and two of its tributaries in addition to the three other drainages (including the main drainage located along and immediately north of State Route [SR] 138).

The direct and indirect loss in on-site functional units will be mitigated through passive enhancement of open space areas, active enhancement of 6.5 acres of wetland, and creation of approximately 78.4 acres of wetland/riparian habitat (GLA 2009a). Following implementation of mitigation, the Project provides approximately 4,748.5 FCUs. Therefore, the proposed mitigation will result in a functional gain of 327.5 FCUs, thereby ensuring a net increase in functionality in the post-Project condition (GLA 2009a). In summary, implementation of the proposed jurisdictional resource mitigation will actually result in a net gain in the measurable functional capacity and

therefore, the habitat values, of the on-site and off-site drainages and other aquatic features.[3418]

To implement the creation/restoration/enhancement of streambed/wetland habitats on the site, the Project Applicant/Developer shall develop a Streambed and Wetland Habitat Creation and Enhancement Plan commensurate with regulatory agency permits and/or agreements. The purpose of this plan is to demonstrate the feasibility of creating the required mitigation acreage and to ensure that the overall biological functions and values are increased. The plan shall be developed by a qualified Restoration Specialist and shall be submitted ~~to the County for approval~~ and approved by the County and CDFW, and RWQCB prior to grading that would impact jurisdictional waters or wetlands. The Streambed and Wetland Habitat Creation and Enhancement Plan shall specify the following for each tentative tract map area:

- **Statement of Impacts:** A statement of impacts and avoidance shall be prepared, including temporary and permanent impacts.
- **Personnel:** Responsibilities and qualifications of the personnel required to implement and supervise the plan will be specified. The responsibilities of the Landowner, Specialists, and Maintenance Personnel that will supervise and implement the plan will also be included.
- **Site Selection:** Identification of preservation, enhancement and/or creation sites on Mitigation Preserve shall be included. A summary of location of preserved wetlands and/or waters required to achieve applicable preservation performance standards shall also be included. The sites for mitigation will be determined through coordination between the project applicant/Developer, the USACE, the CDFW, the applicable RWQCB, and the County.
- **Site Preparation and Planting Implementation:** Site preparation will include: (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting and/or decompacting); (5) fencing, grading and contouring to improve topographic heterogeneity and floodplain benching, erosion-control measures (i.e.,

[3418] For information about the functional values of the impacted jurisdictional resources and proposed mitigation areas, see GLA 2009b in Appendix 5.7-B.

rice or willow wattles); (6) seed mix application and quantities; and (7) procedures for seed collection from existing habitat on the site. Implementation procedures such as mulching will also be included.

- **Schedule:** Establishment of restoration/revegetation sites will be conducted between October 1 and January 30. Seeding and planting of container plants will take place immediately after preparation of the restoration sites.
- **Maintenance Plan/Guidelines:** The maintenance plan will include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; (6) replacement planting; ~~and~~ (7) vehicle washing program to capture invasive propagules; and (8) pest management.
- **Monitoring Plan:** The monitoring plan will include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) vegetation performance success criteria, as approved by the USACE, the CDFW, and the applicable RWQCB [including success for species richness: (≥10), native vegetative cover (≥70 percent) and invasive species (≤5 percent)]; (4) biannual reports (i.e., two reports the first year) for the first year will be submitted to the USACE, the CDFW, the applicable RWQCB; and (5) annual reports, which will be submitted to all three agencies and the County for an additional four years after initial planting. The monitoring is planned for five years, but may be shorter or longer depending upon the performance of the mitigation sites.
- **Long-Term Preservation:** Long-term preservation of the mitigation sites will be outlined in the mitigation plan to ensure that they are not impacted by future development. An open space dedication, conservation easement, performance bond, management by the Tejon Ranch Conservancy, or other County-approved method will be used to ensure long-term preservation.
- **Performance Standards:** A statement of mitigation performance standard being met (functional value or acreage ratio) shall be included. These will be developed by conducting a biological functions and values assessment (using an accepted method such as Hydrogeomorphic Modeling [HGM]) to establish a

baseline for the overall biological value of the affected streambeds and riparian areas on the site. Revegetation will be considered successful at five years if the percent cover and species diversity of the restored and/or created habitat areas are similar to percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing, restored, and created habitat areas [for species richness (≥10), native vegetative cover (≥70 percent) and invasive species (≤5 percent)]. Contingency measures shall also be described in the event that mitigation efforts are not successful.

- **Temporary Impacts**: standards for minimizing and restoring temporary impacts, which include recontouring and erosion control for intermittent channels and reseeding requirements for riparian vegetation areas.
- **Cattle Exclusion Methods:** Measures to exclude cattle from habitat creation areas and enhancement areas (where applicable) shall be identified and described.
- **Funding:** The funding source(s) for all proposed mitigation actions shall be identified.

The Streambed and Wetland Habitat Creation and Enhancement Plan shall be subject to approval by the County, the USACE, the CDFW, and the applicable RWQCB for impacts within the respective jurisdictional areas of these agencies. If pro-rated mitigation ratios are used, it shall be demonstrated that the mitigation performance standards have been accomplished. The accomplishment shall be verified by the USACE, the CDFW, and the applicable RWQCB based on the performance standards established above prior to the County's issuance of a grading permit. Implementation of these mitigation measures may serve the dual purpose of satisfying the conditions (or a portion of the conditions) of the agreements/permits of the USACE, the CDFW, and the applicable RWQCB.

The first paragraph of MM 7-13 on page 5.7-190 is hereby revised as follows:

MM 7-13 The Project Applicant/Developer shall develop a Landscaping Plan for review and approval by the County Biologist. The Landscaping Plan shall be (1) prepared by a qualified biologist; (2) submitted to the County for approval with each tentative map; (3) provided to builders; (4) provided to future project occupants as described in the Specific Plan; and (5). which

> includes a plant palette composed of non-invasive species that are adapted to the conditions found on the Project site and do not require high irrigation rates. The Landscaping Plan will also include a list of invasive plant species prohibited from being planted on the Project site. In addition, retail sales of these invasive plant species will be prohibited at any businesses (nurseries) located within the Project site. Landscape plans shall encourage planting of local natives typical of native vegetation within ten miles of the Project site.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The last paragraph of MM 7-13 on page 5.7-190 of the Draft EIR is hereby revised as follows:

> The Homeowners Association shall supply future residents of the Project site with the list of invasive plant species from the Landscaping Plan that will be prohibited from being planted on the Project site and educational materials that emphasize the importance of adhering to the list. The prohibition shall be clearly described and distributed to home buyers through their home purchase contacts and CC&Rs. A list of local native plants and educational materials shall be provided to homeowners and shall be posted on the community intranet.

The second sentence of MM 7-14 on page 5.7-191 is hereby revised as follows:

> The width of the underpass shall be 100 feet as it passes under SR-138 and shall flare out on both sides of the highway as it moves away from SR-138 to a 150-foot width in the Project open space adjacent to the highway.

The following text is hereby added within the first paragraph of MM 7-15 on page 5.7-191 of the Draft EIR:

> Waste and recycling receptacles that discourage foraging by wildlife species adapted to urban environments shall be installed by the Project Applicant/Developer in common areas (i.e., any area where public trash receptacles would be placed, such as parks, sidewalks, community centers, and walking trails) throughout the Project site. Common, residential, and commercial areas will all be served with wildlife resistant trash receptacles.

The second paragraph of MM 7-15 on page 5.7-191 is hereby revised as follows:

> The Homeowners Association shall supply an educational pamphlet to future residents of the Project site regarding: the importance of not feeding wildlife; information stating that trash (containing food) and microtrash that could potentially attract condors should not be accessible to wildlife; the necessity of keeping the ground free of fallen fruit from trees; and instructions about not

leaving pet food outside. Additionally, in order to minimize impacts on native wildlife, the use of rodenticides on the Project site shall be prohibited.

The following paragraph is hereby added after the last paragraph of MM 7-15 on page 5.7-191:

All vertical open pipes used for fence posts, property line stakes, signs, roof veneration, chimneys, vault toilets, and similar structures and metal fence stakes used on the Project site shall be capped. Capping can be accomplished using bolts or other materials to avoid raptor talons becoming entrapped within the bolt holes of metal fence stakes.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The second paragraph of MM 7-15 on page 5.7-191 of the Draft EIR is hereby revised as follows:

The Homeowners Association shall post the information on the community intranet and shall supply an educational pamphlet to future residents of the Project site regarding: the importance of not feeding wildlife; information stating that trash (containing food) and microtrash that could potentially attract condors should not be accessible to wildlife; the necessity of keeping the ground free of fallen fruit from trees; and instructions about not leaving pet food outside. Additionally, in order to minimize impacts on native wildlife, the use of rodenticides on the Project site shall be prohibited. The prohibition shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs.

In the last paragraph of MM 7-16 on page 5.7-192, the text of the fifth control is hereby revised as follows:

(5) Ensuring that all landscape container plants ~~installed within 200 feet of preserved populations~~ are ant free prior to installation to reduce the chance of colonies establishing in areas close to the preserved populations;

The following text is hereby added after the last paragraph of MM 7-16 on page 5.7-192:

Similarly, to preclude the invasion of Argentine ants into Mitigation Preserve lands, "dry zones" of a minimum of 350 feet shall be established between development and the Mitigation Preserve. Soil moistures shall be maintained at levels below about 10 percent soil saturation within dry zones to deter the establishment of nesting colonies of ants. All landscaping materials to be used in these zones shall be inspected and certified as “free” of Argentine ants prior to planting. Additionally, these materials shall be inspected by a qualified restoration specialist for the presence of Argentine ants. Plants or other materials with Argentine ants shall be rejected.

To prevent the establishment of invasive aquatic wildlife such as the American bullfrog (*Lithobates catesbeianus*) and the African clawed frog (*Xenopus laevis*), all Project flood control and other water retention features shall be monitored seasonally and following rain fall events to confirm pooling does not persist for more than 15 days. If such pooling beyond 15 days is detected, including, for example, in artificially created fishing/casting ponds which can only be constructed following issuance of a conditional use permit and further environmental review, the constructed pond location shall be checked routinely for presence of aquatic invasive wildlife by a qualified biologist until the unexpected pooling no longer persists. If detected, eradication measures to remove all invasive aquatic wildlife shall be implemented by the qualified biologist and may include one or more techniques, including trapping, pithing, and pellet shooting.

MM 7-17 on pages 5.7-192 and 5.7-193 is hereby revised as follows:

MM 7-17 The Project Applicant/Developer shall implement a public awareness program (prior to the first occupancy permit) in an effort to restrict public access to the riparian and open space areas on the Project site to designated trails and to prevent unleashed domestic animals from entering these areas. The program's educational materials shall discuss the presence of native animals (e.g., coyote, bobcat, and mountain lion), indicate that those native animals could prey on pets, indicate that no actions shall be taken against native animals should they prey on pets allowed outdoors, and indicate that pets must be leashed while using the designated trail system and/or in any areas within or adjacent to open space. The educational materials shall also discuss the impacts pets can have on native birds. Control of stray and feral cats and dogs will be conducted in open space areas on an as-needed basis. Feral cats and dogs may be trapped and deposited with the local Society for the Prevention of Cruelty to Animals or the Los Angeles County Department of Animal Control. This program shall include signs that identify the boundaries of ecologically sensitive areas (including the avoided special status plant populations described in MM 7-1); the use of temporary, wildlife-friendly fencing around sensitive areas that appear to be receiving a high level of disturbance until the disturbance is reversed; and promotion of public education and awareness of such areas. In addition to signage being located along the boundaries of the Mitigation Preserve, signage denoting the boundaries of ecologically sensitive areas and other pertinent information shall be included along the Pacific Crest Trail where it overlaps the Mitigation Preserve. The Project Applicant/Developer shall be responsible for the initial development of the public

awareness program and installation of interpretive signs and wildlife-friendly fencing. The Homeowners Association, the Project Applicant/Developer, or an acceptable Land Manager/Agency (as approved by the County) shall be responsible for maintaining this program, including signs and wildlife-friendly fencing.

Only passive recreational activities shall be permitted within the designated natural open space areas and shall be restricted to trails. Some areas may allow slightly greater impacts if designated as picnic and/or camping areas.

Domestic cats shall be prohibited from free-roaming (i.e., be allowed outdoors), and shall be required to have a microchip. All dogs shall be required to be leashed while in the designated natural open space areas, and bags for removing pet excrement will be provided at trail entrances and other appropriate locations. In addition, all dogs and cats shall be required to be neutered or spayed; all dogs shall be required to have a microchip; and potential owners shall show evidence prior to entry into the Centennial Development, as required by Los Angeles County Code (Section 10.20.350). These restrictions/features and their purpose will be described within educational material and distributed to new homeowners and made available to all homeowners as needed.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The third paragraph of MM 7-17 on page 5.7-193 of the Draft EIR is hereby revised as follows:

Domestic cats shall be prohibited from free-roaming (i.e., be allowed outdoors), and shall be required to have a microchip. All dogs shall be required to be leashed while in the designated natural open space areas, and bags for removing pet excrement will be provided at trail entrances and other appropriate locations. In addition, all dogs and cats shall be required to be neutered or spayed; all dogs shall be required to have a microchip; and potential owners shall show evidence prior to entry into the Centennial Development, as required by Los Angeles County Code (Section 10.20.350). These restrictions/features and their purpose will be described within educational material and distributed to new homeowners ~~and~~, shall be posted on the community intranet, made available to all homeowners as needed, and shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs.

MM 7-21 on page 5.7-194 is hereby revised as follows:

MM 7-21 In order to ensure that no direct impacts to Significant Ecological Area (SEA) 17 occur, brush clearance zones shall be contained within the current Project impact boundary and no overlap with the adjacent SEA 17 shall occur. Vegetation management for fire abatement purposes is not authorized in SEA areas. An Implementation Plan, including fire risk abatement measures (including but not limited to vegetation management) required to comply with State and County fire prevention and response legal requirements, shall be submitted as part of the tentative tract map for portions of the Project site that border an SEA or mitigation preserve area. The Plan shall include: (a) a summary of applicable State and County fire risk abatement requirements; (b) a prohibition on the use of vegetation clearance within SEA 17 or mitigation preserve areas. The Plan shall be submitted to the County for approval with the first tentative map, and shall be updated to include new or modified State or County fire risk abatement requirements as part of each subsequent tentative tract map submittal. ~~The Plan shall include this prohibition on vegetation clearance within these biologically sensitive areas.~~

MM 7-22 on page 5.7-194 is hereby revised as follows:

MM 7-22 If a golf course is developed as part of Project implementation, the Project Applicant/Developer shall prepare a Golf Course Management Plan that requires any golf course developed on the site to incorporate the design and management measures consistent ~~be built and managed in accordance~~ with the Audubon Cooperative Sanctuary Program for Golf Courses (or equivalent), which is a cooperative effort between the United States Golf Association and Audubon International that is designed to promote ecologically sound land management and to conserve natural resources (see Appendix 5.7-E). The Plan shall be submitted to the County for approval with any tentative map that includes a golf course.

MM 7-23 is hereby added immediately after MM 7-22 as follows:

MM 7-23 Notwithstanding any provision of the Centennial Specific Plan to the contrary, land designated by the Centennial Specific Plan as On-Site Mitigation Preserve, Off-Site Mitigation Preserve, Disturbed Green Space, and Undisturbed Green Space shall only be used in a manner consistent with the following land use restrictions:

On-Site Mitigation Preserve: Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Off-Site Mitigation Preserve: Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Disturbed Green Space: Uses within Disturbed Green Space shall be restricted to one or more of the following: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities.

> Undisturbed Green Space: Uses within Undisturbed Green Spaces shall be restricted to one or more of the following: continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The second and third paragraphs of MM 7-23 are hereby revised as follows:

> On-Site Mitigation Preserve: Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the ~~Mitigation Preserve~~ Ranch-wide Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan strictly for resource management values.
>
> Off-Site Mitigation Preserve: Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed,

Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the ~~Mitigation Preserve~~ Ranch-wide Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan strictly for resource management values.

The following revision is hereby made to the last reference on page 5.7-197:

California Department of Fish and Game (CDFG). ~~2010~~ 2003 (September). *List of Vegetation Alliances and Associations, Vegetation Classification and Mapping Program.* Sacramento, CA: CDFG.

Section 5.9 – Population, Housing, and Employment

The second full paragraph on page 5.9-27 is hereby revised as follows:

Since the Project's estimated population of 57,150 residents would represent 14.1 percent of the buildout population of the Antelope Valley's unincorporated area, the Project would not be taking up a large portion of future growth planned for the area. Rather, it would result in a population increase that would be in accordance with County projections and, within the context of County planning, would not lead to substantial unanticipated growth on the Project site or in the Antelope Valley.

Section 5.10 – Traffic, Access, and Circulation

All references to the "Centennial Transportation Improvement Program" or "CTIP" are hereby revised throughout the Draft EIR as follows:

~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement

Four new rows are hereby added to at the top of Table 5.10-2 on page 5.10-17 as follows:

TABLE 5.10-2
CAPACITIES FOR FREEWAYS AND EXPRESSWAYS – EXISTING CONDITIONS

Location		Lanes	MSF	f_W	P_T	E_T	f_{HV}	f_P	SF/ Lane
I-5									
90	Btw. Bear Mountain & Old Rive	2M	2,400	1.0	29%	1.5	0.87	1.00	2,096
91	Btw. Old Rive & Copus Rd	2M	2,400	1.0	29%	1.5	0.87	1.00	2,096
92	Btw. Copus Rd & Maricopa Hwy	2M	2,400	1.0	29%	1.5	0.87	1.00	2,096
93	Btw. Maricopa Hwy & SR-99	2M	2,400	1.0	29%	1.5	0.87	1.00	2,096
1	Btw SR-99 and Laval/Wheeler	4M	2,400	1.0	22%	1.5	0.90	0.95	2,050

Four new rows are hereby added at the top of Table 5.10-4 on page 5.10-24 and the AADT for Intersections 1, 2 and 3a is hereby revised as follows:

TABLE 5.10-4
EXISTING (2014 AND 2015) FREEWAY PEAK HOUR VOLUMES AND V/C SUMMARY – NORTHBOUND AND EASTBOUND

Location		AADT Volume (2-Way)	Northbound/Eastbound					
			Lanes	Total Capacity	AM Vol	AM V/C	PM Vol	PM V/C
I-5								
90	Btw. Bear Mountain & Old River Rd	36,000	2M	4,192	685	0.16	840	0.20
91	Btw. Old River Rd & Copus Rd	36,000	2M	4,192	689	0.16	844	0.20
92	Btw. Copus Rd & Maricopa Hwy	36,000	2M	4,192	695	0.17	851	0.200
93	Btw. Maricopa Hwy & SR-99	37,000	2M	4,192	627	0.15	425	0.10
1	Btw SR-99 and Laval/Wheeler	82~~75~~,000	4M	8,200	1,561	0.19	2,158	0.26
2	Btw Laval/Wheeler and Grapevine	75~~74~~,000	4M	8,200	1,570	0.19	2,051	0.25
3a	Btw. Grapevine and Fort Tejon Rd (Mixed-flow)	51~~50~~,000	2M	4,412	1,013	0.23	1,362	0.31

Four new rows are hereby added at the top of Table 5.10-5 on page 5.10-28 and the AADT for Intersections 1, 2 and 3a is hereby revised as follows:

TABLE 5.10-5
EXISTING (2014 AND 2015) FREEWAY PEAK HOUR VOLUMES AND V/C SUMMARY – SOUTHBOUND AND WESTBOUND

Location		AADT Volume (2-Way)	Southbound/Westbound					
			Lanes	Total Capacity	AM Vol	AM V/C	PM Vol	PM V/C
I-5								
90	Btw. Bear Mountain & Old River Rd	36,000	2M	4,192	664	0.16	833	0.20
91	Btw. Old River Rd & Copus Rd	36,000	2M	4,192	668	0.16	838	0.20
92	Btw. Copus Rd & Maricopa Hwy	36,000	2M	4,192	673	0.16	845	0.20
93	Btw. Maricopa Hwy & SR-99	37,000	2M	4,192	242	0.06	377	0.09
1	Btw SR-99 and Laval/Wheeler	8275,000	4M	8,200	1,461	0.18	1,884	0.23
2	Btw Laval/Wheeler and Grapevine	7574,000	4M	8,200	1,422	0.17	1,780	0.22
3a	Btw Grapevine and Fort Tejon Rd	5150,000	2M	4,140	880	0.21	1,038	0.25

The second full paragraph on page 5.10-36 is hereby revised as follows:

> There is no implementation schedule for the NW SR-138 Project; however, the draft EIR/EIS for the proposed improvements was made available for public review in July 2016. The draft NW SR-138 EIR/EIS, TAR and ICE Report ~~do~~ did not identify a preferred alternative and Caltrans deferred the selection of a preferred alternative to the Final EIR/EIS. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 would include a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. Caltrans has also reserved the right to determine the specific preferred intersection control based on the traffic and safety data at the time the improvements occur. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The last row of Table 5.10-8 on page 5.10-41 is hereby revised as follows:

TABLE 5.10-8
VOLUME/CAPACITY RATIO LEVEL OF SERVICE RANGES

LOS	V/C Ratio Range	
	Arterial Roads and Intersections[a]	**Freeway Segments (FFS = 75 mph)[b]**
A	0.00–0.60	0.00–0.34
B	0.61–0.70	0.35–0.56
C	0.71–0.80	0.57–0.76
D	0.81–0.90	0.77–0.90
E	0.91–1.00	0.91–1.00
F	Above 1.00	Above 1.00

LOS: Level of Service; V/C Ratio: volume-to-capacity ratio; FFS: free flow speed; mph: miles per hour

[a] Traffic Impact Analysis Report Guidelines

[b] Highway Capacity Manual 2010

Source: Stantec 2017 (Table 1-2).

The first sentence under "Impact Criteria for Freeway Mainline Segments" on page 5.10-41 is hereby revised as follows:

> The impact analysis for freeway mainline segments is based on peak hour volumes by direction for SR-14 and I-5.

The first sentence on page 5.10-43 is hereby revised as follows:

> To achieve conformity in the evaluation of freeway mainline segments and acknowledging that there exist some such rural segments as described above within the study area, Caltrans has agreed that, for evaluation of the study area for the Project, LOS E is to be uniformly utilized as the performance criterion for freeways studied for the purpose of determining significant Project impacts within the study area, with the following exception:

The third sentence under "On-Site Impacts" on page 5.10-51 is hereby revised as follows:

> It is estimated that 40 percent of the trips made on-site would be 3 miles or less in length, ~~which is a comfortable biking distance that most people can make in less than 15 to 20 minutes,~~ and close to 70 percent of the trips would be 4 miles or less, which are comfortable biking distances that most people can make in less than 15 to 20 minutes.

The following edits were identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The last sentence of the fourth full paragraph on page 5.10-52 of the Draft EIR is hereby revised as follows:

> In the event that a CTIP is not entered into, MM 10-3, MM 10-6 through MM 10-~~28~~ 24, and MMs 10-~~31~~ 27 through 10-~~45~~ 41 require that the Project Applicant contribute fair share funding towards the improvements required to mitigate for Project impacts.

The first sentence of the second paragraph under "Off-Site Impacts, Existing Plus Project Scenario" on page 5.10-53 is hereby revised as follows:

> An evaluation of the off-site impacts to SR-138 ~~roadway segments and intersections~~ and freeway mainline segments, freeway ~~and~~ ramps and arterial intersections due to buildout of the Specific Plan under existing plus Project conditions was prepared by directly adding the traffic that would be generated by the Project to existing conditions.

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Table 5.10-21 on page 5.10-57 are hereby revised as follows:

TABLE 5.10-21
FREEWAY/EXPRESSWAY VOLUME AND CAPACITY SUMMARY – EXISTING (2014 AND 2015) PLUS PROJECT WITH EXISTING LANES

	Location	ADT Volume	Northbound/Eastbound							Southbound/Westbound							LOS Threshold	Project Impact?
			Lanes	Cap/ Lane	Total Cap	AM Vol	AM V/C	PM Vol	PM V/C	Lanes	Cap/ Lane	Total Cap	AM Vol	AM V/C	PM Vol	PM V/C		
I-5																		
90	Btw. Bear Mountain & Old River Rd		2M							2M							LOS D	
	2015 Count	36,000		2,096	4,192	685	0.16	840	0.20		2,096	4,192	664	0.16	833	0.20		
	Project Traffic	1,700				31		2					121		30			
	2015 + Full Project	37,700		2,096	4,192	716	0.17	842	0.20				785	0.19	863	0.21		
	Project V/C						0.01		0.00					0.03		0.01		
91	Btw. Old River Rd & Copus Rd		2M							2M							LOS D	
	2015 Count	36,000		2,096	4,192	689	0.16	844	0.20		2,096	4,192	668	0.16	838	0.20		
	Project Traffic	1,800				33		6					127		34			
	2015 + Full Project	37,800		2,096	4,192	722	0.17	850	0.20				795	0.19	872	0.21		
	Project V/C						0.01		0.00					0.03		0.01		
92	Btw. Copus Rd & Maricopa Hwy		2M							2M							LOS D	
	2015 Count	36,000		2,096	4,192	695	0.17	851	0.20		2,096	4,192	673	0.16	845	0.20		
	Project Traffic	1,900				35		10					133		38			
	2015 + Full Project	37,900		2,096	4,192	730	0.17	861	0.21				806	0.19	883	0.21		
	Project V/C						0.00		0.00					0.03		0.01		
93	Btw. Maricopa Hwy & SR-99		2M							2M							LOS D	
	2015 Count	37,000		2,096	4,192	627	0.15	425	0.10		2,096	4,192	242	0.06	377	0.09		
	Project Traffic	2,100				37		18					140		42			
	2015 + Full Project	39,100		2,096	4,192	664	0.16	443	0.11				382	0.09	419	0.10		
	Project V/C						0.01		0.00					0.03		0.01		
1	Btw SR-99 and Laval/Wheeler		4M							4M								
	2015 Count	8275,000		2,050	8,200	1,561	0.19	2,158	0.26		2,050	8,200	1,461	0.18	1,884	0.23		
	Project Traffic	8,300				168		206					489		251		LOS D	
	2015 + Full Project	9083,300		2,050	8,200	1,729	0.21	2,364	0.29		2,050	8,200	1,950	0.24	2,135	0.26		
	Project V/C						0.02		0.03					0.06		0.03		
2	Btw Laval/Wheeler and Grapevine		4M							4M								
	2015 Count	7574,000		2,050	8,200	1,570	0.19	2,051	0.25		2,050	8,200	1,422	0.17	1,780	0.22		
	Project Traffic	8,800				198		256					509		301		LOS D	
	2015 + Full Project	8382,800		2,050	8,200	1,768	0.22	2,307	0.28		2,050	8,200	1,931	0.24	2,081	0.25		
	Project V/C						0.03		0.03					0.07		0.03		
3a	Btw Grapevine and Fort Tejon Rd (MF)		2M							2M								
	2015 Count	5157,000		2,206	4,412	1,013	0.23	1,362	0.31		2,070	4,140	880	0.21	1,038	0.25		
	Project Traffic	8,200				139		204					387		267		LOS D	
	2015 + Full Project	5958,200		2,206	4,412	1,152	0.26	1,566	0.35		2,070	4,140	1,267	0.31	1,305	0.32		
	Project V/C						0.03		0.04					0.10		0.07		
3b a	Btw Grapevine and Fort Tejon Rd (MF + Truck lane)		2T							2T								
	2015 Count	24,000		1,025	2,b050	528	0.26	673	0.33		1,025	2,050	518	0.25	744	0.36		
	Project Traffic	1,600				89		102					151		94		LOS D	
	2015 + Full Project	25,600		1,025	2,050	617	0.30	775	0.38		1,025	2,050	669	0.33	838	0.41		
	Project V/C						0.04		0.05					0.08		0.05		

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The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. Number 4 on page 5.10-85 is hereby revised as follows:

~~4. **290th St W and SR-138**~~	~~Widen SR-138 to a four-lane highway from westerly Project entrance to 290th Street West, with auxiliary lanes between intersections, resulting in three through lanes in the WB and EB directions. Additional intersection improvements include two EB left-turn lanes, one WB right-turn lane, two SB left-turn and two SB right-turn lanes. Install traffic signal. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative). (MM 10-10 and Traffic Study MM-5)~~

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. Number 9 on page 5.10-86 is hereby revised as follows:

~~9. **190th St W and SR-138**~~	~~Widen SR-138 to a four-lane highway from 290th Street West to 190th Street West with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions. Additional improvements include adding one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left-turn lane and one dedicated EB right-turn lane. Install traffic signal. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative). (MM 10-15 and Traffic Study MM-10)~~

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. Number 11 on page 5.10-87 is hereby revised as follows:

~~11.~~ **~~110th St W and SR-138~~**	~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in two through lanes in the WB and EB directions at the intersection. Additional improvements include one EB left-turn lane, one WB left-turn lane, two NB left-turn lanes, one SB left-turn lane and two SB right-turn lanes. Install traffic signal. Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative). (MM 10-17 and Traffic Study MM-12)~~

The following edits were identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. Number 14 on page 5.10-87 is hereby revised as follows:

14. **~~30th St W~~ <u>SR-14</u> and SR-138**	~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in two through lanes in the WB and EB directions at the intersection. Additional improvements include adding one EB left-turn lane and one WB left-turn lane.~~ <u>Installation of traffic signals at the NB off-ramp and the SB off-ramp at the SR-14 and SR-138 interchange.</u> Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-~~20~~ <u>17</u> and Traffic Study MM-15)

Table 5.10-25 on page 5.10-93 is hereby revised as follows:

TABLE 5.10-25
FREEWAY VOLUME AND CAPACITY SUMMARY – CUMULATIVE (2035 AND 2040) CONDITIONS WITH AND WITHOUT THE PROJECT

Location	ADT Volume	NORTHBOUND/EASTBOUND							SOUTHBOUND/WESTBOUND							LOS Threshold	Project Impact?
		Lanes	Cap/ Lane	Total Cap	AM Vol	AM V/C	PM Vol	PM V/C	Lanes	Cap/ Lane	Total Cap	AM Vol	AM V/C	PM Vol	PM V/C		
I-5																	
90 Btw. Bear Mountain & Old River Rd		2M							2M							LOS D	
2015 Count	36,000		2,096	4,192	685	0.16	840	0.20		2,096	4,192	664	0.16	833	0.20		
2040 Without Project	45,000		2,096	4,192	2,380	0.57	2,540	0.61		2,096	4,192	1,800	0.43	2,330	0.56		
2040 With Project	46,000		2,096	4,192	2,450	0.58	2,540	0.61		2,096	4,192	1,800	0.43	2,400	0.57		
Project Traffic & V/C	1,000				70		0					0		70			
91 Btw. Old River Rd & Copus		2M							2M							LOS D	
2015 Count	36,000		2,096	4,192	689	0.16	844	0.20		2,096	4,192	668	0.16	838	0.20		
2040 Without Project	47,000		2,096	4,192	2,400	0.57	2,560	0.61		2,096	4,192	1,820	0.43	2,340	0.56		
2040 With Project	48,000		2,096	4,192	2,470	0.59	2,560	0.61		2,096	4,192	1,820	0.43	2,410	0.57		
Project Traffic & V/C	1,000				70		0					0		70			
92 Btw. Copus & Maricopa Hwy		2M							2M							LOS D	
2015 Count	36,000		2,096	4,192	695	0.17	851	0.20		2,096	4,192	673	0.16	845	0.20		
2040 Without Project	48,000		2,096	4,192	2,410	0.57	2,580	0.62		2,096	4,192	1,840	0.44	2,350	0.56		
2040 With Project	49,000		2,096	4,192	2,490	0.59	2,580	0.62		2,096	4,192	1,840	0.44	2,420	0.58		
Project Traffic & V/C	1,000				80		0					0		70			
93 Btw. Maricopa Hwy & SR-99		2M							2M							LOS D	
2015 Counts	34,000		2,096	4,192	630	0.15	430	0.10		2,096	4,192	240	0.06	380	0.09		
2040 Without Project	48,000		2,096	4,192	2,440	0.58	2,740	0.65		2,096	4,192	2,040	0.49	2,380	0.57		
2040 With Project	49,000		2,096	4,192	2,520	0.60	2,740	0.65		2,096	4,192	2,040	0.49	2,470	0.59		
Project Traffic & V/C	1,000				80		0					0		90			
1 Btw SR-99 and Laval/Wheeler		4M							4M								
2015 Count	8275,000		2,050	8,200	1,561	0.19	2,158	0.26		2,050	8,200	1,461	0.18	1,884	0.23		
2040 Without Project	114,300110, 250		2,050	8,200	5,250120	0.6462	6,730570	0.8280		2,050	8,200	4,79054 0	0.5855	6,33017 0	0.7775	LOS D	
2040 With Project	118,250		2,050	8,200	5,420	0.66	6,730	0.82		2,050	8,200	4,810	0.59	6,690	0.82		
Project Traffic & V/C	3,9508,000		2,050	8,200	170300	0.0204	160	0.02		2,050	8,200	270	0.014	360520	0.057		
2 Btw Laval/Wheeler and Grapevine		4M							4M								
2015 Count	7574,000		2,050	8,200	1,570	0.19	2,051	0.25		2,050	8,200	1,422	0.17	1,780	0.22		
2040 Without Project	108,500105, 450		2,050	8,200	5,090	0.62	6,250	0.76		2,050	8,200	4,580	0.56	5,560	0.68	LOS D	
2040 With Project	114,450		2,050	8,200	5,420	0.66	6,450	0.79		2,050	8,200	4,880	0.60	6,140	0.75		
Project Traffic & V/C	5,9509,000				330	0.04	200	0.03				300	0.04	580	0.07		
3a Btw Grapevine and Fort Tejon Rd (MF)		2M							2M								
2015 Count	5150,000		2,206	4,412	1,013	0.23	1,362	0.31		2,070	4,140	880	0.21	1,238	0.30		
2040 Without Project	6263,400		2,206	4,412	3,260	0.74	5,310	1.20		2,070	4,140	3,310	0.80	4,250	1.03	LOS D	
2040 With Project	70,800		2,206	4,412	3,500	0.79	5,500	**1.25**		2,070	4,140	3,520	0.85	4,650	**1.12**		Yes
Project Traffic & V/C	87,400				240	0.05	190	0.05				210	0.05	400	0.09		
3b a Btw Grapevine and Fort Tejon Rd (MF + Truck lane)		2T							2T								
2015 Count	24,000		1,025	2,050	528	0.26	673	0.33		1,025	2,050	518	0.25	744	0.36		
2040 Without Project	33,900		1,025	2,050	900	0.44	990	0.48		1,025	2,050	950	0.46	930	0.45	LOS D	
2040 With Project	36,500		1,025	2,050	1,020	0.50	1,050	0.51		1,025	2,050	1,060	0.52	1,160	0.57		
Project Traffic & V/C	2,600				120	0.06	60	0.03				110	0.06	230	0.12		

Rows 11 through 13 of Table 5.10-25 on page 5.10-94 are hereby revised as follows:

11	Btw Smokey Bear Rd and Vista Del Lago Rd		4M							4M								
	2014 Count	70,000		1,489	5,957	1,351	0.23	2,359	0.40		1,489	5,957	1,309	0.22	2,240	0.38		
	2035 Without Project	110,000		1,489	5,957	2,110~~330~~	0.3~~539~~	4,150	0.70		1,489	5,957	2,980	0.50	3,070~~23~~ ~~0~~	0.52~~54~~	LOS D	
	2035 With Project	129,000		1,489	5,957	2,490	0.42	5,500	**0.92**		1,489	5,957	4,390	0.74	3,610	0.61		Yes
	Project Traffic & V/C	19,000				380~~160~~	0.0~~703~~	1,350	0.22				1,410	0.24	540~~380~~	0.09~~07~~		
12	Btw Vista Del Lago Rd and Templin Hwy		4M							4M								
	2014 Count	70,000		1,489	5,957	1,351	0.23	2,359	0.40		1,489	5,957	1,309	0.22	2,240	0.38		
	2035 Without Project	110~~117~~,000		1,489	5,957	2,110~~330~~	0.3~~539~~	4,150	0.70		1,489	5,957	2,980	0.50	3,070~~23~~ ~~0~~	0.52~~54~~	LOS D	
	2035 With Project	129,000		1,489	5,957	2,490	0.42	5,500	**0.92**		1,489	5,957	4,390	0.74	3,610	0.61		Yes
	Project Traffic & V/C	19~~12~~,000				380~~160~~	0.0~~703~~	1,350	0.22				1,410	0.24	540~~380~~	0.09~~07~~		
13	Btw Templin Hwy and Lake Hughes Rd		4M							4M								
	2014 Count	70,000		1,489	5,957	1,351	0.23	2,359	0.40		1,489	5,957	1,309	0.22	2,240	0.38		
	2035 Without Project	111~~114~~,000		1,489	5,957	2,190~~410~~	0.37~~40~~	4,160	0.70		1,489	5,957	2,930	0.49	3,140~~30~~ ~~0~~	0.53~~55~~	LOS D	
	2035 With Project	130,000		1,489	5,957	2,530	0.42	5,500	**0.92**		1,489	5,957	4,350	0.73	3,640	0.61		Yes
	Project Traffic & V/C	19~~16~~,000				340~~120~~	0.05~~02~~	1,340	0.22				1,420	0.24	500~~340~~	0.08~~06~~		

Rows 70 and 71 of Table 5.10-25 on page 5.10-99 are hereby revised as follows:

SR-99																		
70	Btw Jct SR-58 W and California		4M							4M								
	2015 Count	104,110		2,246	8,985	3,848	0.43	6,276	0.70		2,246	8,985	4,004	0.45	6,694	0.75		
	2040 Without Project	125~~126~~,890		2,246	8,985	4,928~~808~~	0.55~~54~~	7,522~~8,0~~ ~~42~~	0.84~~90~~		2,246	8,985	5,393~~44~~ ~~3~~	0.60~~61~~	7,712~~70~~ ~~2~~	0.86	LOS E	
	2040 With Project	127,890		2,246	8,985	4,948	0.55	7,452	0.83		2,246	8,985	5,413	0.60	7,802	0.87		
	Project Traffic & V/C	2~~1~~,000				20~~140~~	0.0~~1~~	(70~~590~~)	(0.01~~07~~)				20~~(30)~~	0.0~~(0.01)~~	90~~100~~	0.01		
71	Btw California and Jct SR-58 E		4M							4M								
	2015 Count	89,700		2,246	8,985	3,392	0.38	5,263	0.59		2,246	8,985	3,390	0.38	5,895	0.66		
	2040 Without Project	105~~106~~,855		2,246	8,985	4,090~~3,9~~ ~~70~~	0.46~~44~~	6,325~~335~~	0.70~~71~~		2,246	8,985	4,354~~39~~ ~~4~~	0.48~~49~~	6,712~~70~~ ~~2~~	0.75	LOS E	
	2040 With Project	107,855		2,246	8,985	4,120	0.46	6,255	0.70		2,246	8,985	4,374	0.49	6,822	0.76		
	Project Traffic & V/C	2~~1~~,000				30~~150~~	0.0~~2~~	(70~~80~~)	(0.0~~1~~)				(20~~)~~	0.01~~00~~	110~~120~~	0.01		

The following edits were identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The last sentence of the last paragraph on page 5.10-103 is hereby revised as follows:

> MM 10-~~31~~ 27 requires fair share funding for the addition of one auxiliary lane in each direction between Lake Hughes and Parker roads, the addition of one HOV or HOT lane in each direction between Parker Road and SR-14, and MM 10-~~28~~ 24 for the strengthening and widening of the inside and outside shoulders of I-5 between the Fort Tejon and Grapevine Road and SR-138 and Lake Hughes Road interchanges.

The second through fourth rows of Table 5.10-27 on page 5.10-108 are hereby revised as follows:

Laval/Wheeler West NB Off Ramp								Laval/Wheeler Ridge West SB On Ramp							
Existing	1,450	1	1,500	50	0.03	80	0.05	Existing	6,200	1	1,500	270	0.18	330	0.22
2040 No Project	967	1	1,500	90	0.06	50	0.03	2040 No Project	7,667	1	1,500	430~~620~~	0.29~~41~~	430~~610~~	0.29~~41~~
2040 With Project	1,667	1	1,500	140	0.09	110	0.07	2040 With Project	9,067	1	1,500	710	0.47	650	0.43
Project Traffic & V/C	700			50	0.03	60	0.04	Project Traffic & V/C	1,400			28~~0~~90	0.18~~06~~	22~~0~~40	0.14~~02~~
Laval/Wheeler East NB Off Ramp								Grapevine SB On Ramp Loop							
Existing	3,850	1	1,500	170	0.11	260	0.17	Existing	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2040 No Project	5,000~~100~~	1	1,500	470~~540~~	0.31~~36~~	330~~420~~	0.22~~28~~	2040 No Project	5,600	1	1,500	230	0.15	620	0.41
2040 With Project	7,000	1	1,500	580	0.39	470	0.31	2040 With Project	6,200	1	1,500	280	0.19	650	0.43
Project Traffic & V/C	2,000~~1,900~~			110~~40~~	0.08~~03~~	140~~50~~	0.09~~03~~	Project Traffic & V/C	600			50	0.04	30	0.02
Grapevine NB Off Ramp								Grapevine SB On Ramp							
Existing	1,750	1	1,500	50	0.03	40	0.03	Existing	1,200	1	1,500	40	0.03	50	0.03
2040 No Project	9~~11~~,467	1	1,500	620	0.41	1,010	0.67	2040 No Project	4,600	1	1,500	330	0.22	360	0.24
2040 With Project	11,667	1	1,500	680	0.45	1,070	0.71	2040 With Project	5,200	1	1,500	390	0.26	390	0.26
Project Traffic & V/C	2,400~~200~~			60	0.04	60	0.04	Project Traffic & V/C	600			60	0.04	30	0.02

The last row of Table 5.10-29 on page 5.10-124 is hereby revised as follows:

TABLE 5.10-29
ICU AND LOS SUMMARY – EXISTING (2014 & 2015) CONDITIONS AND CUMULATIVE (2035) WITH PROJECT COMPARISON (LOS ANGELES COUNTY SR-138 INTERSECTIONS)

Intersection	Jurisdiction	Control	Existing (2014 & 2015) Conditions				Cumulative (2035) With Project				ICU Difference	
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour			
			ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	AM	PM
1. Westerly Access & SR-138	LA County/ Caltrans	NA	NA[1]	NA[1]	NA[1]	NA[1]	0.98	E	1.20	F	NA[1]	NA[1]
2. Central Access & SR-138	LA County/ Caltrans	NA	NA[1]	NA[1]	NA[1]	NA[1]	1.11	F	1.22	F	NA[1]	NA[1]
3. 300th St W & SR-138[2]	LA County/ Caltrans	North leg stop	0.17	A	0.20	A	0.98	D	1.04	F	**0.81**	**0.84**
4. 290th St W & SR-138	LA County/ Caltrans	No control	0.18	A	0.20	A	0.86	D	1.04	F	**0.68**	**0.84**
7. 245th St W & SR-138	LA County/ Caltrans	South leg stop	0.17	A	0.19	A	1.84	F	1.86	F	**1.67**	**1.67**
9. 190th St W & SR-138	LA County/ Caltrans	North/South leg stop	0.17	A	0.19	A	1.65	F	1.81	F	**1.48**	**1.62**
11. 110th St W & SR-138	LA County/ Caltrans	North/South leg stop	0.17	A	0.21	A	1.68	F	1.83	F	**1.51**	**1.62**
13. 60th St W & SR-138[2]	LA County/ Caltrans	North/South leg stop	0.22	A	0.25	A	2.03	F	2.46	F	**1.81**	**2.21**

ICU = Intersection Capacity Utilization; LOS = level of service; NA – not applicable
[1] not an existing intersection
[2] denotes Los Angeles CMP route and cross street
Note: The SR-138 freeway/expressway configuration results in a reduced number of access locations to the SR-138 due to expressway intersection spacing requirements.
Boldface type – denotes significant impact.
Performance Criteria is outlined in Table 5.10-12 (Table 1-6 of Traffic Study).

Source: Stantec 2017 (Table 4-9).

The two full paragraphs on page 5.10-130 are hereby revised as follows:

> The on-site roadway network has been designed to accommodate projected traffic from proposed land uses. Impacts on the internal roadway system would be less than significant after mitigation. If improvements at Project access points on SR-138 are not constructed, impacts would be significant and unavoidable. Project buildout would result in significant traffic impacts on off-site roadways and freeways, including SR-138, I-5 mainline segments and interchange ramps, and arterial roadway intersections (see Table 5.10-~~30~~32 below). Mitigation measures have been identified to reduce all significant Project impacts, as listed in Table 5.10-~~31~~33, Mitigation Summary. In addition, MM 10-~~23~~20 would protect the right-of-way needed to widen and realign SR-138.
>
> Although mitigation measures identified for Caltrans facilities would reduce Project impacts, it is outside the control of the County of Los Angeles to implement these measures. The ~~CTIP~~ Traffic Mitigation Agreement or the Project Applicant's fair share contribution requirements in MM 10-3 and MMs 10-6 through 10-~~28~~24 and MMs 10-~~31~~27 through 10-4~~5~~41 will provide funding for the planning, design, and construction of certain improvements. MM 10-4 requires the Project Applicant to work to establish a funding program to collect fair share contributions from other projects for the required improvements. Compliance with these mitigation measures would reduce traffic impacts to a less than significant level. Potential Project impacts would be significant and unavoidable, however, if the improvements are not constructed by Caltrans because the County (as the Lead Agency) lacks jurisdiction and control over State highway facilities and cannot mandate the construction of improvements to these facilities.

Table 5.10-33 on pages 5.10-132 through 5.10-134 is hereby revised as follows:

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation **SR-138**
Existing Plus Project Mitigation • Improve SR-138 to a four lane expressway from I-5 to 240th Street West and to a limited access conventional four-lane highway from 240th Street West to 190th Street West, with right-of-way reserved for a six-lane expressway between I-5 and 300th Street West or comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-6/Traffic Study MM-1) • Intersection improvements from the westerly access of the Centennial Specific Plan area to SR-14 ~~30th Street West or~~ comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o Specific Plan Westerly Access and SR-138 o Specific Plan Central Access and SR-138 o 300th Street West and SR-138 ~~o 290th Street West and SR-138~~ o Margalo Drive and SR-138 o Three Points and SR-138 o ~~245th~~ 250th Street West and SR-138 o ~~230th~~ 210th Street West and SR-138 ~~o 190th Street West and SR-138~~ o 170th Street West and SR-138 ~~o 110th Street West and SR-138~~ o 90th Street West and SR-138 o 60th Street West and SR-138 ~~o 30th Street West and SR-138~~ **Cumulative Conditions Mitigation** • Dedicate right-of-way within the Project site at each site access location to accommodate the ultimate intersection or interchange configuration as determined by the Northwest 138 Corridor Improvement project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~ (MM 10-20~~23~~/Supplemental Traffic Study MM-18) • To accommodate up to 75 percent of the Project and anticipated cumulative development, ~~C~~contribute fair share of adding one lane in both directions (six lanes total) on SR-138 from I-5 to 300th Street West and one lane in both directions (four lanes total) on SR-138 from 300th Street West to the SR-14 interchange (in addition to above), or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-22~~24~~/Supplemental Traffic Study MM-19) • To accommodate 100 percent of the Project and anticipated cumulative development, ~~C~~contribute fair share of adding a second additional ~~one auxiliary~~ lane in both directions (six lanes total) on SR-138 from 300th Street West to approximately ½ mile east of 250th~~245th~~ Street West (in addition to above), or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-23~~25~~/Supplemental Traffic Study MM-20) • Fair share participation and/or contribution to the Kern COG RTP/SCS improvement projects on SR-58 between I-5 in Kern County and I-15 in San Bernardino County, which could include development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors. (MM 10-24~~26~~/Traffic Study MM-21) • ~~Fair share participation and/or contribution to the SR-138 improvements to a limited access facility with grade-separated interchanges, consistent with the County's analysis of the AVAP, or fair share participation and/or contribution to the SR-138 improvements (freeway/ expressway or expressway/limited access conventional highway) being advanced by Caltrans in the Northwest 138 Corridor Improvement project (specific improvements pending Caltrans selection of a preferred alternative). (MM 10-27/Traffic Study MM-22)~~ • ~~Fair share participation and/or contribution to strengthening and widening the inside and outside shoulders of I-5 between the Fort Tejon and Grapevine Road interchanges and between the SR-138 and Lake Hughes Road interchanges. (MM 10-28/Traffic Study MM-23)~~
I-5
Cumulative Conditions Mitigation • On-Site Transportation Management Association (TMA) that would coordinate and manage the following programs: (MM 10-25~~29~~/Traffic Study MM-24) 1. Ride Share Program 2. Transit Program 3. Commuter Bus Program • Contribute fair share to planned freeway mainline improvements for the following segments: (MM 10-27~~31~~/Traffic Study MM-25) 1. Between Parker Road and SR-14 – add one HOV or HOT lane in each direction. 2. Between Lake Hughes and Parker – add one auxiliary lane in each direction. • Fair share participation and/or contribution to the development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors between I-5 in Kern County and I-15 in San Bernardino County. (MM 10-24~~26~~/Traffic Study MM-26)
I-5/SR-138 Interchange
Existing Plus Project Mitigation • To mitigate the westbound SR-138 to SB I-5 connector ramp, construct one auxiliary lane to the I-5 mainline, or contribute fair share to the SR-138/I-5 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-18~~21~~/Traffic Study MM-16) **Cumulative Conditions Mitigation** • To mitigate the westbound SR-138 to SB I-5 connector ramp, contribute fair-share to the construction of two auxiliary lanes to the I-5 mainline, or contribute fair share to the SR-138/I-5 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-28~~32~~/Traffic Study MM-27) • To mitigate the northbound I-5 to eastbound SR-138 connector ramp, contribute fair share to the construction of two auxiliary lanes to the I-5 mainline before the northbound I-5 to eastbound SR-138 connector ramp, or contribute fair share to the SR-138/I-5 connector ramps improvements being

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-29~~33~~/Traffic Study MM-28)
SR-14/SR-138 Interchange
Cumulative Conditions Mitigation • Contribute fair share to the construction of one mainline auxiliary lane and a second off-ramp lane for the SR-14 northbound off ramp to SR-138, or contribute fair share to the SR-138/SR-14 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-30~~34~~/Traffic Study MM-29) • Contribute fair share to the construction of a second lane on the SR-14 southbound on-ramp from SR-138, or contribute fair share to the SR-138/SR-14 connector ramps improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~. (MM 10-31~~35~~/Traffic Study MM-30)
Off-Site Intersections
Existing Plus Project Mitigation • Contribute fair-share to recommended mitigation measures at the following intersections, or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o Intersection improvements from the westerly access of the Centennial Specific Plan area to the SR-14 interchange ~~30th Street West~~ (MMs 10-7 through 10-17~~20~~/Supplemental Traffic Study MM-2 through MM-15) o I-5 SB Ramps and Sedona/The Old Road (Intersection 26) (MM 10-19~~22~~/Traffic Study MM-17) **Cumulative Conditions Mitigation** • Contribute fair-share to recommended mitigation measures at the following intersections, or contribute fair share to the SR-138 improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~: o SR-14 SB Ramps and SR-138 (Caltrans Intersection) (MM 10-32~~36~~/Supplemental Traffic Study MM-31) o SR-14 NB Ramps and SR-138 (Caltrans Intersection) (MM 10-33~~37~~/Supplemental Traffic Study MM-32) o I-5 NB Ramps and Lake Hughes (LA County/Caltrans Intersection) (MM 10-34~~38~~/Supplemental Traffic Study MM-33) o I-5 SB Ramps and Sedona/The Old Road (LA County/Caltrans Intersection) (MM 10-19~~22~~/Traffic Study MM-34) o I-5 SB Ramps and Magic Mountain (LA County/Caltrans Intersection) (MM 10-35~~39~~/Traffic Study MM-35) o I-5 NB Ramps and Magic Mountain (City of Santa Clarita/Caltrans Intersection) (MM 10-36~~40~~/Traffic Study MM-36) o I-5 SB Ramps and Valencia (LA County/Caltrans Intersection) (MM 10-37~~41~~/Traffic Study MM-37) o I-5 NB Ramps and Valencia (City of Santa Clarita/Caltrans Intersection) (MM 10-38~~42~~/Traffic Study MM-38) o I-5 SB Ramps and McBean (LA County/Caltrans Intersection) (MM 10-39~~43~~/Traffic Study MM-39)

TABLE 5.10-33
MITIGATION SUMMARY

Mitigation
o I-5 SB Ramps and Calgrove (City of Santa Clarita/Caltrans Intersection) (MM 10-40~~44~~/Traffic Study MM-40) o I-5 NB Ramps and Calgrove (City of Santa Clarita/Caltrans Intersection) (MM 10-41~~45~~/Traffic Study MM-41)
393SR: State Route; I: Interstate; Kern COG: Kern Council of Governments; RTP/SCS: Regional Transportation Plan/Sustainable Communities Strategy; HOT: high-occupancy toll; Caltrans: California Department of Transportation.
Sources: ~~Stantec 2017 (Table 4-11).~~ Draft EIR Appendix 5.10-A (Traffic Study) and Final EIR Appendix 5.10-C (Supplemental Traffic Study)

The following edits were identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The Impact Summary on page 5.10-139 is hereby revised as follows:

Impact Summary: The Project would not conflict with the Los Angeles County and Kern County CMPs. Impacts would be less than significant, and no mitigation is required beyond those previously identified (MMs 10-~~23~~ 20 through 10-~~28~~ 24 and MMs 10-~~31~~ 27 through 10-~~45~~ 41). However, if Caltrans does not implement the needed improvements identified under Threshold 10-1 above, impacts on freeways, arterial roadways, and intersections on the CMP highway network would be significant and unavoidable.

The following mitigation measures and accompanying text beginning with the last partial paragraph on page 5.10-145 to the end of the first full paragraph on page 5.10-157 are hereby revised as follows:

MM 10-3 The Project Applicant/Developer shall seek to enter into a ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement for Land Development Impacts to California State Transportation Facilities with Caltrans and shall comply with the terms the ~~CTIP agreement~~ Traffic Mitigation Agreement if approved and implemented. Compliance with the ~~CTIP~~ Traffic Mitigation Agreement shall constitute compliance with the mitigation measures for the Project's traffic impacts on the State highway system. Any required improvements that result from direct Project impacts (i.e., not from cumulative impacts), and are required on Caltrans-owned facilities, shall be implemented through a ~~CTIP~~ Traffic Mitigation Agreement. Any required improvements that result from cumulative traffic impacts may be implemented through payment of fair share fees.

MM 10-6 *(Supplemental Traffic Study MM-1)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall

comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement to improve SR-138 to a four lane expressway from I-5 to 240th Street West and to a limited access four lane conventional highway from 240th Street West to 190th Street West, with right-of-way reserved for a six-lane expressway between ~~I-5~~ Gorman Post Road and 300th Street West, or comparable improvements consistent with the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-7 *(Supplemental Traffic Study MM-2)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the following intersection improvements at Specific Plan Westerly Access and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections~~, resulting in three through lanes in the WB and EB directions.
- Construct intersection to include: two NB left-turn lanes, three NB through lanes and one NB right-turn lane.
- In the SB direction, construct two left turn lanes, three through lanes and ~~one free-flow~~ two right-turn lanes.
- In the EB direction, construct three left-turn lanes and one right-turn lane.
- In the WB direction, construct two left-turn lanes and ~~a free-flow~~ two right-turn lanes.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-8 *(Supplemental Traffic Study MM-3)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Specific Plan Central Access and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street

West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions.

- In the NB and SB directions, construct two left-turn lanes, three through lanes and one right-turn lane.
- In the EB direction, construct two left-turn lanes and one right-turn lane.
- In the WB direction, construct two left-turn lanes and ~~a free-flow~~ two right-turn lanes.
- Install traffic signal and include SB and NB right-turn overlap phasing.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-9 *(Supplemental Traffic Study MM-4)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 300th Street West and SR-138:

- Widen SR-138 to a ~~four~~ six-lane ~~highway~~ expressway from westerly project entrance to 300th ~~290th~~ Street West, ~~with auxiliary lanes between intersections,~~ resulting in three through lanes in the WB and EB directions.
- Construct two left-turn lanes and one right-turn lane in the EB direction and two left-turn lanes and dual right-turn lanes in the WB direction.
- In the NB direction, construct two left-turn lanes, three through lanes, and one right-turn lane.
- In the SB direction, construct two left turn lanes, three through lanes and one ~~free-flow~~ right-turn lane.
- Install traffic signal and include WB right-turn overlap phasing.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-10** *(Traffic Study MM-5)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 290th Street West and SR-138:~~

- ~~Widen SR-138 to a four-lane highway from westerly project entrance to 290th Street West, with auxiliary lanes between intersections, resulting in three through lanes in the WB and EB directions.~~
- ~~Additional intersection improvements include: two EB left turn lanes, one WB right-turn lane, two SB left-turn and two SB right-turn lanes.~~
- ~~Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-~~10~~11 *(Supplemental Traffic Study MM-6)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Margalo Drive and SR-138:

- Widen SR-138 to a four-lane ~~highway~~ expressway from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions~~.
- Additional intersection improvements include: ~~one~~ two EB left turn lanes~~,~~ ~~and~~ one WB right-turn lane, one SB left-turn lane, and two SB right-turn lanes.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-11~~12~~ *(Supplemental Traffic Study MM-7)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at Three Points and SR-138:

- Widen SR-138 to a four-lane ~~highway~~ expressway from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs~~ resulting in ~~three~~ two through lanes in the WB and EB directions.
- Additional improvements include adding one NB left-turn lane~~, and~~ one SB left turn lane and one SB right turn lane.

Or contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-12~~13~~ *(Supplemental Traffic Study MM-8)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 250~~245~~th Street West and SR-138:

- Widen SR-138 to a four-lane expressway ~~highway~~ from 300th ~~290th~~ Street West to 240th ~~190th~~ Street West ~~with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs~~ resulting in ~~three~~ two through lanes in the WB and EB directions.
- Additional improvements include adding one ~~NB left-turn lane and one~~ SB left turn lane, one EB left-turn lane, one WB U-turn lane and one dedicated ~~EB~~ WB right-turn lane.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-13~~14~~ *(Supplemental Traffic Study MM-9)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement

for implementation of the following intersection improvements at 210th ~~230th~~ Street West and SR-138:

- Widen SR-138 to a four-lane limited access conventional highway from 240th ~~290~~th Street West to 190th Street West.
- Additional improvements include one SB left-turn lane, one ~~SB~~ NB ~~right~~ left-turn lane, ~~and~~ one EB left-turn lane, one EB right-turn lane, and one WB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-15** *(Traffic Study MM-10)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 190th Street West and SR-138:~~

- ~~Widen SR-138 to a four-lane highway from 290th Street West to 190th Street West with roadway augmentation at intersection, approximately ¼ mile in length for the west and east legs resulting in three through lanes in the WB and EB directions.~~
- ~~Additional improvements include adding one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left turn lane and one dedicated EB right-turn lane.~~
- ~~Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-14~~16~~ *(Supplemental Traffic Study MM-11)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 170th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2

through lanes in the WB and EB directions at the intersection.

- Additional improvements include one EB left-turn lane, one WB left-turn lane, one NB left-turn lane and one SB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

~~**MM 10-17** *(Traffic Study MM-12)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for implementation of the following intersection improvements at 110th Street West and SR-138:~~

- ~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.~~
- ~~Additional improvements include: one EB left-turn lane, one WB left-turn lane, two NB left-turn lanes, one SB left-turn lane and two SB right-turn lanes.~~
- ~~Install traffic signal.~~

~~Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

MM 10-15~~18~~ *(Supplemental Traffic Study MM-13)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 90th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.
- Additional improvements include: ~~one~~ two EB left-turn lanes, one EB right-turn lane, one WB left-turn lane, one WB right-turn lane, one NB left-turn lane and one SB left-turn lane.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-16~~19~~ *(Supplemental Traffic Study MM-14)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at 60th Street West and SR-138:

- Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.
- Additional improvements include: one EB left-turn lane, one EB right-turn lane, one WB left-turn lane, one WB right-turn lane, one NB left-turn lane and one SB left-turn lane.
- Install traffic signal.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-17~~20~~ *(Supplemental Traffic Study MM-15)* To mitigate the Project's impacts to SR-138, the Project Applicant/Developer shall comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for implementation of the following intersection improvements at ~~30th Street West~~ the SR-14 and SR-138 interchange:

- ~~Roadway augmentation at intersection, approximately ¼ mile in length for the east and west legs, resulting in 2 through lanes in the WB and EB directions at the intersection.~~
- ~~Additional improvements include adding one EB left-turn lane and one WB left-turn lane.~~
- Install traffic signals at the NB off-ramp and the SB off-ramp.

Or, contribute fair share to intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-18~~21~~ *(Traffic Study MM-16)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of one auxiliary lane at the connector ramp from westbound SR-138 to southbound I-5 for existing plus Project conditions

MM 10-19~~22~~ *(Traffic Study MM-17 and MM-34)* To provide adequate capacity at The Old Road at I-5 SB Ramps/Sedona intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the addition of a second southbound left-turn lane from The Old Road to the I-5 Southbound On-Ramp.

MM 10-20~~23~~ *(Supplemental Traffic Study MM-18)* To mitigate the increase of side-street delay for the existing adjacent off-site areas and for planned on-site side streets along SR-138, the Project Applicant/Developer shall either (1) comply with the terms of the ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement or (2) dedicate right-of-way within the project site at each site access location to accommodate the ultimate intersection or interchange configuration to be determined by the Northwest Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~ at the following SR-138 intersections:

- Westerly Access
- Central Access
- 300th Street West
- ~~290th Street West~~

MM 10-21 *(Supplemental Traffic Study MM-22)* To provide adequate on- and off-site capacity to accommodate up to 10 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall comply with the terms of the Traffic Mitigation Agreement for the following SR-138 intersection improvements for site access:

- Westerly Access: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn

lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one shared NB through/right lane, one SB left-turn lane, and one shared SB through/right lane. Install traffic signal.

- Central Access: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one NB through lane, one NB right-turn lane, one SB left-turn lane, one SB through lane, and one SB right-turn lane. Install traffic signal.
- 300th Street West: Provide one EB left-turn lane, one EB through lane, one EB right-turn lane, one WB left-turn lane, one WB through lane, one WB right-turn lane, one NB left-turn lane, one shared NB through/right lane, one SB left-turn lane, and one shared SB through/right lane. Install traffic signal.
- 190th Street West: Provide one EB left-turn lane, one EB through lane, one WB through lane, one WB right-turn lane, one SB left-turn lane, and one SB right lane.

MM 10-2224 *(Supplemental Traffic Study MM-19)* To provide adequate on- and off-site capacity to accommodate up to 75 percent of the Project and anticipated cumulative development, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the widening of SR-138, including:

- Addition of ~~an auxiliary~~ one additional lane in each direction (six lane~~s total~~ freeway) from I-5 to Gorman Post Road
- Addition of two additional lanes in each direction (six lane expressway) from Gorman Post Road to 300th Street West
- Addition of one additional lane in each direction (four lane expressway) from 300th Street West to 240th Street West
- Addition of one additional lane in each direction (four lane limited access conventional highway) from 240th Street West to the SR-14 interchange

MM 10-2325 *(Supplemental Traffic Study MM-20)* To provide adequate on- and off-site capacity to accommodate 100 percent of the Project and anticipated cumulative development, the Project

Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the widening of SR-138, including:

- Addition of ~~an auxiliary~~ a second additional lane in each direction (six lanes total) from 300th Street West to approximately ½ mile east of 250th ~~245th~~ Street West
- Construct additional intersection turn lanes at the following SR-138 intersections:
  - Westerly Project Access
  - 300th Street West
  - Margalo Drive
  - Three Points Road
  - 60th Street West

MM 10-24~~26~~ *(Traffic Study MM-21 and MM-26)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards RTP/SCS improvement projects on SR-58 between I-5 in Kern County and I-15 in San Bernardino County, as verified by the County in consultation with the Kern COG and Caltrans. Improvements could include development of a high capacity goods movement facility along the SR-58 and/or E-220 corridors.

~~**MM 10-27** *(Traffic Study MM-22)* To provide adequate capacity on SR-138, the Project Applicant/Developer shall comply with the terms of the CTIP for the SR-138 improvements to a limited access facility with grade-separated interchanges, consistent with the County's analysis of the AVAP, or fair share participation and/or contribution to the SR-138 improvements (freeway/expressway or expressway/limited access conventional highway) being advanced by Caltrans in the Northwest 138 Corridor Improvement Project (specific improvements pending Caltrans selection of a preferred alternative).~~

~~**MM 10-28** *(Traffic Study MM-23)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the CTIP or (2) contribute fair~~

~~share funding towards the following planned improvements to I-5:~~

- ~~I-5 between Fort Tejon and Grapevine Road and between SR-138 and Lake Hughes Road interchanges: Strengthening and widening the inside and outside shoulders of I-5.~~

MM 10-25~~29~~ *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs.

The Project Applicant/Developer, through the required implementation of the Mobility Plan, shall:

- Reinforce and serve the Land Use Plan;
- Provide future residents, visitors and employees with multiple modes of transit/non-single occupancy vehicle (non-SOV) accessibility for internal and external trips ~~by future residents and visitors~~;
- Provide options to reduce vehicle trips and emissions by linking effective travel demand management with transportation systems and parking policies;
- Provide residents and employees on the Project site with multiple modes of transportation options (i.e., walk, bike, public transit, private auto, car share, bike share, etc.);
- Provides for 80 percent on average, but no less than 50 percent of each Village's residential units to be located within one-half mile of a Village center that includes retail and service uses;
- Provide parks within a 5-minute walk (0.25 mile) of 80 percent of all residential units;
- Provide a transit route easement no less than 25 feet wide in the Centennial Commerce District connecting the Town Center, Business Park, and Industrial/Civic areas and also northerly connecting to the Village Five Core;

- Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than ~~single-occupancy automobile~~ SOV use ~~by 30 percent in relation to standard ITE-generation rates for the overall Project~~; ~~and~~
- Require TMA implementation of a combination of transit and transportation measures to ~~reduce~~ ensure that a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs ~~single-occupancy automobiles by 20 percent~~.;
- Require TMA implementation of a program to coordinate with automotive dealers on the Project site to promote CNG, electric, and hybrid electric vehicles~~.~~;
- Require TMA oversight of requirement for service fleet vehicles for agencies or businesses located on-site to be alternative fuel vehicles to the maximum extent feasible, as determine by the Project Applicant/Developer~~.~~; and
- Require TMA implementation of a combination of measures to provide adequate temporary bike parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure.

The Circulation Plan sets forth requirements for roadway classifications; intersection controls; and traffic calming measures. Where approved by the California Department of Transportation (Caltrans) and the County and where maintenance and durability costs are comparable to traditional materials, use "cool" pavement materials, which reduce heat island effect.

MM 10-2630 *(Traffic Study MM-24)* Each component of the Mobility Plan incorporates Transportation Demand Management (TDM) features to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and thereby reduce pollutant emissions. Related to

this is the creation and ongoing operation of a Transportation Management Association (TMA) to fund and manage the operation of ongoing transportation programs, including but not limited to transit and on-demand services.

The key TDM elements that are inherent in the overall Mobility Plan are:

- Sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas;
- Small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations;
- Pedestrian environments incorporated with public streets;
- Transit route easement connecting the residential and commerce areas;
- Parking behind buildings to encourage walking in retail areas along street frontage; and
- Parks within 0.25 mile of 80 percent of all residential units.

MM 10-2731 *(Traffic Study MM-25)* To provide adequate capacity to the I-5 mainline freeway, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards the following planned improvements to I-5:

- I-5 between Lake Hughes and Parker: Addition of one auxiliary lane in each direction.
- I-5 between Parker Road and SR-14: Addition of one HOV or HOT lane in each direction.

MM 10-2832 *(Traffic Study MM-27)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of two auxiliary lanes at the connector ramp from westbound SR-138 to southbound I-5 for ~~Year 2035~~ cumulative buildout conditions.

MM 10-29~~33~~ *(Traffic Study MM-28)* To provide adequate capacity at the I-5/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at I-5/SR-138:

- Addition of two auxiliary lanes at the connector ramp mainline before the northbound I-5 to eastbound SR-138 connector ramp.

MM 10-30~~34~~ *(Traffic Study MM-29)* To provide adequate capacity at the SR-14/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at SR-14/SR-138:

- Construction of one auxiliary lane and a second off-ramp lane for the SR-14 northbound off ramp to SR-138.

MM 10-31~~35~~ *(Traffic Study MM-30)* To provide adequate capacity at the SR-14/SR-138 interchange, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the following ramp improvement at SR-14/SR-138:

- Construction of a second lane on the SR-14 southbound on-ramp from SR-138.

MM 10-32~~36~~ *(Supplemental Traffic Study MM-31)* To provide adequate capacity at the SR-14 SB Ramps and SR-138 interchange, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the reconfiguration of the interchange to include two eastbound through lanes and ~~three~~ two westbound through lanes~~. In the southbound direction, add a second right-turn lane;~~ and install a traffic signal ~~and include right-turn overlap phasing~~ or (2) contribute fair share funding for intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-33~~37~~ *(Supplemental Traffic Study MM-32)* To provide adequate capacity at SR-14 NB Ramps and SR-138 interchange, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement for the reconfiguration of the interchange to include two eastbound through lanes and two westbound through lanes ~~and, in the northbound direction,~~

~~add two left-turn lanes~~ and a traffic signal or (2) contribute fair share funding for intersection improvements being advanced by Caltrans in the Northwest 138 Corridor Improvement Project ~~(specific improvements pending Caltrans selection of a~~ preferred alternative~~)~~.

MM 10-34~~38~~ *(Traffic Study MM-33)* To provide adequate capacity at Lake Hughes Road at I-NB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the addition of one lane to the northbound off-ramp and restripe the configuration to include one left-turn, one shared left/right-turn lane, and one dedicated right-turn lane.

MM 10-35~~39~~ *(Traffic Study MM-35)* To provide adequate capacity at the Magic Mountain Parkway at I-5 SB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the restriping of the southbound off-ramp to provide two left-turn lanes, one shared left-turn/through lane, and one right-turn lane.

MM 10-36~~40~~ *(Traffic Study MM-36)* To provide adequate capacity at the Magic Mountain Parkway at I-5 NB Ramps intersection, the Project Applicant/Developer shall (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding towards planned improvements to I-5 for the conversion of the shared through/right-turn lane to a shared left/through/right-turn lane.

MM 10-37~~41~~ *(Traffic Study MM-37)* To provide adequate capacity at the Valencia Road at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the striping of a third westbound through lane.

MM 10-38~~42~~ *(Traffic Study MM-38)* To provide adequate capacity at the Valencia Road at I-5 NB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the traffic signal modification to add a northbound right-turn overlap phase.

MM 10-39~~43~~ *(Traffic Study MM-39)* To provide adequate capacity at the McBean Parkway at I-5 SB Ramps intersection, the Project

Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward the restriping of the dedicated westbound right-turn lane to a shared through/right-turn lane.

MM 10-~~40~~44 *(Traffic Study MM-40)* To provide adequate capacity at the Calgrove Road at I-5 SB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward adding a second eastbound through lane and a de-facto right-turn lane and a second through lane in the westbound direction.

MM 10-~~41~~45 *(Traffic Study MM-41)* To provide adequate capacity at the Calgrove Road at I-5 NB Ramps intersection, the Project Applicant/Developer shall either (1) comply with the terms of the ~~CTIP~~ Traffic Mitigation Agreement or (2) contribute fair share funding toward restriping to add a westbound de facto right-turn lane.

Since Caltrans has ~~deferred the selection of a preferred build alternative for the Northwest 138 Corridor Improvement Project and has also~~ reserved the right to determine the specific types of intersection controls at the time the improvements occur ~~and MMs 10-6 through 10-27 and MMs 10-31 through 10-35 would mitigate the Project's impacts and cumulative impacts on the SR-138~~, ~~these~~ mitigation measures related to intersection controls on SR-138 are subject to change pending Caltrans determination of the specific types of intersection controls that will be implemented ~~preferred 138 Corridor alternative~~. T~~herefore, t~~he Centennial Project will contribute its fair share and/or contribute towards the cost of the Northwest 138 Corridor Improvement Project preferred Alternative 2. ~~for the alternative ultimately selected by Caltrans and Metro.~~ Refer to the Traffic Study (Draft EIR Appendix 5.10-A) and the Supplemental Traffic Study (Final EIR Appendix 5.10-C) for additional detail on the traffic mitigation.

Under MM 10-25~~29~~, the Project is required to reduce use of automobiles by implementing PDFs and TDM measures to be administered and monitored by a Transportation Management Association. These mandatory mitigation measures require ~~the reduction of single-occupancy automobile use for~~ that a minimum of 20 percent of total peak morning and afternoon off-site commute~~s~~ trips and a minimum of 30 percent of total on-site internal trips be completed by using transit modes other than ~~20 percent, and require the reduction of~~ single occupancy automobile use ~~within the Project site by 30 percent~~. The traffic analysis above conservatively assumes full trip (i.e., single occupancy automobile) volumes on- and off-site, and thus, is conservative and actual traffic volumes from the Project are anticipated to be lower.

5.10.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation measures have been established to reduce the Project's significant impacts on traffic access and circulation. However, these mitigation measures call for improvements to Caltrans facilities, which are outside the control of the County of Los Angeles and the Project Applicant. Implementation of the ~~CTIP~~ Traffic Mitigation Agreement or fair share contributions by the Project Applicant in accordance with MM 10-3, MMs 10-6 through 10-24~~28~~, and MMs 10-27~~31~~ through 10-41~~45~~ will ensure that the Project provides fair share funding required to mitigate potential Project impacts. Implementation of a traffic mitigation fee program (MM 10-4) would provide a mechanism for providing fair share contributions from other projects and future activity affecting State facilities.

The following further edits were identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 10-3 on page 5.10-145 of the Draft EIR and MM 10-25, which starts on page 5.10-152 of the Draft EIR, are hereby revised as follows:

MM 10-3 The Project Applicant/Developer shall seek to enter into a Traffic Mitigation Agreement for Land Development Impacts to California State Transportation Facilities ~~with~~ by and between the Project Applicant/Developer and Caltrans, and during the term of such agreement shall comply with the terms ~~the Traffic Mitigation Agreement if approved and implemented~~ and conditions thereof. Compliance with the Traffic Mitigation Agreement shall constitute compliance with the mitigation measures for the Project's traffic impacts on the State highway system. Any required improvements that result from direct Project impacts (i.e., not from cumulative impacts), and are required on Caltrans-owned facilities, shall be implemented through a Traffic Mitigation Agreement. Any required improvements that result from cumulative traffic impacts may be implemented through payment of fair share fees.

MM 10-25 *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs.

The Project Applicant/Developer, through the required implementation of the Mobility Plan, shall:

- Reinforce and serve the Land Use Plan;
- Provide future residents, visitors and employees with multiple modes of transit/non-single occupancy vehicle (non-SOV) accessibility for internal and external trips;
- Provide options to reduce vehicle trips and emissions by linking effective travel demand management with transportation systems and parking policies;
- Provide residents and employees on the Project site with multiple modes of transportation options (i.e., walk, bike, public transit, private auto, car share, bike share, etc.);
- Provide for 80 percent on average, but no less than 50 percent of each Village's residential units to be located within one-half mile of a Village Center that includes retail and service uses;
- Provide parks within a 5-minute walk (0.25 mile) of 80 percent of all residential units;
- Provide a transit route easement no less than 25 feet wide in the Centennial Commerce District connecting the Town Center, Business Park, and Industrial/Civic areas and also northerly connecting to the Village Five Core;
- Require TMA implementation of a combination of transit and transportation measures to ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than SOV use, including on-demand pooled car or multi-passenger vehicle service;
- Require TMA implementation of a combination of transit and transportation measures to ensure that a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs, which shall include requiring the TMA to provide am and pm peak hour demand-based multi-passenger transit services for Project residents and employees that link the Project to the nearest Metrolink station and commuter transit hub to the south (currently Santa Clarita) and the east (currently Palmdale), and to the north (Tejon Mountain Village, Tejon Commerce Center, and Grapevine), and to other commuter destinations as warranted by consumer demand;
- Require TMA implementation of a program to coordinate with automotive dealers on the Project site to promote battery electric, or hydrogen fuel cell (collectively

"electric") vehicles; at minimum, this program shall include preferences for dealers offering bulk discounts or other financial incentives;

- Require TMA oversight of requirement for service fleet vehicles for agencies or businesses located on-site to be electric vehicles to the maximum extent feasible, as determine by the Project Applicant/Developer in consultation with the County, or other future vehicle technologies as may be developed and comply with California's air quality, greenhouse gas, and climate change mandates, and which meet the performance and affordability needs of Project employees and residents as determined by the Project Applicant/Developer in consultation with the County (collectively, "Future Vehicle Fleet" or "FVF"); and
- Require TMA implementation of a combination of measures to provide adequate temporary bike or personal electric vehicle (e.g., scooter) parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure.

The Circulation Plan sets forth requirements for roadway classifications; intersection controls; and traffic calming measures. Where approved by the California Department of Transportation (Caltrans) and the County and where maintenance and durability costs are comparable to traditional materials, use "cool" pavement materials, which reduce heat island effect.

Section 5.11 – Air Resources

Table 5.11-21 on page 5.11-56 is hereby revised as follows:

ESTIMATED ANNUAL MID-PROJECT COMBINED EMISSIONS (SCAQMD UNITS [LBS/DAY])

Source	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Unmitigated Emissions						
Year 18 Construction	**94**	**137**	207	1	73	33
Year 18 Operations	**1,319**	**761**	**3,948**	13	**1,430**	**410**
Combined Year ~~11~~18 Emissions	**1413**	**898**	**4155**	2	**1503**	**443**
SCAQMD Operations Thresholds	55	55	550	150	150	55
Exceeds Threshold	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**
Mitigated Emissions						
Year ~~11~~18 Construction	**75**	43	272	1	37	14
Year ~~11~~18 Operations	**1,319**	**761**	**3,948**	13	**1,430**	**410**
Combined Year ~~11~~18 Emissions – construction	**1,394**	**804**	**4,220**	2	**1,467**	**424**
SCAQMD Operations Thresholds	55	55	550	150	150	55
Exceeds Threshold	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less.

Note: Totals may not add due to rounding.

Bold indicates emissions exceeding threshold

Sources: SCAQMD 2015 (thresholds). Emissions calculations can be found in Appendix 5.11-A

The first sentence of the second full paragraph on page 5.11-73 is hereby revised as follows:

> Because the Project would generate traffic on SR-138, the receptors evaluated included 3 existing residences within 500 feet of SR-138, as well as the proposed residential and institutional areas that could be located within ~~150~~ 500 feet of the freeway.

MM 11-2 on pages 5.11-78 and 5.11-79 is hereby revised as follows:

> **MM 11-2** The Project's plans and specifications shall include the following measures to minimize nitrogen oxide (NOx) and volatile organic compound (VOC) emissions during construction:

- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency (USEPA) Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). Any emissions-control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If Tier 4 Final equipment is not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability.
- Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach. These policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA).
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). If the Project Applicant/Developer determines that 2010 model year or newer diesel trucks cannot be obtained, trucks that meet USEPA 2007 model year NOx emissions requirements shall be required. If 2010 model year or newer diesel trucks are not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability.
- A copy of each unit's certified tier specification, BACT documentation, and CARB or District operating permit shall be provided to the County at the first occurrence of mobilization of each applicable unit of equipment.
- Construction contractors shall ensure construction equipment is properly serviced and maintained to the manufacturer's standards.

- Construction contractors shall limit non-essential idling of construction equipment to no more than five consecutive minutes.
- Construction contractors shall use Super-Compliant Architectural/Industrial (AIM) Coatings to the extent that they are commercially available and certified to meet the applicable requirements of Antelope Valley Air Quality Management District Rule 1113 and South Coast Air Quality Management District Rule 1113.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 11-3 on page 5.11-79 of the Draft EIR is hereby revised as follows:

MM 11-3 The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. These requirements shall be posted on the community intranet and shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs.

MM 11-4 on pages 5.11-79 and 5.11-80 is hereby revised as follows:

MM 11-4 The Project's plans and specifications for non-residential buildings shall demonstrate that the following features have been incorporated into the building designs. Proof of compliance shall be provided to the County prior to the issuance of occupancy permits.

- For buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupant.

- Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to ~~15~~ 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces.

- ~~Facilities~~ Electric Vehicle Charging Spaces (EV Space), as defined by CALGreen Code Section 202, shall be installed to support future installation of ~~e~~Electric ~~v~~Vehicle Supply Equipment (EVSE), as defined by CALGreen Code Section 202, ~~charging~~ at each non-residential building with ~~3~~ 10 or more parking spaces. Installation of each EV Space shall be consistent with Sections A5.106.5.3 and A5.106.5.3.1, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code. The EV Space facilities shall meet Section 406.9 (Electric Vehicle) of the *California Building Code* and as follows:

Total Number of Actual Parking Spaces	Tier 1 Number of Required EV Spaces
0-9	0
10-25	2
26-50	3
51-75	5
76-100	7
101-150	10
151-200	14
≥200	8 percent of total spaces rounded up to nearest whole number

~~**Single charging space requirements.** When only a single charging space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1. The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.~~

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the

electric vehicles (EV) at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Provide raceways from the electrical service panel to the designated parking areas which are required to be installed at the time of construction.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 11-4, which starts on page 5.11-79 of the Draft EIR, is hereby revised as follows:

MM 11-4 The Project's plans and specifications for non-residential buildings shall demonstrate that the following features have been incorporated into the building designs. Proof of compliance shall be provided to the County prior to the issuance of occupancy permits.

- For buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupant.
- Preferential parking for <u>electric vehicles, other FVF vehicles,</u> ~~low-emitting, fuel-efficient,~~ and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces.
- Electric Vehicle Charging Spaces (EV Space), as defined by CALGreen Code Section 202, shall be installed to support future installation of Electric Vehicle Supply Equipment (EVSE), as defined by CALGreen Code Section 202, at each non-residential building with 10 or more parking spaces. Installation of each EV Space shall be consistent with Sections A5.106.5.3 and A5.106.5.3.1,

Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code. The EV Space facilities shall meet Section 406.9 (Electric Vehicle) of the *California Building Code* and as follows:

Total Number of Actual Parking Spaces	Tier 1 Number of Required EV Spaces
0-9	0
10-25	2
26-50	3
51-75	5
76-100	7
101-150	10
151-200	14
>200	8 percent of total spaces rounded up to nearest whole number

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles (EV) at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Provide raceways from the electrical service panel to the designated parking areas which are required to be installed at the time of construction.

Increased EVSE Installations. Changes to EVSE parking shall be allowed to the extent allowed under state laws, and the duration of vehicular occupancy of EV spaces may be restricted as authorized by state law to allow charging of multiple vehicles each day. Demand for EV Space facilities shall be monitored biennially by the TMA, additional EV parking spaces shall be made available at lots where demand exceeds supply. The TMA biennial survey shall also consider future transportation technology and practices, including for example changes in vehicular electric charging technology, other FVF changes, or other transportation practices and services changes (e.g., with lower-automobile ownership rates leading to reduced parking demand and/or reduced private ownership of vehicles requiring daily electric charging).

The third bullet under MM 11-5 on page 5.11-80 is hereby revised as follows:

- Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by Section 22.52.1225B of the County Code, whichever is more stringent. The requirements under the Residential Voluntary Measures of the CALGreen Code are as follows:

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 11-5, which starts on page 5.11-80 of the Draft EIR, is hereby revised as follows:

MM 11-5 The Project's plans and specifications for residential buildings shall demonstrate that the following features have been incorporated.

- Visitor parking shall include preferentially located parking spaces for electric ~~alternative-fueled~~ vehicles.
- Exterior electrical receptacles and natural gas or propane hookups.
- Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by Section 22.52.1225B of the County Code, whichever is more stringent. The requirements under the Residential Voluntary Measures of the CALGreen Code are as follows:

  Short-term bicycle parking. Provide permanently anchored bicycle racks within 100 feet of the visitor's entrance, readily visible to passers-by, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack.

  Long-term bicycle parking for multifamily buildings. Provide on-site bicycle parking for at least one bicycle per every two dwelling units. Acceptable parking facilities shall be conveniently reached from the street and may include, but not limited to:

  1. Covered, lockable enclosures with permanently anchored racks for bicycles.
  2. Lockable bicycle rooms with permanently anchored racks.
  3. Lockable, permanently anchored bicycle lockers.

Long-term bicycle parking for hotel and motel buildings. Provide one on-site bicycle parking space for every 25,000 square feet, but not less than two. Acceptable parking facilities shall be conveniently reached from the street and may include, but not be limited to:

1. Covered, lockable enclosures with permanently anchored racks for bicycles.
2. Lockable bicycle rooms with permanently anchored racks.
3. Lockable, permanently anchored bicycle lockers.

Bicycle parking areas may also be used by small electric vehicles such as scooters.

MM 11-6 on page 5.11-81 is hereby revised as follows:

MM 11-6 The Project's plans and specifications for parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, shall demonstrate that the following features have been incorporated into the parking facility.

- The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations when a demand is demonstrated~~. Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV Space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:

Single charging space requirements. When only a single EV ~~charging s~~Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

Multiple charging spaces required. When multiple EV ~~charging s~~Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent.
- Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for nonresidential land uses or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first bullet of MM 11-6 on page 5.11-81 of the Draft EIR is hereby revised as follows:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric~~, natural gas, or similar low-emitting technology)~~ vehicles.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further

edits have been made to this text. MM 11-10 on page 5.11-82 of the Draft EIR is hereby revised as follows:

MM 11-10 The Project's plans and specifications shall demonstrate that any land uses involving the public congregation of sensitive receptors (e.g. residential, schools, hospital, daycare center) are not within ~~150~~ 250 feet of the near edge of the SR-138 traffic lanes.

MM 11-11 on page 5.11-82 is hereby revised as follows:

MM 11-11 Prior to the approval of any tract map that includes an air quality sensitive receptor (e.g. residential, day care, schools, hospital) located within 500 feet of the SR-138 and/or any "high volume roadway" (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), the Project Applicant/Developer shall provide to the Air Pollution Control District(s) with jurisdiction over the mapped area a dispersion analysis prepared in accordance with each applicable Air District's methodological requirements to calculate the health risks from vehicle emissions from SR-138 and/or high volume roadway, as relevant. If the study concludes that ~~health risks would be significant at the location of a proposed sensitive receptor~~ any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices (or future more stringent thresholds as may be adopted by the applicable Air District(s) and approved by the County for use on projects subject to the County's lead agency authority under the California Environmental Quality Act)(District TAC Thresholds), then the applicant shall submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of District TAC Thresholds, shall be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan, TAC exposure reduction measures shall be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed District TAC Thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a

building permit approval for future sensitive use(s) included in the tentative tract map. ~~effective design measures must be implemented into the structures to mitigate for interior air quality, such as ventilation systems that include MERV13 filters or equivalent protections against TACs from vehicle emissions. Confirmation of compliance shall be provided to the County prior to occupancy that include sensitive receptors within 500 feet of the SR-138.~~

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 11-11 on page 5.11-82 of the Draft EIR is hereby revised as follows:

MM 11-11 Prior to the approval of any tract map that includes an air quality sensitive receptor (e.g. residential, day care, schools, hospital) located more than 250 feet, but less than or equal to 500 feet, of the SR-138 and/or within 500 feet ~~of the SR-138 and/or~~ of any "high volume roadway" (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), the Project Applicant/Developer shall provide to the Air Pollution Control District(s) with jurisdiction over the mapped area a dispersion analysis prepared in accordance with each applicable Air District's methodological requirements to calculate the health risks from vehicle emissions from SR-138 and/or high volume roadway, as relevant. If the study concludes that any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices (or future more stringent thresholds as may be adopted by the applicable Air District(s) and approved by the County for use on projects subject to the County's lead agency authority under the California Environmental Quality Act) (District TAC Thresholds), then the applicant shall submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of District TAC Thresholds, shall be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan, TAC exposure reduction measures shall be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed District TAC Thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation

and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map.

Exhibit Response F.8-196, Sheets A through C, are hereby added to the end of Section 5.11, Air Resources.

Section 5.12 – Noise

The second to last sentence of the first full paragraph on page 5.12-2 is hereby revised as follows:

> MM 12-3 would be incorporated into the Project and require stationary equipment to operate at a distance of greater than 450 feet <u>from residences or schools</u> or to provide an enclosure or similar noise attenuation to limit the average hourly daytime noise level to 60 dBA or less.

MMs 12-1 through 12-3 on pages 5.12-48 and 5.12-49 are hereby revised as follows:

MM 12-1 For residences, hotels and motels, schools, and places of worship ~~adjacent to~~ <u>within 500 feet from the centerline of</u> a collector road with a buildout forecast of 10,000 average daily trips (ADT) or greater, a limited secondary road with a buildout forecast of 6,500 ADT or greater, or any higher classification road, the Project Applicant/Developer shall submit to the County an Acoustical Study prepared in accordance with Section 1207.12 of the County Building Code. The Acoustical Study shall demonstrate that exterior noise levels at areas where residents would reasonably be expected to spend more than one hour (e.g., backyards) would not exceed 65 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL). The Acoustical Study shall also verify, including during construction and before Certificate of Occupancy (CofO) issuance, that the buildings have been properly designed to comply with a CNEL requirement of 45 dBA for habitable interior living areas, classrooms, and rooms used for patient care and worship. The design features required to achieve the noise standard shall include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the roadway; noise barriers; building orientation relative to the roadway; interior living space (bedroom, common area) orientation; sound-rated windows; upgraded exterior wall and/or roof construction; insulation batts; and forced air ventilation.

150ft Buffer of Future Hwy 138 (approximate pavement edge)

70-year Risk

- < 10
- >= 10

Proposed Land Use

- C - Commercial
- OS - Open Space
- NAP - Not a Part

Aerial Source: ESRI, NAIP 2014

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70-year Risk

Centennial Project

N W E S

500 250 0 500 Feet

Exhibit Response F.8-196 — Sheet A

150ft Buffer of Future Hwy 138
(approximate pavement edge)

70-year Risk

- < 10
- >= 10

Proposed Land Use

- VLDR - Very Low Density Residential
- LDR - Low Density Residential
- MDR - Medium Density Residential
- HDR - High Density Residential
- C - Commercial
- BP - Business Park
- OS - Open Space
- ROW - Right-of-Way

4.3

3.4

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7.2

Aerial Source: ESRI, NAIP 2014

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70-year Risk

Centennial Project

Exhibit Response F.8-196 — Sheet B

N W E S 500 250 0 500 Feet

150ft Buffer of Future Hwy 138
(approximate pavement edge)

70-year Risk

- < 10
- >= 10

Proposed Land Use

- VLDR - Very Low Density Residential
- LDR - Low Density Residential
- MDR - Medium Density Residential
- HDR - High Density Residential
- I/C - Institutional and Civic
- C - Commercial
- BP - Business Park
- OS - Open Space
- ROW - Right-of-Way

Aerial Source: ESRI, NAIP 2014

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70-year Risk

Centennial Project

N W E S

500 250 0 500

Feet

Exhibit Response F.8-196 — Sheet C

MM 12-2 For each business park use, school, community use area, park and recreation area, animal control facility, utility, County maintenance facility, commercial development, or manufacturing/industrial development, the Project Applicant/Developer shall submit an Acoustical Study verify that the Project has been properly designed to comply with the County of Los Angeles's Noise Ordinance standards at the nearby sensitive properties (both on and off site). The design features required to achieve the noise standard shall include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the sensitive receptors; noise barriers; building orientation relative to the sensitive receptor; sound-rated windows; and upgraded exterior wall and/or roof construction. All stationary and point sources of noise shall adhere to the requirements of the County Code, including but not limited to Section 12.08.390, Exterior Noise Standards, Section 12.08.460, Loading and Unloading Operations, and Section 12.08.530, Residential Air-Conditioning or Refrigeration Equipment.

MM 12-3 To ensure that construction noise is minimized, in addition to meeting all requirements of Section 12.08 of the *County of Los Angeles Code,* the following measures shall be implemented during construction:

- All construction equipment, including internal combustion engines and stationary equipment (used for construction purposes) shall be equipped with noise-reducing features such as, but not limited to improved mufflers, intake silencers, ducts, engine enclosures, and acoustical shields or shrouds. All equipment items must have the manufacturers' recommended noise abatement measures, such as mufflers, engine enclosures, and engine vibration isolators, intact and operational.
- Stationary equipment (e.g., generators, air compressors, concrete pumps) located within 450 feet of residences or schools shall have noise abatement (e.g., engine enclosures or equipment placed behind barriers) to limit the noise level at the sensitive receptor to an average sound level (L_{eq}) of 60 dBA or less. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors, to the greatest extent feasible. The construction contractor shall locate pile drivers, or other machinery capable of causing strong vibrations or load noises, such that the rear of the vibratory pile driver or

machinery faces toward the noise sensitive receptor when the machine is being utilized, to the greatest extent feasible.

- Equipment and material staging areas and equipment maintenance areas shall be located at least 500 feet from sensitive noise receivers, if feasible.
- Construction activities should be timed to minimize noise impact on exposed areas, by sequencing the use of equipment with relatively low noise levels versus during noise sensitive periods, routing truck traffic and controlling construction traffic activity to minimize vehicle idling, gear shifting, and accelerating under load, to the greatest extent feasible.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction should be hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Construction contracts shall specify that notices shall be sent out to all residences located within 1,000 feet of the Project site at least 15 days prior to commencements of construction. The notices shall include the construction schedule and a telephone number where complaints can be registered with the noise disturbance coordinator. A sign, legible at a distance of 50 feet, shall also be posted at the construction sites throughout construction which includes the same details as the notices.
- A "noise disturbance coordinator" shall be established at all construction sites. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved.

- The construction contractor shall establish a training program for equipment operators to instruct them in methods of operating their equipment to minimize environmental noise, and to inform them of all applicable State and County noise regulations, including the requirements contained in these mitigation measures.

The third paragraph on page 5.12-46 is hereby revised as follows:

> Increases in the ambient noise environment adjacent to SR-138 between Gorman Post Road and Old Ridge Route Road would exceed the applicable significance criterion at identified receptors. There are no mitigation measures available to reduce the significance of this impact that are within the County's jurisdiction to adopt. There are f~~F~~easible mitigation measures available - construction of a noise barrier at affected receptors or resurfacing the roadway with rubberized asphalt pavement - that would reduce these impacts to a less than significant level, but these measures are not within the jurisdiction of the County. Impacts would be significant and unavoidable.

Section 5.13 – Visual Resources

The fifth sentence of the third paragraph on page 5.13-10 is hereby revised as follows:

> Exhibit 5.14-~~2~~1, ~~Trails and Bikeways in the Project Vicinity~~ Existing Open Space and Recreation Areas, depicts the existing alignment of the PCT.

The following footnote is hereby added to the end of the fourth sentence of the second paragraph on page 5.13-18:

> However, MM 13-1 would require that, during grading and development of the Project, rock outcroppings that are visible from SR-138 would be preserved to the extent feasible.[2]
>
> [2] Section 21061.1 of CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors".

The following text is hereby added after the fourth sentence of the second full paragraph on page 5.13-21:

> The conceptual realignment of this segment of the PCT has broad views of flat-lying areas developed with rural/agricultural and older suburban land uses. As the PCT comes out of the cover of the hills between Pine Canyon Road and SR-138, trail users will have views of the proposed residential development across SR-138. Closer to SR-138 and at the proposed public trail parking lot just outside the Project site, trail users will see the Business Park adjacent to and west of the PCT on the south side of SR-138 at the intersection of 300th

Street West. The visual simulation in Exhibit 5.13-4 provides an example of the views of the Business Park located south of the SR-138.

The following text is hereby added after the fifth sentence of the second full paragraph on page 5.13-21:

Development on the eastern section of the site would present trail users with views of residential, commercial, and business park structures along 300th Street West for a distance of approximately 1½ miles. A proposed commercial site will be located on the northwest corner of SR-138 and 300th Street West, with the PCT running between the commercial use and 300th Street West. The PCT would proceed north in a setback area along the street that would include a wall between the trail and residential development, a paved bike path and landscaped area. Visible to the east of the future commercial site would be a community park and a school site. A typical cross section of the PCT is provided in Exhibit 5.13-6.

The sixth sentence in the second full paragraph on page 5.13-21 is hereby revised as follows:

MM 13-4 requires that structures proposed along the PCT alignment be screened by a block wall along the rear of the structures and a wide, landscaped setback that would contain the conceptual PCT realignment (see Exhibit 5.13-6 for a typical cross section of the PCT).

The following text is hereby added prior to the third full paragraph on page 5.13-21:

Therefore, views from the conceptual future realignment of the portion of the PCT along 300th Street West would be reduced to a less than significant level.

The PCT and 300th Street West then pass through a privately-owned inholding within Centennial and then enter a second area of residential development, which extends to the east side of 300th Street West. Before the PCT reaches the SWP Aqueduct, on the west side of the PCT is another school and beyond that, a community park. As shown on Exhibit 4-14, the property for the WRF East is adjacent to 300th Street West, just south of the SWP Aqueduct. On the east side of 300th Street West, across from the school, is another small commercial site.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 13-4 on page 5.13-30 of the Draft EIR is hereby revised as follows:

MM 13-4 Structures proposed along the Pacific Crest National Scenic Trail (PCT) shall be screened by a block wall or comparable screening along the rear of the structures abutting the trail and a 34-foot-



Source: Placeworks 2017

Typical Cross-Section of Pacific Crest Trail

Exhibit 5.13-6

Centennial Project

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wide landscaped setback shall be provided that would contain the conceptual PCT realignment.

Section 5.14 – Parks and Recreation

The fourth sentence in the second paragraph under "Existing Alignment" on page 5.14-13 is hereby revised as follows:

Exhibit 5.14-1~~2~~ depicts the existing alignment of the PCT.

The second to last sentence in the first paragraph on page 5.14-22 is hereby revised as follows:

Of this amount, approximately ~~3,867~~ 3,866 acres are designated as Los Angeles County Significant Ecological Area (SEA) 17 to be preserved within the Project site boundaries.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 14-5, which starts on page 5.14-28 of the Draft EIR, is hereby revised as follows:

MM 14-5 The Project shall provide public and private recreation amenities that equate to the acreage requirements of the County of Los Angeles General Plan local parkland standard (4 acres for every 1,000 persons in the unincorporated County).* For purposes of monitoring compliance with the General Plan standard, whenever either a Tentative Map or a Final Map is submitted for the County's review and clearance, those maps shall have a table that provides a breakdown of acreage per lot for the following categories: (1) Public Park acreage (maximum slope 3 percent or less); (2) Public Park Acreage Equivalency (which shall be based upon estimated Public Park Improvement Values derived from Total Project Cost Estimates required at the time of map clearance and the Parkland Dedication Ordinance/Quimby Ordinance in effect at the time the map is submitted); (3) Private Park acreage, including pocket parks; (4) Greenway and County multi-use (hiking, equestrian, and mountain biking) trail acreage; (5) Community Recreation Facility acreage; and (6) Private Recreation Facility acreage.

*_Note:_ Independent of this measure, an additional 96 acres of designated park space (increasing identified parkland to 6 acres per 1,000 persons) has been voluntarily agreed to by the Project applicant as a component of the Development Agreement. *See* Item 7.1 (entitled "Commitment to Provide Additional Regional Park Land") in Exhibit G of the Development Agreement.

Section 5.15 – Education

MM 15-2 on page 5.15-21 is hereby revised as follows:

> **MM 15-2** The Project Applicant/Developer shall demonstrate to the County that they have an executed agreement with all school districts that operate within the boundaries of the Project site. The Transportation Management Association shall coordinate with local schools and school districts to establish and maintain a Safe Routes to School program to facilitate students walking and biking to schools.

Section 5.16 – Fire and Law Enforcement Services

The first sentence under "Fire Services" on page 5.16-1 is hereby revised as follows:

> Fire services and emergency response for fire incidents during the initial development phases of the Project would be provided from Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person assessment engine company, which is an engine company with some limited paramedic capabilities.

The last column of the second row in Table 5.16-1 on page 5.16-7 is hereby revised as follows:

> 3-person assessment engine company**

The last row in Table 5.16-1 on page 5.16-7 is hereby revised as follows:

> ** an engine company with some limited paramedic capabilities

The first sentence on page 5.16-12 is hereby revised as follows:

> Fire services and emergency response for fire incidents during the initial construction phases of the Project would be provided from LACFD Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person assessment engine company.

The fifth sentence of the fourth paragraph on page 5.16-12 is hereby revised as follows, per the Developer Fee Detailed Fire Station Plan[3419]:

> A large station consists of an approximate ~~15,500~~ 13,000-sf building on an approximately 4.00-acre lot.

[3419] LACFD 2017, Attachment A

Section 5.17 – Other Public Services

The first sentence of the first full paragraph on page 5.17-2 is hereby revised as follows:

> The Project has committed to diverting 100 percent of soil during grading activities, and at least ~~70~~ 75 percent of non-hazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier I voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code (PDF 17-2, MM 17-9).

PDF 17-1 on page 5.17-25 is hereby revised as follows:

> **PDF 17-2** The Project has committed to diverting from landfill disposal 100 percent of soil during grading activities, and at least ~~70~~ 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier I voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first paragraph of PDF 17-3 on page 5.17-26 of the Draft EIR is hereby revised as follows:

> **PDF 17-3** The Project includes a Solid Waste Management Plan to achieve the goal of diverting 75 percent of operational solid waste generated from Project requiring landfill disposal. Property Owners shall process on-site, contract with a waste management company and/or recyclers/composters, and/or self-haul to waste and recycling facilities to properly recycle, divert, compost, and dispose of solid wastes generated on-site, such as metals, paper, household plastics, glass, cardboard, food waste, and green waste. Throughout the Project's operation, the waste hauler shall be required by contract to maintain records showing the diversion of not less than 75 percent of the operational waste generated by the Project. The Solid Waste Management Plan has many interrelated components, including, but not limited to:

The third sentence of the first paragraph under "Construction" on page 5.17-29 is hereby revised as follows:

> As described in PDF 17-2 and ensured by MM 17-9, the Project has committed to diverting from landfill disposal 100 percent of soil during grading activities, and at least ~~70~~ 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier I voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code.

The third sentence of the first paragraph under "Off-Site Impacts" on page 5.17-32 is hereby revised as follows:

> The planned ~~70~~ 75 percent diversion for non-hazardous construction and demolition waste (PDF 17 2, MM 17-9) would apply to the off-site Project features.

The first sentence of the "Impact Summary" on page 5.17-33 is hereby revised as follows:

> ***Impact Summary:*** As described in PDF 17-2 and ensured by MM 17-9, the Project has committed to diverting 100 percent of soil during grading activities, and at least ~~70~~ 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier I voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 17-3 on page 5.17-12 of the Draft EIR is hereby revised as follows:

> **MM 17-3** The Project Applicant/Developer shall dedicate to the County Library one (1) site of up to 2.62 acres within Village 3 of the Project (the "Dedicated Land") for public library purposes or other location for the permanent facility mutually agreed upon by the County Librarian and the Project Applicant/Developer. The Project Applicant/Developer shall receive a credit against unpaid Library Facilities Mitigation Fees in an amount equal to the fair market value of all Dedicated Land as of the date of the dedication to the County of Los Angeles for County Library purposes. The Dedicated Land shall be conveyed to the County concurrently with the filing and recordation of the final map within which the Dedicated Land is located. If the County Library desires to increase the size of the Dedicated Land, it shall make such request of the Project Applicant/Developer no later than the date that the County approves the tentative map

for the proposed subdivision in which the Dedicated Land is located. Tthe Project Applicant/Developer agrees to increase the size of the Dedicated Land upon the County's request provided: (i) the County cooperates with the Project Applicant/Developer in any related land use boundary changes, transfers or conversions necessary to accommodate the larger library site, subject to the requirements of CEQA and (ii) the County either pays the fair market value for such land with either (A) U.S. funds or (B) a dollar-for-dollar credit against unpaid Library Facilities Mitigation Fees, so long as the Project-Wide Fee Total has not already been offset pursuant to MM 17-4 through MM 17-7. ~~"Fair market value" for the land described in this paragraph shall be determined based on the value of such land had it been entitled for institutional office purposes and the property had a maximum floor area ratio (FAR) of 0.25.~~ If the Dedicated Land is not used for a County Library ~~at any time changes the use~~ within ten (10) years of the land's conveyance, or if the Dedicated Land ~~from that of~~ is not fully used for a ~~County owned public~~ library ~~facility~~ or another use by the County that is mutually approved by the County and Project Applicant/Developer, then the Dedicated Land (or portion thereof) will revert back to ~~Centennial~~ the Project Applicant/Developer.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 17-4, which starts on page 5.17-12 of the Draft EIR, is hereby revised as follows:

MM 17-4 The Project Applicant/Developer shall provide plans and specifications with a one or two-story, turn-key public library building (the "Permanent Facility") on the Dedicated Lands. The Permanent Facility may be constructed in phases. The size and scope of the Permanent Facility will be determined by the County Librarian in consultation with the Project Applicant/Developer provided, however, that the Project Applicant/Developer's maximum financial contribution shall not exceed the Project-Wide Fee Total, less any offsets pursuant to Mitigation Measures 17-4, 17-6, and 17-7 in this EIR. The sizing, design and programming of the Permanent Facility, including the influence of technology on library services, will be agreed upon by representatives from County Library and the Project Applicant/Developer. A report shall be prepared ~~by an independent library consultant selected by~~ in connection with the ~~County Library~~ preparation of the architectural design parameters that will solicit input from the community with

respect to the types of library services desired at the Permanent Library Facility. The consultant's report shall be paid for by the Project Applicant/Developer and the Project Applicant/Developer shall receive a credit against the Project-Wide Fee Total for the Project Applicant/Developer's payment of such costs. The Permanent Facility and Permanent Library furniture, fixture, and equipment (FF&E, as defined below) will be substantially similar in quality and materials to the Quartz Hill branch of the County Library on November 2016. The design of the Permanent Library will be performed by an architect mutually selected by the Project Applicant/Developer and the County Librarian. The Permanent Facility must comply with all requirements of the County Library's Low Voltage Specifications in effect on the date the design contract for the Permanent Facility is fully executed. The County Library shall be responsible for all costs of design and construction of the Permanent Library in excess of the Project Applicant/Developer's Library Facilities Mitigation Fee obligations hereunder. If, after application of the fee credits against Library Facilities Mitigation Fees to which the Project Applicant/Developer is entitled, there is insufficient funds to construct the Permanent Facility and purchase the Permanent Library FF&E, the Project Applicant/Developer shall not be required to fund construction of the Permanent Facility until additional and sufficient funds are authorized by the County to construct the Permanent Facility and to procure the Permanent Library FF&E. The Permanent Facility will be completed and operational on a date agreed to between the County Librarian and the Project Applicant, subject to force majeure and events within the control of the County (such as, for example, the County's failure to pay any funding shortfalls if credits against the Project-Wide Fee Total are exhausted). The size of the Permanent Facility will be proportionately reduced in size and materials if the County approves less than the 19,333 residential units proposed for the Centennial Project.

The first sentence of MM 17-9 on page 5.17-33 is hereby revised as follows:

MM 17-9 The Project Applicant/Developer shall be responsible for implementing the following construction waste reduction requirements to ensure that 100 percent of soil is diverted during grading activities, and that at least ~~70~~ 75 percent of nonhazardous construction and demolition waste is diverted from landfill disposal.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first paragraph and first bullet of MM 17-10 on page 5.17-34 of the Draft EIR are hereby revised as follows:

MM 17-10 The Project shall incorporate the Solid Waste Management Plan (Section 3.7 of the Centennial Specific Plan) and the Property Owner/Developer shall be responsible for implementation of the following operational waste reduction requirements to ensure that at least 75 percent of operational waste is diverted from landfill disposal, which shall be posted on the community intranet, and shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs:

- The Property Owner/Developer shall process an on-site contract with a waste management company and/or recyclers/composters, and/or self-haul to waste and recycling facilities to properly recycle, divert, compost, and dispose of solid waste generated on-site. Throughout the Project's operation, the waste hauler shall be required by contract to maintain records showing the diversion of not less than 75 percent of the operational waste generated by the Project.

Section 5.18 – Water Resources

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. A third point is added after point 2(b) in MM 18-1 on page 5.18-76 of the Draft EIR as follows:

3. Water meters shall be required to measure potable water use and may be required to measure recycled water usage at commercial, recreational, and institutional uses; and to monitor single family home lots via sample home survey selection criteria.

Section 5.19 – Wastewater Collection

The fourth paragraph on page 5.19-11 is hereby revised as follows:

As discussed in Section 5.19.2, Title 22 of the California Code of Regulations establishes criteria for recycled water, treatment, conveyance, and water quality testing and is administered by the SWRCB Division of Drinking Water. State surface and groundwater quality, including discharge from the WRFs, is further regulated by the Lahontan RWQCB under the Porter Cologne Act. Each of the proposed WRFs will be required to obtain WDRs from the Lahontan RWQCB that include enforceable operational, treatment, conveyance,

discharge, water quality and monitoring requirements before wastewater treatment and recycled water operations may commence. The engineering design and permitting process for the WRF East will include details related to the size, volume, liners, and construction methods for the storage reservoirs, which will be determined at the start of the design process in consultation with the Lahontan RWQCB. Details regarding the type of impervious liner required to prevent infiltration of recycled water and prevent the degradation of the groundwater, including any required monitoring systems to detect leakage in the seasonal storage pond liners, will be provided to the satisfaction of the Lahontan RWQCB, as required through the permitting process. The WDRs issued by the Board will be consistent with the RWQCB's wastewater treatment requirements (Psomas 2017b).

MM 19-2 on page 5.19-14 is hereby revised as follows:

MM 19-2 The Project Applicant/Developer shall demonstrate that the Project has either been annexed into an existing qualified public utility district (e.g. Golden Valley Municipal Water District) or that a new public utility district (e.g. Project Water Purveyor) has been created to serve the Project. The Project Water Purveyor or alternate qualified public utility district shall be responsible for the design, construction, and operation of the wastewater facilities, and shall ensure compliance with all applicable standards and regulations, including all Lahontan RWQCB and Title 22 requirements of the California Code of Regulations.

Wastewater treatment facilities, effluent facilities, and sewer lift stations shall be designed with emergency backup power sources and spill containment features, which shall be provided to the satisfaction of the Lahontan RWQCB.

MMs 19-6 and 19-7 are hereby added after MM 19-5 on page 5.19-15 as follows:

MM 19-6 Recycled water from Project Wastewater Reclamation Facilities that is used in a manner that could accidentally recharge groundwater shall meet the groundwater quality objectives in the Lahontan Basin Plan for nitrate as nitrogen, or 10 milligrams per liter based on the California state drinking water standard as referenced in the Lahontan Basin Plan for groundwater quality objectives of 45 milligrams per liter of nitrate as nitrate.

MM 19-7 The Project Applicant/Developer shall provide an evaluation of alternate disinfection measures, including the use of ultraviolet disinfection, for water treatment at the eastern wastewater reclamation facility (WRF East) and the western wastewater reclamation facility (WRF West), and provide a

recommendation regarding the most efficient and effective means of disinfection to the Lahontan Regional Water Quality Control Board (Lahontan RWQCB) for review. The WRF East and WRF West shall be designed to the satisfaction of the Lahontan RWQCB, with appropriate disinfection measures to ensure that any incidental recharge from the use of recycled water will not adversely affect receiving groundwater.

Section 5.20 – Dry Utilities

The first paragraph under "SCE Infrastructure" on page 5.20-10 is hereby revised as follows:

SCE has also determined that full Project buildout would require a new substation, currently named the "Centennial Substation". The Centennial Substation would be located in the ~~in the~~ vicinity west of 300th ~~to 310th~~ Street West ~~either north or south~~ within Village 6, north of SR-138. This necessary infrastructure would also be ensured via MM 20.2-2. Approximately 4.5 acres would be required for this substation site. The substation would convert the 66 kV voltage to 12 kV~~/9.5 kV~~ for distribution to the various uses within this portion of the Project site. A detailed description of the proposed substation can be found in Section 4.5.10, Dry Utilities, of the Project Description (Section 4.0).

MM 20.2-2 on pages 5.20-13 and 5.20-14 is hereby revised as follows:

MM 20.2-2 The Project Applicant/Developer shall provide the County with plans and specifications that demonstrate a future substation shall be constructed in the eastern half of the Project site to serve Project development in the easterly portion of the Project site. To provide adequate capacity for electrical services for the Project, SCE would select one or both of the following two options to implement: (1) reconfigure the Bailey Substation or (2) upgrade the Gorman Substation and retrofit the existing overhead power lines. An electrical ~~generation and distribution~~ infrastructure system shall be constructed as part of the main utility corridors for dry utilities. The timing of construction, as well as specific facility location and sizing, shall be coordinated with SCE.

Section 5.21 – Climate Change

The following edit was identified subsequent to publication of the Final EIR, and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. PDF 21-4 on page 5.21-41 of the Draft EIR is hereby revised as follows:

PDF 21-4 The Green Development Program requires that all ~~a minimum of 70 percent of~~ public and community pools and spas would be equipped with active solar heating systems where heating is necessary or desired. The applicant for a pool permit shall provide the proposed plan for compliance with this provision prior to obtaining a permit for the pool.

The following edit was identified subsequent to publication of the Final EIR, and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. PDF 21-8 on page 5.21-42 of the Draft EIR is hereby revised as follows:

PDF 21-8 The Green Development Program requires that the Project's wastewater reclamation facilities (WRF) will ~~include equipment to~~ capture and reuse biogas for energy production.

The following edit was identified subsequent to publication of the Final EIR, and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. PDF 21-11 on page 5.21-43 of the Draft EIR is hereby revised as follows:

PDF 21-11 The Centennial Specific Plan's Green Development Program requires the installation of one 208/240 volts of alternating current (VAC) receptacle that may be used for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of Section 4.106.4.1 of the 2016 CALGreen Code, or the most applicable code at the time of construction.

The second bullet of PDF 21-12 on pages 5.21-43 and 5.21-67 is hereby revised as follows:

- Multi-family residential buildings of at least seventeen ~~20~~ 17 residential units shall provide a minimum of one alternative energy vehicle fueling station for the first ~~twenty~~ seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty~~ seventeen (~~20~~ 17) residential units thereafter.

The following further edit was identified subsequent to publication of the Final EIR, and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors.

No further edits have been made to this text. The first paragraph of PDF 21-12 on page 5.21-43 of the Draft EIR is hereby revised as follows:

PDF 21-12 The *Centennial Specific Plan's* Green Development Program requires each applicant to provide plans and specifications to the County demonstrating compliance with the Electric Vehicle Supply (EVS) charging station measures specified in MM 11-4. If and to the extent subsequently approved by the County, compliant with state laws, and resulting in no new significant impacts to the environment following County review and approval, EVS charging stations may be replaced by "alternative energy fueling stations" which may include other types of electric vehicle charging technology (e.g., operating at higher or lower voltages), or alternative vehicular fuel technology that results in zero or near zero (as defined by CARB) GHG emission such as hydrogen fuel cells, biofuels, or other qualifying fuel technologies. An electric charging station shall allow for simultaneous charging of two electric vehicles. ~~for an applicable construction permit to install "alternative energy fueling stations" as listed below. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station (allowing simultaneous charging of two or more vehicles) or a station providing another new or improved technology (e.g. compressed natural gas [CNG] and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel.~~

The following edit was identified subsequent to publication of the Final EIR, and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first bullet of PDF 21-14 on page 5.21-44 of the Draft EIR is hereby revised as follows:

- Visitor parking shall include preferentially located parking spaces for ~~alternative-fueled~~ electric vehicles.

A third bullet is hereby added under PDF 21-15 on page 5.21-44 as follows:

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

The following further edit was identified subsequent to publication of the Final EIR, and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. PDF 21-15 on page 5.21-44 of the Draft EIR is hereby revised as follows:

PDF 21-15 The Green Development Program requires that prior to issuance of an applicable construction permit for each parking structure and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric, ~~natural gas, or similar low-emitting technology)~~ vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 ~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated~~. Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code.
- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

The first sentence of the PDF 17-2 discussion under "Project Design Features" on page 5.21-53 is hereby revised as follows:

PDF 17-2 PDF 17-2 of Section 5.17, Other Services, states that the Project has committed to diverting from landfill disposal 100 percent of soil during grading activities, and at least ~~70~~ 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier I voluntary measure in Section A5.408.3.1 of the California Green Building Standards Code.

Table 5.21-11 on pages 5.21-73 through 5.21-84 is hereby revised as follows:

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 1: GREEN BUILDING AND ENERGY	
Existing County Initiatives	
Energy Upgrades to Existing Structures provides rebates and incentives for energy retrofit efficiency projects.	Because Centennial will be a new community, energy efficiency is required for buildings, infrastructure (e.g., outdoor irrigation), and appliances. The Project does not include any existing structures, and thus this CCAP action is not applicable.
Los Angeles County Code (Title 31) requires implementation of sustainable policies for new building design.	The Project is consistent with Title 31 of the County Code ~~applies to the Project,~~ and ~~is~~ implement~~ed through~~ a variety of measures including, for example (1) landscape design restrictions related to minimizing turf grass and the use of non-invasive and drought tolerant plants and tree species; (2) recycling and/or salvaging a minimum of 75% of the non-hazardous construction and demolition debris, and 100% of soils during grading; and (3) compliance with a water budget for landscape irrigation use conforms to the California Department of Water Resources Model Water Efficient Landscape Ordinance.
Commercial Building Performance Partnership provides financial mechanisms for energy conservation upgrades to existing buildings.	Energy conservation is required for new structures, and no retrofits of existing structures are included in the Project and thus this CCAP action is not applicable.
Renewable Energy and Clean Fuels Program implements projects to accelerate the use of compressed natural gas as an alternative fuel.	Renewable energy produced within the Project will be primarily rooftop solar, and at minimum 50% of the Project's anticipated electricity demand will be satisfied from on-site renewable energy generation. It is anticipated that the dominant alternative transportation fuel will be electricity (e.g., electric and hybrid-electric vehicles); however, compressed natural gas (CNG) will also be made available as a transportation fuel to the extent consistent with

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	then-applicable recommendations and/or requirements from the California Air Resources Board (CARB) and County.
New CCAP Actions	
BE-1: Green Building Development encourages energy reductions in new development through voluntary reductions that exceed the minimum standards set forth in the State's CALGreen Building Code (Title 24).	The Project exceeds the CALGreen Building Code minimum requirements in several ways, including: 1. Compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings, resulting in buildings that would exceed 2016 Title 24 requirements by 15% (PDF 21-1). 2. Compliance with CALGreen voluntary measure A5.203.1.2.1 for nonresidential buildings and residential buildings taller than 4 stories, resulting in buildings that would exceed 2016 Title 24 requirements by 10%. 3. Owners of all single-family units and multi-family residential structures are required, upon resale, to present to the buyer a written energy audit checklist at the time the seller provides the buyer with the Real Estate Transfer Disclosure Statement required by Section 1102 et seq. of the *California Civil Code.* The energy audit checklist shall certify that all heating, ventilation, and air conditioning (HVAC) systems, thermostats, appliances, windows, and swimming pools are either the same as originally installed or otherwise comply with the Green Development Program. 4. For nonresidential buildings, within 90 days after the end of the first full calendar year following the issuance of the certificate of occupancy, and within 90 days after each 5-year period thereafter, the owner or tenant in possession thereof shall submit to the master commercial owners association or other applicable association a report prepared by the owner or a qualified, independent third party that evaluates whether all major building systems such as a heat furnace, air conditioner, and other energy-consuming mechanical fixtures are working within the design standards established by the manufacturer of such equipment. 5. Residential appliances offered by builders shall consist ~~exclusively~~ of low-energy and/or low-

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	water consuming appliances that are Energy-Star compliant for each appliance that is rated by Energy Star (e.g., refrigerator, clothes washer, dishwasher, and room air conditioner). These project design features meet and exceed the requirements of ~~Section 22.52.2130~~ Title 31 of the County Code (Green Building).
BE-2: Energy Efficiency retrofits will be further encouraged for existing buildings and structures.	The Project does not include any existing buildings, so this measure is not applicable.
BE-3: Solar Installations are encouraged for new and existing buildings	Renewable energy produced within the Project would ~~be generated~~ provide ~~at~~ a minimum of 50% of the Project's anticipated electricity demand ~~would be satisfied from on-site renewable energy generation~~. Specific metrics to achieve this goal include: 1. A minimum of 100% of all single-family detached residential units at buildout shall ~~have~~ be pre-wired to support solar energy collection equipment and a minimum of 30% of all single-family detached residential units at buildout shall have solar energy collection equipment installed on roof areas or on top of other structures on the site (e.g., patio covers or pergolas). 2. Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. 3. A minimum of 10% of all single-family detached residential units at buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. 4. A minimum of 30% of all multi-family residential units at buildout shall have solar energy collection equipment, which shall be installed on roof areas facing within 30 degrees of true south. 5. A~~ll~~ minimum of 70% of public and community swimming ~~s~~pools constructed within the Project shall be heated by a solar water heating system or

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	renewable power system that provides electricity for water heating. 6. A minimum of 60% of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south.
BE-4: Alternative Renewable Energy Programs are designed to encourage the use of non-solar renewable energy technology such as wind, hydropower, and geothermal resources, as feasible.	The Project site does not have hydropower or geothermal resources. Utility-scale wind plants present a potential hazard to sensitive biological resources such as the California Condor, and utility-scale solar plants are not an authorized use on the Project site or vicinity under the Antelope Valley Area Plan. However, the Specific Plan states that renewable energy systems shall be installed in connection with the development of one or more of the following: residential units, non-residential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity.
BE-5: Wastewater Treatment Plant Biogas recovery and reuse	The Project's wastewater reclamation facilities (WRF) will include equipment to capture and reuse biogas for energy production.
BE-6: Energy Efficiency Retrofits of Wastewater Equipment promotes efficient treatment equipment	There is no existing wastewater treatment facility at the Project site, so this measure is not applicable.
BE-7 Landfill Biogas encourages renewable biogas projects at regional landfills.	There is no existing or proposed landfill at the Project site, so this measure is not applicable.
CATEGORY 2: LAND USE AND TRANSPORTATION	
Existing County Initiatives	
Healthy Design Ordinance (Ordinance 2013-001, amending Title 21 (Subdivisions) and Title 22 (Planning and Zoning)) is designed to require projects to have better walking environments (e.g., with wider sidewalks and more shade trees), encourage more bicycling (e.g., by requiring bike parking), improve access to healthy foods (e.g., with weekly farmer's markets and permissible community gardens), and enhance project review requirements to provide an opportunity to review healthy design features such as landscaping, lighting, street furniture and bike parking spots.	The Project design ~~complies~~ is consistent with all of the substantive standards of the Healthy Design Ordinance, including but not limited to requirements for right-of-way widths; pedestrian crossings; tree plantings in lot frontages; and bicycle parking facilities. The Project allows community gardens as legally permitted uses in residential, ~~and~~ mixed-use, park, recreation/entertainment, and institutional/civic areas of the Project. The Project Transportation Demand Management (TDM) Program includes bicycle program metrics, discussed below.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
Bicycle Master Plan promotes bicycle ridership and bike-friendly designs throughout the County.	The Project includes a safe and aesthetically pleasing dedicated bicycle network and pedestrian system into all development designs, and distributes community uses such as neighborhood parks, elementary schools, and neighborhood-scale retail in key locations throughout the Project to reduce single-occupancy automobile travel for these neighborhood-scale destinations. The Mobility Plan of the Specific Plan ~~Project TDM Program~~ includes bicycle program metrics, discussed below.
Sustainable Transportation Programs to increase the efficiency of the transportation network.	The Project includes the following measures to reduce single-occupancy commuter travel to and from the Project site: 1. Land use planning principles that create a balanced master-planned community that includes: A. Mixed-use neighborhoods where residential, commercial, and other employment-generating uses and institutional/public uses are proximate to each other and connected by a network of walkable streets, bikeways and trails to reduce reliance on automobile use within the Project site. B. A diverse range of residential product types, including dedication of a minimum of 10 percent of residential units as affordable housing, to compliment the diverse range of employment opportunities within the Project and help minimize the off-site employment commuter trips. 2. Establishment of a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is also to coordinate and facilitate transit and rideshare usage to serve as many riders as possible, and to reduce the volume of automobile trips within and from the Project site, as described in more detail in the ~~Project TDM Program~~ Mobility Plan below.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
New CCAP Actions	
LUT-1: Bicycle Programs and Supporting Facility improvements to expand the County's existing bicycle network.	As a new community, the Project includes a network of bikeways and multi-purpose trails, as well as community trails, in addition to the greenways and paseos. The Project trail system will connect to the Pacific Crest Trail (PCT), which is designated as a National Scenic Trail that traverses approximately 2,650 miles through 3 states (California, Oregon, and Washington) will be relocated to the west side of 300th Street West, which travels through the Project site. This realignment is not a part of the Project, but is assumed to be the future alignment for evaluation purposes in this EIR. The Project requires bicycle parking facilities for 5% of the minimum required vehicle parking spaces for nonresidential land uses or as required by County Code Section 22.52.1225B, whichever is more stringent, to encourage and support bicycle use.
LUT-2: Pedestrian Network improvements to expand the County's existing pedestrian network.	As a new community, the Project implements a Complete Streets design approach that includes sidewalks and dedicated bicycle network and pedestrian system incorporated into all development designs and throughout the community to reduce single-occupancy automobile travel for neighborhood-scale destinations.
LUT-3: Transit Expansion to create priority bus lanes and improve the existing efficiency of the transportation network.	As a new community, the Project implements a ~~TDM Program~~ Mobility Plan that includes strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. The Project also includes a transit easement running North-South through the center of the development, connecting its most housing-dense areas with the business park, accommodating future internal commuting within the Project site.
LUT-4: Travel Demand Management to encourage ride-sharing and employer-sponsored vanpools to reduce peak-period vehicle trips.	The Project ~~TDM Program~~ Mobility Plan encourages ride-sharing and employer-sponsored vanpools, as well as other measures to reduce automobile trips within and from the Project site. The TDM will be managed by the TMA.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
LUT-5: Car-Sharing Program promotes the shared use of private and employer-owned vehicles.	The Project ~~TDM Program~~ Mobility Plan includes formation of strategic partnerships with car sharing services (e.g., Uber or Lyft) and other innovation/technology approaches to increase transportation efficiency, as described in more detail below.
LUT-6: Land Use Design and Density targets land use patterns to support mobility, and improve the diversity of urban and suburban developments	The Project includes a balanced mix of housing, employment, and community uses including schools, retail, and public services, to minimize off-site trips. The Project design also encourages pedestrian and bicycle use through the use of walkable communities planning and design techniques, and includes a diverse range of housing types.
LUT-7: Transportation Signal Synchronization Program Improve the network of traffic signals on the major streets throughout Los Angeles (LA) County.	The Project site does not include any existing traffic signals, but the Project will use synchronized traffic signals to ensure the efficient use of future Project roadways.
LUT-8: Electric Vehicle Infrastructure. Install EV charging facilities at County-owned public venues and ensure that at least one-third of these charging stations will be available for visitor use.	The Project requires electric vehicle infrastructure, specifically: 1. Builders will be required to install one 240 volt of alternating current (VAC) outlet available for use to charge electric vehicles in the garage or other suitable location for each single-family home. 2. For business park and institutional land uses, a minimum of 1 electric vehicle charging station (consisting of a 208/240 VAC or alternative electric charging technology approved by the County, serving 2 adjacent parking spaces) will be installed for the first 50,000 square feet (sf) of building space, and an additional fueling station will be installed for each subsequent 50,000 sf of building space. 3. For multi-family residential projects that include at least ~~20~~ 17 units, a minimum of 1 alternative energy ~~electric~~ vehicle fueling ~~charging~~ station be installed for the first 17 ~~20~~ units and an additional ~~charging~~ alternative energy vehicle fueling station will be installed for each subsequent ~~20~~ 17 units. 4. Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided for nonresidential structures ~~larger than 20,000 sf and made available for employees and visitors~~ as specified in Section

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10% of total for 201 and more spaces. 5. For parking facilities and parking lots with more than 20 spaces, the parking facility or lot must include: A. A minimum of 5% preferentially located parking spaces for alternative-fueled vehicles. B. Electrical lines designed and sized to provide electric vehicle charging stations for up to 3% of parking space when demand is demonstrated.
LUT-9: Idling Reduction Goal. Encourage idling limits of 3 minutes for heavy-duty construction equipment as feasible within manufacturer's specifications.	The Project includes as a mandatory contract specification for all construction contractors a restriction to limit unnecessary construction equipment idling to 3 minutes, and include methods to encourage equipment operators to achieve the 3-minute goal.
LUT-10: Efficient Goods Movement is designed to improve cargo transport on existing roadways and transportation infrastructure.	The Project includes contributions to California Department of Transportation (Caltrans) to avoid any adverse Project-related impact to goods movement on Interstate (I) 5 and State Route (SR) 138. Contributions are described in mitigation measures in Section 5.10, Traffic, Access and Circulation.
LUT-11: Sustainable Pavements Program is designed to improve the resiliency of, and reduce the GHG emissions associated with, existing paved roadways.	The Project will use durable roadway paving materials that will be determined upon consideration of aggregates, asphalt materials, cementitious materials, recycled materials, and other roadway materials that are commonly used in pavement construction in order to assess from a life-cycle perspective the role they play in contributing to the sustainability of the Project's pavement system. "Cool" pavements will be used to reduce heat island effects.
LUT-12: Electrify Construction and Landscaping Equipment. Utilize electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment.	All landscape maintenance equipment at Centennial will be CARB-approved or electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 3: WATER CONSERVATION AND WASTEWATER	
Existing County Initiatives	
Conservation rebates, smart gardening workshops and stormwater controls provide water and wastewater improvements in existing communities	This measure does not apply to new communities. The Project includes compliance with drought-response State measures including the Model Water Efficient Landscape Ordinance (MWELO), which are more stringent than required by CALGreen (DWR 2015). The Project includes 2 WRFs that will provide a reliable supply of recycled water for landscaping, to reduce reliance on potable water supplies.
New CCAP Actions	
WAW-1: Per Capita Water Use Reduction Goal. Meet the State established per capita water use reduction goal as identified by Senate Bill (SB) X7-7 for 2020. The State goal is a 20 percent reduction in per capita water use compared to baseline levels.	The final EIR for the Antelope Valley Area Plan (AVAP) update utilized the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) average Antelope Valley estimate of per capita water use (199 gallons per capita per day [gpcd]) to evaluate the water demand growth that could occur from the implementation of the AVAP. At full buildout, the Project's total per capita water use would be approximately 177.5 gpcd. The Project would reduce water demand by approximately 10% below the per capita average consumption in the Antelope Valley. The analysis compared the Project to the baseline per capita consumption in the Project vicinity since the Project site is undeveloped there is not an established baseline of water consumption on the Project site.
WAW-2: Recycled Water, Water Supply Improvement Programs, and Stormwater Runoff. Promote the use of wastewater and gray water to be used for agricultural, industrial, and irrigation purposes. Manage stormwater, reduce potential treatment, and protect local groundwater supplies.	The Project includes a comprehensive water resources management program, including: 1. *Recycled Water.* The Project includes water recycling facility to recycle, and reuse, wastewater piped to the Project WRF. All nonresidential and multi-family development must install recycled water infrastructure to irrigate common areas for these facilities (except where prohibited by law), and all available recycled water shall be used for such irrigation uses. 2. *Potable Water Conservation.* The Project includes numerous potable water conservation measures, including: A. Establishing maximum available water allocations for each residential and commercial parcel, and monitoring and enforcing such allocations through a

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	metering system and rate structure and/or penalty structure for those exceeding their water allocations. B. Restricting outdoor landscaping planting in private yards to a designated low-water plant pallets to minimize use of potable water for private landscaping, ~~prohibiting~~ mandating that only recycled water be used to irrigate turf in commercial areas ~~projects~~, and restricting turf to 25% of landscaped areas on private residential projects. C. Requiring the ~~exclusive~~ use of Energy Star or equivalent major appliances, as described above, that use less water (as well as less energy). D. Requiring the exclusive use of kitchen and bathroom faucets that comply with 2013 CALGreen code residential voluntary measures specified in Sections A4.303.1 and A4.303.3 of the Code. 3. *Storm Water Management.* The Project's integrated water resources management approach will comply with County requirements related to hydrology and flood control considerations through compliance with Low Impact Development (LID) standards and best management practices (BMPs) for sediment management through hydromodification techniques. The Project includes 2 WRFs that will provide a reliable supply of recycled water for landscaping, to reduce reliance on potable water supplies. The Project provides a reliable water supply through use of an integrated water resources management approach that incorporates water conservation measures; uses recycled water for non-potable uses; uses multiple sources of water supply to ensure that the Project's water needs are met without the need to solely rely on the annual delivery of a fixed amount of imported water; provides a high degree of water supply reliability for each stage of Project buildout; and minimizes the impacts of additional water demand on the state's water supply.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 4: WASTE REDUCTION, REUSE AND RECYCLING	
Existing Initiatives	
Community waste diversion programs to redirect 50 percent of solid wastes to recycling or re-use instead of landfills	The Project will exceed this existing measure by implementing a 100 percent diversion of soil during grading activities, and at least ~~70~~ 75 percent of non-hazardous construction and demolition waste. The Project will also divert 75 percent of operational solid waste.
New CCAP Action	
SW-1: Waste Diversion Goal. For the County's unincorporated areas, adopt a waste diversion goal to comply with all State mandates to divert at least 75 percent of waste from landfill disposal by 2020.	The Project includes both a construction and operational waste reduction measures. 1. The Project must implement a plan and monitoring program to ensure recycle or reuse of a minimum of 75% by weight of construction and demolition debris, exclusive of soil, rock, and gravel. This quantity exceeds the 50% requirement of Section 20.87.040 of the County Code and the 75% target proposed in the CCAP. 2. The Developer must provide the County with a contract establishing an on-site waste recycling and composting program, including the collection of metals, paper, household plastics, glass, cardboard, green waste and food waste. The waste hauler should be required by contract to maintain records showing the diversion of not less than 75% of the operational waste generated by the Project. The Project will include a minimum of five acres for a Materials Recovery Facility/Transfer Station (MRF/TS), which may include mulching and composting operations and a Household Hazardous Waste Permanent Collection Center. An MRF/TS could be privately or publicly operated. The MRF/TS would allow for all materials that are recyclable to be sorted and compacted for shipment to an off-site recycling processing facility. The Developer shall encourage a waste management company to build these facilities within the Project site by grading, improving, and providing utility hookups by the end of the first phase of construction. The CC&R for the MRF/TS will require that the lot provided within the site remain as a Non-Disposal Solid Waste Processing Facility.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 5: LAND CONSERVATION AND TREE PLANTING	
Existing Initiatives	
Implementation of the urban forestry plan and oak woodlands conservation management plan.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total 23,547 acres, for a combined total of 28,663 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimizes disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. Open spaces will be provided within the Business Park that allow for wildlife movement between the southern portion of the Project site through to the drainage located on the northern side of SR 138.
New CCAP Actions	
LC-1: Develop Urban Forests. Support and expand urban forest programs within the unincorporated areas.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent ($MTCO_2e$). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
LC-2: Create New Vegetated Open Space. Restore and revegetate previously disturbed land and/or unused urban and suburban areas.	This action is not directly applicable to new development projects. However, the Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. Additionally, the Project would plant an estimated 35,123 new trees, as required by the County Tree Planting Ordinance. This would result in an estimated long-term sequestration of 24,867 $MTCO_2e$. This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance
LC-3: Promote the Sale of Locally Grown Foods and/or Products. Establish local farmers markets and support locally grown food.	The Project will include a weekly Farmer's Market sponsored by the homeowners association (HOA) or other entity selected by the Master Applicant/Developer, and will allow for community gardens as a permitted use in ~~commercial and~~ residential, mixed use, park, recreation/entertainment, and institutional/civic areas. The Project also accommodates a total of 50-acres for on-site food-growing and agriculture-related uses in places such as community gardens, orchards, groves, and greenhouses.
LC-4: Protect Conservation Areas. Encourage the protection of existing land conservation areas.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The following row of Table 5.21-11 of the Draft EIR is hereby revised as follows:

BE-3: Solar Installations are encouraged for new and existing buildings	Renewable energy produced within the Project would provide a minimum of 50% of the Project's anticipated electricity demand. Specific metrics to achieve this goal include: 1. A minimum of 100% of all single-family detached residential units at buildout shall be pre-wired to support solar energy collection equipment and a minimum of 30% of all single-family detached residential units at buildout shall have solar energy collection equipment installed on roof areas or on top of other structures on the site (e.g., patio covers or pergolas). 2. Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. 3. A minimum of 10% of all single-family detached residential units at buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. 4. A minimum of 30% of all multi-family residential units at buildout shall have solar energy collection equipment, which shall be installed on roof areas facing within 30 degrees of true south. 5. <u>All</u> ~~A minimum of 70% of public and community~~ swimming ~~s~~pools constructed within the Project shall be heated by a solar water heating system or renewable power system that provides electricity for water heating. 6. A minimum of 60% of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 21-5 on page 5.21-89 of the Draft EIR is hereby revised as follows:

MM 21-5 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that all ~~a minimum of 70 percent of~~ public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. The Project Applicant/Developer shall provide the proposed plan for compliance with this provision prior to obtaining a permit for the pool.

MM 21-8 on page 5.21-90 is hereby revised as follows:

MM 21-8 Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements, or equivalent, shall be ~~exclusively~~ offered by residential builders. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 21-9 on page 5.21-90 of the Draft EIR is hereby revised as follows:

MM 21-9 The Project Applicant/Developer shall provide plans and specifications to the County that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards, demonstrating that the Project's wastewater reclamation facilities (WRFs) shall ~~include equipment to~~ capture and reuse biogas for energy production.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 21-9 on page 5.21-90 of the Draft EIR is hereby revised as follows:

MM 21-14 Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan (see Appendix 3-H of the Centennial Specific Plan).*

**Note:* Independent of this measure, the Project Applicant/Developer has voluntarily agreed to a higher affordability percentage than imposed by this measure as part of the Development Agreement. *See* Item 11 (entitled

"Affordable Home Ownership and Rental Housing Program") in Exhibit G of the Development Agreement.

MM 21-15 on page 5.21-91 is hereby revised as follows:

MM 21-15 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. MM 21-15 and the first paragraph of MM 21-16 on page 5.21-91 of the Draft EIR are hereby revised as follows:

MM 21-15 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction. The Project Applicant/Developer shall provide a further credit of $500 to 50 percent of future homeowners (as requested by homeowner) to pay for the type of charging device then in use for electric vehicles or, with County approval, to pay for other energy conservation uses. The availability of this EV incentive benefit shall be disclosed and promoted at the time of initial sale of single family homes and shall thereafter be promoted by the TMA on its website.

MM 21-16 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating compliance with the Electric Vehicle Supply (EVS) charging station measures specified in MM 11-4. If and to the extent subsequently approved by the County, compliant with state laws, and resulting in no new significant impacts to the environment following County review and approval, EVS charging stations may be replaced by "alternative energy fueling stations" which may include other types of electric vehicle charging technology (e.g., operating at higher or lower voltages), or alternative

vehicular fuel technology that results in zero or near zero (as defined by CARB) GHG emission such as hydrogen fuel cells, biofuels, or other qualifying fuel technologies. ~~that "alternative energy fueling stations" shall be installed as follows. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel.~~ An electric charging station shall allow for simultaneous charging of two electric vehicles.

The second bullet of MM 21-16 on page 5.21-91 is hereby revised as follows:

- Multi-family residential buildings of at least seventeen ~~20~~ (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first ~~twenty~~ seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty~~ seventeen (~~20~~ 17) residential units thereafter.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first bullet of MM 21-18 on page 5.21-92 of the Draft EIR is hereby revised as follows:

- Visitor parking shall include preferentially located parking spaces for ~~alternative-fueled~~ electric vehicles.

MM 21-19 on page 5.21-92 is hereby revised as follows:

MM 21-19 For parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of

supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 ~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated.~~ Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:

Single charging space requirements. When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electrical vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent.

The following further edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first bullet of MM 21-19 on page 5.21-92 of the Draft EIR is hereby revised as follows:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric~~, natural gas, or similar low-emitting technology)~~ vehicles.

The following edit was identified subsequent to publication of the Final EIR and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first paragraph of MM 21-20 on page 5.21-92 of the Draft EIR is hereby revised as follows:

MM 21-20 The Project Applicant/Developer shall ensure that the implementation of the Green Development Program ~~takes into account compliance with the~~ that complies with all applicable legal requirements, including but not limited to the following regulations (as may be amended):

MMs 21-21 and 21-22 have hereby been added after MM 21-20 on page 5.21-94 as follows:

MM 21-21 The Project Applicant/Developer shall require contractors to use locally available and recycled building materials, provided such materials meet all applicable Building Code and other requirements, and are readily available and comparably priced to assure that such materials do not increase the cost and decrease the affordability of housing or community infrastructure.

MM 21-22 The Project parking lots shall be designed to reduce vehicle queuing and improve pedestrian safety. Parking lot access designs shall include self-enforcement features for reducing the speeds on driveways, such as speed bumps or curved driveways. The parking lots shall include clearly marked pedestrian pathways connecting building entrances to parking, sidewalk, and transit drop-off/pick-up locations.

Section 7 – Cumulative Impacts

The carryover paragraph on page 7-9 is hereby revised as follows:

> existing alignment of SR-138. The portion of SR-138 between 300th Street West and Gorman Post Road, which is applicable to the Project site, is envisioned by Caltrans to be a six-lane expressway. This alternative would involve at-grade signalized intersections at Cement Plant Road and 300th Street West; a grade-separated overcrossing at the Gorman Post Road intersection (same as Build Alternative 1); and a new grade separate structure (standard box culvert) east of Quail Lake near the airport (same as Build Alterative 1). Same as Build Alternative 1, this alternative would include an extension of the existing RCB culvert at the Quail Lake Outlet into the west branch of the California Aqueduct. In June 2017 the Final EIR/EIS identified Alternative 2 (Expressway/Highway) as the preferred alternative. Alternative 2 would include a 6-lane freeway from the I-5 interchange to Gorman Post Road, a 6-lane Expressway from Gorman Post Road to 300th Street West, a 4-lane expressway from 300th Street West to 240th Street West, and a 4-lane limited access conventional highway from 240th Street West to the SR-14 interchange, generally following the existing alignment of SR-138. A Supplemental Traffic Study (STS) has been prepared to incorporate the preferred Alternative 2 for SR-138 into the Project analysis. The STS is attached as Appendix 5.10-C of this Final EIR. The STS evaluates potential impacts using the Highway Capacity Manual (HCM) methodology and the North County Sub-Area Model utilized in the NW SR-138 Final EIR/EIS as updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The STS determined that the implementation of Alternative 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 Final EIR/EIS and the Project Draft EIR. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Project Draft EIR.

The third sentence of the last paragraph on page 7-14 is hereby revised as follows:

> In addition, ~~two~~ three sites within the open space areas (CA-LAN-3206, CA-LAN-3217, and CA-LAN-3227) would be treated as eligible and protected from secondary impacts as they are immediately adjacent to the development footprint.

The first full bullet point on page 7-16 is hereby revised as follows:

- The ~~open space~~ Mitigation P~~p~~reserve proposed as part of the Project, the resource protection provided in the nearby National Forest lands, and the Los Angeles County Significant Ecological Areas in the area together encompass a large portion of the region and provide a valuable haven for species as other parts of the region are developed.

The third sentence of the second full paragraph on page 7-16 is hereby revised as follows:

> Implementation of the Project's mitigation measures would enhance, restore, and create these vegetation types within the proposed ~~open space~~ Mitigation P~~p~~reserve and would therefore reduce impacts to less than significant levels for all vegetation types except native grasslands.

The fourth sentence of the last partial paragraph on page 7-19 is hereby revised as follows:

> The proposed ~~Centennial Transportation Improvement Program (CTIP)~~ Traffic Mitigation Agreement provides a mechanism for the needed transportation improvements to be implemented by providing advance funding for planning, design, and construction of certain improvements and establishing a funding program to collect fair shares for other improvements.

The following edit was identified subsequent to publication of the Final EIR, and is presented in this consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text. The first sentence of the second full paragraph on page 7-26 is hereby revised as follows:

> As described in Section 5.17.3, construction of the Project is estimated to result in approximately 180,873 ~~150,728~~ tons of construction wastes requiring disposal over the 20-year Project buildout period, after waste diversion; this is approximately 9,044 ~~7,537~~ tons per year or 34.8 ~~29.0~~ tons per day.

Section 8 – Alternatives to the Proposed Project

Table 8-1 on page 8-15 is hereby revised as follows:

TABLE 8-1
CENTENNIAL SPECIFIC PLAN ALTERNATIVES COMPARISON

	Centennial Project	Alternative A No Project	Alternative B Previously Proposed Project	Alternative C Additional Drainage Avoidance	Alternative D Infrastructure Relocation	Alternative E Density Clustering/East of Aqueduct	Alternative F Central EOA Development
Project Site	12,323 ac	12,323 ac	11,676 ac	12,323 ac	12,323 ac	12,323 ac	12,323 ac (within 23,930-ac EOA)
Open Space	5,624 ac	12,323 ac [a]	3,829 ac	5,661 ac	5,612 ac	6,280 ac	5,624 ac
Residential Area	4,987 ac	0 ac	3,982.5 ac	4,952 ac	4,984 ac	4,519 ac	4,987 ac
Dwelling Units	19,333 du	0 du	22,998 du	19,241 du	19,333 du	19,333 du	19,333 du
Non-Residential Area [a]	699 ac	0 ac	884.5 ac	678 ac	699 ac	650 ac	699 ac
Non-Residential Floor Area (msf)	10.10 msf	0 msf	14.22 msf	9.90 msf	10.10 msf	10.10 msf	10.10 msf
Civic and Institutional Uses [b]	~~684~~ 685 ac	0 ac	943.3 ac	699 ac	720 ac	632 ac	~~684~~ 685 ac
Public Rights-of-Way [c]	327 ac	0 ac	~~2,036.7~~ 627.8 ac [c]	327 ac	327 ac	303 ac	327 ac
Developed Land Use	7,207 ac [d]	Existing	7,847 ac	7,170 ac [e]	7,223 ac [f]	6,551 ac [g]	7,207 ac [d]
Open Space: Natural/Unimpacted	5,116 ac	Existing	3,829 ac	5,153 ac	5,100 ac	5,772 ac	5,116 ac

EOA: Economic Opportunity Area; ac: acres; du: dwelling unit; msf: million square feet

[a] includes Commercial, Business Park, and Employment areas
[b] includes Schools, Golf Course, Parks, and Utilities
[c] includes roads, greenways, internal slopes
[d] includes 6,698 acres of developed hardspace and 509 acres of graded open space within the grading footprint
[e] includes 6,656 acres of developed hardspace and 509 acres of graded open space within the grading footprint
[f] includes 6,730 acres of developed hardspace and 496 acres of graded open space within the grading footprint
[g] includes 6,104 acres of developed hardspace and 1,164 acres of graded open space within the grading footprint

Note: Acreage for all categories is conceptual gross acreage and does not include transitional slopes and/or internal slopes. Actual totals may vary with future detailed planning. Total for Project site may not add due to rounding.

The fourth paragraph in Table 8-3, row one, column two, on pages 8-69 and 8-70 is hereby revised as follows:

> However, Alternative~~s~~ C ~~and D~~ would provide less development than the Project. Under thi<u>s</u>~~se~~ alternative, the County would not be able to achieve housing and employment levels anticipated by the AVAP and associated with the adopted growth projections unless development occurs in excess of projections in other areas of the Antelope Valley.

Appendix 5.4-A – Centennial Project Water Quality Technical Report

The following text is hereby added immediately before the italicized heading "Municipal Recycled Water Landscape Irrigation Use Permit" on page 36:

> <u>*Water Reclamation Requirements for Recycled Water Use*</u>
>
> <u>In June 2016, the State Water Resources Control Board adopted General Order No. 2016-0068-DDW. The Order provides a streamlined Notice of Applicability process for the beneficial, non- potable use of recycled water consistent with the California Uniform Statewide Recycling Criteria, except recycled water use to replenish groundwater resources, the disposal of treated wastewater in percolation ponds, and excessive hydraulic loading of recycled water in use areas where the primary purpose of the activity is disposal of treated wastewater and direct potable reuse. General Order No. 2016-0068-DDW encourages recycled water use and reduced demand on potable water supplies by (1) maintaining a streamlined approach in permitting new recycled water users through a water recycling program and (2) providing the option for a single recycled water use permit coverage for larger users that typically need permit coverage from multiple Regional Water Boards. The Order is applicable to recycled water projects where recycled water is used or transported for non-potable uses, such as landscape irrigation, irrigation of crops and pasture land, construction, fire suppression, and hydrostatic testing. The Order does not regulate the treatment of wastewater, and compliance with the Order does not relieve producers or distributors from the obligation to comply with applicable Waste Discharge Requirements (WDRs) for discharges from wastewater treatment plants, other than the recycled water uses described in the Order.</u>
>
> <u>An applicant must submit a notice of intent (NOI) to obtain coverage under the Order. The applicant must declare responsibility for the administration of the water recycling program authorized pursuant to the Order and describe a program the applicant will administer to ensure that recycled water use complies with the requirements of the Uniform Statewide Recycling Criteria and the Order. Once coverage is authorized, the applicant then becomes the administrator for the covered water recycling program. The Order includes specific recycled water recycling administration requirements and other reporting and monitoring requirements.</u>

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4.2 CLARIFICATIONS AND REVISIONS TO RESPONSES PREVIOUSLY PUBLISHED IN THE FINAL EIR

Following the publication of the Final EIR in May 2018 and the subsequent addenda resulting from each Regional Planning Commission Hearing, typographical errors were identified. These errors pertain solely to: (1) the solar heating of all, rather than 70 percent, of pools and spas; and (2) reference to a Mitigation Preserve Management Plan, which does not exist, instead of the Ranch-wide Management Plan. All instances of these errors in the Final EIR and subsequent addenda are hereby revised as listed below, and are presented in this Consolidated Final EIR for the consideration of the Board of Supervisors. No further edits have been made to this text.

The information included in these clarifications and revisions to responses previously published in the Final EIR does not constitute substantial new information that requires recirculation of the Draft EIR pursuant to Section 15088.5 of the State CEQA Guidelines. Recirculation of the Draft EIR is not required because the new information added to the EIR through these modifications clarifies or amplifies information already provided or makes insignificant modifications to the already adequate Draft EIR.

The clarifications and revisions to the Final EIR contained in Section 4.2 are in the same order as the information appears in the Draft EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by double underlining (<u>underline</u>) where text has been added.

Response to Comment B.4-25

The third sentence of Response to Comment B.4-25 is hereby revised as follows:

> Regarding point 2 of the comment, the Draft EIR discusses impacts to the burrowing owl on page 5.7-150, while impacts to individuals is considered potential significant and ~~imitation~~ <u>mitigation</u> is provided, the loss of habitat is determined to be adverse but less than significant.

Response to Comment F.8-79

Response to Comment F.8-79 is hereby revised as follows:

> In addition, MM 21-5 requires the Project to equip ~~a minimum of 70 percent of~~ <u>all</u> public and community pools and spas with active solar water hearing systems where heating is necessary or desired, and MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature.

Response to Comment F.8-95

Response to Comment F.8-95 is hereby revised as follows:

> Specifically, regarding renewable energy production, MM 21-1 requires the Project Applicant/Developer to provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation, which may include, but is not limited to, solar, geothermal, biofuel and hydroelectric systems. In addition, MM 21-5 requires the Project to equip ~~a minimum of 70 percent of~~ all public and community pools and spas with active solar water hearing systems where heating is necessary or desired, and MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature.

Response to Comment F.8-204

Row 215 of response to Comment F.8-204 is hereby revised as follows:

> Further, per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that ~~a minimum of 70 percent of~~ all public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (*Id.,* p. 5.21-89)

Response to Comment F.8-204

Row 216 of response to Comment F.8-204 is hereby revised as follows:

> Per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that ~~a minimum of 70 percent of~~ all public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (Id., p. 5.21-89)

Response to Comment F.8-204

Row 220 of response to Comment F.8-204 is hereby revised as follows:

> Per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that ~~a minimum of 70 percent of~~ all public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (DRP 2017, p. 5.21-89)

Response to Comment F.8-204

Row 297 of response to Comment F.8-204 is hereby revised as follows:

~~A minimum of 70 percent of~~ All public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired.

Response to Comment F.8-204

Row 411 of response to Comment F.8-204 is hereby revised as follows:

Further, per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that ~~a minimum of 70 percent of~~ all public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (Id., p. 5.21-89)

Response to Comment F.3A-46

Response to Comment F.3A-46 is hereby revised as follows:

> With respect to this comment's recommended mitigation measures regarding renewable energy production, the EIR includes functionally equivalent measures. Specifically, MM 21-1 requires the Project Applicant/Developer to provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation, which may include, but is not limited to, solar, geothermal, biofuel and hydroelectric systems in a manner consistent with the Specific Plan. In addition, MM 21-5 requires the Project to equip ~~a minimum of 70 percent of~~ all public and community pools and spas with active solar water heating systems where heating is necessary or desired, and MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature.

Response to Comment F.3A-71

Response to Comment F.3A-71 is hereby revised as follows:

> In addition, MM 21-5 requires the Project to equip ~~a minimum of 70 percent of~~ all public and community pools and spas with active solar water heating systems where heating is necessary or desired, and MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent.

Responses to Comments B.4-64 and F.8-18, and Clarifications and Revisions to Section 4.0 – Project Description

Responses to Comments B.4-64 and F.8-18, and the clarifications and revisions to Section 4.0, Project Description, of the Draft EIR presented in the Final EIR published May 2018 are hereby revised as follows:

In addition, to clarify the scope of permitted uses within the open space areas associated with the Project, four open space subdesignations (three on-site, one off-site) are hereby added to page 4-24 of Section 4.0, Project Description of the Draft EIR, and conforming edits are made to the Specific Plan:

CENTENNIAL OPEN SPACE DEFINITIONS

Mitigation Preserve: The Mitigation Preserve encompasses 43,079 acres of land to be preserved and managed in perpetuity for biological resources values. The Preserve consists of an On-site Mitigation Preserve, comprised of approximately 3,866 acres within the Project boundaries, but outside of the development footprint, and an Off-site Mitigation Preserve made up of 39,213 acres within adjacent and nearby off-site lands. These mitigation lands provide sufficient land and biological resource values to implement mitigation strategies to fully mitigate for Project biological resource impacts.

On-site Mitigation Preserve

The On-site Mitigation Preserve is divided into two areas. The southern on-site mitigation area includes 968 acres located immediately south of the development footprint along south side of SR-138. The northern on-site mitigation area consists of 2,898 acres located to the north and west of the development footprint on the west side of the aqueduct. All of the lands within the on-site portion of the Mitigation Preserve are within Los Angeles County SEA No. 17.

Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the ~~Mitigation Preserve~~ Ranch-wide Management Plan shall be permitted. New impacts shall be limited to the placement of two

water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan strictly for resource management values.

Off-site Mitigation Preserve

The Off-site Mitigation Preserve is divided into seven areas. Area 1 consists of 6,417 acres located adjacent to and immediately east of the southeastern corner of the Project site. Area 2 consists of 2,556 acres located adjacent and contiguous to the northwestern portions of the Project site. Nearly all of the land within these two preserve areas also occurs within SEA No. 17. Area 3 consists of 4,183 acres; this mitigation area is located in Kern County, immediately north of the Project site. Area 4 consists of 7,319 acres located on the northern slope of the Antelope Valley, northeast of both Area 3 and the Project site. Area 5 consists of 643 acres and is a square-shaped parcel located in Kern County on the northern slope of the Antelope Valley, immediately east of Area 4 and northeast of the Project site. Area 6 consists of 2,429 acres and is located in Kern County on the northern slope of the Antelope Valley, farthest to the northeast of the Centennial Project site. Area 7 (two distinct portions) consists of a combined 15,668 acres located in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and boarders Area 6 to the north. The combined off-site Mitigation Preserve area amounts to 39,213 acres of mitigation lands. Cumulatively, both on and off-site, the Mitigation Preserve encompasses 43,079 acres of Project mitigation lands. The majority of three of these areas, Areas 3, 4, and 5 are the subject of conservation easements, therefore, although available for mitigation including enhancement, restoration, and creation, are not available for mitigation acreage value as preservation.

Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the ~~Mitigation Preserve~~ Ranch-wide Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan strictly for resource management values.

Green Space

Disturbed Green Space consists of areas within the project boundary that are impacted and will need to be mitigated. Disturbed Green Space will be amenities for the Project and could include one or more of the following uses: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. No Mitigation credit has been taken into account for the Project impacts from the Green Spaces. While Green Spaces could be impacted initially, the concept of these areas is to restore it for community amenities and visual aesthetics between neighborhoods of development.

Undisturbed Green Space consists of areas within the project boundary that are not impacted and require no mitigation. There is no project mitigation credit taken for preserving these areas. To preserve these areas and to make sure there is no future mitigation needed, the uses are restricted to the following: Continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

In addition, MM 7-23 is hereby added to Draft EIR Section 5.7.7, as follows:

MM 7-23 Notwithstanding any provision of the Centennial Specific Plan to the contrary, land designated by the Centennial Specific Plan as On-Site Mitigation Preserve, Off-Site Mitigation Preserve, Disturbed Green Space, and Undisturbed Green Space shall only be used in a manner consistent with the following land use restrictions:

On-Site Mitigation Preserve: Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is

necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the ~~Mitigation Preserve~~ Ranch-wide Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan strictly for resource management values.

Off-Site Mitigation Preserve: Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the ~~Mitigation Preserve~~ Ranch-wide Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan strictly for resource management values.

Disturbed Green Space: Uses within Disturbed Green Space shall be restricted to one or more of the following: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities.

Undisturbed Green Space: Uses within Undisturbed Green Spaces shall be restricted to one or more of the following: continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and

emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

Response to Comment B.4-65

Response to Comment B.4-65 is hereby revised as follows:

The vast majority of the Project's open space will be designated as On-Site Mitigation Preserve or Undisturbed Green Space. Pursuant to the new mitigation measure described in response to Comment B.4-64, within the On-Site Mitigation Preserve no improvements beyond what is necessary to maintain roads and fences will be allowed, with the exception of the placement of two water towers with a maximum disturbance of five acres each. Moreover, habitat enhancement, restoration and creation may only occur as described in the Project's ~~Mitigation Preserve~~ Ranch-wide Management Plan and must be approved by the County. Public access and recreational hunting will also be prohibited on this land, though hiking and biking for private inholding owners and permitted Ranch guests would be permitted. Authorized motorized vehicles including, but not limited to Tejon Ranch employees, utility maintenance vehicles that have a Tejon Ranch permit, and emergency vehicles will be restricted to existing ranch roads and all recreational motorized vehicles will also be prohibited within the On-Site Mitigation Preserve. Grazing within the On-Site Mitigation Preserve will be allowed to continue strictly for resource management values and as directed by the ~~Mitigation Preserve~~ Ranch-wide Management Plan.

Clarifications and Revisions to Section 1 – Executive Summary

Clarifications and revisions to Table 1-2, Centennial Specific Plan Mitigation Summary, of the Draft EIR presented in the Final EIR published May 2018 is hereby revised as follows:

TABLE 1-2
CENTENNIAL SPECIFIC PLAN MITIGATION SUMMARY

#	Environmental Factor	Mitigation
5.7	**Biological Resources**	**MM 7-23** Notwithstanding any provision of the Centennial Specific Plan to the contrary, land designated by the Centennial Specific Plan as On-Site Mitigation Preserve, Off-Site Mitigation Preserve, Disturbed Green Space, and Undisturbed Green Space shall only be used in a manner consistent with the following land use restrictions: On-Site Mitigation Preserve: Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Ranch-wide ~~Mitigation Preserve~~ Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values. Off-Site Mitigation Preserve: Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Ranch-wide ~~Mitigation Preserve~~ Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Ranch-wide ~~Mitigation Preserve~~ Management Plan strictly for resource management values. Disturbed Green Space: Uses within Disturbed Green Space shall be restricted to one or more of the following: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. Undisturbed Green Space: Uses within Undisturbed Green Spaces shall be restricted to one or more of the following: continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

Clarifications and Revisions to Section 5.21 – Climate Change

Clarifications and revisions to 5.21-11, Centennial Project Compliance with the Los Angeles County Community Climate Action Plan, of the Draft EIR presented in the Final EIR published May 2018 is hereby revised as follows:

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
BE-3: Solar Installations are encouraged for new and existing buildings	Renewable energy produced within the Project would provide a minimum of 50% of the Project's anticipated electricity demand. Specific metrics to achieve this goal include: 1. A minimum of 100% of all single-family detached residential units at buildout shall be pre-wired to support solar energy collection equipment and a minimum of 30% of all single-family detached residential units at buildout shall have solar energy collection equipment installed on roof areas or on top of other structures on the site (e.g., patio covers or pergolas). 2. Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. 3. A minimum of 10% of all single-family detached residential units at buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. 4. A minimum of 30% of all multi-family residential units at buildout shall have solar energy collection equipment, which shall be installed on roof areas facing within 30 degrees of true south. 5. <u>All</u> ~~A minimum of 70% of public and community~~ swimming ~~s~~pools constructed within the Project shall be heated by a solar water heating system or renewable power system that provides electricity for water heating. 6. A minimum of 60% of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south.

4.3 CONFORMED AND ANNOTATED DRAFT EIR SECTION 5.21, *CLIMATE CHANGE*

Section 5.21 – Climate Change

Annotation 1:

For clarification and ease of reference, this "conformed and annotated" EIR Section 5.21, *Climate Change*, compiles into a single document all revisions made to Chapter 5.21 following the May 2017 publication of the Draft Environmental Impact Report (DEIR). All such revisions made after publication of the DEIR and prior to publication of the Final Environmental Impact Report (FEIR) were initially disclosed in FEIR, Section 3.0, *Draft EIR Clarifications and Revisions*. All such revisions made after publication of the FEIR were disclosed in the *Updated Greenhouse Gas Calculations for the Centennial Project Final Environmental Impact Report* (the "Updated GHG Report") presented to the Regional Planning Commission at its August 29, 2018 hearing. This conformed and annotated version of Chapter 5.21 compiles all such revisions into a single document, as shown in so-called "redlined" double underline and ~~strikethrough~~ text herein.

This "conformed and annotated" EIR Section 5.21, *Climate Change*, also sets forth a series of annotations that explain the conclusions of the Updated GHG Report presented to the Regional Planning Commission at its August 29, 2018 Project hearing, and to the Board of Supervisors at its December 11, 2018 Project hearing. The Updated GHG Report was prepared by Psomas, the Lead Agency's environmental consultant, to compare the Project's GHG emissions calculated in the DEIR ("DEIR Quantified GHG Emissions") with an updated analysis completed at the Lead Agency's request ("Updated GHG Calculations"). For ease of reference, a complete copy of the Updated GHG Report is attached to this "conformed and annotated EIR Section 5.21, *Climate Change*.

The revisions and annotations set forth herein, and the Updated GHG Report, do not constitute "significant new information" that requires recirculation of the Draft EIR. Under section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. (CEQA Guidelines, § 15088.5.) To the extent the revisions and annotations set forth herein, and the Updated GHG Report, included new information, such information clarifies or amplifies the information set forth in the Draft EIR by, for example, updating the Draft EIR's quantification of Project GHG emissions by using the most current version of the California Emissions Estimator Model (CalEEMod) and by factoring in emission reductions associated with regulatory requirements adopted following publication of the Draft EIR, as explained below.

As explained in the Updated GHG Report, and in the annotations that follow this Annotation 1, the Updated GHG Calculations show that Project-specific GHG emissions will be

approximately 35 percent lower than the quantitative estimates included in the DEIR, based on GHG legal reduction mandates that were not in effect when the DEIR GHG emissions were calculated, more advanced GHG quantification methodologies, including newer versions of GHG emission models, and the quantification of GHG emissions from Project mitigation measures that reduce GHG emissions.[1]

The Updated GHG Calculations include: (1) emissions estimates from the most current version (16.3.2) of CalEEMod, which was made available after publication of the DEIR; (2) updated information regarding applicable electric vehicle (EV) adoption rates and quantified GHG emissions associated with EV charging stations; (3) estimated internal and external trip reductions attributable to the Project's single occupancy vehicle (SOV) mitigation measures; (4) updated estimates of the Project's water and wastewater energy use and emissions; and (5) revised estimates of the Project's solid waste GHG emissions based on applicable landfill diversion mitigation requirements.[2]

1. Updated GHG Report at 1.
2. *Id*. at 1-2.

5.21.1 – Introduction

Purpose

The County of Los Angeles Department of Regional Planning Environmental Checklist Form, which has been prepared pursuant to the California Environmental Quality Act (CEQA), requires that greenhouse gas (GHG) emissions issues be evaluated as part of the environmental documentation process. Because the effects of GHG emissions are considered in a global context, that is, global warming and climate change, GHG emissions are generally addressed as a cumulative issue. However, plan-level direct and indirect impacts are also addressed. Growth-inducing impacts and cumulative impacts are described in Sections 6.0 and 7.0 of this Environmental Impact Report (EIR), respectively. Because the topic of climate change is most appropriately considered on a cumulative level, the impact analysis in this EIR section is fundamentally a cumulative analysis. Therefore, the discussion in Section 7.0, Cumulative Impacts, presents a summary of the conclusions of this section.

Summary

The County acknowledges the consensus among leading scientists that without action to reduce GHG emissions, climate change due to global warming will pose a considerable threat to the environment and to human health and society (DRP 2015a). The *Final Unincorporated Los Angeles County Community Climate Action Plan 2020* (CCAP) is part of the County General Plan and was adopted along with the General Plan on October 6, 2015.

In accordance with CEQA Guidelines 15183.5(b), the CCAP provides that projects that "demonstrate consistency with applicable CCAP actions can be determined to have a less than significant cumulative impact on GHG emissions and climate change". The Project's design concepts are consistent with the CCAP, as summarized in Table 5.21-11, Centennial Project Compliance With Los Angeles County Community Climate Action Plan. The Project's

Green Development Program includes elements specifically created to reduce GHG emissions. These elements are delineated in the analysis below as project design features (PDFs). The analysis of Project consistency with each of the CCAP goals and policies shows that the Project is consistent with the CCAP.

Additional analysis under Threshold 21-1, and in Section 5.8, Land Use, Entitlements, and Planning, and in Table 5.8-1, shows that the Project would not conflict with applicable goals and policies of the Antelope Valley Area Plan (AVAP). Moreover, the analysis under Threshold 21-2 below shows that the Project would not conflict with the Southern California Association of Governments (SCAG) 2012–2035 Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS) and 2016–2040 RTP/SCS.

The quantification of greenhouse gas emissions as calculated through the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 estimates that the Project at buildout in 2035 would have GHG emissions of approximately 244,379 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year as shown in Table 5.21-1. Project GHG emissions as shown in column 2 (Emissions $MTCO_2e$) of Table 5.21-1 include quantified reductions from project design features and mitigation measures (e.g., mixed use development community design, solar electricity generation, etc.), as further discussed in Section 5.21.6, Environmental Impacts. This total includes amortized emissions from the construction period, the loss of carbon-sequestering vegetation, and the planting of carbon-sequestering trees.

TABLE 5.21-1
OPERATIONAL AND TOTAL GHG EMISSIONS

GHG Sources	Emissions $MTCO_2e$	Percent of Operational Emissions
Operational	239,215	
Area	11,297	5%
Energy	49,414	21%
Mobile	160,904	67%
Solid waste	10,214	4%
Water	7,387	3%
Construction	*4,490*	
Vegetation loss	922	
New trees	-249	
Total	**244,379**	
AVAQMD Project-Level CEQA Significance Threshold	***100,000***	
Exceeds threshold?	Yes	
Service population (SP)	80,825	
GHG Efficiency	**3.02**	
SCAQMD Plan-Level Staff-Proposed GHG Efficiency Threshold ($MTCO_2e$/SP/Year)	***4.1***	
Exceeds threshold?	No	
SCAQMD Project-Level Staff-Proposed GHG Efficiency Threshold ($MTCO_2e$/SP/Year)	***3.0***	
Exceeds threshold?	Yes	

GHG: greenhouse gas; $MTCO_2e$/yr: Metric tons of carbon dioxide equivalent per year; AVAQMD: Antelope Valley Air Quality Management District; CEQA: California Environmental Quality Act; SCAQMD: South Coast Air Quality Management District.

Emissions calculations can be found in Appendix 5.11-A.

Annotation 2:

Updated GHG Report Table 1(below), compares the DEIR Quantified GHG Emissions (as shown in DEIR Table 5.21-1, above) with the results of the Updated GHG Calculations described in the Updated GHG Report. As explained in the Updated GHG Report, total Project emissions in the Updated GHG Calculations are 157,642 metric tons of carbon dioxide equivalent per year ($MTCO_2e$/yr), a reduction of -86,736 $MTCO_2e$/yr (approximately 35 percent) from the DEIR Quantified GHG Emissions of 244,370 $MTCO_2e$/yr.[1]

UPDATED GHG REPORT TABLE 1
DEIR QUANTIFIED GHG EMISSIONS AND UPDATED GHG CALCULATIONS
($MTCO_2E$/YEAR)

GHG Emission Sources	DEIR Quantified GHG Emissions	Reductions		Net Change in GHG Emissions	Updated GHG Calculations
		From Regulations and CalEEMod Update	*From Mitigation Measures*		
Mobile	160,904	-52,694[a]	-31,203[b]	-83,897	77,007
Energy	49,414	5,584	50	5,634	55,047
Electrical Power	*23,276*	*5,806*[c]	*50*[d]	*5,856*	*29,132*
Natural Gas	*26,137*	*-222*	*0*	*-222*	*25,915*
Water and Wastewater	7,387	0	-3,184[e]	-3,184	4,203
Solid Waste	10,214	-5,107[f]	0	-5,107	5,107
Area	11,297	0	-74[g]	-74	11,223
Construction	4,490	0	0	0	4,490
Vegetation	673	-108[h]	0	-108	565
Total Emissions	**244,379**	**-52,324**	**-34,412**	**-86,736**	**157,642**

Sources: DEIR Quantified GHG Emissions from DEIR Section 5.21; Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018).

a Reductions assume that 80 percent of the GHG emissions reductions attributable to the utilization of EVs at Project buildout are due to regulatory, CalEEMod and EV market development factors (see "Mobile Emissions" discussion below).

b Reductions attributable to MM 10-1, MM 10-25, MM 10-26, MM 21-14, MM 21-22, and MM 14-11, as well as 20 percent of the reductions attributable to the utilization of EVs at Project buildout (see "Mobile Emissions" discussion below).

c Overall increases attributable to combination of EV charging infrastructure emissions (increase of 11,224 $MTCO_2e$/yr allocated at 80 percent per footnote "a" above, and due to MM 11-4, MM 11-6, MM 21-15, MM 21-16, MM 21-18 and MM 21-19). GHG decreased emissions are also included, due to 2019 Title 24 Standards (reductions of -3,173 $MTCO_2e$/yr).

d Overall increases attributable to combination of EV charging infrastructure emissions (increase of 11,224 $MTCO_2e$/yr allocated at 20 percent per footnote "b" above), and due to MMs 13-2 and 13-6 (reduction of -109 $MTCO_2e$/yr) and MM 21-1 (-2,086 $MTCO_2e$/yr).

e Reductions attributable to MM 18-1, MM 21-9, and MM 21-13.

f Reductions attributable to MM 17-10 and attributed to regulatory factors.

g Reductions attributable to MM 11-3 and electric landscape equipment (Green Development Program).

h Reductions attributable to MM 7-11, MM 7-12 and MM 21-20 and attributed to regulatory factors.

Note: Total emissions may not add up exactly due to rounding.

As discussed in more detail in Updated GHG Report Section 2.2, *Energy*, due to the combination of quantified EV charging demand, which increases Project electricity use, and reductions in electricity use associated with the new 2019 Title 24 Building Energy Efficiency

Standards, which decreases Project electricity use, the Updated GHG Calculations include an overall increase GHG emissions from the use of electrical power when compared to the DEIR Quantified GHG Emissions. However, as discussed in Updated GHG Report Section 2.1, *Mobile Emissions*, a higher rate of EV adoption reduces mobile source GHG emissions by -83,897 $MTCO_2e$/yr from the DEIR Quantified GHG Emissions.

Cap and Trade Reductions

As further explained in Section 3.0 and Table 3 of the Updated GHG Report, approximately 96 percent (150,808 $MTCO_2e$/yr) of the Updated GHG Calculations emissions are covered by, and subject to, the purchase of emission allowances under the new, expanded state Cap and Trade program approved by the Legislature after the DEIR was issued, and signed into law in 2017 (Assembly Bill 398 [AB 398]). The Cap and Trade program was designed to comprehensively regulate fossil fuels (from "wells to wheels" – from production, through refining, through ultimate consumption).

Compliance with the Cap and Trade program was upheld as a lawful CEQA mitigation measure to reduce GHG emissions to a less-than-significant-level for fossil fuels used by a refinery project for both direct refinery operations as well as indirect electricity consumption-related GHG emissions in a recent CEQA appellate court case, *Association of Irritated Residents v. Kern County Board of Supervisors, et al. (Alon USA Energy, Inc., et al., Real Parties in Interest)* (2017) 17 Cal.App.5th 708 ("*Alon*").[2] The California Supreme Court declined to reverse, or de-publish, this case. The California Air Resources Board (CARB) has also determined that existing California law provides sufficient authority to extend the Cap and Trade program as required to meet state GHG reduction objectives, as explained in the Updated GHG Report.

Updated GHG Report Table 3, below, shows that approximately 96 percent, or 150,808 $MTCO_2e$/yr of the total Updated GHG Calculations emissions are covered by the Cap and Trade program. Only approximately 4 percent of the total emissions, or 6,834 $MTCO_2e$/yr, largely from landfill waste and wastewater treatment process biogas reuse for energy production, would not be subject to the purchase of emission allowances under the Cap and Trade program.

UPDATED GHG REPORT TABLE 3
UPDATED GHG CALCULATIONS EMISSIONS SUBJECT TO CAP-AND-TRADE (MTCO2E/YEAR)

GHG Emission Sources	Updated GHG Calculations	Subject to Cap and Trade?	Amount Subject to Cap-and-Trade	Remaining Emissions After Cap-and-Trade
Area	11,223	Yes: natural gas for fireplaces and electricity for landscaping equipment	-11,223	0
Energy				
Electrical Power	29,132	Yes: emissions from generating electrical power	-29,132	0
Natural Gas	25,915	Yes: Natural gas used for building heating, cooking, etc.	-25,915	0
Mobile	77,007	Yes: transportation fuels	-77,007	0

Solid Waste	5,107	No: landfill decomposition emissions	0	5,107
Water and Wastewater				
Wastewater Electricity	277	Yes: emissions from generating electrical power	-277	0
Water Electricity	2,764	Yes: emissions from generating electrical power	-2,764	0
Bio-Gas	1,162	No: biogas recovered from treatment process	0	1,162
Construction	4,490	Yes: transportation fuels	-4,490	0
Vegetation				
Vegetation Loss	814	No	0	814
New Trees	-249	No	0	-249
Total	**157,642**		**-150,808**	**6,834**
Source: Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018)				

Net Zero Carbon For The Electric Sector

The Project's Development Agreement obligates the Project to achieve a "net zero carbon for the electric sector" standard on all public and private facilities constructed within the Project. Per the Development Agreement, "net zero carbon for the electric sector" means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions. As further explained in Section 4.0 and Table 4 of the Updated GHG Report, GHG emissions from all Project electrical power consumption in the Updated GHG Calculations, including EV charging requirements, are 32,173 $MTCO_2e$/yr. These emissions are significantly less than the Updated GHG Calculation's net -86,736 $MTCO_2e$/yr reduction from the DEIR Quantified GHG Emissions. Even without consideration of GHG emissions reductions associated with regulations (see Updated GHG Report Table 1), the Project's MMs account for -34,412 $MTCO_2e$/yr of the net reduction in GHG emissions, which is greater than the emissions associated with Project's electricity usage. Therefore, the Project achieves the "net zero carbon from the electric sector" commitment included in the Project's Development Agreement by assuring that GHG emissions from Project electricity consumption are more than offset by mitigation-based GHG reductions, as shown in Updated GHG Report Table 4, below. As shown in Updated GHG Report Table 5, below, total Project GHG Emissions are 157,642 $MTCO_2e$/yr.

UPDATED GHG REPORT TABLE 4
ADDITIONAL REDUCTION ANALYSIS ELECTRICAL POWER EMISSIONS AND NET EMISSIONS REDUCTIONS FROM DEIR

GHG Emission Sources	Electrical Power GHG Emissions ($MTCO_2e$/yr)
Area	0
Energy	29,132
Electrical Power	*29,132*
Natural Gas	*0*
Mobile	0

Solid Waste	0
Water and Wastewater	
Water (Supply, Treatment, Distribution)	2,764
Wastewater Electricity	277
Construction	0
Vegetation	0
Total Electrical Power GHG Emissions	**32,173**
Updated GHG Calculations Electrical Power and Total GHG Emissions Summary	
Total Electrical Power GHG Emissions	**32,173**
Total Reduction from DEIR Quantified GHG Emissions (Mitigation Measures Only- See Updated GHG Report Table 1)	**-34,412**
GHG Emission Reductions Net of Electrical Power Emissions	**-2,239**
Sources: DEIR Quantified GHG Emissions from DEIR Section 5.21; Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018).	

Service Population GHG Efficiency

As explained in Section 5.0 and Table 5 of the Updated GHG Report, the Project's GHG Efficiency based on the estimated service population decreased from 3.02 as presented in the DEIR Quantified GHG Emissions to 1.93 as calculated in the Updated GHG Calculations. The CARB adopted the 2017 Climate Change Scoping Plan (see Annotation 3), which recommends statewide targets of no more than 6 $MTCO_2e$ per capita by 2030, and no more than 2 $MTCO_2e$ per capita by 2050. The Project's GHG Efficiency of 1.93 at Project buildout is below the Scoping Plan's 2030 and 2050 per capita targets, as shown in Updated GHG Report Table 5, below:

UPDATED GHG REPORT TABLE 5
UPDATED GHG CALCULATIONS
SERVICE POPULATION GHG EFFICIENCY

	Factors
Residents at Buildout	57,150
Non-Resident Employees	15,783
Non-Resident/Non-Employee Visitors	8,915
Service Population (SP)	**81,848**
Project GHG Emissions ($MTCO_2e$/yr)	**157,642**
GHG Efficiency ($MTCO_2e$/SP/yr)	**1.93**
Sources: DEIR Section 5.9, Population and Housing and Stantec.	

1. Updated GHG Report at 3.
2. *See also, Association of Irritated Residents v. Kern County Board of Supervisors* (2017) 17 Cal.App.5th 708 (17 Cal.Rptr.3d 463) (Appellants' Opening Brief, 2016 WL 733999 (filed 12/ 9/2016); Joint Respondents' Brief, 2017 WL 977138 (filed 3/10/2017); Appellants' Reply Brief, 2017 WL 2398823 (filed 5/26/2017); *see also*, *California Building Industry Assn. v. Bay Area Air Quality Management District* (2013) 218 Cal.App.4th 1171 (161 Cal.Rptr.3d 128) (Appellant's Opening Brief, 212 WL 6552886 (filed 11/15/2012); Respondent's Brief, 2013 WL 359687 (filed 01/18/2013); Appellant's Reply Brief, 2013 WL 1177301 (filed 02/19/2013); *see also*, CARB. October 2011. California's Cap-And-Trade Program Final Statement of Reasons, p. 2: https://www.arb.ca.gov/regact/2010/capandtrade10/fsor.pdf (incorporating by reference CARB. October 28, 2010. Staff Report: *Initial Statement of Reasons for the Proposed Regulation to Implement the California Cap-and-Trade Program Part 1, Vol. 1,* pp. II-10, II-20, II-21, 11-53: https://www.arb.ca.gov/regact/2010/capandtrade10/capisor.pdf).

As discussed further in Section 5.21.2, in 2016 the California Supreme Court reviewed a quantitative GHG significance threshold (29% below "Business as Usual") in a CEQA lawsuit challenging the Newhall master planned community project, and determined that the state agency respondent's reliance on this quantitative GHG threshold was not appropriate because it was a statewide GHG reduction threshold, and the record lacked substantial evidence in support of the use of this threshold for the particular land use project at issue in that lawsuit. The AVAQMD GHG threshold was adopted, and the SCAQMD GHG threshold was proposed by staff but never adopted, prior to this Supreme Court decision; neither of these agencies included substantial evidence in the public record justifying the use of their respective quantitative thresholds for particular types of projects. However, for informational purposes, Table 5.21-1 also shows that Project GHG emissions would exceed the AVAQMD 100,000 $MTCO_2e$ per year project-level threshold. The Project's service population is estimated at 57,150 residents and 23,675 employees for a total of 80,825 at Project buildout. Also, for informational purposes, Table 5.21-1 shows that the Project's GHG efficiency would be 3.02, which would not exceed the SCAQMD-staff-proposed "plan-level" 4.1 GHG efficiency threshold, but would exceed the SCAQMD-staff-proposed "project-level" 3.0 GHG efficiency threshold.

The Project would be consistent with the CCAP, the SCAG 2012–2035 and 2016–2040 RTP/SCS, and regulatory measures designed to reduce GHG emissions. Additionally, the Project is consistent with the SCAQMD's staff's proposed draft efficiency threshold for the AVAP.

As discussed in detail in Section 5.21.6, based on the Project's consistency with the CCAP, the SCAG 2012–2035 and 2016–2040 RTP/SCS, and based on its compliance with applicable GHG-reducing regulatory measures, the Project could be found to have a less than significant impact on GHG. However, climate change is a global phenomenon and the significance of GHG emissions is most appropriately considered on a cumulative level. The Project would emit GHGs at an estimated rate of 244,379 metric tons per year and would contribute to the global inventory of GHGs.

To date, the vast majority of other States and nations have not followed California's lead in mandating GHG emission reductions across a broad spectrum of economic sectors and have not enacted regulations similar to those adopted in California, which already has nearly the lowest level of GHG per capita of any state. The County of Los Angeles has no jurisdictional control or responsibility for GHG reductions in other parts of California, and certainly not in the context of global action. Moreover, due to the County's limited jurisdiction over many GHG reduction measures required in both the CCAP and the RTP/SCS, and with respect to the many GHG-reducing regulatory programs implemented at the State level, the County lacks the requisite level of jurisdiction and control to ensure that all such measures and programs will be fully implemented as planned by third party agencies and private parties. Therefore, because of the global context of GHG emissions which are outside the County's jurisdiction and control, and because the of Project's forecasted GHG emission rate, the project's incremental contribution to the cumulative environmental impact related to GHG emissions is conservatively determined to be cumulatively considerable and this significant cumulative impact would be significant and unavoidable.

All reasonable and feasible measures to maximize project GHG emissions reduction to the greatest extent feasible are described in Section 5.21.7.

Section Format

This section of environmental analysis includes a description of the state of the science of climate change; a discussion of the regulatory setting; a description of the related PDFs incorporated into the Project to minimize Project impacts; identification of thresholds of significance (or lack thereof); the GHG inventory; and analysis of the Project's potential individual and cumulative effects and identification of significant impacts:

- Introduction
    - Purpose
    - Summary
    - Section Format
    - Global Climate Change
- Relevant Plans, Policies, and Regulations
- Environmental Setting
- Project Design Features
- Threshold Criteria
- Environmental Impacts—A separate analysis is provided for each of the following categories of potential impacts:
    - On-Site Impacts
    - Off-Site Impacts
- Mitigation Measures
- Level of Significance After Mitigation
- References

Global Climate Change

Global climate change is a broad term used to describe any worldwide, long-term change in the Earth's climate. Global climate change refers to an increase in temperatures across the Earth due to human and industrial activity. Climate change, in addition to rising temperatures, can cause other climatic changes, such as a shift in the frequency and intensity of weather events such as rainfall or hurricanes, but it does not necessarily imply that all locations will be warmer. In fact, with global climate change, some locations will have climate patterns that may change in a way that makes the locations colder than average temperatures.

Climate change is a recorded change in the Earth's average weather measured by variables such as wind patterns, storms, precipitation, and temperature. Historical records show that global temperature changes have occurred naturally in the past, such as during previous ice ages. The year 2014 ranks as Earth's warmest year since 1880, and the 10 warmest years in the instrumental record, with the exception of 1998, have now occurred since 2000. The

average global temperature has risen about 1.4 degrees Fahrenheit (°F) (0.8 degrees Celsius [°C]) since 1880 (NASA 2015).

The global atmospheric concentration of carbon dioxide (CO_2), the most abundant GHG, has increased from a pre-industrial (roughly 1750) value of about 280 parts per million (ppm) to a seasonally-adjusted 405.75 ppm in February 2017, primarily due to fossil fuel use, with land use change providing a significant but smaller contribution. The annual CO_2 concentration growth rate during the ten-year period between 1995 and 2005 was larger than the growth rate from the beginning of continuous direct measurements in 1960 to 2005 (ESRL 2017).

Greenhouse Gases

GHGs, as defined by the United States Environmental Protection Agency (USEPA) and California Air Resources Board (CARB), include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). GHGs are global pollutants and are therefore unlike criteria air pollutants such as ozone (O_3), particulate matter (respirable particulate matter with a diameter of 10 microns or less [PM10] and fine particulate matter with a diameter of 2.5 microns or less [PM2.5]), and toxic air contaminants (TACs), which are pollutants of regional and local concern (see Section 5.11, Air Resources, of this EIR). While pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes, ranging from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe. Therefore, GHG effects are global, as opposed to the local and/or regional air quality effects of criteria air pollutant and TAC emissions.

Global warming potential (GWP) is a term used to indicate, on a pound for pound basis, how much a gas will contribute to global warming relative to how much warming would be caused by the same mass of CO_2. As the baseline for measuring GWP, CO_2 is considered to have a GWP equal to one. CH_4 and N_2O are substantially more potent than CO_2 with GWPs of 25 and 298, respectively. (Prior values of 21 and 310 were from the Intergovernmental Panel on Climate Change [IPCC] second assessment report; CARB has adopted the current values from the IPCC's fourth assessment report.) Carbon dioxide equivalent (CO_2e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the quantity of that gas to produce CO_2e.

The Greenhouse Effect

In a greenhouse, sunlight enters through the glass panels, and the heat from the sunlight is then trapped inside the structure. The Earth's atmosphere acts like a greenhouse by allowing sunlight in, but traps some of the heat that reaches the Earth's surface. When solar radiation from the sun reaches the Earth, much of it penetrates the atmosphere and ultimately reaches the Earth's surface. This solar radiation is absorbed by the Earth's surface and is then re-emitted as heat in the form of infrared radiation. Whereas the GHGs in the atmosphere let

solar radiation through, GHGs trap infrared radiation, resulting in the overall warming of the Earth's surface.[3420] This phenomenon is referred to as the "greenhouse effect".

Concentrations of major greenhouse gases, such as CO_2, CH_4, N_2O, and water vapor (H_2O) have been naturally present for millennia at relatively stable levels in the atmosphere, and act to keep temperatures on Earth hospitable. Without these GHGs, the earth's temperature would be too cold for life to exist. With increased human industrial activity, concentrations of certain GHGs have grown dramatically. In the absence of major industrial human activity, natural processes maintain atmospheric GHG concentrations at relatively stable levels, which have allowed global temperatures to remain at constant levels over the last several centuries. As the concentrations of GHGs have increased as a result of human industrial activity, the amount of infrared radiation that is trapped has increased, thereby increasing the Earth's average temperature.

5.21.2 – Relevant Plans, Policies, and Regulations

Many legal requirements applicable to greenhouse gas and climate change continue to be expanded and modified. This subsection presents a summary of applicable international laws (national treaties followed by sub-national agreements), federal laws, regulations and other actions, state laws, regulations, and other actions, and then local (regional and County) laws, regulations and other actions. Many of these legal requirements emerged over time through a combination of executive or agency actions, court decisions, regulations, enacted statutes, and approved plans. This regulatory background discussion includes a broader range of legal authorities than is included in other topical sections; is focused on the most significant of these measures; and based on the continuing evolution of these requirements within each category, is generally organized chronologically from earliest to most recent.

International

International Treaties and Other Developments

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change. It was adopted in Kyoto, Japan, on December 11, 1997, and entered into force on February 16, 2005. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction against 1990 levels over the 2008–2012 five-year period. The major distinction between the Protocol and the Convention is that, while the Convention encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities" (UN 1997). The United States has not ratified the Kyoto Protocol. A

[3420] Infrared radiation has longer wavelengths than does solar radiation. GHGs reflect radiation with longer wavelengths. As a result, instead of escaping back into space, GHGs reflect much infrared radiation (i.e., heat) back to Earth.

$^2/_3$ majority vote in the Senate is required for approval. As long as the United States has not ratified the treaty, it is not subject to its terms and obligations.

Negotiations after Kyoto have continued in an attempt to address the period after the first "commitment period" of the Kyoto Protocol, concluded at the end of 2012. In Durban, South Africa, in 2011, parties to the protocol agreed in principle to negotiate a new comprehensive and legally binding climate agreement by 2015 and to enter it into force for all parties starting from 2020. However, significant divisions remain in determining the parameters of any such new protocol, including its enforcement mechanisms and the degree to which developing economies will begin to be subject to binding emissions targets.

The 21st session of the Conference of Parties (COP21) took place from November 30, 2015 to December 11, 2015, in Paris, France. The session included representatives from 196 parties to the United Nations Framework Convention on Climate Change. Outcomes from COP21 include, but are not limited to, limiting global temperature increase well below 2°C; establishing binding commitments by all parties to make Nationally Determined Contributions (NDC) and to pursue domestic policies aimed at achieving NDCs; and regular reporting by all countries on their emissions and progress made in implementing and achieving their NDCs (UN 2016). The continued commitment of the United States to the Paris Treaty was among the issues addressed in the 2016 Presidential election, with President Trump stating in some contexts his position that the United States should withdraw from the Paris treaty. No such withdrawal proposal has been made by the Trump administration, and a withdrawal request would trigger a multi-year process before taking effect. The timing, terms, and consequences of a full or partial withdrawal request remain speculative at this time.

Federal

Federal Action on Greenhouse Gas Emissions

In 2002, President George W. Bush set a national policy goal of reducing the GHG emission intensity (tons of GHG emissions per million dollars of gross domestic product) of the U.S. economy by 18 percent by 2012 (NOAA 2002). The goal did not establish any binding reductions. Rather, the USEPA administers a variety of voluntary programs and partnerships with GHG emitters in which the USEPA partners with industries that produce and utilize synthetic gases to reduce emissions of particularly potent GHGs.

April 2007 Supreme Court Ruling

In *Massachusetts et al. vs. Environmental Protection Agency et al.* (April 2, 2007), the U.S. Supreme Court ruled that the USEPA was authorized by the Clean Air Act to regulate CO_2 emissions from new motor vehicles. The Court did not mandate that the USEPA enact regulations to reduce GHG emissions, but found that the only instances in which the USEPA could avoid taking action were if it found that GHGs do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHGs contribute to climate change. On December 7, 2009, the USEPA issued an "endangerment finding" under the Clean Air Act, concluding that GHGs threaten the public health and welfare of current and future

generations and that motor vehicles contribute to GHG pollution (USEPA 2009a). These findings provide the basis for adopting new national regulations to mandate GHG emission reductions under the Federal Clean Air Act.

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have been working together on developing a National Program of regulations to reduce GHG emissions and to improve the fuel economy of light-duty vehicles. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. On October 15, 2012, the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The rules require these vehicles to meet an estimated combined average emissions level of 295 grams of CO_2 per mile by 2012, decreasing to 250 grams per mile by 2016, and finally to an average industry fleet-wide level of 163 grams per mile in model year 2025. The 2016 standard is equivalent to 35.5 miles per gallon (mpg) and the 2025 standard is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. The agencies expect, however, that a portion of these improvements will occur due to air conditioning technology improvements (i.e., they will leak less) and due to the use of alternative refrigerants, which would not contribute to fuel economy. These standards would cut GHG emissions by an estimated 2 billion metric tons and 4 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2017–2025). The combined USEPA GHG standards and NHTSA Corporate Average Fuel Economy (CAFE) standards resolve previously conflicting requirements under both federal programs and the standards of the State of California and other States that have adopted the California standards (USEPA 2010b; USEPA and NHTSA 2012).

Heavy-Duty Engines and Vehicles Fuel Efficiency Standards

In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the USEPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks, which applies to vehicles from model year 2014 to 2018 (USEPA 2011). USEPA and NHTSA have adopted standards for CO_2 emissions and fuel consumption, respectively, tailored to each of three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this program will reduce GHG emissions and fuel consumption for affected vehicles between 9 percent to 23 percent.

Additional Federal GHG Rules and Policies

In addition to the rules and regulations developed with respect to stationary and mobile sources discussed above, various other federal developments have occurred that aim to reduce GHGs from other sources, including land use activities.

Energy Independence and Security Act

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law (EISA). Among other key measures, the EISA would do the following, which would aid in the reduction of national mobile and non-mobile GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022;
2. Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances; and
3. Set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks. (These were superseded by the NHTSA and USEPA actions discussed above.)

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs".

American Recovery and Reinvestment Act

On February 17, 2009, President Obama signed the American Recovery and Reinvestment Act of 2009 (ARRA). ARRA was passed in response to the economic crisis of the late 2000s, with the primary purpose to maintain existing jobs and create new jobs. Among the secondary objectives of ARRA was investment in "green" energy programs, including funding the following through grants, loans, or other funding; private companies developing renewable energy technologies; local and State governments implementing energy efficiency and clean energy programs; research in renewable energy, biofuels, and carbon capture; and development of high efficiency or electric vehicles.

Council on Environmental Quality National Environmental Policy Act Guidelines on Greenhouse Gasses

On February 18, 2010, the White House Council on Environmental Quality (CEQ) published draft guidance on the consideration of greenhouse gases and climate change for National Environmental Policy Act (NEPA) analyses (CEQ 2010). On December 18, 2014 CEQ released the *Revised Draft Guidance on the Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in NEPA Reviews* (CEQ 2014). Both documents recommend that proposed federal actions that are reasonably expected to directly emit 25,000 million metric tons of carbon dioxide equivalent per year ($MMTCO_2e$/year) should prepare a quantitative and qualitative NEPA analysis of direct and indirect greenhouse gas emissions.

The draft guidance provides reporting tools and instructions on how to assess the effects of climate change. The draft guidance does not propose to regulate greenhouse gases. Although

CEQ has not yet issued final guidance, various NEPA documents are beginning to incorporate the approach recommended in the draft guidance.

Voluntary Programs

The USEPA administers a variety of voluntary programs and partnerships with GHG emitters in which the USEPA partners with industries that produce and utilize synthetic gases to reduce emissions of particularly potent GHGs. For example, the USEPA's National Clean Diesel Campaign (NCDC) promotes diesel emission reduction strategies. The NCDC works to reduce the pollution emitted from diesel engines across the country through the implementation of varied control strategies by working with manufacturers, fleet operators, air quality professionals, environmental and community organizations, and State and local officials to reduce diesel emissions. NCDC activities include: developing new emissions standards for locomotive and marine diesel engines; and promoting the reduction of emissions for existing diesel engines, including use of cleaner fuels, retrofitting and repairing existing fleets, idling reduction among others. The USEPA also administers the State and Local Climate and Energy Program that provides technical assistance, analytical tools, and outreach support to State, local, and tribal governments (USEPA 2017).

Greenhouse Gas and Climate Policies of the Trump Administration. President Trump and his senior advisors and appointees, including US Environmental Protection Agency Secretary Scott Pruitt, have stated their intent to halt various regulatory activities to reduce greenhouse gas emissions, including for example, the Climate Action Plan, the Clean Power Plan, and a waiver program allowing California to mandate more stringent emission standards for passenger cars and light duty trucks. Representatives from various states, including California's Governor and Legislative leaders, along with national environmental advocacy groups such as the Natural Resources Defense Council, have stated their intent to sue to block federal agency actions that would postpone or eliminate GHG reduction measures approved by former President Obama, and to consider expansions of state-level GHG reduction measures that are not dependent on federal action. The timing, emission consequences, litigation outcome, and implementation consequences of these types of federal GHG decisions, and the potential for and consequences of enhanced GHG reduction regulatory programs by other entities such as the state of California, remain speculative at this time.

Multi-State/Regional Area

Western Regional Climate Action Initiative

The Western Regional Climate Action Initiative (WCI) is a partnership among seven States, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 and 85 percent by 2050. California is working closely with the other States and provinces to design a regional GHG reduction program that

includes a cap-and-trade approach. CARB's planned cap and-trade program, discussed below, is also intended to link California and the other member States and provinces. As of January 1, 2014, California's Cap-and-Trade program is linked to Quebec's pursuant to the Agreement Between the California Air Resources Board and the Gouvernement du Québec Concerning the Harmonization and Integration of Cap-and-Trade Programs Reducing Greenhouse Gas Emissions, in accordance with the direction in CARB Board Resolution 13-7 (CARB 2013).

Pacific Coast Action Plan on Climate and Energy

On October 28, 2013, the Governors of California, Oregon, and Washington and the Premier of British Columbia signed a clean energy pact, known as the Pacific Coast Action Plan on Climate and Energy (Pacific Coast Action Plan). Although the Action Plan does not impose legally enforceable obligations and lacks a specific schedule for implementation, the pact sets out a number of goals and aspirational measures. The Action Plan calls upon each of the parties to undertake a number of measures to address the use of carbon-based fuels in the transportation sector, including the adoption or maintenance of low-carbon fuel standards; the development of targets and action plans in order to encourage public and private investment in low-carbon commercial fleets that use alternative fields; and the expansion of the sale of zero-emissions vehicles to a goal of ten percent of new vehicle purchases by 2016 (Pacific Coast Collaborative 2013).

State

California has enacted a variety of legislation relating to climate change, much of which sets aggressive goals for GHG emissions reductions within the state. However, none of this legislation provides definitive direction regarding the treatment of climate change in environmental review documents prepared under CEQA. In particular, the amendments to the State CEQA Guidelines do not require or suggest specific methodologies for performing an assessment or thresholds of significance, and do not specify greenhouse gas reduction mitigation measures. Instead, the CEQA amendments continue to rely on lead agencies to choose methodologies and make significance determinations based on substantial evidence, as discussed in further detail below (CNRA 2009b). Consequently, no State agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating any significant effects in CEQA documents. The discussion below provides a brief overview of the Governor's, CARB and California Office of Planning and Research (OPR) policies, of court decisions, and of the legislation that relates to climate change that may affect the emissions associated with the proposed Project.

California Supreme Court Ruling in Center for Biological Diversity v. Department of Fish and Wildlife

In its recent decision, *Center for Biological Diversity v. Department of Fish and Wildlife,* S217763 (*Newhall*), the Court evaluated the California Department of Fish and Wildlife's (CDFW) analysis of potential impacts caused by GHG emissions contained in the EIR for the proposed land development called Newhall Ranch (California 2015a). In the EIR, the CDFW

analyzed GHG emissions under Assembly Bill (AB) 32, using the business-as-usual (BAU) comparison as its sole criterion of significance.

In *Newhall*, the California Supreme Court concluded that a finding of consistency with meeting statewide emission reduction goals is a legally permissible criterion of significance when analyzing potential impacts of GHG emissions under CEQA. However, the Court found that the EIR's conclusion that the project's emissions would be less than significant under that criterion was not supported by substantial evidence, and remanded back to the appellate court the narrow issue of whether substantial evidence supported the application of AB 32 statewide GHG reduction goal of 29 percent to new land use projects.

The Court then identified "potential options" for lead agencies evaluating cumulative significance of a proposed land use development's GHG emissions in future CEQA documents, but the Court was careful to note that there was no "guarantee" that any of these would be sufficient:

> We do not, of course, guarantee that any of these approaches will be found to satisfy CEQA's demands as to any particular project; what follows is merely a description of potential pathways to compliance, depending on the circumstances of a given project.

The "potential pathways to compliance" suggested by the Court are as follows:

1. **Business As Usual (BAU) Model:** While the Court cautioned that the Scoping Plan may not be appropriate at the project-level, the BAU model might be used to determine what level of reduction from business as usual a new land use development at the proposed location must contribute in order to comply with statewide goals pursuant to AB 32. The Court specifically directed that reliance on this type of quantitative threshold must be supported by substantial evidence in the record that links the statewide GHG reduction standard to the appropriate GHG reduction standard for the specific type of project under consideration.
2. **Compliance With Regulatory Programs Designed To Reduce Greenhouse Gas Emissions:** The Court suggests that a lead agency could rely on a showing of compliance with regulatory programs designed to reduce greenhouse gas emissions in order to demonstrate consistency with AB 32's goals. The Court clarifies that a significance analysis based on compliance with such statewide regulations only goes to impacts within the area governed by the regulations.
3. **Local Climate Action Plan Or Other "Geographically Specific Greenhouse Gas Emission Reduction Plans":** The Court points out that these plans may provide a basis for the tiering or streamlining of project-level CEQA analysis, so long as the plan is "sufficiently detailed and adequately supported."

4. **Regional Sustainable Community Strategy (SCS):** The Court also articulates that a lead agency need not additionally analyze greenhouse gas emissions from cars and light trucks in CEQA documents for certain residential, mixed use and transit priority projects that are consistent with an applicable SCS adopted pursuant to SB [Senate Bill] 375.
5. **Numerical GHG Significance Thresholds:** Although noting that use of such thresholds are not required, the Court favorably cited to the BAAQMD GHG significance thresholds, based on compliance with AB 32, which use a "service population" GHG ratio threshold for land use projects and a 10,000 ton annual GHG emission threshold for industrial projects. The Court remanded for further consideration the application of the 29 percent overall Scoping Plan metric, which is used by several Air Districts and, like the favorably-cited BAAQMD [Bay Area Air Quality Management District] metric, is based on AB 32.
6. **Executive Order Nos. S-3-05 and B-30-15:** Citing to Executive Order Nos. S-3-05 and B-30-15, the Court cautioned that those EIRs taking a goal-consistency approach to CEQA significance may "in the near future" need to consider the project's effects on meeting emissions reduction targets beyond 2020.

Following the Supreme Court's decision in *Newhall*, the EIR at issue in that case was set aside on remand by the lower court. On November 2016, the CDFW released a draft Additional Environmental Analysis (AEA) intended to address the agency's CEQA compliance obligations (CDFW 2016). The AEA does not respond to the Supreme Court's direction to provide substantial evidence supporting the 29% BAU statutory GHG reduction threshold relied upon by the *Newhall* EIR. The AEA also does not include an assessment of the *Newhall* project's consistency with any of the Court's suggested GHG CEQA compliance pathways, although referenced documentation in the *Newhall* administrative record do include and confirm compliance with each pathway. Instead, as described in the AEA, the *Newhall* project applicant (Five Point LLC) voluntarily modified its project and proposed to achieve "net zero" GHG emissions for the project with the implementation of the project applicant's "zero net emission" proposal, which was made enforceable by the addition of 13 mitigation measures that correspond to the applicant's proposal, as further described in the AEA. The AEA states that the adoption and implementation of the 13 mitigation measures would reduce mobile source, electricity, natural gas, vegetation removal, and construction-related emissions by the amount of emissions estimated for the project and result in no net contributions of GHG emissions from the project, or "zero net emissions." The AEA further concludes that because the project would result in no net increase of GHG emissions after implementation of the mitigation measures, there would be no contribution of GHG emissions to cumulative GHG emissions influencing global climate change and the *Newhall* project would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs. Consequently, the AEA concludes that project GHG and climate change impacts would be less than significant. (CDFW 2016, pp. 1-18).

Executive Order S-3-05 (Statewide GHG Targets)

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

Executive orders do not have the same status as a law because in California's constitutional system, it is the Legislature, not the Governor, who is entrusted with the role of making statewide laws (California 1997 [p. 836], 1990). The Legislature declined to include the Executive Order's 2050 goal in AB 32 (discussed below), and again declined to use the EO's 2050 goal in adopting Senate Bill (SB) 375 (discussed below), nor has it incorporated it in any implementing legislation or applicable plans. Additionally, although CARB has the requisite authority to adopt whatever regulations are necessary beyond the AB 32 horizon year 2020 to meet the target set forth in S-3-05, the agency has not done so. Since the Legislature has never enacted EO S-3-05's 2050 target, and no expert agency has interpreted CEQA to require it, the 2050 target has only the force and effect of an executive order issued by a former Governor. There is no authority that suggests that the constitutional authority to establish CEQA significance thresholds resides in the Governor. CEQA is a statute, and the authority to amend and revise its requirements falls first to the Legislature. The Legislature alone has the authority to enact, amend, or revise legislation, absent some express delegation of authority to the Governor or an executive branch agency through statutory enactments (California 2010 [p. 1015]). If the Legislature has delegated any of its authority to define CEQA's requirements, it delegated that authority to OPR and not to the Governor's office.

Moreover, CARB's Scoping Plan to implement AB 32 looked beyond 2020 to assess whether implementing the Scoping Plan would achieve the State's long-term climate goals and determined that it would do the following (CARB 2008a [p. 117]):

Climate scientists tell us that the 2050 target represents the level of greenhouse gas emissions that advanced economies must reach if the climate is to be stabilized in the latter half of the 21st century. Full implementation of the Scoping Plan will put California on a path toward these required long-term reductions. Just as importantly, it will put into place many of the measures needed to keep us on that path.

The 2014 Scoping Plan Update confirms that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" and it recognizes the potential for California to "reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050" (CARB 2014b, p. 2).

However, the 2014 Scoping Plan Update also concludes that additional actions will be needed to continue reducing emissions and meet the 2050 goals in the face of anticipated

population and economic growth (CARB 2014b). In fact, significant technological innovation, well beyond the scope of an individual development project, are absolutely necessary components of any plausible path to achieving the EO S-3-05's 2050 target. For example, CARB has concluded that "California must transition to zero and near-zero emission transportation and freight movement technologies" which require expedited completing of "promising new heavy-duty vehicle technologies," and to "encourage additional needed technology innovation" CARB proposes to amend some of its regulatory requirements. [https://www.arb.ca.gov/msprog/itr/itr.htm] Similarly, in one of several reports CARB's Advanced Technology to Meet California's Climate Goals: Opportunities, Barriers & Policy Solutions (CARB, 2009) concludes that "(m)eeting California's long-term GHG goals will require the development and deployment of low and zero GHG advanced technologies in addition to the accelerated diffusion of currently available technologies."

These new technology innovations to change transportation engine and fuel technology, and energy generation and storage technology are generally outside the jurisdiction and control of the local government agency such as the County. Achieving these goals will require wholesale shifts in fuel and energy technology, neither of which are currently available, rendering any further analysis of a given development project's impacts relative to the 2050 target too speculative for purposes of determining CEQA significance.

The Court in the ***Newhall*** decision noted that an analysis of goals beyond 2020 may be necessary for new development; however, Court noted that the target set by EO S-3-05 and the interim goal set in EO B-30-15 (discussed below) were not required significance criteria in analyzing impacts related to GHG emissions and climate change under CEQA for the abovementioned reasons.

Executive Order B-30-15 (Statewide Interim GHG Targets)

California EO B-30-15 (April 29, 2015) set an "interim" statewide emission target to reduce GHG emissions to 40 percent below 1990 levels by 2030, and directed State agencies with jurisdiction over greenhouse gas emissions to implement measures pursuant to statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels. Specifically, the Executive Order directed CARB to update the Scoping Plan to express this 2030 target in metric tons. This new Executive Order is subject to all the same limitations as discussed above for EO S-03-05. However, EO B-30-15 is more specific in its direction to State agencies so it remains to be seen how it will be implemented, and like EO S-3-05, neither CARB nor the legislature have incorporated the target set forth in B-30-15 in any implementing legislation or applicable plans. However, SB 350 was signed into law and (discussed below) it requires the state to double energy efficiency savings in electricity and natural gas by retail customers by 2030 and raises the Renewable Portfolio Standard (RPS) so that half of the state's electricity must be procured from renewable sources by 2030.

Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006 (AB 32) was signed into law in September 2006 after considerable study and expert testimony before the Legislature (California 2006a). The law instructs CARB to develop and enforce regulations for the

reporting and verifying of statewide GHG emissions. The Act directed CARB to set a GHG emission limit based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. Based on CARB's calculation of 1990 baseline emissions levels, California must reduce GHG emissions by approximately 28.5 percent below "business-as-usual" predictions of year 2020 GHG emissions to achieve this goal. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. Key AB 32 milestones for CARB's actions include the following:

- **June 30, 2007.** Identification of discrete early action GHG emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures (CARB 2007a). These were later supplemented by adding six other discrete early action measures (CARB 2007b).
- **January 1, 2008.** Identification of the 1990 baseline GHG emissions level; approval of a statewide limit equivalent to that level; and adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline (CARB 2007c).
- **January 1, 2009.** Adoption of the Scoping Plan for achieving GHG emission reductions. On December 11, 2008, CARB adopted *Climate Change Scoping Plan: A Framework for Change* (Scoping Plan), discussed in more detail below (CARB 2008a).
- **January 1, 2010.** Adoption and enforcement of regulations to implement the "discrete" actions. Several early action measures have been adopted and became effective on January 1, 2010 (CARB 2007a, 2007b).
- **January 1, 2011.** Adoption of GHG emissions limits and reduction measures by regulation. On October 28, 2010, CARB released its proposed cap-and-trade regulations, which would cover sources of approximately 85 percent of California's GHG emissions. On October 20, 2011, the Board adopted the final cap-and-trade regulation. The final rulemaking packing was approved by the Office of Administrative Law (OAL) on December, 14 2011, with an effective date of January 1, 2012 (CARB 2011a).
- **January 1, 2015.** Cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas, with emissions that meet or exceed specified emissions thresholds. Emission offsets are allowed for up to eight percent of a facility's compliance obligation. According to the 2016 California Climate Investments Annual Report, $2.6 billion from the Greenhouse Gas Reduction Fund has been appropriated to State agencies, and $1.7 billion has been awarded to projects (CARB 2016a). CARB has confirmed that the Cap-and-Trade program will continue to be administered after 2020.

As noted above, on December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emission level would require a reduction of GHG emissions of approximately 28.5 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business as usual"). The Scoping Plan evaluates opportunities for sector-specific reductions; integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities; identifies additional measures to be pursued as regulations; and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan (CARB 2008a) include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions;
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In 2009, a coalition of environmental groups brought a challenge to the Scoping Plan alleging that it violated AB 32 and that the environmental review document (called a "Functional Equivalent Document" [FED]) violated CEQA by failing to appropriately analyze alternatives to the proposed cap-and-trade program. On May 20, 2011, the San Francisco Superior Court entered a final judgment in favor of the coalition and ordered that CARB take no further action with respect to cap-and-trade rulemaking until it complies with CEQA by properly analyzing alternatives in its FED to cap and trade (California 2011). CARB appealed the decision on May 23, 2011 (CARB 2011b). The Appellate Court stayed the Superior Court's injunction on June 3, 2011. The portions of the Scoping Plan that do not relate to cap and trade remain valid under the Court's judgment. On June 19, 2012, the California First District Court of Appeal upheld the Scoping Plan and affirmed CARB's approval of the Scoping Plan as in compliance with AB 32.

In connection with preparation of the supplement to the Functional Equivalent Document, CARB released revised estimates of the expected 2020 emission reductions in consideration of the economic recession and the availability of updated information from development of measure-specific regulations. Consideration of the economic recession and the effectiveness of adopted regulation reduced the projected 2020 BAU emissions from 596 $MMTCO_2e$ to 545

$MMTCO_2e$ (CARB 2011c). With the revised 2020 BAU projection, achieving the 1990 emissions level would require a reduction of GHG emissions of 118 $MMTCO_2e$, or 21.7 percent (down from 28.5 percent), to achieve in 2020 emissions levels in the BAU condition. CARB also updated its BAU evaluation to account for new laws and regulations mandating GHG reductions that had been implemented subsequent to the original Scoping Plan, such as the cleaner car mandates required by Pavley (vehicle model-years 2009–2016) and the renewable portfolio standard (12 percent–20 percent). Inclusion of these new GHG mandates further reduced the 2020 projected estimate of GHG emissions to 507 $MMTCO_2e$. As a result, based on both the economic recession and new GHG reduction implementation mandates, CARB determined in 2011 that achieving the 1990 emission level (and 2020 emissions limit of 427 $MMTCO_2e$) would require a reduction of GHG emissions of 80 $MMTCO_2e$, or a reduction by approximately 15.8 percent (down from 28.5 percent, but not directly comparable because of the change in methodology) to achieve in 2020 emissions levels in the "business as usual" or NAT condition (CARB 2011d).

CARB approved the final "First Update to the Climate Change Scoping Plan" on May 22, 2014. The first update describes California's progress towards AB 32 goals, stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32". Specifically, "if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts [MW] of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050" (CARB 2014b). This first update retains from the October 2013 draft the recalculated 1990 GHG emissions level of 431 $MMTCO_2e$, as well as the 509 $MMTCO_2e$ 2020 "business as usual" or NAT condition (CARB 2014b). Thus, under CARB's most current document, reducing the "business as usual" or NAT condition of 509 $MMTCO_2e$ to the 1990 emissions level of 431 $MMTCO_2e$ will require a reduction of 78 $MMTCO_2e$, or approximately a 15.3 percent reduction (compared to a 28.5 percent reduction as set forth in the original Scoping Plan but not directly comparable because of the change in methodology).

CARB is moving forward with a second update to the Scoping Plan to reflect the 2030 target established in Executive Order B-30-15 (CARB 2015a) and in Senate Bill 32 (discussed below).

On January 20, 2017, CARB completed a draft 2030 Target Scoping Plan Update for which an extended public comment process is scheduled for completion in April 2016 (CARB 2016b). CARB estimates that adoption of the final 2030 Target Scoping Plan Update will be considered for approval by the CARB board at a public hearing conducted in Summer 2017. The 2030 Target Scoping Plan Update includes the new statutory GHG reduction requirements that were not included in the current Scoping Plan, including for example Senate Bill 32 (discussed below) which sets a 40% GHG reduction target below 1990 GHG levels to be achieved by 2030, SB 350 (which sets a 50% reduction in GHG emissions from electricity generation and other energy uses in existing structures, and a 50% renewable energy portfolio requirement), and SB 650 (which establishes priority GHG reduction targets

for designated types of greenhouse gases such as methane). The key elements of the draft Scoping Plan proposal call for further GHG reductions from the refinery sector specifically, further reductions from other stationary sources through either a renewed and expanded cap and trade or carbon tax program, further reductions from other sectors such as transportation technologies and services, water and solid waste conservation and management, and land uses in both open space and urban areas. The additional state statutory requirements addressed by the draft 2030 Target Scoping Plan Update are described below. Ongoing statutory proposals (e.g., to increase the renewable portfolio standard to 100% instead of 50%, and to adopt and expand cap and trade as a tax rather than fee program), and uncertainties regarding the greenhouse gas reductions requiring federal concurrence or support, may result in modifications to the 2030 Target Scoping Plan Update which are unknown at this time.

Annotation 3:

On December 14, 2017, by Resolution 17-46, CARB adopted the final 2030 Target Scoping Plan Update, which establishes a path to achieve California's goal of reducing statewide GHG emissions 40% below 1990 levels by 2030, and to substantially advance toward achieving the State's 2050 climate goal to reduce GHG emissions by 80% below 1990 levels.[1] As adopted, the 2030 Target Scoping Plan Update sets forth a package of technologically feasible actions to keep California on track to achieve its 2030 and 2050 targets, including but not limited to programs and policies to double energy efficiency savings, increase use of clean vehicle and fuels, prioritize direct GHG reductions, support Cap-and-Trade, achieve California's renewable energy portfolio standards, and invest in communities to reduce emissions.

As explained in Annotation 2, the 2017 Scoping Plan recommends statewide targets of no more than 6 $MTCO_2e$ per capita by 2030, and no more than 2 $MTCO_2e$ per capita by 2050.[2] The Project's GHG Efficiency based on the estimated service population decreased from 3.02 as presented in the DEIR Quantified GHG Emissions to 1.93 as calculated in the Updated GHG Calculations.[3] The Project's GHG Efficiency of 1.93 at Project buildout is thus below the Scoping Plan's 2030 and 2050 per capita targets.

1. Updated GHG Report at 13-14; *see also*, D. Freidman *et al*. 2018. *California, Greenhouse Gas Regulation, and Climate Change*. Chapman University Center for Demographics & Policy. Page 7.
2. Updated GHG Report at 14.
3. *Ibid*.

Senate Bill 32

SB 32, signed into law on September 8, 2016, requires CARB to ensure that statewide greenhouse gas emissions are reduced to at least 40 percent below the 1990 statewide greenhouse gas level no later than December 31, 2030. Per SB 32, CARB is to achieve this 2030 GHG reduction target by "adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions[.]" See Health & Safety Code Section 38566. The new SB 32 GHG reduction mandate is the same as the GHG reduction included in Executive Order B-30-15 of 40 percent below 1990 levels by 2030. As discussed above, CARB is the process of preparing the 2030 Target Scoping Plan Update, which is intended to build upon and leverage the framework for achieving

California's GHG reduction mandate established in the initial Scoping Plan and its first update, and to define the state's climate change priorities for the next 14 years and beyond.

Assembly Bill 197

AB 197 is a companion to, and was enacted on the same day as, SB 32 (i.e., September 8, 2016). AB 197 adds two non-voting members to the CARB board, establishes certain qualifications for CARB board membership, and creates a six member Joint Legislative Committee on Climate Change Policies to determine facts and make recommendations to the Legislature regarding California climate change policy. Under AB 197, the CARB Chair is required to appear before this committee on an annual basis and present annual information regarding GHG emissions, toxic air contaminants, and criteria pollutants generated by all economic sectors covered by the Scoping Plan. AB 197 further authorizes the committee to establish an expert panel to independently analyze the State's climate change policies. In addition, AB 197 requires CARB to make available on its website, and updated annually, all GHG emissions, criteria pollutants, and toxic air contaminant information broken down to a local level for stationary sources and sub-county level for mobile sources. AB 197 also obligates CARB, when adopting rules and regulations that achieve emission reductions beyond statewide GHG emission limits to consider "social costs" and to prioritize (a) emissions reductions from large stationary sources of GHG emissions, and (b) direct emission reductions from mobile sources. For purposes of AB 197, "social costs" is defined to mean "an estimate of the economic damages, including, but not limited to, changes in net agricultural productivity; impacts to public health; climate adaptation impacts, such a property damages from increased flood risk; and changes in energy system costs, per metric ton of greenhouse gas emissions per year." Finally, AB 197 requires each Scoping Plan update to identify for each of its emission reduction measures (i) the range of air pollution reductions and GHG emissions reductions projected to result from each measure, and (ii) the cost-effectiveness, including avoided social costs, of each measure.

Senate Bill 375 (Land Use Planning)

SB 375 became law on (date) and it provides for a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32 (California 2008b). SB 375 requires Metropolitan Planning Organizations (MPOs) relevant to the project area (including SCAG) to incorporate a "sustainable communities strategy" (SCS) in their regional transportation plans (RTPs) that will achieve GHG emission reduction targets set by CARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 will be implemented over the next several years.

SB 375 is similar to the Regional Blueprint Planning Program, established by the California Department of Transportation, which provides discretionary grants to fund regional transportation and land use plans voluntarily developed by MPOs working in cooperation with Councils of Governments. On April 22, 2009, the Metropolitan Transportation Commission (MTC) adopted the 2009 Regional Transit Plan (RTP) with AB 32 goals in mind. The 2012 RTP was SCAG's first plan subject to SB 375. The Scoping Plan, adopted by CARB

in December of 2008, relies on the requirements of SB 375 to implement the carbon emissions reductions anticipated from land use decisions.

SB 375 also required CARB to appoint a Regional Targets Advisory Committee (RTAC) to recommend factors for CARB to consider and methodologies for it to use in setting GHG emission reduction targets for each region. The RTAC must include representation from the League of California Cities, the California State Association of Counties, MPOs, developers, planning organizations, and other stakeholders. In January 2009, CARB appointed 21 members to the RTAC. On September 29, 2009, the RTAC released its recommendations to CARB, representing a key step in the establishment of regional targets for inclusion in sustainable community strategies (RTAC 2009). The RTAC recommendations focus largely on the manner in which CARB staff should interact with various stakeholders during the target-setting process, and how staff should use empirical studies and modeling in establishing regional GHG targets.

Following the release of RTAC's recommendations, CARB began the process of developing regional GHG reduction targets (Regional Targets) for the State's MPOs. On September 23, 2010, CARB adopted Regional Targets applying to the years 2020 and 2035 (CARB 2011e). For the area under SCAG's jurisdiction—including the Project area—CARB adopted Regional Targets of 8 percent for 2020 and 13 percent for 2035. On February 15, 2011, the CARB's Executive Officer approved the final targets (CARB 2011f). CARB filed a Notice of Decision two days later on February 17, 2011 (CARB 2011e). CARB is considering further changes to the SB 375 MPO GHG reduction targets, with workshops scheduled in March of 2017 and new targets to be set following CARB approval of the 2030 Scoping Plan Target Update. The new targets will take effect as of the next MPO approval cycle for the Regional Transportation Plan/Sustainable Communities Strategy, which for SCAG will occur in 2020.

Senate Bill 605 and the Short-Lived Climate Pollutant Reduction Strategy

On September 21, 2014, Governor Jerry Brown signed Senate Bill 605 (SB 605), which requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants in the state no later than January 1, 2016. As defined in the statute, short-lived climate pollutant means "an agent that has a relatively short lifetime in the atmosphere, from a few days to a few decades, and a warming influence on the climate that is more potent than that of carbon dioxide." SB 605, however, does not prescribe specific compounds as short-lived climate pollutants or add to the list of GHGs regulated under AB 32. In developing the strategy, CARB must complete an inventory of sources and emissions of short-lived climate pollutants in the state based on available data, identify research needs to address any data gaps, identify existing and potential new control measures to reduce emissions, and prioritize the development of new measures for short-lived climate pollutants that offer co-benefits by improving water quality or reducing other air pollutants that impact community health and benefit disadvantaged communities. The draft strategy released by CARB in September 2015 focuses on methane, black carbon, and fluorinated gases, particularly hydrofluorocarbons, as important short-lived climate pollutants. The draft strategy recognizes emission reduction efforts implemented under AB 32 (e.g., refrigerant management programs) and other regulatory programs (e.g., in-use diesel engines, solid waste diversion) along with additional measures to be developed. On November 28, 2016,

CARB released for 45-day public review and comment its Revised Proposed Short-Lived Climate Pollutant Reduction Strategy and the CARB board will consider its adoption at a public hearing scheduled for March 23 and 24, 2017 (CARB 2016d).

Senate Bills 1078, 107, and SBX1-2 (Renewable Portfolio Standards)

Established in 2002 under SB 1078 (California 2002b), and accelerated in 2006 under SB 107 (California 2006c) and again in 2011 under SBX1-2 (California 2011b), California's Renewable Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. The 33 percent standard is consistent with the RPS goal established in the Scoping Plan (CARB 2008a). As interim measures, the Renewable Portfolio Standards require 20 percent of retail sales to be sourced from renewable energy by 2013 and 25 percent by 2016. Initially, the Renewable Portfolio Standard provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS (California 2011b).

Senate Bill 1

Senate Bill 1 of 2006 (SB 1) established the statewide California Solar Initiative, also required the California Energy Commission (CEC) to implement regulations that require sellers of production homes to offer a solar energy system option to all prospective homebuyers. Besides offering solar as an option to prospective homebuyers, sellers of homes constructed on land for which an application for a tentative subdivision map has been deemed complete on or after January 1, 2011, must disclose to the prospective homebuyer the total installed cost of the solar option, the estimated cost savings associated with the solar energy system option, information about California solar energy system incentives, and information about the Go Solar California website. Sellers of production homes affected by this law may opt for the solar offset program rather than offer solar as an option to prospective homebuyers. The solar offset program requires sellers to install a solar system elsewhere which is equivalent to the aggregate capacity of solar that would have been installed in an affected subdivision if 20 percent of the buyers had opted for the solar option (California 2006d).

Assembly Bill 1109

Assembly Bill 1109 (AB 1109), the Lighting Efficiency and Toxic Reduction Act, requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018 (California 2007b).

Senate Bill 350

Senate Bill (SB) 350. Signed October 7, 2015, is the *Clean Energy and Pollution Reduction Act of 2015*. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are

(1) To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.

(2) To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation (California 2015b).

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the *California Code of Regulations* [CCR]) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The CEC adopted the 2008 changes to the Building Energy Efficiency Standards in order to (1) "Provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy" and (2) "Respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its greenhouse gas emissions to 1990 levels by 2020". The current applicable standards are the 2013 Standards, effective July 1, 2014. The 2016 Code went into effect on January 1, 2017 (CBSC 2015). The 2016 code is at least 28 percent more efficient for than the 2013 Code (CEC 2015a). The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas use and electricity generation result in GHG emissions.

Annotation 4:

On May 9, 2018, the California Energy Commission adopted the 2019 Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6 of the California Code of Regulations (2019 Standards).[1] The 2019 Standards become effective January 1, 2020, and apply to newly constructed buildings and additions or alterations to existing buildings.[2] Significantly, the 2019 Standards require installation of solar photovoltaic systems on all newly constructed single-family homes, and update indoor and outdoor lighting standards for nonresidential buildings that maximize the use of LED technology.[3] As discussed in Annotation 2, and in Updated GHG Report Section 1, the air pollutant emissions presented in the Updated GHG Calculations are based in part on Project compliance with the 2019 Standards.

1. State Energy Resources Conservation and Development Commission Resolution No. 18-0509-2 (May 9, 2018).
2. California Energy Commission. March 2018. 2019 *Building Energy Efficiency Standards Frequently Asked Questions.* https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf
3. *Ibid*.

Title 24 Green Building Standards

The 2013 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California (CBSC 2014). The development of the CALGreen Code is intended to (1) cause a reduction in greenhouse gas (GHG) emissions from buildings; (2) promote environmentally responsible, cost effective, healthier places to live and work;

(3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

The CALGreen Code contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others.

Beyond the mandatory standards, optional Tier 1 status can be achieved by complying with voluntary measures for energy and water efficiency, material conservation, and other design features. An example of a Tier 1 requirement is 12 percent less indoor water use in nonresidential construction. Tier 2 status can be achieved by complying with additional voluntary measures; an example requirement is 20 percent less indoor water use in nonresidential construction.

Executive Order S-01-07 and the Low Carbon Fuel Standard

Executive Order S-01-07 (January 18, 2007) requires a ten percent or greater reduction (from current transportation fuels) in the average fuel carbon intensity for CARB-regulated transportation fuels in California (California 2007a). CARB identifies the Low Carbon Fuel Standard (LCFS) as a Discrete Early Action item under AB 32.

In 2009, CARB approved for adoption the LCFS regulation, which became fully effective in April 2010 and is codified in the *California Code of Regulations* (CCR, specifically Title 17, Sections 95480–95490). The LCFS will reduce greenhouse gas emissions by reducing the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "lifecycle" of a transportation fuel. Following a federal lawsuit challenging the LCFS, on September 25, 2015, CARB re-adopted the LCFS regulation (CARB 2015b).

Assembly Bill 1493 (Mobile Source Reductions)

Assembly Bill (AB) 1493 required CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from noncommercial passenger vehicles and light-duty trucks of model year

2009 and after (California 2002a). The bill required the California Climate Action Registry (CCAR) to develop and adopt protocols for the reporting and certification of GHG emissions reductions from mobile sources for use by CARB in granting emission reduction credits. The bill authorized CARB to grant emission reduction credits for reductions of GHG emissions prior to the date of the enforcement of regulations, using model year 2000 as the baseline for reduction.

In 2004, CARB applied to the USEPA for a waiver under the Federal Clean Air Act to authorize implementation of these regulations. The waiver request was formally denied by the USEPA in December 2007. In January 2008, the State Attorney General filed a lawsuit against the USEPA challenging the denial of California's request for a waiver to regulate and limit GHG emissions from these vehicles. In January 2009, President Barack Obama issued a directive to the USEPA to reconsider California's request for a waiver, which the USEPA granted on June 30, 2009, as discussed further below (USEPA 2009b). As part of this waiver, the USEPA specified that CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by the manufacturer for the 2009 model year. The emission standards become increasingly more stringent through the 2016 model year. Regulations to make California emissions standards for model year 2017 and beyond consistent with federal standards were adopted in 2012 and are discussed further below.

CARB's Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. The program also requires car manufacturers to offer for sale an increasing number of zero-emission vehicles (ZEVs) each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles.

In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017–2025 through compliance with the EPA GHG requirements for those same model years (CARB 2012).

Cap and Trade

Pursuant to AB 32, CARB was allowed, but not required, to include among mechanisms intended to reduce GHG emissions a "system of market-based declining annual aggregate emission limits". As noted above, CARB developed a Scoping Plan that directed CARB staff to develop, among other programs, a cap-and-trade mechanism that would apply a declining aggregate cap on GHG emissions and provide a flexible compliance system using tradable instruments. On October 20, 2011, CARB adopted the final cap-and-trade regulation (17 CCR Subchapter 10, Article 5). The program imposes a "cap" on the total GHG emissions from covered entities in the state, and the quantity of emissions allowed under the cap will decrease each year, ultimately reaching the goal of returning statewide GHG emissions to 1990 levels by 2020. The quantity of allowed emissions actually increased between 2014

and 2015, but that is to account for the addition of the fuel importers and distributors and additional electricity importers to the program as discussed below. The net effect is to reduce overall GHG emissions.

The cap-and-trade program started on January 1, 2012, and will proceed in "compliance phases", the first of which began on January 1, 2013. In the first phase, the program applies to electric utilities, importers of electricity, and specified industries, including refineries. Approximately 350 electric utilities and approximately 600 industrial facilities were included in the initial phase of the program. On January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO_2e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California. Phasing in of cap-and-trade compliance obligations for transportation fuel providers further reduces GHG emissions attributable to mobile sources, beyond the GHG emissions reductions achieved by the Pavley Standard, LCFS, and Advanced Clean Cars Program discussed above. This analysis does not incorporate GHG emissions reductions based on cap-and-trade compliance obligations applicable to transportation fuel suppliers.

Annotation 5:

On July 25, 2017, the Governor signed into law **Assembly Bill 398**, which reauthorizes the continuation of the Cap and Trade program through December 31, 2030.[1] The following day, July 26, 2017, the Governor signed into law **Assembly Bill 617**, a companion bill to AB 398, that requires CARB to develop a statewide air quality monitoring plan and to select priority locations for the placement of community air monitoring systems.[2] AB 617 requires CARB to work with local air districts and communities to develop and implement plans to reduce the emission of criteria air pollutants.

1. Legis. Counsel's Dig., Assem. Bill No. 398 (2016-2017 Reg. Sess.)
2. Legis. Counsel's Dig., Assem. Bill No. 617 (2016-2017 Reg. Sess.)

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (*California Public Resources Code,* Sections 40000 et seq.) requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities. Additionally, jurisdictions are not prohibited from implementing source reduction, recycling, and composting activities designed to exceed these requirements.

Assembly Bill 341

Assembly Bill 341 amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is a policy goal of the State that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the State's policy goal. CalRecycle conducted several stakeholder workshops and published a discussion document in May 2012 titled California's New Goal: 75 Percent Recycling, which identifies concepts that CalRecycle believes would assist the State in reaching the 75 percent goal by 2020 (CalRecycle 2016a).

Assembly Bill 1826

In October 2014 Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units (however, multifamily dwellings are not required to have a food waste diversion program). Organic waste (also referred to as organics) means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. This law phases in the mandatory recycling of commercial organics over time. In particular, the minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply (CalRecycle 2016b).

California Water Code

Sections 10910 through 10915 of the *California Water Code* require preparation of a project-specific Water Supply Assessment for developments consisting of 500 or more dwelling units. Sections 10610.4, 10617, and 10620 of the *California Water Code* require urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies.

State Model Water Efficient Landscape Ordinance (MWELO) and Executive Order B-29-15

The MWELO (23 CCR Division 2, Chapter 2.7) establishes an outdoor water budget for new landscaped areas that are 500 square feet or larger, and rehabilitated landscaped areas that are 2,500 square feet or larger (DWR 2015). Executive Order (EO) B-29-15 called for revisions to the MWELO in order to increase water efficiency standards for new and rehabilitated landscapes through more efficient irrigation systems, greywater usage, on-site storm water capture, and by limiting the portion of landscapes that can be covered in turf. It also established a goal of achieving a statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (California 2015b). The California Department of Water Resources (DWR) updated the MWELO in December 2015 to incorporate these

elements and the emergency drought regulations set forth by EO B-29-15, which establish improved efficiency standards for water appliances.

Senate Bill X7-7 (Water Conservation Act of 2009)

The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The State is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This in an implementation measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment.

The DWR adopted a regulation on February 16, 2011, that sets forth criteria and methods for exclusion of industrial process water from the calculation of gross water use for purposes of urban water management planning. The regulation would apply to all urban retail water suppliers required to submit an Urban Water Management Plan, as set forth in the *California Water Code* (specifically, Division 6, Part 2.6, Sections 10617 and 10620).

CARB Airborne Toxic Control Measures and Emission Standards

CARB adopted an airborne toxic control measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter (PM) and other toxic air contaminants, and promulgated emission standards for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles.

Senate Bill 97 (State CEQA Guidelines)

SB 97 required OPR to prepare amended the State CEQA Guidelines for submission to the California Natural Resources Agency (CNRA) regarding GHG analysis and feasible mitigation of the effects of GHG emissions as required by CEQA. These amendments became effective as of March 18, 2010. The adoption of SB 97 and subsequent CEQA amendments are widely recognized as confirmation that lead agencies are required to include an analysis of climate change impacts in CEQA documents.

CEQA Amendments

Pursuant to SB 97, OPR developed proposed amendments to the State CEQA Guidelines (CEQA Amendments) for the feasible mitigation of GHG emissions and their effects, which it first submitted to the Secretary of the CNRA on April 13, 2009. After a public review and comment period, on December 30, 2009, the CNRA adopted the CEQA Amendments, which became effective on March 18, 2010.

The CEQA Amendments for Greenhouse Gas Emissions state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Amendments note that an agency may identify emissions by either selecting a "model or methodology" to quantify the

emissions or by relying on "qualitative analysis or other performance based standards" (CNRA 2009b). Section 15064.4(b) provides that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment (CNRA 2009b):

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, Section 15064.7(c) of the CEQA Amendments specifies that "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (CNRA 2009b). Similarly, the revisions to Appendix G, Environmental Checklist Form, which is often used as a basis for lead agencies' selection of significance thresholds, does not prescribe specific thresholds. Rather, Appendix G asks whether the project would conflict with a plan, policy or regulation adopted to reduce GHG emissions or would generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency.

Accordingly, the CEQA Amendments do not prescribe specific methodologies for performing an assessment; they do not establish specific thresholds of significance; and they do not mandate specific mitigation measures. Rather, the CEQA Amendments emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009b).

The CEQA Amendments indicate that lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to the Project, these potential mitigation measures, set forth in Section 15126.4(c), may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency's decision; (2) reductions in GHG emissions resulting from a project through implementation of project design features; (3) off-site measures, including offsets, to mitigate a project's emissions; and (4) carbon sequestration measures (CNRA 2009b).

Among other things, the CNRA noted in its Public Notice for these changes that impacts of GHG emissions should focus on the cumulative impact on climate change. The Public Notice states (CNRA 2009c):

> While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before [CNRA] indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable.

Thus the CEQA Amendments continue to make clear that the significance of greenhouse gas emissions is most appropriately considered on a cumulative level.

Other Potentially Applicable State Regulations or Policies

Executive Order S-13-08

On November 14, 2008, Governor Schwarzenegger issued Executive Order S-13-08 instructing California agencies to assess and prepare for the impacts of rising sea level associated with climate change (California 2008c).

The resulting 2009 California Climate Adaptation Strategy (CAS) report was developed by the CNRA in coordination with the Climate Action Team (CAT). The report presents the best available science relevant to climate impacts in California and proposes a set of recommendations for California decision-makers to assess vulnerability and promote resiliency in order to reduce California's vulnerability to climate change. Guidance regarding adaptation strategies is general in nature and emphasizes incorporation of strategies into existing planning policies and processes.

In addition to requiring the CAT to create a Climate Adaptation Strategy, Executive Order S-13-08 ordered the creation of a comprehensive Sea Level Rise Assessment Report. The report, published in June 2012, indicates that the sea level along most of California's coast is expected to rise about one meter over the next century and is likely to increase the risk of damage in the form of flooding, coastal erosion, and wetland loss due to storm surges and high waves. The sea level increase is slightly higher than projected for global sea levels (National Research Council 2012).

Executive Order S-13-08 also called for the California Ocean Protection Council (OPC) to work with the other CAT State agencies to develop interim guidance for assessing the potential impacts of sea level rise due to climate change in California. In coordination with National Academy of Sciences (NAS) efforts, the OPC drafted interim guidance recommending that State agencies consider a range of sea level rise scenarios for the years 2050 and 2100 in order to assess project vulnerability, reduce expected risks, and increase resiliency to sea level rise. The draft resolution and interim guidance document is consistent with the Ocean Protection Act (*California Public Resource Code,* Division 26.5, Section 35615[a][1]), which specifically directs the OPC to coordinate activities of State agencies to improve the effectiveness of State efforts to protect ocean resources (CNRA 2014; Sea Level Rise Task Force 2010). An update to the 2009 CAS report, the final "Safeguarding California Plan", was published in July 2014.

Assembly Bill 1613 (Waste Heat and Carbon Emissions Reduction Act)

AB 1613 directed the CEC, the California Public Utilities Commission (CPUC), and CARB to implement the Waste Heat and Carbon Emissions Reduction Act, which is designed to encourage development of new combined heat and power (CHP) systems in California with a generating capacity of not more than 20 megawatts. In June 2010 and updated in 2015, the CEC published modified final guidelines establishing technical criteria for eligibility of CHP systems for programs to be developed by the CPUC and publicly owned utilities (CEC 2015b). Section 2840 of the Act provides that the CEC's guidelines require that CHP systems:

- Be designed to reduce waste energy;
- Have a minimum efficiency of 60 percent;
- Have nitrogen oxides (NOx) emissions of no more than 0.07 pound per megawatt-hour;
- Be sized to meet the eligible customer generation thermal load;
- Operate continuously in a manner that meets the expected thermal load and optimizes the efficient use of waste heat; and
- Be cost-effective, technologically feasible, and environmentally beneficial.

As directed by AB 1613, the CPUC also established (1) a standard tariff for the sale of electricity to electricity corporations for delivery to the electrical grid and (2) a "pay as you save" pilot program requiring electricity corporations to finance the installation of qualifying CHP systems by non-profit and government entities. A January 2011 decision by an administrative law judge determined that the pilot program will not be established due to lack of customer interest and difficulties in instituting a program that meets California Department of Corporations requirements (Decision 11-01-010 Before the Public Utilities Commission of the State of California 2011).

Executive Order B-16-12

On March 23, 2012, Governor Brown issued EO-B-16-12, which orders CARB, the CEC, the CPUC, and other relevant agencies to facilitate the rapid commercialization of zero-emission vehicles (ZEVs), and sets a target for the number of ZEVs in California at 1.5 million by 2025. The Executive Order also directs that the California's state vehicle fleet increase the number of its ZEVs through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles be zero-emission by 2015 and at least 25 percent by 2020. Further, the Executive Order also sets a target for a reduction of GHG emissions from the transportation sector equaling 80 percent less than 1990 levels by 2050.

Senate Bill 391 and California Transportation Plan 2040

On October 11, 2009, Governor Brown signed into law SB 391, which directs the California Department of Transportation (Caltrans) to update the California Transportation Plan to address how the state will achieve maximum feasible emissions reductions in order to attain a statewide reduction of GHG emissions to 1990 levels by 2020 and 80 percent below 1990

levels by 2050. Per SB 391, the California Transportation Plan update must be adopted by December 31, 2015 and updated every five years thereafter. Pursuant to SB 391, in June 2016, Caltrans adopted California Transportation Plan 2040 (CTP 2040), which provides a long-range policy framework to meet future statewide mobility needs and reduce greenhouse gas emissions for the transportation sector. (Caltrans 2016a) The CTP 2040 outlines goals and recommendations to achieve a safe, sustainable, accessible, and competitive transportation system that provides reliable mobility while meeting the state's GHG reduction goals over a 20 year planning horizon. Per SB 391, the CTP 2040 is scheduled to be updated every five years, starting in 2021.

Executive Order B-32-15 and the California Sustainable Freight Action Plan

Executive Order B-32-15 (July 17, 2015) requires the California State Transportation Agency, the California Environmental Protection Agency, the California Natural Resources Agency, CARB, Caltrans, the California Energy Commission, and the Governor's Office of Business and Economic Development to develop an integrated action plan by July 2016 to establish clear targets to improve freight efficiency and transition to zero-emission technologies, and to identify state policies, programs, and investments to meet these targets. Pursuant to Executive Order B-32-15, in July 2016, the participating agencies published the California Sustainable Freight Action Plan (Freight Action Plan) (CARB 2016b). The Freight Action Plan recommends a high-level vision for a sustainable freight transportation system and 11 guiding principles for state agencies to utilize when developing specific policies, investments, and programs related to the California freight transportation system. The Freight Action Plan also establishes targets to (i) improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector relative to amount of carbon that it produces by 2030, and (ii) deploy over 100,000 freight vehicles and equipment capable of zero emission operation and to maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030. Per the Freight Action Plan, its targets are not mandates, but rather aspirational measures of progress toward sustainability for the State to meet and try to exceed; under the plan, state agencies will measure and report progress on the statewide Freight Action Plan targets, and evaluate the targets to determine necessary adjustments.

California 2016 Mobile Source Strategy

On May 16, 2016, CARB published the updated Mobile Source Strategy 2016, which establishes a comprehensive statewide strategy to reduce emissions from mobile sources to meet climate change and air quality goals over a fifteen year planning horizon. (CARB 2016c) The Mobile Source Strategy sets forth several measures CARB is proposing to achieve its mobile source emission reduction goals, including a heavy-duty low NOx engine standards and a "last-mile" delivery regulation that would require the use of low-NOx engines as a stepping stone to zero-emission trucks. The Mobile Source Strategy also provides a framework to inform updates to the State Implementation Plan strategy, the California Sustainable Freight Action Plan, and the Short-Lived Climate Pollution Reduction Strategy, and revises the Advance Clean Transit strategy to include low-NOx engines to transit busses. Additional mobile source emission reduction measures described in the Mobile Source Strategy include: expanding the requirements for cleaner low carbon fuels; incentives for the

turnover of equipment and fleets to the cleanest technologies; pilot studies to demonstrate new clean technologies; programs to ensure that emission control systems remain durable over vehicle lifetimes.

California New Residential Zero Net Energy Action Plan

In June 2015, the California Energy Commission and the California Public Utilities Commission jointly published the *California New Residential Zero Net Energy Action Plan 2015-2020* (ZNE Plan) (CEC 2015c). The ZNE Plan is designed to operationalize the State's goal to have 100% of new homes achieve zero net energy (ZNE) by establishing guiding principles for establishing a regulatory framework achieving that goal by 2020 (CEC 2015c). Starting in 2008, the Title 24 energy efficiency requirements for residential homes have been periodically ratcheted up with the objective of eventually achieving the ZNE goal, with updates adopted in 2013 (effective 2014) and 2016 (effective 2017). With each update, the Title 24 standards efficiency requirements have increased at a rate of 12-15% in each cycle. The 2016 standards that went into effect on January 1, 2017 get still closer to ZNE by requiring, for example, high efficiency lighting, high efficiency walls and attics with increased continuous insulation, and high efficiency water heating systems. According to the ZNE Plan, the 2019 update to Title 24 (effective 2020) will require full ZNE for all new residential construction.

Regional

Antelope Valley Air Quality Management District

The AVAQMD has adopted GHG emissions requirements into the appropriate Rules and Regulations. The AVAQMD's *CEQA and Federal Conformity Guidelines* (2011) establishes a CEQA significance threshold of 100,000 tons (90,718 metric tons) of CO_2e per year for GHG emissions, as discussed in Section 5.21.6, Environmental Impacts.

South Coast Air Quality Management District

On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold for projects where the SCAQMD is the lead agency (SCAQMD 2008). Currently, the SCAQMD Governing Board has only adopted thresholds relevant to industrial (stationary source) projects. To achieve a policy objective of capturing 90 percent of GHG emissions from new residential/commercial development projects and implement a "fair share" approach to reducing emission increases from each sector, SCAQMD staff have proposed as a draft approach combining performance standards and screening thresholds. At this time, the SCAQMD has not adopted any significance thresholds for new residential, commercial, or mixed use development projects, but has proposed several draft thresholds over the last few years. The SCAQMD's latest iteration of proposed thresholds, as introduced in September 2010 (SCAQMD 2010), are discussed in Section 5.21.6, Environmental Impacts.

Since sharing the proposed approach to CEQA significance at its GHG CEQA Significance Threshold Stakeholder Working Group meeting in September 2010, the SCAQMD has cancelled all subsequent meetings and no schedule has been issued for how or when

thresholds will be established. The Working Group has not convened since the fall of 2010. As of the preparation of this Draft EIR, the proposal has not been considered or approved for use by the SCAQMD Board.

Southern California Association of Governments

As described above, SB 375 requires the MPOs to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. SCAG's SCS is included in the SCAG 2012–2035 Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS) (SCAG 2012a). The document was adopted by SCAG in April 2012. The goals and policies of the RTP/SCS that reduce vehicle miles traveled (VMT) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play and designing communities so there is access to high quality transit service. The 2012–2035 RTP/SCS is expected to reduce per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035. In June of 2012, CARB accepted SCAG's determination that the Final RTP/SCS would meet the region's GHG reduction target.

SCAG's SCS is now included in its 2016–2040 RTP/SCS. The document was adopted by SCAG on April 7, 2016. The 2016–2040 RTP/SCS is expected to reduce per capita transportation emissions by 8 percent by 2020 and by 18 percent by 2035 (SCAG 2016a).

Metro Countywide Sustainability Planning Policy and Implementation Plan

The *Metro Countywide Sustainability Planning Policy and Implementation Plan*, approved in December 2012, builds upon existing federal, State, regional, and local sustainability policies and plans. This policy serves as a guidance and implementation tool to increase coordination and collaboration across transportation modes, planning disciplines, and government agencies. The main goals of this policy are to improve air quality and increase transportation choices in Los Angeles County (Metro 2012).

Metro Complete Streets Policy

The *Metro Complete Streets Policy* was developed by the Los Angeles County Metropolitan Transportation Authority (Metro) in October 2014, and serves as a standard for comprehensive, multimodal transportation system design in Los Angeles County. This policy uses the existing policies established by the *Metro Countywide Sustainability Planning Policy and Implementation Plan* and builds upon them by clarifying and adding goals. These goals further encourage a multimodal transportation system by promoting active transportation, and add goals similar to those of the CTP 2040 by encouraging safety and healthy, equitable communities (Metro 2014).

Local – Los Angeles County

Countywide Energy and Environmental Policy

The Countywide Energy and Environmental Policy (Policy) was adopted by the Los Angeles County Board of Supervisors on January 16, 2007, to provide guidelines for the development and enhancement of energy conservation and environmental programs within County

departments. The Policy was also the County's response for the need for energy conservation and reduction in GHG emissions. It directs the County to track its GHG emissions with the California Climate Action Registry, and to reduce its facilities' energy consumption by 20 percent by the year 2015. Under this policy, the Los Angeles County Energy Program (LACEP) provides financing for energy efficiency or solar improvements, and the County's Capital Project Program requires all new County buildings (i.e., greater than 10,000 square feet) to be Leadership in Energy and Environmental Design (LEED™) Certified at the Silver Level (CCAR 2009a).

Revisions to the Policy, adopted on June 30, 2015, enhance the County's existing and future policies programs, and reporting with regard to environmental sustainability. Further, the 2015 revisions established a County Sustainability Council with responsibilities that include, but are not limited to, developing consistent approaches and metrics to provide County services in an environmentally sustainable manner and leading efforts to acquire funding for countywide or regional sustainability programs (LACISD 2015).

Additionally, the County has pledged to be a "Cool County" by establishing a GHG emissions footprint; developing a GHG mitigation plan; working with local entities to reduce regional GHGs by 80 percent by 2050; and supporting federal legislation to raise CAFE standards. In addition, the County has implemented various internal programs on energy conservation; water conservation; waste reduction and recycling; green purchasing and contracting; and alternative fuel vehicle purchasing. On January 13, 2009, the County created an action plan for developing a Comprehensive Renewable Energy Program to develop renewable energy projects on existing County facilities and properties.

In 2009, the Los Angeles County Board of Supervisors directed the Chief Executive Officer (CEO) to take actions toward the use of renewable energy. The actions focused upon cost-benefit analyses. The CEO was directed to examine the practicality of Los Angeles County offsetting between 10 percent and 100 percent of current electrical needs through the use of renewable energy, including the purchase of renewable energy credits. The CEO was also instructed to compare costs and benefits of purchasing electricity from renewable energy sources to the costs and benefits of investing money in improving the energy efficiency of the County's operations.

The CEO provided a report to the County with a proposal to include (1) a cost analysis feasibility assessment; (2) recommendations regarding constituent-focused initiatives to be included in the Program; (3) an analysis of community choice aggregation, home energy audits, financing of residential renewable energy products, and other initiatives as deemed appropriate. The May 5, 2014 Energy & Environmental Policy Report #9 updated the accomplishments and activities of the County Office of Sustainability. The Report identified the creation of the Los Angeles County Energy Program, which is a comprehensive home energy retrofit program, and staff training sessions to promote sustainable construction and building operations (LACISD 2014).

Los Angeles County General Plan

The Los Angeles County 2035 General Plan and Programmatic EIR were adopted by the Los Angeles County Board of Supervisors on October 6, 2015. There are five Guiding Principles that serve as the foundation of the General Plan and all future growth within the County. The Guiding Principles are to (1) employ smart growth; (2) ensure community services and infrastructure are sufficient to accommodate growth; (3) provide the foundation for a strong and diverse economy; (4) promote excellence in environmental resource management; and (5) provide healthy, livable, and equitable communities (DRP 2015b). In addition to the Guiding Principles, the General Plan provides the policy framework for how and where the unincorporated County will grow through the year 2035, while recognizing and celebrating the County's wide diversity of cultures, abundant natural resources, and status as an international economic center. The Los Angeles County 2035 General Plan accommodates new housing and jobs within the unincorporated areas in anticipation of population growth in the County and the region (DRP 2014). The Final EIR addresses the environmental effects associated with the implementation on the Los Angeles County 2035 General Plan. The FEIR finds that Greenhouse Gas Emissions Impacts would be significant and unavoidable without the implementation of Community Climate Action Plan (DRP 2014).

Los Angeles County Community Climate Action Plan

The *Final Unincorporated Los Angeles County Community Climate Action Plan 2020* (CCAP) is part of the County General Plan under the Air Quality Element and was adopted along with the General Plan on October 6, 2015. The County acknowledges the consensus among leading scientists that without action to reduce GHG emissions, climate change due to global warming will pose a considerable threat to the environment and to human health and society (DRP 2015a).

The CCAP is being implemented by the County to mitigate and avoid GHG emissions associated with community activities in unincorporated Los Angeles County. The CCAP addresses emissions from building energy, land use and transportation, water consumption, and waste generation. The measures and actions outlined in the CCAP tie together with the County's climate change initiatives and provides a blueprint for a more sustainable future. To reduce the impacts of climate change, the County has set a target to reduce GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020, which is consistent with AB 32 targets. The CCAP describes the County's plan for achieving this goal, including specific strategy areas for each of the major emissions sectors, and provides details on the 2010 and projected 2020 emissions in the unincorporated areas.

The actions in the CCAP are priority actions and intended for near-term implementation such that the County can achieve its GHG reduction goal for 2020 for the unincorporated areas of Los Angeles County. The County has designated a CCAP Implementation Team (CIT) to lead and coordinate the County's efforts on CCAP implementation, monitoring, and plan updates. The following is a list of general implementation steps that the County will undertake to implement each CCAP local action.

- Develop implementation plans for each CCAP action
- Estimate project-specific costs
- Adopt or update ordinances and/or codes
- Establish partnerships
- Pursue funding sources
- Create monitoring/tracking processes and indicators
- Engage the community and stakeholders in CCAP action implementation

The environmental impacts associated with implementation of the CCAP were analyzed in the *Los Angeles County General Plan Update Environmental Impact Report* (SCH# 2011081042) certified by the County on October 6, 2015.

Los Angeles County General Plan and Antelope Valley Area Plan

The *Los Angeles County General Plan* and the *Antelope Valley Area Plan* (AVAP) include goals and policies that address greenhouse gases in the unincorporated County. The AVAP goals and policies applicable to the analysis of greenhouse gas emissions with Project implementation are listed below.

Goal LU 5: A land use pattern that decreases greenhouse gas emissions.

> **Policy LU 5.1:** Ensure that development is consistent with the Sustainable Communities Strategy adopted in 2012, an element of the Regional Transportation Plan developed by the Southern California Association of Governments.
>
> **Policy LU 5.2:** Encourage the continued development of rural town centers that provide for the daily needs of surrounding residents, reducing the number of vehicle trips and providing local employment opportunities.
>
> **Policy LU 5.3:** Preserve open space areas to provide large contiguous carbon sequestering basins.
>
> **Policy LU 5.4:** Ensure that there is an appropriate balance of residential uses and employment opportunities within close proximity of each other.

Goal COS 17: Buildings are sustainable, conserving energy, water, and other resources, and limiting greenhouse gas emissions.

> **Policy COS 17.1:** Promote green building techniques for the construction and operation of public and private buildings in the unincorporated Antelope Valley.
>
> **Policy COS 17.2:** Require that new buildings be sited and designed in a manner that maximizes efficient use of natural resources, such as air and light, to reduce energy consumption, heat profiles, and greenhouse gas emissions.

Policy COS 17.4: Promote the use of individual renewable energy systems and require appropriate development standards for such systems to minimize potential impacts to surrounding properties. Simplify the permitting process for individual renewable energy systems that meet these development standards.

Policy COS 17.5: Protect active and passive solar design elements and systems from shading by neighboring structures and trees through appropriate development standards.

Policy COS 17.6: Require new landscaping to comply with applicable water efficiency requirements in the County Code.

Policy COS 17.7: Require low-flow plumbing fixtures in all new developments.

Policy COS 17.9: Require reduction, reuse, and recycling of construction and demolition debris.

Los Angeles County Green Building Standards Code (Title 31)

In November 2013, the Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31) in response to the mandates set forth in the CALGreen Code (2010 Green Building Standards Code) (CBSC 2014). Title 31 became effective on January 1, 2014. Title 22 (Planning and Zoning Code) Green Building and Drought Tolerant Landscaping requirements are now found in Title 31. The purpose of Title 31 is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts that have a reduced negative impact or positive environmental impact and that encourage sustainable construction practices in planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental air quality (Title 31 of the Los Angeles County Code). Notably, Title 31 requires nonresidential buildings that are equal to or greater than 25,000 square feet (sf) to comply with the CALGreen Code (specifically, Section A5.601.2.4, Voluntary measures for CALGreen Tier 1). These measures include, but are not limited to, requirements for energy efficiency, parking for fuel-efficient vehicles, cool roofs, reduction of indoor potable water use, recycled content of construction materials, reduction in construction and demolition waste, and thermal insulation (Los Angeles County 2016).

The County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydrozoning irrigation techniques shall be incorporated into the landscape design. Title 31 also establishes low-impact development (LID) standards for new construction that would conserve water, energy, and natural resources; divert waste from landfills; minimize impacts to existing infrastructure; and promote a healthier environment (County of Los Angeles 2016a).

Los Angeles County Tree Planting Ordinance (Title 22)

On March 29, 2016, the Board of Supervisors adopted the Tree Planting Ordinance that does the following (DRP 2016b):

- Amended Title 22 (Planning and Zoning) of the Los Angeles County Code ("County Code") to establish tree planting requirements for new projects and
- Amended Title 21 (Subdivisions) and Title 22 (Planning and Zoning) of the County Code to repeal drought tolerant landscaping and green building requirements that are now found in Title 31.

The Tree Planting Ordinance, effective April 28, 2016, includes the following requirements:

a. For projects that are primarily residential with 3 or fewer units per lot, a minimum of 2 trees shall be planted on each lot.
b. For projects that are primarily residential with 4 or more units per lot, a minimum of 1 tree shall be planted for every 5,000 square feet of building footprint per lot.
c. For projects that are nonresidential or mixed-use, a minimum of 3 trees shall be planted for every 10,000 square feet of developed lot area.

Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location (DRP 2016b) pursuant to Section 22.56.2100.

Los Angeles County Roadmap for a Sustainable Waste Management Future.

On April 22, 2014, the Board of Supervisors adopted a motion directing the development of a Roadmap to achieve a Sustainable Waste Management Future for the County unincorporated communities. Accordingly, the Sustainable Waste Management Future Working Group was formed to collectively develop the Roadmap. The intent of the Roadmap is to guide the County in implementing the four strategies identified by the Working Group, which are as follows: (1) Programs and Services, (2) Measuring Results, (3) Facilities and Infrastructure, and (4) Outreach and Education. By implementing these strategies the Roadmap sets to achieve 80 percent diversion from landfills by 2025; 90 percent diversion from landfills by 2035; and 95 percent (or higher) diversion from landfills by 2045. To accomplish these goals, the Working Group identified specific recommended initiatives, which will be expanded in detailed implementation plans. Although the Roadmap does not contain currently enforceable regulations, development under the *Centennial Specific Plan* will comply with any implementation plans once adopted.

5.21.3 – Environmental Setting

Global, National, State, and Regional Contributions to GHG Emissions

Table 5.21-2 compares the magnitude of GHG emissions on the global, national, State, and regional (i.e., Los Angeles County) scales.

TABLE 5.21-2
COMPARISON OF WORLDWIDE GHG EMISSIONS

Area and Data Year	Annual GHG Emissions ($MMTCO_2e$)
World (2012)	46,049
United States (2014)	6,870
California (2013)	459
Los Angeles County, Unincorporated (2010)	8.0
$MMTCO_2e$: million metric tons of carbon dioxide equivalent Source: WRI 2016; USEPA 2016; CARB 2015c; DRP 2015a.	

The U.S. contributes approximately 14.7 percent of worldwide GHG emissions per year; California contributes approximately 1.0 percent; and the unincorporated portion of the County contributes approximately 0.02 percent. CO_2 constitutes approximately 84 to 85 percent of all GHG emissions in the U.S. and California. The primary contributors to California GHG emissions are (1) transportation; (2) electric power production from both in-state and out-of-state sources; and (3) industrial uses. The primary contributors to unincorporated County GHG emissions are (1) building energy (49 percent) and (2) transportation (42 percent). The CCAP forecasts that unincorporated County GHG emissions will increase from 7.98 $MMTCO_2e$ per year in 2010 to 9.06 $MMTCO_2e$ per year in 2020 (DRP 2015a).

California GHG emissions have fallen from about 1.36% of the global total in 1990 to about 0.98% in 2011 (WRI 2016). The annual amount of global $C0_2e$ emissions increased by 12,936 $MtCO_2e$ from 1990 to 2011, or by more than 40% since 1990. For the same period, California's CO_2e emissions increased by only 8.3 $MTCO_2e$ (2%), and declined by approximately 10.7% from 2007 to 2011. Overall, California accounted for only 0.065% of the net global CO_2e emissions increase between 1990 and 2011. Moreover, California emits approximately 50% less CO_2e per capita than the rest of the United States, and far less than locations such as Texas or Canada. In 2011, California emitted 11.4 metric tons CO_2e per capita, whereas the US, Texas, and Canada emitted 22.3, 30.9, and 20.9 metric tons CO_2e per capita, respectively. Indeed, California's 2011 per capita GHG emission rate was on part with Germany (10.8 $MTCO_2e$ per capita), a country widely regarded as a world leader in the development of zero-emission energy sources (WRI 2016).

Project Site GHG Emissions

The Project site is currently undeveloped and used primarily for livestock grazing. Of the 12,323 acres of land comprising the Project site, approximately 10,950 acres (89 percent) are currently used for cattle grazing. Existing GHG emissions from the Project site occur from enteric fermentation (cattle digestive processes), which primarily produces CH_4, and from vehicles used on the property for grazing management. The extensive vegetation on the Project site sequesters CO_2, thereby reducing GHG emissions attributed to the existing condition. A portion of State Route (SR) 138 extends through the Project site, and vehicles traveling that roadway do emit GHGs. However, for the purposes of this analysis, it is

assumed that the existing emissions are not quantified, as they are not associated with activities at the site.

Local Climate Change Effects

The following descriptions of potential adverse effects are taken from the CCAP.

Large increases in global GHG concentrations could have substantial adverse effects on natural and human environments in the unincorporated areas. Current research efforts coordinated through the CARB and other State agencies examine the specific changes to California's climate that will occur as Earth's surface warms. California's *2012 Vulnerability and Adaptation Study*, the State's third major assessment on climate change, examines local and statewide vulnerabilities to climate change and includes new data and projections on climate changes in California. Dr. Alex Hall, from the University of California, Los Angeles (UCLA), in partnership with the Los Angeles Regional Collaborative for Climate Action and Sustainability (LARC), recently published several studies that develop climate change predictions that are specific to the greater Los Angeles area. These studies indicate that if GHG emissions continue to increase globally based on current trends, climate change could impact the natural environment in the following ways:

> **Increases in Ambient Temperatures:** On average, the Los Angeles region is expected to warm 4 to 5°F over land by mid-century. The coasts and oceans will likely warm the slowest, whereas the mountains and deserts will experience more rapid warming. Warming across the region will be greatest in the summer and fall. For the unincorporated areas in particular, UCLA's high emissions modeling scenario predicts that mountain and inland areas may warm up to or greater than 4.5°F, and coastal and valley/urban areas warming up to 3.7 to 3.9°F.
>
> **Increases in Extreme Heat Conditions:** Heat waves and very high temperatures could last longer and become more frequent. The number of extreme heat days is expected to triple in the coastal and central areas; the San Fernando Valley and San Gabriel Valley will witness almost a quadrupling of heat days. The number of extreme heat days in the desert and mountain areas will increase five to six times relative to the current amounts. For the unincorporated areas in particular, UCLA's high emissions modeling scenario predicts a nearly 12-fold increase in the number of heat days.
>
> **Decreased Snowfall and Winter Snowpack:** The region's mountains could see a 42 percent reduction in annual snowfall by mid-century. The winter snowpack is also expected to melt 16 days earlier as a result of rising temperatures. As of March 2014, California is facing a severe drought and the snowpack in the Sierra Nevada is 12 percent of the annual average (DWR 2014). Changes in snowfall could exacerbate drought-like conditions, reducing water supplies and water security for all end users throughout the County.
>
> **Increased Frequency, Intensity, and Duration of Extreme Storms:** Changes in storm events could create conditions that are conducive to air pollution formation,

which further exacerbates air quality issues. Increased winter storm events could also affect peak stream flows and flooding as well as landslides.

Changes in Growing Season and Species Distribution: Changes in growing season conditions could cause variations in crop quality and yield. Plant and wildlife distributions may also be affected by changes in temperature, competition from colonizing species, regional hydrology, sea level, and other climate-related effects.

Rising Sea Levels: Sea levels are expected to steadily rise by mid-century, which could inundate portions of the coastline.

5.21.4 – Project Design Features

Green Development Program

The Project would implement a Green Development Program, included as Appendix 1-B to the *Centennial Specific Plan*. The Green Development Program includes but is not limited to:

- Project features that comply with and implement the CCAP and
- Additional Project features that comply with and implement State and federal GHG reduction mandates and goals.

The Project first applies land use planning principles to create a balanced master-planned community that includes mixed-use neighborhoods where residential, commercial, and other employment-generating uses and institutional/public uses are proximate to each other and connected by a network of pathways to reduce reliance on automobile use and off-site commuting. The bicycle and pedestrian trail system connects community uses such as neighborhood parks, elementary schools, and neighborhood-scale retail to reduce single-occupancy automobile travel for these neighborhood-scale destinations.

The Project then applies infrastructure and building design standards to reduce GHG emissions through energy and water conservation measures. The Project's integrated water resources management approach would (1) minimize water use and maximize water reuse through development of two wastewater reclamation facilities (WRF) that will produce recycled water for landscape irrigation use throughout the Project site and (2) incorporate a variety of water supply sources including State Water Project (SWP) water, banked water, groundwater, and other non-SWP supplies to reduce the GHG emissions associated with water supply delivery.

The Project includes components (e.g., the Mobility Plan, Green Development Program) to conserve and enhance open space, promote transit, and reduce waste. Development within established Significant Ecological Areas would be entirely avoided, thereby minimizing disturbance of high-value biological resources and preserving open space areas that sequester CO_2. As part of the Green Program the Project incorporates a comprehensive waste diversion and recycling program. In order to promote the use of alternative forms of transportation, the Project includes a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or similar

organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible thereby reducing GHG emissions from mobile sources.

Elements of the Green Development Program that would reduce GHG are stated in the project design features (PDF) listed below. The emissions reductions for some PDFs are quantifiable; others are not, but would reduce GHG emissions from the quantified levels and reduce associated GHG emissions impacts. PDFs that demonstrate quantifiable GHG emissions reductions are also stated as Mitigation Measures.

Operational – Energy Efficiency

PDF 21-1 The Green Development Program requires compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings. Therefore, the energy efficiency of these buildings would exceed 2016 Title 24 requirements by 15 percent. Low-rise residential buildings are three stories or less.

PDF 21-2 The Green Development Program requires compliance with CALGreen voluntary measure A5.203.1.2.1 for nonresidential buildings. Therefore, the energy efficiency of nonresidential, hotel, and high-rise residential buildings would exceed 2016 Title 24 requirements by 10 percent. High-rise residential buildings are four stories or more.

PDF 21-3 The Green Development Program requires a minimum of 50 percent of the Project's anticipated electrical energy demand at buildout (i.e. household, business, civic/institutional, recreational, and public facilities) shall be satisfied from on-site renewable energy generation. "Anticipated electrical energy demand" shall be determined on the basis of the anticipated loads for each building as shown in the reports submitted at the time of building permit application pursuant to the Building Energy Efficiency Standards of Title 24 or equivalent. "On-site renewable energy generation" includes, but is not limited to, solar, wind, geothermal, biofuel and hydroelectric systems. These systems shall be installed in connection with the development of one or more of the following: residential units, nonresidential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity.

PDF 21-4 The Green Development Program requires that <u>all</u> ~~a minimum of 70 percent of~~ public and community pools and spas would be equipped with active solar heating systems where heating is necessary or desired. The applicant for a pool permit shall provide the proposed plan for compliance with this provision prior to obtaining a permit for the pool.

PDF 21-5 The Green Development Program requires that deeds, CC&Rs (Covenants, Conditions and Restrictions), or similar legal documents contain the following requirement: The owners of all single-family and multi-family residential units

shall be required, upon resale, to present to the buyer a written energy audit checklist prepared by a qualified third party at the time the seller provides the buyer with the Real Estate Transfer Disclosure Statement required by Section 1102 et seq. of the *California Civil Code.* The energy audit checklist shall certify that all heating, ventilation, and air conditioning (HVAC) systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. The CC&Rs of the master homeowners association or other applicable association shall require compliance with the provisions of this measure and shall provide notice to individual owners of the resale energy audit checklist requirement. The master homeowners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure.

PDF 21-6 The Green Development Program requires that deeds, CC&Rs, or similar legal documents contain the following requirement: For nonresidential buildings, within 90 days after the end of the first full calendar year following the issuance of the certificate of occupancy and within 90 days after each 5-year period thereafter, the owner or tenant in possession thereof shall submit to the master commercial owners association or other applicable association a report prepared by the owner or a qualified, independent third party that evaluates whether all major building systems such as heat furnace, air conditioner, and other mechanical fixtures are working within the design standards established for each system. The master commercial owners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure.

PDF 21-7 The Green Development Program requires builders to install energy efficient major appliances and HVAC systems which meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners.

PDF 21-8 The Green Development Program requires that the Project's wastewater reclamation facilities (WRF) will ~~include equipment to~~ capture and reuse biogas for energy production.

Operational – Vehicle Trip and Vehicle Miles Traveled Reductions

PDF 21-9 The Green Development Program requires that the Project establish a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purposes are to coordinate and facilitate transit and rideshare usage to serve as many riders as possible; to promote multi-modal transportation services and options; and to reduce resident and employee use of single-occupancy

automobiles for off-site commuting, and for internal travel within the Specific Plan. PDF 21-9 is required for implementation through MM 10-1, detailed in Section 5.10, Traffic, Access, and Circulation.

PDF 21-10 The Centennial Affordable Housing Implementation Plan (see Appendix 3-H of the Centennial Specific Plan, which is in Appendix 4.0-A of the EIR) will be adopted in conjunction with the Specific Plan, which includes dedication of a minimum of ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable. The California Air Pollution Control Officers Association's (CAPCOA's) 2010 document entitled *Quantifying Greenhouse Gas Mitigation Measures* identifies affordable housing as a quantifiable measure for reducing GHG emissions as it allows lower income families to live closer to jobs centers.

PDF 21-11 The Centennial Specific Plan's Green Development Program requires the installation of one 208/240 volts of alternating current (VAC) receptacle that may be used for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1.. The installation shall comply with requirements of Section 4.106.4.1 of the 2016 CALGreen Code, or the most applicable code at the time of construction.

PDF 21-12 The *Centennial Specific Plan's* Green Development Program requires each applicant to provide plans and specifications to the County demonstrating compliance with the Electric Vehicle Supply (EVS) charging station measures specified in MM 11-4. If and to the extent subsequently approved by the County, compliant with state laws, and resulting in no new significant impacts to the environment following County review and approval, EVS charging stations may be replaced by "alternative energy fueling stations" which may include other types of electric vehicle charging technology (e.g., operating at higher or lower voltages), or alternative vehicular fuel technology that results in zero or near zero (as defined by CARB) GHG emission such as hydrogen fuel cells, biofuels, or other qualifying fuel technologies. An electric charging station shall allow for simultaneous charging of two electric vehicles. ~~for an applicable construction permit to install "alternative energy fueling stations" as listed below. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station (allowing simultaneous charging of two or more vehicles) or a station providing another new or improved technology (e.g. compressed natural gas [CNG] and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel.~~

- Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter.

- Multi-family residential buildings of at least seventeen ~~20~~ 17 residential units shall provide a minimum of one alternative energy vehicle fueling station for the first seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional seventeen (~~20~~17) residential units thereafter.
- The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station.
- Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station.

PDF 21-13 The Green Development Program requires that, prior to the issuance of each nonresidential construction permit, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs:

- Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for nonresidential land uses or as required by Section 22.52.1225B of the County Code, whichever is more stringent
- For new nonresidential buildings with over 10 tenant-occupants, provide secure bicycle parking spaces at a rate of 5 percent of tenant parking being added, with a minimum of 1 space. Acceptable parking facilities shall be conveniently reached from the street and may include, but not be limited to:
    - Covered, lockable enclosures with permanently anchored racks for bicycles.
    - Lockable bicycle rooms with permanently anchored racks.
    - Lockable, permanently anchored bicycle lockers.

PDF 21-14 The Green Development Program requires that prior to the issuance of an applicable construction permit for each residential building permit, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs or specifications.

- Visitor parking shall include preferentially located parking spaces for ~~alternative-fueled~~ electric vehicles.
- Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

PDF 21-15 The Green Development Program requires that prior to issuance of an applicable construction permit for each parking structure and parking lots

with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric~~, natural gas, or similar low-emitting technology)~~ vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated~~. Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code.
- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

PDF 21-16 The Green Development Program requires that the Project Applicant/Developer provide:

- Internet infrastructure and high-speed broadband access to facilitate telecommuting.
- A community intranet (or similar) with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities reduce the need for people to use automobile travel to obtain the information that is provided.

Compliance shall be required prior to the issuance of building permit for the 1,000th residential unit.

Operational – Water Conservation to Reduce Emissions Associated with Water Supply, Treatment, and Distribution

PDF 21-17 The Green Development Program requires each applicant for an applicable construction permit for a nonresidential or multi-family building to install recycled water infrastructure to serve common areas for these facilities, except where prohibited by law. To the extent recycled water is produced within the Project and available, recycled water shall be used for landscape irrigation within those common areas. Compliance with these measures shall be established prior to the issuance of a building permit for nonresidential and multi-family facilities and at the time of County approval of final landscaping plans submitted by the applicant after final map recordation for homeowners association common areas. Covenants, conditions and restrictions shall require the owners of such common areas to maintain, repair and replace irrigation systems and plantings in accordance with County approved plans.

PDF 21-18 The Green Development Program requires each applicant for an applicable construction permit for a nonresidential building to install indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with 2016 CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code.

PDF 21-19 The Green Development Program requires each applicant for an applicable construction permit for a single or multi-family residential building to install kitchen faucets and appliances that comply with 2016 CALGreen code residential voluntary measures specified in Sections A4.303.1 and A4.303.3 of the code.

PDF 21-20 Implement MM 18-1, which requires water rates to be based on the assigned water budget for each parcel, to assure that outdoor landscaped areas for single-family and multi-family homes do not exceed the assigned outdoor water budget for the parcel through excessive watering or excessive turf planting.

Construction – Vehicle Emissions Reduction

PDF 21-21 The Green Development Program requires that, prior to the issuance of each construction permit, the Project Applicant/Developer shall require in contract specifications that contractors set goals to limit unnecessary construction equipment idling to three minutes and provide a program to encourage equipment operators to achieve the three-minute goal. This requirement exceeds State regulations (*California Code of Regulations* [CCR], Title 13, 2449[d][2]) that limit idling to five minutes.

5.21.5 – Threshold Criteria

CEQA Thresholds

The following significance threshold criteria are derived from the County of Los Angeles Environmental Checklist and track the thresholds recommended in the State CEQA Guidelines as amended by the California Natural Resources Agency (CNRA) (CNRA 2009a). The Project would result in a significant impact if it would:

Threshold 21-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Threshold 21-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Neither the County's Environmental Checklist nor the State CEQA Guidelines prescribe specific methodologies and significance criteria for determining the significance of GHG emissions impacts. The State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate thresholds consistent with the manner in which other impact areas are handled in CEQA. CEQA cases have upheld local agencies discretion to determine the significance of GHG emissions.

As with all determinations made in preparing an EIR, pursuant to Section 15064.7(b) of the State CEQA Guidelines, even without the express discretion as is the case for GHG, the substantial evidence standard applies to an agency's determination of the significance of an impact. Under Section 15384, substantial evidence is defined as "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts". Under the substantial evidence standard, even if there is other information that supports a contrary conclusion, or a disagreement among experts as to the methodology or significance criteria, so long as the agency decision is supported by substantial evidence, it will be upheld even if there is other substantial evidence or expert opinions to the contrary (California 1988, p. 407). As such, an agency determination of significance is upheld so long as it is based on substantial evidence.

Determining how to analyze the significance of a project's climate change impacts poses a difficulty for lead agencies. The science in this area is evolving constantly. At the same time, local agencies do not specialize in this area, and there are currently no local, regional, or statewide significance criteria for determining whether a mixed-use residential development in the County of Los Angeles has a "significant" impact on climate change. Although the CNRA has adopted the CEQA Amendments developed by OPR pursuant to SB 97, as discussed above, the CEQA Amendments pose two questions that agencies should evaluate, they leave considerable discretion to lead agencies to develop appropriate methodologies and significance criteria in evaluating these questions. As such, the County's analysis of GHG significance is a good faith effort to consider all potential significance criteria under the current state of the guidance, policy, and regulation.

Under Threshold 21-1, this impact analysis evaluates consistency with regulatory programs designed to reduce GHG emissions and that contribute to the achievement of AB 32's goals as the primary significance criterion. In addition, for informational purposes, this impact analysis also evaluates the Project's estimated emissions as compared to the Antelope Valley Air Quality Management District (AVAQMD) significance thresholds for impacts related to GHG emissions, as well as certain significance thresholds for impacts related to GHG emissions proposed by staff of South Coast Air Quality Management District (SCAQMD), but not adopted by SCAQMD Board.

Under Threshold 21-2, this impact analysis evaluates consistency with the Los Angeles County Community Climate Action Plan (CCAP) and consistency with SCAG's RTP/SCS as primary significance criteria. For informational purposes, this impact analysis also evaluates consistency with the GHG emissions-related goals and policies of the *Antelope Valley Area Plan* (AVAP).

Therefore, this impact analysis utilizes the "potential compliance pathways" described by the Court in the *Newhall* decision, namely compliance with a local climate action plan and/or other geographically specific GHG emission reduction plans (i.e., the CCAP, the SCAG RTP/SCS, and, for informational purposes, the AVAP); compliance with regulatory programs designed to reduce GHG emissions and that contribute to the achievement of AB 32's goals; and, for informational purposes, consistency with numerical GHG significance thresholds (AVAQMD and staff-proposed SCAQMD significance thresholds).

As discussed in Section 5.21.5, following the Supreme Court's decision in *Newhall*, on November 2016, the CDFW released a draft Additional Environmental Analysis (AEA) intended to address that agency's CEQA compliance obligations at issue in that case. (CDFW 2016) As described in the AEA, the *Newhall* project applicant (Five Point LLC) voluntarily modified its project and proposed to achieve "net zero" GHG emissions for the project with the implementation of 13 mitigation measures described in the AEA. On that basis, the AEA concludes that, since the *Newhall* project will result in no net increase in GHG emissions, it would not contribute to cumulative GHG emissions influencing global climate change and thus would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs. Consequently, the AEA concludes that project GHG and climate change impacts would be less than significant (CDFW 2016, pp. 1-18).

It is important to note that the *Newhall* AEA does not establish a new significance criteria of any kind, much less a "net zero" GHG threshold under CEQA. In fact, agencies that have considered a zero threshold approach have rejected it. For example, despite having been urged to propose a zero-emissions CEQA threshold in its proposed amendments to the CEQA guidelines regarding the analysis of GHG emissions released in April 2009 (Proposed Guidelines), the state Office of Planning and Research (OPR) responded in its *Initial Statement of Reasons for Regulatory Action: Proposed Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97* that Section 15064.4(b)(1) of the Proposed Guidelines is not intended to suggest a zero emission threshold, as CEQA does not include a "one molecule" rule. (CRNA 2009a, p. 20; *see also*, SJVAPCD 2009b, p. 34 [explaining that OPR's Proposed Guidelines confirm that a lead

agency is not responsible for wholly eliminating all GHG emissions from a project]). In addition, in its report to the Ventura County Air Pollution Control Board on GHG significance thresholds, staff reported that "[n]ot a single California air pollution agency is considering either of the first two approaches for GHG significance thresholds [a "no threshold approach" or a "zero threshold approach"].

Moreover, with respect to the *Newhall* AEA, the applicant imposed a "net zero emissions" program for GHG; it was not imposed under CEQA by the State of California, which is acting as the lead agency, and unlike a local city or county has direct statutory and regulatory authority to reduce GHG emissions from all sectors of the California economy, including most notably the major sectors producing GHG emissions (electricity production, transportation fuels, and large-scale industrial facilities such as refineries and cement plants). In the *Newhall* AEA, for example, CARB and Cal/EPA were directly involved in – and contemporaneously produced a letter affirming the achievement of – the *Newhall* applicant's "net zero" voluntary proposal. With respect to the project analyzed in this EIR, the County's land use jurisdiction does not extend to having jurisdiction or control over the vast majority of GHG emissions within the state. With respect to consideration of land use project, particularly large-scale projects, this EIR considers – and the Project complies with – SB 375, which is the state's statutory program for ensuring GHG reductions from land use and transportation projects, as discussed in Section 5.21.6.

5.21.6 – Environmental Impacts

On-Site Impacts

Threshold 21-1 **Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Compliance with Regulatory Programs Designed to Reduce GHG Emissions and Project GHG Emissions

In addition to complying with the policies and regulations of the CCAP (discussed in Table 5.21-11 below), the Project will incorporate the project design features and comply with applicable regulations designed to reduce GHG emissions, thus contributing to the achievement of AB 32's goals. Some regulatory measures were promulgated prior to or independently of AB 32, and others were identified in CARB's 2008 Climate Change Scoping Plan and promulgated subsequent to approval of the Scoping Plan. A full list and description of these project design features and regulatory programs are presented in detail above in Sections 5.21.4 and 5.21.2, respectively. Following the Newhall Court's direction, the following highlight key project design features and regulatory programs, organized by emission source category, in order to clarify which measures apply to each emission source, thus contributing to the reduction of GHG emissions associated with that source. After a brief discussion of the methodology used to calculate the Project's GHG emissions, this analysis is organized by the following emissions source categories:

- Construction emissions

- Vegetation changes
- Annual operational emissions
    - Area sources (lawn mowers; natural gas fire places)
    - Energy use
    - Water supply, treatment, and distribution
    - Solid waste
    - Mobile source

Calculation Methodology

GHG emissions were calculated by using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 as described in Section 5.11, Air Resources. In addition to the construction and operational inputs described in Section 5.11, Air Resources, the GHG emissions analysis includes the following input data or estimates:

- Electrical energy use
- Water use – indoor and outdoor, potable and recycled
- Solid waste generation
- Carbon sequestration loss from vegetation removal and gain from planting of trees
- Renewable generation of 50 percent of the Project's electrical energy use as specified in PDF 21-3, as implemented by MM 21-1.
- For the calculation of GHG emissions for the electrical energy used by the Project, including direct Project consumption of electricity and the electricity used to supply, distribute, and treat water used by the Project, it was assumed that Southern California Edison (SCE) would achieve the 50 percent renewable energy goal for 2030 established by EO B-30-15 and SB 350. It was not assumed that renewable energy would exceed 50 percent by 2035. (Note that under the modeling methodology, this 50 percent renewable energy assumption was made only for electricity consumption, and did not extend to transportation, etc.)
- Energy efficiency was assumed to exceed the 2016 code requirements as specified in PDF 21-1 and PDF 21-2, as implemented by MM 21-2 and 21-3, respectively. No credit was taken for additional energy efficiency that may be required by the 2019 and subsequent codes.

One-Time Emissions

Construction Emissions

The major construction phases included in this analysis are as follows:

- **Demolition** involves tearing down of buildings or structures and removal of asphalt and concrete parking areas and walkways.

- **Site Preparation** involves clearing vegetation (grubbing and tree/stump removal) and stones prior to grading.
- **Grading** involves cut and fill of land to ensure the proper base and slope for the construction foundation.
- **Building Construction** is the construction of structures and buildings.
- **Architectural Coating** is the application of coatings to both the interior and exterior of buildings or structures
- **Paving** is the laying of concrete or asphalt such as in parking lots or roads.

These phases would occur in connection with anticipated construction at the Project site and related off-site Project impact areas, as described in Section 4.0, Project Description. GHG emissions from these construction phases are largely attributable to fuel use from construction equipment and worker commuting. Additional indirect GHG emissions would result from the supply and delivery of water used during site grading.

Construction GHG emissions were calculated by using CalEEMod Version 2016.3.1 as described in Section 5.11, Air Resources. Specific inputs to CalEEMod include but are not limited to the start and finish dates of construction phases; inventories of construction equipment to be used during each phase; areas to be paved; and areas to be painted. Output emissions data are provided for off-road equipment and on-road vehicles.

Once construction begins (in Year 1), it will proceed continuously for approximately 20 years, with full buildout completed after 20 years. Construction emissions are calculated for the following construction activities: grading, building, paving, and architectural coating (painting).[3421] The rate of construction would vary with a variety of factors including, but not limited to, market demand, weather, and as-found site conditions. The estimation of the quantities of grading, building, paving, and painting on a year-by-year basis for a 20-year project would be highly speculative. Therefore, the construction effort is initially evaluated assuming that each construction activity would be spread equally over the applicable years. Additionally, as further explained below, construction emissions are evaluated for a peak grading year.

Grading would occur from Year 1 through Year 18. Preliminary grading engineering design indicates that approximately 127 million cubic yards (mcy) of earth would be moved for the total Project. Based on the preliminary grading estimates, the average daily grading quantity over the 18 years of grading would be approximately 26,500 to 36,500 cubic yards (cy), depending on the number of days of grading. For a conservative estimate, it is assumed that grading would be limited by weather and other factors to 200 days per year, and the average daily grading quantity would be 36,500 cy. Cut and fill would be balanced on the Project site and no off-site export or import is anticipated. Soil movement within the site would be by scraper. Equipment used for the average year grading analysis is shown in Table 5.21-3

[3421] Emissions modeling often includes demolition and site preparation (clearing and grubbing) activities. Demolition required for the proposed Project would be negligible. Clearing and grubbing would be predominantly grassland, and would occur concurrently with grading.

Further below in Table 5.21-10, all summary of all Project-related GHG emissions are presented.

TABLE 5.21-3
GRADING, BUILDING, PAVING, AND ARCHITECTURAL COATING EQUIPMENT FOR AVERAGE YEAR EMISSIONS ESTIMATES

Equipment Type	Number of Equipment
Grading	
Scrapers	10
Dozers	7
Compactors	2
Water trucks	2
Graders	1
Building	
Cranes	4
Forklifts	12
Tractor/Loader/Backhoes	12
Welders	4
Generator Sets	4
Paving	
Paving Machine	1
Roller	3
Architectural Coating	
Compressors	4

For the purposes of the GHG modeling assumptions, the Project construction is assumed to begin in 2016, with buildout complete in 2035, although the actual start of construction and buildout are likely to occur later than 2016 and 2035, respectively. The 2035 buildout date is consistent with the Project traffic impact analysis (see Section 5.10, Traffic, Access, and Circulation) and also with the CalEEMod model, which does not include on-road emissions factors beyond 2035. This is a conservative approach; if the actual start of construction occurs later than 2016 and buildout occurs later than 2035, both the construction equipment fleet and on-road vehicles are assumed to be "cleaner" than would be the case if construction starts in 2016 and buildout occurs in 2035, as described CARB's 2016 Mobile Source Strategy. This is so because such later model vehicles will be subject to more stringent emission controls and fuel standards and thus generate less unit emissions with each future year. As such, assuming development of the Project site occurs sooner than is likely to occur provides a more conservative assessment of construction GHG emissions.

It is estimated that construction grading would use 9,744 acre-feet (3,176 million gallons) of water for dust control during the estimated 20-year construction period. This estimation accounts for climatic conditions (i.e., dry and windy conditions) in the Project area. The water would come from previously imported water, banked, and stored north of the Project

site. GHG emissions associated with this water use were calculated using energy data from CAPCOA's 2010 publication, *Quantifying Greenhouse Gas Mitigation Measures* and the SCE GHG intensity factor for 2025 (CAPCOA 2010).

The estimated Project construction GHG emissions for the Project's 20-year construction period are estimated at 134,692 $MTCO_2e$. CalEEMod data for construction emissions are included in Appendix 5.11-A.

Annotation 6:

As shown in Updated GHG Report Table 1 (see Annotation 2), Project GHG emissions attributable to construction activities in the Updated GHG Calculations are equal to the DEIR Quantified GHG Emissions – i.e., 4,490 $MTCO_2e/yr$.[1] As explained in Updated GHG Report Section 2.5, *Other Emissions*, for construction source GHG emissions, MM 11-2 contributes to emission reductions for air quality purposes, but does not directly contribute to GHG emissions reductions.[2] Project related construction emissions were conservatively assumed to be diesel/gasoline and do not include any GHG emission reductions for electrically powered construction equipment.[3]

1. Updated GHG Report at 3.
2. Ibid at 9.
3. Ibid.

Regulatory Requirements

SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Thresholds. Because construction activity impacts are relatively short in duration, they contribute a relatively small portion of the total lifetime GHG emissions of a project. In addition, GHG emissions-reduction measures for construction equipment are relatively limited. Therefore, in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Thresholds*, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008). That method is used in this analysis. Emissions generated during the operational phase of the Project are considered in addition to the amortized construction phase emissions.

USEPA and NHTSA CO_2 Standards. The USEPA and NHTSA have adopted standards for CO_2 emissions and fuel consumption, respectively, tailored to each of three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to USEPA, this program will reduce GHG emissions and fuel consumption for affected vehicles by 6 percent to 23 percent.

CARB Airborne Toxic Control Measures and Emission Standards. CARB adopted an airborne toxic control measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other toxic air contaminants. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000

pounds that are licensed to operate on highways. This measure also does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time. In addition to limiting exhaust from idling trucks, CARB promulgated emission standards for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles. This regulation aims to reduce emissions through installation of diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. Implementation is staggered based on fleet size, with the largest operators beginning compliance in 2014.

Title 24 Green Building Standards Code. The 2013 California Green Building Standards Code (24 CCR Par 11), also known as the CALGreen Code, contains mandatory requirements aimed to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. For example, projects must recycle and/or salvage for reuse a minimum of 50 percent of nonhazardous construction and demolition debris or meet local ordinance, whichever is more stringent (Section 5.408.3). In addition, 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled (Section 5.408.4).

Annotation 7:

The 2016 CalGreen Code became effective on January 1, 2017. As with the 2013 CalGreen Code, the 2016 code contains mandatory requirements aimed to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impact during and after construction. For example, under the 2016 standards, projects must recycle and/or salvage for reuse a minimum of 65 percent of nonhazardous construction and demolition debris or meet local ordinance, whichever is more stringent (Section 4.408.1).

Los Angeles Green Building Standards Code. Title 31 of the Los Angeles County Code of Ordinances was adopting in 2013 in response to the mandates set forth in the CALGreen Code. The purpose of Title 31 is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices in planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental air quality.

Antelope Valley Area Plan (AVAP). Policy COS 17.1 promotes green building techniques for the construction and operation of public and private buildings in the unincorporated Antelope Valley. Policy COS 17.9 requires reduction, reuse, and recycling of construction and demolition debris.

Project Design Features

PDF 17-2. PDF 17-2 of Section 5.17, Other Services, states that the Project has committed to diverting from landfill disposal 100 percent of soil during grading activities, and at least ~~70~~

75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier I voluntary measure in Section A5.408.3.1 of the California Green Building Standards Code. This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code. PDF 17-2 is required for implementation through MM 17-9.

PDF 21-21. The Green Development Program requires that, prior to the issuance of each construction permit, the Project Applicant/Developer shall require in contract specifications, that contractors set goals to limit unnecessary construction equipment idling to three minutes and include a program to encourage equipment operators to achieve the three-minute goal.

As the Project will incorporate these project design features and must comply with these applicable regulations imposed by law, the Project would contribute to the achievement for AB 32's goals related to construction emissions.

PDF 21-21 is required for implementation through MM 21-4.

Vegetation Changes

Permanent vegetation changes that would occur as a result of Project development constitute a change in the carbon sequestration capacity of the Project site.

The loss of vegetation would occur concurrently with construction. Therefore, the increase in GHG emissions attributable to the loss of carbon sequestration is also amortized over 30 years. However, the reduction in GHG emissions resulting from the planting of new trees would occur more slowly and this reduction is conservatively amortized over 100 years in accordance with IPCC recommendations.

The removal of an estimated 6,416 acres of grassland and other vegetative covers on the Project site during construction would result in an estimated reduction in current levels of sequestration of 27,653 $MTCO_2$ as shown in Table 5.21-4. The planting of an estimated 35,123 new trees, as required by the adopted County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 $MTCO_2e$. Therefore, in total the Project would result in an overall reduction in the amount of carbon sequestration on the Project site, resulting in an overall increase in GHG emissions of 2,786 $MTCO_2$ (27,653–24,867 $MTCO_2$). A summary of all Project-related greenhouse gas emissions is presented in Table 5.21-10 later in this section.

TABLE 5.21-4
VEGETATION CHANGE GREENHOUSE GAS EMISSIONS

Type of Vegetation	Acres in Current Condition	Acres in Buildout Condition	Net Change	GHG Emissions $MTCO_2$
Grassland	6,416[a]	0	-6,416 acres	+ 27,653
Annual Increase in CO_2 over 30 year Amortization				**+922**
Type of Tree	**Replacement Trees in Current Condition**	**Replacement Trees in Buildout Condition**	**Net Change**	
Miscellaneous	0	35,123	+35,123 trees	-24,867
Annual Decrease in CO_2 over 100 year Amortization				**-249**

GHG: greenhouse gas; $MTCO_2e$: metric tons of carbon dioxide

Annotation 8:

As shown in Updated GHG Report Table 1 (see Annotation 2), Project GHG emissions attributable to vegetation change in the Updated GHG Calculations are 565 $MTCO_2e$/yr, as compared to the 673 $MTCO_2e$/yr in the DEIR Quantified GHG Emissions (i.e. from DEIR Table 5.21-4, above, 922-249 = 673), which represents a reduction of -108 $MTCO_2e$/yr.[1] As discussed in Updated GHG Report Section 2.5, *Other Emissions*, MM 7-11 and MM 7-12 (which require restoration of impacted woodlands and jurisdictional drainages pursuant to County and regulatory agency permit requirements), and MM 21-20 (landscaping requirements), contribute to quantified vegetation emission reductions for the Updated GHG Calculations.[2] MMs 4-4, 7-1, 7-13, and 7-19 support the implementation and management of these quantified MMs, but were not directly quantified in the Updated GHG Report.[3]

1. Updated GHG Report at 3.
2. Ibid at 9.
3. Ibid.

Regulatory Requirement

Los Angeles County Tree Planning Ordinance. On March 29, 2016, the Board of Supervisors adopted the Tree Planting Ordinance, effective April 28, 2016, includes the following requirements:

a. For projects that are primarily residential with 3 or fewer units per lot, a minimum of 2 trees shall be planted on each lot.

b. For projects that are primarily residential with 4 or more units per lot, a minimum of 1 tree shall be planted for every 5,000 square feet of building footprint per lot.

c. For projects that are nonresidential or mixed-use, a minimum of 3 trees shall be planted for every 10,000 square feet of developed lot area.

Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location (DRP 2016b).

Annual Operational Emissions

Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, and waste management, would occur every year after buildout. This section identifies operational GHG emissions.

The proposed Project incorporates elements that reduce Project-generated emissions during operation. In addition, the Project would be required to comply with applicable federal, State, and local rules and regulations to further reduce long-term operational emissions. A wide range of regulatory measures have been enacted through legislation or promulgation of regulations (see Section 5.21.2) that would assist with the reduction of GHG emissions associated with the proposed Project, both directly and indirectly. Some measures were promulgated prior to or independently of AB 32, and others were identified in CARB's 2008 Climate Change Scoping Plan and promulgated subsequent to approval of the Scoping Plan. These measures were evaluated and re-emphasized in the First Update to the Scoping Plan. Project elements have been incorporated to further reduce GHG emissions associated with operation. A discussion of the regulatory measures and Project elements to reduce Project-generated GHG emissions follows under each emissions source.

Area Sources

The area source GHG emissions included in this analysis result primarily from natural gas fireplaces with additional emissions from landscaping-related fuel combustion sources, such as lawn mowers. GHG emissions due to natural gas combustion in buildings other than from fireplaces are excluded from area sources since they are included in the emissions associated with building energy use. Emissions were calculated with CalEEMod. The input for fireplace emissions is specified in PDF 11-2 in Section 5.11, Air Resources, which limits fireplaces to a maximum of 13,954 natural gas fireplaces and no wood-burning fireplaces. Landscape maintenance emissions are based on Project land use data. The Project's area source GHG emissions are estimated at 11,297 $MTCO_2e$ per year, as shown in Table 5.21-5. Further below in Table 5.21-10, all summary of all Project-related greenhouse gas emissions are presented.

TABLE 5.21-5
AREA SOURCE GREENHOUSE GAS EMISSIONS

Source	Emissions ($MTCO_2e$/yr)
Fireplaces (Hearth)	11,056
Landscape maintenance	240
Total	**11,297**

$MTCO_2e$/yr: Metric tons of carbon dioxide equivalent per year
Total does not add due to rounding
Emissions calculations can be found in Appendix 5.11-A.

Annotation 9:

As shown in Updated GHG Report Table 1 (see Annotation 2), Project GHG emissions attributable to area emissions in the Updated GHG Calculations are 11,223 $MTCO_2e$/yr, as compared to the 11,297 $MTCO_2e$/yr in the DEIR Quantified GHG Emissions, which represents a reduction of -74 $MTCO_2e$/yr.[1] As discussed in Updated GHG Report Section 2.5, *Other Emissions*, MM 11-3 related to fireplace restrictions and reductions associated with the electrification of landscaping equipment supports GHG reductions of -74 $MTCO_2e$/yr.[2]

1. Updated GHG Report at 3.
2. *Ibid* at 9.

Regulatory Requirements

SCAQMD Rule 445. SCAQMD Rule 445 requires the use of natural gas to power all cooking stoves and fireplaces.

As the Project must comply with this applicable regulation imposed by law, the Project would contribute to the achievement for AB 32's goals related to area sources.

Energy Use

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. The CalEEMod default natural gas use and emissions calculations are modified by application of the 2016 State Energy Efficiency Standards for Residential and Nonresidential Buildings, PDF 21-1 and PDF 21-2. PDF 21-1, and PDF 21-2 commit the Project to comply with CALGreen voluntary Tier 1 measures to exceed the 2016 code for residential and nonresidential buildings, respectively. The combined effect is a 32.4 percent reduction from the CalEEMod base data for Title 24 natural gas and electricity uses. The SCE GHG intensity factor for 2030 was used based on the SB 350 requirement for 50 percent renewable power by 2030. The carbon intensity factor was not extrapolated to 2035. Therefore, if SCE power content is greater than 50 percent in 2035, the Project's GHG emissions would be less than calculated. The Project's estimated 2035 GHG emissions from the direct burning of natural gas and the indirect generation of electricity are 49,412 $MTCO_2e$ per year as shown in Table 5.21-6. Further below, in Table 5.21-9, a summary of all Project-related greenhouse gas emissions is presented.

TABLE 5.21-6
ENERGY USE AND GREENHOUSE GAS EMISSIONS

Land Use*	Energy Use		GHG Emissions ($MTCO_2e$/yr)		
	Electricity (MWh/yr)	Natural Gas (MBTU/yr)	from Electricity Use	from Natural Gas Use	Total
Elementary School	1,834	4,958	312	266	578
General Light Industry	1,007	2,620	171	141	312
Government (Civic Center)	9,219	11,280	1,566	606	2,172
Health Club	689	1,792	117	96	213
High School	1,273	3,442	216	185	401
Office Park	46,430	49,430	7,888	2,654	10,542
Regional Shopping Center	6,465	1,318	1,098	71	1,169
Single-Family Housing	59,030	340,900	10,028	18,300	28,328
Apartments Mid Rise	11,060	71,130	1,879	3,818	5,697
Total	**137,007**	**486,870**	**23,275**	**26,137**	**49,412**

$MTCO_2e$/yr: Metric tons of carbon dioxide equivalent per year; MWh/yr: megawatt hours per year; MBTU/yr: million British thermal units per year

* Land use categories shown are CalEEMod standard names. "Health Club" is Project "Recreation/Entertainment"

Some totals do not add due to rounding.

Emissions calculations can be found in Appendix 5.11-A.

Annotation 10:

Updated GHG Report Table 2, below, describes the changes in electricity and natural gas demands and emissions as between the DEIR Quantified GHG Emissions (as shown in Table 5.21-6) and the Updated GHG Calculations:

UPDATED GHG REPORT TABLE 2
ELECTRICITY AND NATURAL GAS DEMAND AND GHG EMISSIONS

	Energy Use		GHG Emissions ($MTCO_2e$/yr)		
	Electricity (MWh/yr)	Natural Gas (MBTU/yr)	Electricity Use	Natural Gas Use	Total
DEIR Quantified GHG Emissions	137,007	486,870	23,276	26,137	**49,413**
Updated GHG Calculations	173,360	482,765	29,132	25,915	**55,047**
Difference			**5,856**	**-222**	**5,634**

$MTCO_2e$/yr: Metric tons of carbon dioxide equivalent per year; MWh/yr: megawatt hours per year; MBTU/yr: million British thermal units per year

Sources: DEIR Quantified GHG Emissions from Table 5.21-6 in DEIR Section 5.21; Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018)
Note: Total emissions may not add up exactly due to rounding.

Three primary factors contribute to the changes shown in Updated GHG Report Table 2:

- First, 2019 Title 24 Building Energy Efficiency Standards, which were adopted after the DEIR analysis was completed, reduce the Project's electrical consumption estimates for low-density residential and non-residential uses when compared to the 2016 Title 24 Standards, and when compared to MMs 21-2 and 21-3, which require improvements beyond 2016 Title 24 Standards. GHG emissions reductions associated with 2019 Title 24 Standards are -3,173 $MTCO_2e$/yr. The Project includes MM 21-8, which requires use of ENERGY STAR appliances that further reduce electricity consumption. However, for the purposes of the Updated GHG Report analysis, the benefits of MM 21-8 are assumed to be captured within the 2019 Title 24 Standards. MMs 21-6 and 21-7 support the implementation and management of MM 21-8, but were not directly quantified.
- Second, as discussed in more detail in Updated GHG Report Section 2.2, *Energy*, the electrical demand required for the Project's EV charging infrastructure (66,516 MWh/yr) would result in increased GHG emissions of 11,224 $MTCO_2e$/yr.
- Lastly, other factors include reductions not covered by 2019 Title 24 Standards that are attributable to the quantifiable portions of MM 21-1 related to 50 percent on-site renewables, and MMs 13-2 and 13-6 related to high-efficiency lighting, which result in reduced GHG emissions of -2,195 $MTCO_2e$/yr.[1]

In summary, the total projected electrical demand for the Updated GHG Calculations includes the reductions associated with 2019 Title 24 Standards (-3,173 MTCO2e), MM reductions (-2,195 MTCO2e), and EV charging demands (11,224 MTCO2e), resulting in a total increase of 5,856 MTCO2e for the Updated GHG Electrical Calculations when compared to the DEIR Quantified GHG Electrical Emissions.[2] Therefore, the total electrical emissions for the Updated GHG Calculations are 29,132 MTCO2e/yr, as shown in Updated GHG Report Table 2.

As shown in Updated GHG Report Table 1 (see Annotation 2) and Updated GHG Report Table 2, the -222 MTCO2e/year reduction in GHG emissions for natural gas between the DEIR Quantified GHG Emissions and the Updated GHG Calculations is due to inclusion of the energy use reductions associated with the 2019 Title 24 Standards.[3] Because the allocation of energy reductions associated with the 2019 Title 24 Standards between electricity and natural gas is currently unknown and the majority of the reductions is expected to occur in the electricity sector, the projected reductions in energy use that would occur in electricity, and natural gas was calibrated to the comparable level of emissions as reported within the DEIR.[4]

1. Updated GHG Report at 6-7.
2. *Ibid*.
3. *Ibid* at 7.
4. *Ibid*.

Regulatory Requirements

Title 24 Energy Efficiency Standards. Title 24 (Part 11) serves to enhance and regulate California's building standards. Single-family homes built to the 2016 standards will use about 22 percent less energy for lighting, heating, cooling, ventilation and water heating compared to those built pursuant to the standards adopted in 2013. According to the ZNE Plan, the 2019 update to Title 24 (effective 2020) will require all new residential construction to be zero net energy (CEC 2015c).

SB X1 2 and SB 350. SB X1 2 established a use target of 33 percent for renewable energy sources for all electricity providers in California by 2020. SB 350 provides for further development of renewable energy with a target of a 50 percent generation rate by 2030. Conservatively, the estimates below do not include the higher renewable energy target established by SB 350. However, as disclosed previously, a Project design feature requires Project buildings to be 35 percent more energy efficient than 2008 standards, that 60 percent of the commercial building roofs have solar panels and that residences have energy friendly radiant roofs that are "Solar Ready". As the Project will comply with or exceed the applicable regulatory measures, the Project is consistent with the energy related regulatory programs designed to achieve AB 32's goals.

Countywide Energy and Environmental Policy. The Countywide Energy and Environmental Policy (Policy) was adopted by the Los Angeles County Board of Supervisors on January 16, 2007, to provide guidelines for the development and enhancement of energy conservation and environmental programs within County departments. The Policy was also the County's response for the need for energy conservation and reduction in GHG emissions. It directs the County to track its GHG emissions with the California Climate Action Registry, and to reduce its facilities' energy consumption by 20 percent by the year 2015. Under this policy, the Los Angeles County Energy Program (LACEP) provides financing for energy efficiency or solar improvements. Revisions to the Policy, adopted on June 30, 2015, enhance the County's existing and future policies programs, and reporting with regard to environmental sustainability.

Los Angeles Green Building Standards Code. Title 31 of the Los Angeles County Code of Ordinances was adopted in 2013 in response to the mandates set forth in the CALGreen Code. The purpose of Title 31 is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices in planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental air quality. Title 31 includes such measures as requirements for energy efficiency, parking for fuel-efficient vehicles, cool roofs, reduction of indoor potable water use, recycled content of construction materials, reduction in construction and demolition waste, and thermal insulation. Title 31 was updated in April 2016 to relocate drought tolerant landscaping and green building requirements from Titles 21 and 22 to Title 31 (DRP 2016a).

Antelope Valley Area Plan (AVAP). AVAP Policy COS 17.2 requires that new buildings be sited and designed in a manner that maximizes efficient use of natural resources, such as air and light, to reduce energy consumption, heat profiles, and GHG emissions. Policy COS 17.4 promotes the use of individual renewable energy systems, by directing the County to require appropriate development standards for individual renewable energy systems to minimize potential impacts and to simplify the permitting process for such systems that meet these development standards. Policy 17.5 calls for the County to protect active and passive solar design elements and systems from shading by neighboring structures and trees through appropriate development standards.

Project Design Features

PDF 21-1. The Green Development Program requires compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings. Therefore, the energy efficiency of these buildings would exceed 2016 Title 24 requirements by 15 percent. PDF 21-1 is required for implementation through MM 21-2.

PDF 21-2. The Green Development Program requires compliance with CALGreen voluntary measure A5.203.1.2.1 for nonresidential buildings. Therefore, the energy efficiency of nonresidential, hotel, and high-rise residential buildings would exceed 2016 Title 24 requirements by 10 percent. PDF 21-2 is required for implementation through MM 21-3.

PDF 21-3. The Green Development Program requires a minimum of 50 percent of the Project's anticipated electrical energy demand at buildout must be satisfied from on-site renewable energy generation. "Anticipated electrical energy demand" shall be determined on the basis of the anticipated loads for each building as shown in the reports submitted at the time of building permit application pursuant to the Building Energy Efficiency Standards of Title 24. "On-site renewable energy generation" includes, but is not limited to, solar, wind, geothermal, biofuel and hydroelectric systems. PDF 21-3 is required for implementation through MM 21-1.

PDF 21-4. The Green Development Program requires that <u>all</u> ~~a minimum of 70 percent of~~ public and community pools and spas would be equipped with active solar heating systems where heating is necessary or desired. The applicant for a pool permit shall provide the proposed plan for compliance with this provision prior to obtaining a permit for the pool. PDF 21-4 is required for implementation through MM 21-5.

PDF 21-5. The Green Development Program requires that deeds, CC&Rs, or similar legal documents contain the following requirement: The owners of all single-family and multi-family residential units shall be required, upon resale, to present to the buyer a written energy audit checklist prepared by a qualified third party at the time the seller provides the buyer with the Real Estate Transfer Disclosure Statement required by Section 1102 et seq. of the California Civil Code The energy audit checklist shall certify that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. All residential pool covers shall be removable, and shall not be automatic retractable covers.

The CC&Rs of the master homeowners association or other applicable association shall require compliance with the provisions of this measure and shall provide notice to individual owners of the resale energy audit checklist requirement. The master homeowners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure. PDF 21-5 is required for implementation through MM 21-6.

PDF 21-6. The Green Development Program requires that deeds, CC&Rs, or similar legal documents contain the following requirement: For nonresidential buildings, within 90 days

after the end of the first full calendar year following the issuance of the certificate of occupancy and within 90 days after each 5-year period thereafter, the owner or tenant in possession thereof shall submit to the master commercial owners association or other applicable association a report prepared by the owner or a qualified, independent third party that evaluates whether all major building systems such as heat furnace, air conditioner, and other mechanical fixtures are working within the design standards established for each system. The master commercial owners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure. PDF 21-6 is required for implementation through MM 21-7.

PDF 21-7. The Green Development Program requires builders to install energy efficient major appliances and HVAC systems which meet the more stringent of applicable CEC requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. PDF 21-7 is required for implementation through MM 21-8.

PDF 21-8. The Green Development Program requires that the Project's wastewater reclamation facilities (WRF) will ~~include equipment to~~ capture and reuse biogas for energy production. PDF 21-8 is required for implementation through MM 21-9.

As the Project will incorporate these project design features and must comply with these applicable regulations imposed by law, the Project would contribute to the achievement for AB 32's goals related to energy use.

Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. Additional emissions from wastewater treatment include CH_4 and N_2O, which are emitted directly from the wastewater. Estimated indoor and outdoor water use quantities and source are shown in Table 5.21-7 and are summarized from the data provided in Section 5.18, Water Resources. GHG emissions were calculated in CalEEMod using energy data from the CAPCOA publication, *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA 2010). As shown in Table 5.21-7 GHG emissions from water use at buildout are estimated at 7,387 $MTCO_2e$ per year. A summary of all Project-related greenhouse gas emissions is presented in Table 5.21-10 later in this section.

TABLE 5.21-7
WATER USE AND GREENHOUSE GAS EMISSIONS

Water Use/Source	Water Use (afy)		GHG Emissions ($MTCO_2e$/yr)
	Indoor	Outdoor	
Indoor/Imported	5,436		6,329
Outdoor/Imported		1,518	434
Outdoor/Water bank		4,578	624
Total	**5,436**	**6,096**	**7,387**

afy: acre-feet per year; GHG: greenhouse gas; $MTCO_2e$/yr: Metric tons of carbon dioxide equivalent per year.

Annotation 11:

As shown in Updated GHG Report Table 1 (see Annotation 2), Project GHG emissions attributable to water supply, treatment and distribution in the Updated GHG Calculations are 4,203 $MTCO_2e$/yr, as compared to the 7,387 $MTCO_2e$/yr in the DEIR Quantified GHG Emissions, which represents a reduction of -3,184 $MTCO_2e$/yr.[1] As discussed in more detail in Updated GHG Report Section 2.3, *Water and Wastewater Emissions*, the water and wastewater emissions estimates in the Updated GHG Calculations reflect: (1) updated water supply and conveyance energy requirements for Project local water supplies; (2) CalEEMod wastewater treatment default adjustments to exclude treatment technologies that will not be used by the Project; and (3) the Project's recapture and use of biogas to generate power from the wastewater treatment process.[2] The Updated GHG Report used MM 18-1 and MMs 21-9 through 21-13 to quantify the water and wastewater reductions in the Updated GHG Calculations.[3] MM 18-2 and MMs 19-1 through 19-5 support the implementation and management of these quantified MMs, but were not directly quantified in the Updated GHG Report.[4]

1. Updated GHG Report at 3.
2. Ibid at 8.
3. Ibid.
4. Ibid.

Regulatory Requirements

California Water Code. Sections 10910 through 10915 of the *California Water Code* require preparation of a project-specific Water Supply Assessment for developments like the Project. Sections 10610.4, 10617, and 10620 of the *California Water Code* require urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies.

SB X7-7 (Water Conservation Act of 2009). The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The State is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This in an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption reduces the

energy necessary and the associated emissions to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment.

State Model Water Efficient Landscape Ordinance (MWELO) and Executive Order B-29-15. The MWELO (CCR Title 23, Division 2, Chapter 2.7) establishes an outdoor water budget for new landscaped areas that are 500 square feet or larger, and rehabilitated landscaped areas that are 2,500 square feet or larger (DWR 2015). EO B-29-15 called for revisions to the MWELO in order to increase water efficiency standards for new and rehabilitated landscapes through more efficient irrigation systems, greywater usage, on-site storm water capture, and by limiting the portion of landscapes that can be covered in turf. It also established a goal of achieving a statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (California 2015b). The California Department of Water Resources updated the MWELO in December 2015 to incorporate these elements.

Title 24 Green Building Standards Code As Adopted by the Building Standards Commission. The Building Standards Commission, which regulates construction of public schools and community colleges in California, approved a modified version of the MWELO that applies to public schools and community colleges within the Project site.

Title 24 Green Building Standards Code. The California Green Building Code includes water efficiency requirements for new residential and nonresidential structures, including the requirement that indoor potable water use be reduced by 12 percent through the use of water saving fixtures and or flow restrictors.

Los Angeles Green Building Standards Code. Title 31 of the Los Angeles County Code of Ordinances was adopted in 2013 in response to the mandates set forth in the CALGreen Code. The purpose of Title 31 is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices in planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental air quality. Title 31 includes specific measures concerning drought-tolerant landscaping that require: (1) turf area shall be water-efficient and shall not exceed 25 percent of the total landscaped area; (2) non-invasive drought-tolerant plant and tree species appropriate for the climate zone region shall be utilized in at least 75 percent of the total landscaped area; and (3) hydrozoning irrigation techniques shall be incorporated into the landscape design.

Antelope Valley Area Plan (AVAP). AVAP Policy COS 2.1 requires new landscaping to comply with applicable water efficiency requirements in the County Code (including the measures discussed above). Policy COS 2.2 requires low flow plumbing fixtures in all new developments.

Project Design Features

PDF 21-17. The Green Development Program requires each applicant for an applicable construction permit for a nonresidential or multi-family building to install recycled water infrastructure to serve common areas for these facilities, except where prohibited by law. To

the extent recycled water is produced within the Project and available, recycled water shall be used for landscape irrigation within those common areas. Compliance with these measures shall be established prior to the issuance of a building permit for nonresidential and multi-family facilities and at the time of County approval of final landscaping plans submitted by the applicant after final map recordation for homeowners association common areas. Covenants, conditions, and restrictions shall require the owners of such common areas to maintain, repair and replace irrigation systems and plantings in accordance with County approved plans. PDF 21-17 is required for implementation through MM 21-10.

PDF 21-18. The Green Development Program requires each applicant for an applicable construction permit for a nonresidential building to install indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with 2016 CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code. PDF 21-18 is required for implementation through MM 21-11.

PDF 21-19. The Green Development Program requires each applicant for an applicable construction permit for a single or multi-family residential building to install kitchen faucets and appliances that comply with 2016 CALGreen code residential voluntary measures specified in Sections A4.303.1 and A4.303.3 of the code. PDF 21-19 is required for implementation through MM 21-12.

PDF 21-20. The Green Development Program requires that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf. PDF 21-20 is required for implementation through MM 21-13.

As the Project will incorporate these project design features and must comply with these applicable regulations imposed by law, the Project would contribute to the achievement for AB 32's goals related to water supply, treatment, and distribution.

Solid Waste

Solid waste may be disposed in landfills or diverted for recycling, composting, reuse, or other means to avoid landfilling. Any waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. Solid waste GHG emissions were calculated using Project land use data and CalEEMod default emission factors. As shown in Table 5.21-8, solid waste GHG emissions are estimated at 10,214 $MTCO_2e$ per year. Further below in Table 5.21-10, a summary of all Project-related greenhouse gas emissions is presented.

TABLE 5.21-8
SOLID WASTE GENERATION AND
GREENHOUSE GAS EMISSIONS

Land Use	Solid Waste (tons/yr)	GHG Emissions ($MTCO_2e$/yr)
City Park	9	5
Elementary School	730	367
General Light Industry	118	60
Government (Civic Center)	4,469	2,248
Health Club	372	187
High School	319	161
Office Park	3,424	1,722
Regional Shopping Center	543	273
Single-Family Housing	9,087	4,570
Apartments Mid Rise	1,237	622
Total	20,308	10,214

$MTCO_2e$/yr: Metric tons of carbon dioxide equivalent per year
Totals may not add due to rounding.
Emissions calculations can be found in Appendix 5.11-A.

Annotation 12:

As shown in Updated GHG Report Table 1 (see Annotation 2), Project GHG emissions attributable to solid waste in the Updated GHG Calculations are 5,107 $MTCO_2e$/yr, as compared to the 10,214 $MTCO_2e$/yr in the DEIR Quantified GHG Emissions, which represents a reduction of -5,107 $MTCO_2e$/yr.[1] As discussed in more detail in Updated GHG Report Section 2.4, *Solid Waste Emissions*, the solid waste emissions estimates in the Updated GHG Calculations reflect quantified emission reductions associated with Project implementation of MM 17-10 (see Final EIR Appendix 2.0-C.Rev).[2] MM 17-10 requires that at least 75 percent of Project operational waste be diverted from landfill disposal, which is consistent with the implementation of the AB 341 goals for statewide recycling.[3] CalEEMod calculates GHG emissions based on the volume of waste subject to landfill decomposition. The 75 percent waste diversion requirement in MM 17-10 reduces solid waste GHG emissions by -5,107 $MTCO_2e$/yr from the DEIR Quantified GHG Emissions.[4]

1. Updated GHG Report at 3.
2. Ibid at 9.
3. Ibid.
4. Ibid.

Regulatory Requirements

AB 341. AB 341 established a statewide diversion rate for solid waste of not less than 75 percent through measures such as source reduction, recycling, or composting by the year 2020, and annually thereafter. That legislation increased the solid waste diversion rate by 25 percent compared to the California Integrated Waste Management Act of 1989 that it replaced.

Los Angeles County Roadmap for a Sustainable Waste Management Future. As discussed above, the County's Roadmap for a Sustainable Waste Management Future sets to achieve 80 percent diversion from landfills by 2025; 90 percent diversion from landfills by 2035; and 95 percent (or higher) diversion from landfills by 2045. To accomplish these goals, the Working Group identified specific recommended initiatives, which will be expanded in detailed implementation plans. Although the Roadmap does not contain currently enforceable regulations, development under the Centennial Specific Plan will comply with any implementation plans once adopted.

Project Design Features

PDF 17-3. PDF 17-3 of Section 5.17, Other Services, states that the Project includes a Solid Waste Management Plan to achieve the goal of diverting 75% of operational solid waste from the Project requiring landfill disposal. Property Owners shall process on-site, contract with a waste management company and/or recyclers/composters, and/or self-haul to waste and recycling facilities to properly recycle, divert, compost, and dispose of solid wastes generated on-site, such as metals, paper, household plastics, glass, cardboard, food waste, and green waste. The waste hauler shall be required by contract to maintain records showing the diversion from landfills of not less than 75 percent of the operational waste generated by the Project. PDF 17-3 is required for implementation through MM 17-10.

As the Project will incorporate this project design feature and must comply with this applicable regulation imposed by law, the Project would contribute to the achievement for AB 32's goals related to solid waste.

Mobile Sources

The GHG emissions associated with on-road mobile sources are generated from residents, workers, customers, and delivery vehicles visiting the land use types in the Project. The emissions associated with on-road mobile sources includes running and starting exhaust emissions, evaporative emissions, brake and tire wear, and fugitive dust from paved and unpaved roads. Mobile source emissions were calculated in CalEEMod. Trip generation rates were adjusted to be consistent with the trip generation data provided in the Project traffic impact analysis (TIA) (Stantec 2016). Average trip distance inputs were adjusted based on VMT data in the Project TIA. VMT and GHG emissions results are shown in Table 5.21-9. GHG emissions based on 2035 on-road emissions factors are calculated to be 160,904 $MTCO_2e$ per year. Further below in Table 5.21-10, a summary of all Project-related greenhouse gas emissions is presented.

TABLE 5.21-9
MOBILE SOURCE VEHICLE MILES TRAVELED AND GREENHOUSE GAS EMISSIONS

Land Use	Vehicle Miles Traveled (VMT/yr)	GHG Emissions ($MTCO_2e$/yr)*
City Park	750,300	194
Elementary School	15,864,160	4,098
General Light Industry	4,087,962	1,056
Government (Civic Center)	45,359,777	11,718
Health Club	7,694,986	1,988
High School	8,950,942	2,312
Office Park	128,855,027	33,287
Regional Shopping Center	79,419,401	20,516
Single-Family Housing	249,898,307	64,556
Apartments Mid Rise	81,986,191	21,179
Total	622,867,052	160,904

VMT/yr: vehicle miles traveled per year; $MTCO_2e$/yr: Metric tons of carbon dioxide equivalent per year

* CalEEMod does not output mobile source GHG emissions by land use; emissions apportioned based on VMT.

Total may not add due to rounding.

Emissions calculations can be found in Appendix 5.11-A.

Annotation 13:

As shown in Updated GHG Report Table 1 (see Annotation 2), Project GHG emissions attributable to mobile sources in the Updated GHG Calculations is 77,007 $MTCO_2e$/yr, as compared to the 160,904 $MTCO_2e$/yr in the DEIR Quantified GHG Emissions, which represents a reduction of -83,897 $MTCO_2e$/yr.[1] As discussed in more detail in Updated GHG Report Section 2.1, *Mobile Emissions*, the mobile GHG emissions estimates in the Updated GHG Calculations shown in Updated GHG Report Table 1 primarily reflect: (1) an increase in EV adoption rate from 4 percent to 50 percent at Project buildout (*i.e.*, over at least 20 years); and (2) internal and external trip reductions from achieving the required minimum SOV use levels by (MM 10-25).[2] In addition, smaller mobile source reductions are attributable to the quantification of the Project's mitigations for affordable housing (MM 21-14), pedestrian facilities (MMs 21-22, 14-11, and 10-26), and telecommuting attributes (MM 10-1).[3]

1. Updated GHG Report at 3.
2. *Ibid* at 4-6.
3. *Ibid* at 6.

Regulatory Requirements

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards. The USEPA and the NHTSA have been working together on developing a National Program of regulations to reduce GHG emissions and to improve the fuel economy of light-duty vehicles. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The rules require these vehicles to meet an estimated combined average emissions level of 295 grams of CO_2 per mile by 2012, decreasing to 250 grams per mile by 2016, and finally to an average industry fleet-wide level of 163 grams per mile in model year 2025. The 2016 standard is equivalent to 35.5 miles per gallon (mpg) and the 2025 standard is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. These standards would cut GHG emissions by an estimated 2 billion metric tons and 4 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2017–2025).

AB 1493 (Pavley Standard). The Pavley Standard requires CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. The CalEEMod model includes emission reductions for non-commercial passenger vehicles and light-duty trucks of model year 2017–2025.

Executive Order S-01-07 and CARB's Low Carbon Fuel Standard (LCFS). Executive Order S-01-07 (January 18, 2007) requires a ten percent or greater reduction in the average fuel carbon intensity for transportation fuels in California regulated by CARB. The LCFS regulation went into effect on April 15, 2010, and requires a reduction in the carbon intensity of transportation fuels used in California by at least ten percent by 2020. It imposes fuel requirements on fuel that will be sold in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California.

Advanced Clean Cars Program. The Advanced Clean Cars program, introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025.

Cap-and-Trade Regulation. Emissions associated with transportation (largely in the form of consumption of transportation fuels) are the largest portions of Project GHG emissions. Transportation fuels are subject to the cap-and-trade regulation discussed previously in this section. The regulation requires that emissions generated by the combustion of fuels be reduced over time. Although not accounted for under the CalEEMod estimates of the Project's GHG emissions, the cap-and-trade regulations relating to fuels will reduce the Project GHG emissions beyond the estimates included in this section.

Antelope Valley Area Plan (AVAP). Under AVAP Policy M 2.3, the County must require trip reduction measures to relieve congestion and reduce air pollution form vehicle emissions when evaluating new development proposals.

Project Design Features

PDF 21-9. The Green Development Program requires that the Project establish a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible; to promote multi-modal transportation services and options; and to reduce resident and employee use of single-occupancy automobiles for off-site commuting, and for internal travel within the Specific Plan. PDF 21-9 is required for implementation through MM 10-1, detailed in Section 5.10, Traffic, Access, and Circulation. Elements of MM 10-1 that would reduce fossil fuel VMT and thereby reduce GHG emissions include, but are not limited to:

- Providing residents and employees with multiple modes of accessibility for internal and external trips by future residents and visitors;
- Providing residents and employees on the Project site with multiple modes of transportation;
- Allowing for 60 percent of residential units to be located within one-half mile of a Village center that includes retail uses;
- Providing parks within a 5-minute walk of all residences;
- Locating 90 percent of residents within a 10-minute bike ride of retail;
- Locating 70 percent of residents within a 15-minute bike ride of employment center;
- Locating 85 percent of residents within walking or biking distance of a school;
- Requiring TMA implementation of combination of transit and transportation measures to reduce on-site single-occupancy automobile use by 30 percent in relation to standard ITE-generation rates for the overall Project;
- Requiring TMA implementation of a combination of measures to reduce off-site peak hour commutes to and from the Project site in single-occupancy automobiles by 20 percent; and
- Incorporating Transportation Demand Management (TDM) features to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and thereby reduce pollutant emissions. The key TDM elements that are inherent in the overall Mobility Plan are
    - Sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas;
    - Creation and ongoing operation of a Transportation Management Association (TMA) to fund and manage the operation of ongoing transportation programs, including but not limited to transit and on-demand services.
    - Small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations;
    - Pedestrian environments incorporated with public streets;

- Parking behind buildings to encourage walking in retail areas along street frontage; and
- Parks within 0.25 mile of all residences.

PDF 21-10. The Centennial Affordable Housing Implementation Plan (see Appendix 3-H of the Centennial Specific Plan, which is in Appendix 4.0-A of the EIR) will be adopted in conjunction with the Specific Plan and will include dedication of a minimum of ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) to be affordable housing units. A range of employment opportunities will be created within the community; therefore, a range of housing needs will be provided to reduce the number of vehicle trips (particularly long trips outside the Project). CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* identifies affordable housing as a quantifiable measure for reducing GHG emissions as it allows lower income families to live closer to jobs centers (CAPCOA 2010). PDF 21-10 is required for implementation through MM 21-14.

PDF 21-11. The *Centennial Specific Plan's* Green Development Program requires the installation of one 208/240 VAC receptacle that may be used for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGREEN Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of Section 4.106.4.1 of the 2016 CALGreen Code. PDF 21-11 is required for implementation through MM 21-15.

PDF 21-12. The *Centennial Specific Plan's* Green Development Program requires each applicant to provide plans and specifications to the County demonstrating compliance with the Electric Vehicle Supply (EVS) charging station measures specified in MM 11-4. If and to the extent subsequently approved by the County, compliant with state laws, and resulting in no new significant impacts to the environment following County review and approval, EVS charging stations may be replaced by "alternative energy fueling stations" which may include other types of electric vehicle charging technology (e.g., operating at higher or lower voltages), or alternative vehicular fuel technology that results in zero or near zero (as defined by CARB) GHG emission such as hydrogen fuel cells, biofuels, or other qualifying fuel technologies. An electric charging station shall allow for simultaneous charging of two electric vehicles. ~~for an applicable construction permit for a Business Park or Institutional land use to install "alternative energy fueling stations" as listed below. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel.~~

- Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter.
- Multi-family residential buildings of at least seventeen ~~20~~ 17 residential units shall provide a minimum of one alternative energy vehicle fueling station for the first

~~twenty~~ seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty~~ seventeen (~~20~~ 17) residential units thereafter.

- The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station.
- Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station.

PDF 21-12 is required for implementation through MM 21-16.

PDF 21-13. The Green Development Program requires that prior to the issuance of each nonresidential construction permit, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs for non-residential buildings:

- Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for non-residential land uses.
- Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code.

PDF 21-13 is required for implementation through MM 21-17.

PDF 21-14. The Green Development Program requires that prior to the issuance of an applicable construction permit for each multi-family residential building permit, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs or specifications:

- Visitor parking shall include preferentially located parking spaces for ~~alternative-fueled~~ electric vehicles.
- Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

PDF 21-14 is required for implementation through MM 21-18.

PDF 21-15. The Green Development Program requires that, prior to issuance of an applicable construction permit for parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric, ~~natural gas, or similar low-emitting technology)~~ vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202~~ include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated.~~ Calculations for the required number of EV spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code.
- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code or as required by Section 22.52.1225B of the County Code, whichever is more stringent.

PDF 21-15 is required for implementation through MM 21-19.

PDF 21-16. The Green Development Program requires that the Project Applicant/Developer provide:

- Internet infrastructure and high-speed broadband access to facilitate telecommuting, and
- A community intranet (or similar) with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities reduce the need for people to use automobile travel to obtain the information that is provided.

Compliance shall be required prior to the issuance of building permit for the 1,000th residential unit. PDF 21-16 is required for implementation through MM 10-2 in Section 5.10, Traffic, Access, and Circulation.

As the Project will incorporate these project design features and must comply with these applicable regulations imposed by law, the Project would contribute to the achievement for AB 32's goals related to mobile source emissions.

Estimated Project operational GHG emissions are shown in Table 5.21-10. Table 5.21-10 also shows the combined operational, construction, and vegetation change GHG emissions.

As previously described in Section 5.21.5, under Threshold 21-1, this impact analysis evaluates consistency with applicable regulatory programs designed to reduce GHG emissions and that contribute to achievement of AB 32's goals as the primary significance criteria, a method of analysis that is consistent with pathways to compliance described in the *Newhall* decision. The quantitative emissions data in Tables 5.21-4 through 5.21-10 are

provided for information purposes. Also for information purposes, Table 5.21-10 compares the emissions with the AVAQMD project-level CEQA significance threshold and the SCAQMD project-level recommended GHG efficiency threshold, both discussed in more detail below.

TABLE 5.21-10
OPERATIONAL AND TOTAL GHG EMISSIONS

GHG Sources	Emissions $MTCO_2e$	Percent of Operational Emissions
Operational	239,215	
Area	11,297	5%
Energy	49,414	21%
Mobile	160,904	67%
Solid waste	10,214	4%
Water	7,387	3%
Construction	4,490	
Vegetation loss	922	
New trees	-249	
Total	**244,379**	
AVAQMD Project-Level CEQA significance threshold	***100,000***	
Exceeds threshold?	Yes	
Service population (SP)	80,825	
GHG Efficiency	**3.02**	
SCAQMD Plan-Level staff- proposed "plan-level" GHG efficiency threshold ($MTCO_2e$/SP/Year)	***4.1***	
Exceeds threshold?	No	
SCAQMD Plan-Level staff- proposed "project-level" recommended GHG efficiency threshold ($MTCO_2e$/SP/Year)	***3.0***	
Exceeds threshold?	Yes	

GHG: greenhouse gas; MTCO2e: metric tons of carbon dioxide equivalent; AVAQMD: Antelope Valley Air Quality Management District; SCAQMD: South Coast Air Quality Management District.

Emissions calculations can be found in Appendix 5.11-A.

Annotation 14:

Updated GHG Report Table 1(below), compares the DEIR Quantified GHG Emissions (as shown in DEIR Table 5.21-15, above) with the results of the Updated GHG Calculations described in the Updated GHG Report. As explained in the Updated GHG Report, total Project emissions in the Updated GHG Calculations are 157,642 metric tons of carbon dioxide equivalent per year ($MTCO_2e$/yr), a reduction of -86,736 $MTCO_2e$/yr (approximately 35 percent) from the DEIR Quantified GHG Emissions of 244,370 $MTCO_2e$/yr.[1]

UPDATED GHG REPORT TABLE 1
DEIR QUANTIFIED GHG EMISSIONS AND UPDATED GHG CALCULATIONS
($MTCO_2E$/YEAR)

GHG Emission Sources	DEIR Quantified GHG Emissions	Reductions		Net Change in GHG Emissions	Updated GHG Calculations
		From Regulations and CalEEMod Update	*From Mitigation Measures*		
Mobile	160,904	-52,694[a]	-31,203[b]	-83,897	77,007
Energy	49,414	5,584	50	5,634	55,047
Electrical Power	*23,276*	*5,806*[c]	*50*[d]	*5,856*	*29,132*
Natural Gas	*26,137*	*-222*	*0*	*-222*	*25,915*
Water and Wastewater	7,387	0	-3,184[e]	-3,184	4,203
Solid Waste	10,214	-5,107[f]	0	-5,107	5,107
Area	11,297	0	-74[g]	-74	11,223
Construction	4,490	0	0	0	4,490
Vegetation	673	-108[h]	0	-108	565
Total Emissions	**244,379**	**-52,324**	**-34,412**	**-86,736**	**157,642**

Sources: DEIR Quantified GHG Emissions from DEIR Section 5.21; Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018).

a Reductions assume that 80 percent of the GHG emissions reductions attributable to the utilization of EVs at Project buildout are due to regulatory, CalEEMod and EV market development factors (see "Mobile Emissions" discussion below).

b Reductions attributable to MM 10-1, MM 10-25, MM 10-26, MM 21-14, MM 21-22, and MM 14-11, as well as 20 percent of the reductions attributable to the utilization of EVs at Project buildout (see "Mobile Emissions" discussion below).

c Overall increases attributable to combination of EV charging infrastructure emissions (increase of 11,224 $MTCO_2e$/yr allocated at 80 percent per footnote "a" above, and due to MM 11-4, MM 11-6, MM 21-15, MM 21-16, MM 21-18 and MM 21-19). GHG decreased emissions are also included, due to 2019 Title 24 Standards (reductions of -3,173 $MTCO_2e$/yr).

d Overall increases attributable to combination of EV charging infrastructure emissions (increase of 11,224 $MTCO_2e$/yr allocated at 20 percent per footnote "b" above), and due to MMs 13-2 and 13-6 (reduction of -109 $MTCO_2e$/yr) and MM 21-1 (-2,086 $MTCO_2e$/yr).

e Reductions attributable to MM 18-1, MM 21-9, and MM 21-13.

f Reductions attributable to MM 17-10 and attributed to regulatory factors.

g Reductions attributable to MM 11-3 and electric landscape equipment (Green Development Program).

h Reductions attributable to MM 7-11, MM 7-12 and MM 21-20 and attributed to regulatory factors.

Note: Total emissions may not add up exactly due to rounding.

As discussed in more detail in Updated GHG Report Section 2.2, *Energy*, due to the combination of quantified EV charging demand, which increases Project electricity use, and reductions in electricity use associated with the new 2019 Title 24 Building Energy Efficiency

Standards, which decreases Project electricity use, the Updated GHG Calculations include an overall increase GHG emissions from the use of electrical power when compared to the DEIR Quantified GHG Emissions.[2] However, as discussed in Updated GHG Report Section 2.1, *Mobile Emissions*, a higher rate of EV adoption reduces mobile source GHG emissions by -83,897 $MTCO_2e$/yr from the DEIR Quantified GHG Emissions.[3]

1. Updated GHG Report at 3.
2. *Ibid* at 6-17.
3. *Ibid* at 5; see also, CEC. March 2018. *California Plug-In Electric Vehicle Infrastructure Projections 2017-2025*: https://www.nrel.gov/docs/fy18osti/70893.pdf

AVAQMD Thresholds

The AVAQMD's *CEQA and Federal Conformity Guidelines* (2011) establishes significance thresholds to assess the regional impact of project-related air pollutant emissions in the AVAQMD. The AVAQMD threshold for GHG emissions is 100,000 $MTCO_2e$ per year. A project with emission rates below this threshold is considered to have a less than significant effect on regional air quality throughout the AVAQMD portion of the MDAB.

For informational purposes, the Project's estimated combined operational, construction, and vegetation change GHG emissions are 244,379 $MTCO_2e$, thus exceeding AVAQMD's 100,000 $MTCO_2e$ threshold.

Annotation 15:

As discussed in Annotation 2, and in the Updated GHG Report, total Project emissions in the Updated GHG Calculations are 157,642 $MTCO_2e$/yr. Although the Updated GHG Calculations represent a reduction of -86,736 $MTCO_2e$/yr from the DEIR Quantified GHG Emissions, for informational purposes, the Updated GHG Calculations exceed AVAQMD's 100,000 $MTCO_2e$/yr threshold.

SCAQMD Thresholds

In April 2008, SCAQMD convened a Working Group to develop GHG significance thresholds. On December 5, 2008, the SCAQMD Governing Board (Board) adopted its staff proposal for an interim CEQA GHG significance threshold for projects where the SCAQMD is the lead agency. As to all other projects, where the SCAQMD is not the lead agency, the Board has, to date, only adopted an interim threshold of 10,000 $MTCO_2e$ per year for industrial stationary source projects (SCAQMD 2008).

For all other projects, SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions; Tier 2 is consistency with a GHG reduction plan; Tier 3 is a screening value or bright line; Tier 4 is a performance based standard; and Tier 5 is GHG mitigation offsets (SCAQMD 2008). According to the presentation given at the September 28, 2010 Working Group meeting, SCAQMD staff proposed a Tier 3 draft threshold of 1,400 to

3,500 $MTCO_2e$/year depending on if the project was commercial, mixed use, or residential (SCAQMD 2010). For the Tier 4 draft threshold SCAQMD staff presented a percent emission reduction target option but did not provide any specific recommendation for a percent emission reduction target; instead it referenced the San Joaquin Valley Air Pollution Control District (SJVAPCD) approach.

The percent reduction target is based on consistency with AB 32 as it was based on the same numeric reductions calculated in the Scoping Plan to reach 1990 levels by 2020. As discussed in Section 5.21.2, Relevant Plans, Policies, and Regulations, the First Update to the AB 32 Scoping Plan states the following (CARB 2014b):

California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32." Specifically, "if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts [MW] of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050.

The second Tier 4 option is to utilize an efficiency target. The targets for 2020 are 4.8 $MTCO_2e$ per year per service population (SP) for project level thresholds where SP is project residents plus employees and 6.6 $MTCO_2e$ per year per SP for a plan level threshold (SCAQMD 2010). The targets for 2035 are 3.0 $MTCO_2e$ per year per SP for project level thresholds and 4.1 $MTCO_2e$ per year per SP for a plan level threshold.

The Working Group has not convened since the fall of 2010. As of the writing of this EIR, the proposal has not been considered or approved for use by the SCAQMD Board.

The Project's estimated combined operational, construction, and vegetation change GHG emissions are 244,379 $MTCO_2e$ and its estimated service population is 57,150 residents and 23,675 employees for a total of 80,825, resulting in annual emissions of 3.02 $MTCO_2e$ per service population. Thus, for informational purposes, the Project's estimated emissions would exceed the 2035 "project-level" efficiency threshold of 3.0 $MTCO_2e$ proposed by SCAQMD staff, which threshold has not been adopted by the SCAQMD Board. However, Project's estimated emissions would not exceed the 2035 "plan-level" efficiency threshold of 4.1 $MTCO_2e$ proposed by SCAQMD staff.

Annotation 16:

As discussed in Annotation 2, and in the Updated GHG Report Section 5.0, the Project's GHG Efficiency based on the estimated service population decreased from 3.02 (as presented in the DEIR Quantified Emissions) to 1.93 (as calculated in the Updated GHG Emissions).[1] Thus, for informational purposes, the Project's estimated Updated GHG Emissions would not exceed either the 2035 "project-level" efficiency threshold of 3.0 $MTCO_2e$/yr or the 2035 "plan-level" efficiency threshold of 4.1 $MTCO_2e$/yr proposed by SCAQMD staff, which thresholds still have not been adopted by the SCAQMD Board.[2]

1. Updated GHG Report at 13-14.
2. *Ibid*.

Threshold 21-2 Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Consistency with the Los Angeles County Community Climate Action Plan

The Los Angeles County CCAP is designed to support the State's overall GHG reduction goals for 2020 under AB 32. The Project's consistency with the CCAP is shown in Table 5.21-11. If the Project is consistent with the CCAP, it would not have significant GHG emissions relative to the CCAP's 2020 planning horizon and the AB 32 reduction target. Since the Project has a phased implementation schedule with full buildout beyond the CCAP's 2020 planning horizon, consistency with the CCAP is only one *Newhall* compliance pathway used in this Section 5.21.6 to evaluate the significance of the Project's GHG emissions. However, the Project's consistency with the CCAP is important for determining the significance of GHG emissions for the current CCAP planning horizon.

As demonstrated in detail in Section 5.8, Land Use, Entitlements, and Planning, the Project would be consistent with the goals and policies of the AVAP, would implement the AVAP and would not conflict with it. Since the CCAP relies on the AVAP to inform its socioeconomic assumptions, and since the Project is consistent with the AVAP, it follows that the Project is also consistent with the socioeconomic assumptions contained in the County's CCAP.

The CCAP builds on existing County programs, and adds new actions, as shown in Table 5.21-11. Mandatory new actions are identified in ***bold and italic*** text, but this consistency analysis includes both mandatory and voluntary new actions. Centennial Implementation Actions, as shown in the Table 5.21-11 below, include a brief summary listing of Project Design Features (PDFs) and Mitigation Measures (MMs) presented in applicable topical sections 5.1 through 5.21 of this Draft EIR. The CCAP is a countywide program, and this analysis evaluates elements of the CCAP that are relevant to the Centennial Project.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
CATEGORY 1: GREEN BUILDING AND ENERGY	
Existing County Initiatives	
Energy Upgrades to Existing Structures provides rebates and incentives for energy retrofit efficiency projects.	Because Centennial will be a new community, energy efficiency is required for buildings, infrastructure (e.g., outdoor irrigation), and appliances. The Project does not include any existing structures, and thus this CCAP action is not applicable.
Los Angeles County Code (Title 31) requires implementation of sustainable policies for new building design.	The Project is consistent with Title 31 of the County Code ~~applies to the Project,~~ and ~~is~~ implement~~ed~~s ~~through~~ a variety of measures including, for example (1) landscape design restrictions related to minimizing turf grass and the use of non-invasive and drought tolerant plants and tree species; (2) recycling and/or salvaging a minimum of 75% of the non-hazardous construction and demolition debris, and 100% of soils during grading; and (3) compliance with a water budget for landscape irrigation use conforms to the California Department of Water Resources Model Water Efficient Landscape Ordinance.
Commercial Building Performance Partnership provides financial mechanisms for energy conservation upgrades to existing buildings.	Energy conservation is required for new structures, and no retrofits of existing structures are included in the Project and thus this CCAP action is not applicable.
Renewable Energy and Clean Fuels Program implements projects to accelerate the use of compressed natural gas as an alternative fuel.	Renewable energy produced within the Project will be primarily rooftop solar, and at minimum 50% of the Project's anticipated electricity demand will be satisfied from on-site renewable energy generation. It is anticipated that the dominant alternative transportation fuel will be electricity (e.g., electric and hybrid-electric vehicles); however, compressed natural gas (CNG) will also be made available as a transportation fuel to the extent consistent with then-applicable recommendations and/or requirements from the California Air Resources Board (CARB) and County.
New CCAP Actions	
BE-1: Green Building Development encourages energy reductions in new development through voluntary reductions that exceed the minimum standards set forth in the State's CALGreen Building Code (Title 24).	The Project exceeds the CALGreen Building Code minimum requirements in several ways, including: 6. Compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings, resulting in buildings that would exceed 2016 Title 24 requirements by 15% (PDF 21-1).

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	7. Compliance with CALGreen voluntary measure A5.203.1.2.1 for nonresidential buildings and residential buildings taller than 4 stories, resulting in buildings that would exceed 2016 Title 24 requirements by 10%. 8. Owners of all single-family units and multi-family residential structures are required, upon resale, to present to the buyer a written energy audit checklist at the time the seller provides the buyer with the Real Estate Transfer Disclosure Statement required by Section 1102 et seq. of the *California Civil Code.* The energy audit checklist shall certify that all heating, ventilation, and air conditioning (HVAC) systems, thermostats, appliances, windows, and swimming pools are either the same as originally installed or otherwise comply with the Green Development Program. 9. For nonresidential buildings, within 90 days after the end of the first full calendar year following the issuance of the certificate of occupancy, and within 90 days after each 5-year period thereafter, the owner or tenant in possession thereof shall submit to the master commercial owners association or other applicable association a report prepared by the owner or a qualified, independent third party that evaluates whether all major building systems such as a heat furnace, air conditioner, and other energy-consuming mechanical fixtures are working within the design standards established by the manufacturer of such equipment. 10. Residential appliances offered by builders shall consist ~~exclusively~~ of low-energy and/or low-water consuming appliances that are Energy-Star compliant for each appliance that is rated by Energy Star (e.g., refrigerator, clothes washer, dishwasher, and room air conditioner). These project design features meet and exceed the requirements of ~~Section 22.52.2130~~ Title 31 of the County Code (Green Building).
BE-2: Energy Efficiency retrofits will be further encouraged for existing buildings and structures.	The Project does not include any existing buildings, so this measure is not applicable.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
BE-3: Solar Installations are encouraged for new and existing buildings	Renewable energy produced within the Project would ~~be generated~~ provide ~~at~~ a minimum of 50% of the Project's anticipated electricity demand ~~would be satisfied from on-site renewable energy generation~~. Specific metrics to achieve this goal include: 1. A minimum of 100% of all single-family detached residential units at buildout shall ~~have~~ be pre-wired to support solar energy collection equipment and a minimum of 30% of all single-family detached residential units at buildout shall have solar energy collection equipment installed on roof areas or on top of other structures on the site (e.g., patio covers or pergolas). 2. Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. 3. A minimum of 10% of all single-family detached residential units at buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. 4. A minimum of 30% of all multi-family residential units at buildout shall have solar energy collection equipment, which shall be installed on roof areas facing within 30 degrees of true south. 5. All ~~minimum of 70% of~~ public and community swimming ~~s~~pools constructed within the Project shall be heated by a solar water heating system or renewable power system that provides electricity for water heating. 6. A minimum of 60% of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
BE-4: Alternative Renewable Energy Programs are designed to encourage the use of non-solar renewable energy technology such as wind, hydropower, and geothermal resources, as feasible.	The Project site does not have hydropower or geothermal resources. Utility-scale wind plants present a potential hazard to sensitive biological resources such as the California Condor, and utility-scale solar plants are not an authorized use on the Project site or vicinity under the Antelope Valley Area Plan. However, the Specific Plan states that renewable energy systems shall be installed in connection with the development of one or more of the following: residential units, non-residential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity.
BE-5: Wastewater Treatment Plant Biogas recovery and reuse	The Project's wastewater reclamation facilities (WRF) will include equipment to capture and reuse biogas for energy production.
BE-6: Energy Efficiency Retrofits of Wastewater Equipment promotes efficient treatment equipment	There is no existing wastewater treatment facility at the Project site, so this measure is not applicable.
BE-7 Landfill Biogas encourages renewable biogas projects at regional landfills.	There is no existing or proposed landfill at the Project site, so this measure is not applicable.
CATEGORY 2: LAND USE AND TRANSPORTATION	
Existing County Initiatives	
Healthy Design Ordinance (Ordinance 2013-001, amending Title 21 (Subdivisions) and Title 22 (Planning and Zoning)) is designed to require projects to have better walking environments (e.g., with wider sidewalks and more shade trees), encourage more bicycling (e.g., by requiring bike parking), improve access to healthy foods (e.g., with weekly farmer's markets and permissible community gardens), and enhance project review requirements to provide an opportunity to review healthy design features such as landscaping, lighting, street furniture and bike parking spots.	The Project design ~~complies~~ is consistent with all of the substantive standards of the Healthy Design Ordinance, including but not limited to requirements for right-of-way widths; pedestrian crossings; tree plantings in lot frontages; and bicycle parking facilities. The Project allows community gardens as legally permitted uses in residential, ~~and~~ mixed-use, park, recreation/entertainment, and institutional/civic areas of the Project. The Project Transportation Demand Management (TDM) Program includes bicycle program metrics, discussed below.
Bicycle Master Plan promotes bicycle ridership and bike-friendly designs throughout the County.	The Project includes a safe and aesthetically pleasing dedicated bicycle network and pedestrian system into all development designs, and distributes community uses such as neighborhood parks, elementary schools, and neighborhood-scale retail in key locations throughout the Project to reduce single-occupancy automobile travel for these neighborhood-scale destinations. The Mobility Plan of the Specific Plan ~~Project TDM Program~~ includes bicycle program metrics, discussed below.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
Sustainable Transportation Programs to increase the efficiency of the transportation network.	The Project includes the following measures to reduce single-occupancy commuter travel to and from the Project site: 1. Land use planning principles that create a balanced master-planned community that includes: A. Mixed-use neighborhoods where residential, commercial, and other employment-generating uses and institutional/public uses are proximate to each other and connected by a network of walkable streets, bikeways and trails to reduce reliance on automobile use within the Project site. B. A diverse range of residential product types, including dedication of a minimum of 10% of residential units as affordable housing, to compliment the diverse range of employment opportunities within the Project and help minimize the off-site employment commuter trips. 2. Establishment of a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is also to coordinate and facilitate transit and rideshare usage to serve as many riders as possible, and to reduce the volume of automobile trips within and from the Project site, as described in more detail in the ~~Project TDM Program~~ Mobility Plan below.
New CCAP Actions	
LUT-1: Bicycle Programs and Supporting Facility improvements to expand the County's existing bicycle network.	As a new community, the Project includes a network of bikeways and multi-purpose trails, as well as and community trails, in addition to the greenways and paseos. The Project trail system will connect to the Pacific Crest Trail (PCT), which is designated as a National Scenic Trail that traverses approximately 2,650 miles through 3 states (California, Oregon, and Washington) will be relocated to the west side of 300th Street West, which travels through the Project site. This realignment is not a part of the Project, but is assumed to be the future alignment for evaluation purposes in this EIR. The Project requires bicycle parking facilities for 5% of the minimum required vehicle parking spaces for nonresidential land uses or as required by ~~that meet or exceed the~~

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	~~requirements of~~ County Code Section 22.52.1225B, whichever is more stringent, to encourage and support bicycle use.
LUT-2: Pedestrian Network improvements to expand the County's existing pedestrian network.	As a new community, the Project implements a Complete Streets design approach that includes sidewalks and dedicated bicycle network and pedestrian system incorporated into all development designs and throughout the community to reduce single-occupancy automobile travel for neighborhood-scale destinations.
LUT-3: Transit Expansion to create priority bus lanes and improve the existing efficiency of the transportation network.	As a new community, the Project implements a ~~TDM Program~~ Mobility Plan that includes strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. The Project also includes a transit easement running North-South through the center of the development, connecting its most housing-dense areas with the business park, accommodating future internal commuting within the Project site.
LUT-4: Travel Demand Management to encourage ride-sharing and employer-sponsored vanpools to reduce peak-period vehicle trips.	The Project ~~TDM Program~~ Mobility Plan encourages ride-sharing and employer-sponsored vanpools, as well as other measures to reduce automobile trips within and from the Project site. The TDM will be managed by the TMA.
LUT-5: Car-Sharing Program promotes the shared use of private and employer-owned vehicles.	The Project ~~TDM Program~~ Mobility Plan includes formation of strategic partnerships with car sharing services (e.g., Uber or Lyft) and other innovation/technology approaches to increase transportation efficiency, as described in more detail below.
LUT-6: Land Use Design and Density targets land use patterns to support mobility, and improve the diversity of urban and suburban developments	The Project includes a balanced mix of housing, employment, and community uses including schools, retail, and public services, to minimize off-site trips. The Project design also encourages pedestrian and bicycle use through the use of walkable communities planning and design techniques, and includes a diverse range of housing types.
LUT-7: Transportation Signal Synchronization Program Improve the network of traffic signals on the major streets throughout Los Angeles (LA) County.	The Project site does not include any existing traffic signals, but the Project will use synchronized traffic signals to ensure the efficient use of future Project roadways.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
LUT-8: Electric Vehicle Infrastructure. Install EV charging facilities at County-owned public venues and ensure that at least one-third of these charging stations will be available for visitor use.	The Project requires electric vehicle infrastructure, specifically: 1. Builders will be required to install one 240 volt of alternating current (VAC) outlet available for use to charge electric vehicles in the garage or other suitable location for each single-family home. 2. For business park and institutional land uses, a minimum of 1 electric vehicle charging station (consisting of a 208/240 VAC or alternative electric charging technology approved by the County, serving 2 adjacent parking spaces) will be installed for the first 50,000 square feet (sf) of building space, and an additional fueling station will be installed for each subsequent 50,000 sf of building space. 3. For multi-family residential projects that include at least ~~20~~ 17 units, a minimum of 1 alternative energy ~~electric~~ vehicle fueling ~~charging~~ station be installed for the first 17 ~~20~~ units and an additional ~~charging~~ alternative energy vehicle fueling station will be installed for each subsequent ~~20~~ 17 units. 4. Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided for nonresidential structures ~~larger than 20,000 sf and made available for employees and visitors~~ as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10% of total for 201 and more spaces. 5. For parking facilities and parking lots with more than 20 spaces, the parking facility or lot must include: A. A minimum of 5% preferentially located parking spaces for alternative-fueled vehicles. B. Electrical lines designed and sized to provide electric vehicle charging stations for up to 3% of parking space when demand is demonstrated.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
LUT-9: Idling Reduction Goal. Encourage idling limits of 3 minutes for heavy-duty construction equipment as feasible within manufacturer's specifications.	The Project includes as a mandatory contract specification for all construction contractors a restriction to limit unnecessary construction equipment idling to 3 minutes, and include methods to encourage equipment operators to achieve the 3-minute goal.
LUT-10: Efficient Goods Movement is designed to improve cargo transport on existing roadways and transportation infrastructure.	The Project includes contributions to California Department of Transportation (Caltrans) to avoid any adverse Project-related impact to goods movement on Interstate (I) 5 and State Route (SR) 138. Contributions are described in mitigation measures in Section 5.10, Traffic, Access and Circulation.
LUT-11: Sustainable Pavements Program is designed to improve the resiliency of, and reduce the GHG emissions associated with, existing paved roadways.	The Project will use durable roadway paving materials that will be determined upon consideration of aggregates, asphalt materials, cementitious materials, recycled materials, and other roadway materials that are commonly used in pavement construction in order to assess from a life-cycle perspective the role they play in contributing to the sustainability of the Project's pavement system. "Cool" pavements will be used to reduce heat island effects.
LUT-12: Electrify Construction and Landscaping Equipment. Utilize electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment.	All landscape maintenance equipment at Centennial will be CARB-approved or electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment.
CATEGORY 3: WATER CONSERVATION AND WASTEWATER	
Existing County Initiatives	
Conservation rebates, smart gardening workshops and stormwater controls provide water and wastewater improvements in existing communities	This measure does not apply to new communities. The Project includes compliance with drought-response State measures including the Model Water Efficient Landscape Ordinance (MWELO), which are more stringent than required by CALGreen (DWR 2015). The Project includes 2 WRFs that will provide a reliable supply of recycled water for landscaping, to reduce reliance on potable water supplies.
New CCAP Actions	
WAW-1: Per Capita Water Use Reduction Goal. Meet the State established per capita water use reduction goal as identified by Senate Bill (SB) X7-7 for 2020. The State goal is a 20 percent reduction in per capita water use compared to baseline levels.	The final EIR for the Antelope Valley Area Plan (AVAP) update utilized the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) average Antelope Valley estimate of per capita water use (199 gallons per capita per day [gpcd]) to evaluate the water demand growth that

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	could occur from the implementation of the AVAP. At full buildout, the Project's total per capita water use would be approximately 177.5 gpcd. The Project would reduce water demand by approximately 10% below the per capita average consumption in the Antelope Valley. The analysis compared the Project to the baseline per capita consumption in the Project vicinity since the Project site is undeveloped there is not an established baseline of water consumption on the Project site.
WAW-2: Recycled Water, Water Supply Improvement Programs, and Stormwater Runoff. Promote the use of wastewater and gray water to be used for agricultural, industrial, and irrigation purposes. Manage stormwater, reduce potential treatment, and protect local groundwater supplies.	The Project includes a comprehensive water resources management program, including: 1. *Recycled Water.* The Project includes water recycling facility to recycle, and reuse, wastewater piped to the Project WRF. All nonresidential and multi-family development must install recycled water infrastructure to irrigate common areas for these facilities (except where prohibited by law), and all available recycled water shall be used for such irrigation uses. 2. *Potable Water Conservation.* The Project includes numerous potable water conservation measures, including: A. Establishing maximum available water allocations for each residential and commercial parcel, and monitoring and enforcing such allocations through a metering system and rate structure and/or penalty structure for those exceeding their water allocations. B. Restricting outdoor landscaping planting in private yards to a designated low-water plant pallets to minimize use of potable water for private landscaping, ~~prohibiting~~ <u>mandating that only recycled water be used to irrigate</u> turf in commercial <u>areas</u> ~~projects~~, and restricting turf to 25% of landscaped areas on private residential projects. C. Requiring the ~~exclusive~~ use of Energy Star or equivalent major appliances, as described above, that use less water (as well as less energy). D. Requiring the exclusive use of kitchen and bathroom faucets that comply with 2013

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	CALGreen code residential voluntary measures specified in Sections A4.303.1 and A4.303.3 of the code. 3. *Storm Water Management.* The Project's integrated water resources management approach will comply with County requirements related to hydrology and flood control considerations through compliance with Low Impact Development (LID) standards and best management practices (BMPs) for sediment management through hydromodification techniques. The Project includes 2 WRFs that will provide a reliable supply of recycled water for landscaping, to reduce reliance on potable water supplies. The Project provides a reliable water supply through use of an integrated water resources management approach that incorporates water conservation measures; uses recycled water for non-potable uses; uses multiple sources of water supply to ensure that the Project's water needs are met without the need to solely rely on the annual delivery of a fixed amount of imported water; provides a high degree of water supply reliability for each stage of Project buildout; and minimizes the impacts of additional water demand on the state's water supply.
CATEGORY 4: WASTE REDUCTION, REUSE AND RECYCLING	
Existing Initiatives	
Community waste diversion programs to redirect 50 percent of solid wastes to recycling or re-use instead of landfills	The Project will exceed this existing measure by implementing a 100 percent diversion of soil during grading activities, and at least ~~70~~ 75 percent of non-hazardous construction and demolition waste. The Project will also divert 75 percent of operational solid waste.
New CCAP Action	
SW-1: Waste Diversion Goal. For the County's unincorporated areas, adopt a waste diversion goal to comply with all State mandates to divert at least 75 percent of waste from landfill disposal by 2020.	The Project includes both a construction and operational waste reduction measures. 1. The Project must implement a plan and monitoring program to ensure recycle or reuse of a minimum of 75% by weight of construction and demolition debris, exclusive of soil, rock, and gravel. This quantity exceeds the 50% requirement of Section 20.87.040 of the County Code and the 75% target proposed in the CCAP.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
	2. The Developer must provide the County with a contract establishing an on-site waste recycling and composting program, including the collection of metals, paper, household plastics, glass, cardboard, green waste and food waste. The waste hauler should be required by contract to maintain records showing the diversion of not less than 75% of the operational waste generated by the Project. The Project will include a minimum of five acres for a Materials Recovery Facility/Transfer Station (MRF/TS), which may include mulching and composting operations and a Household Hazardous Waste Permanent Collection Center. An MRF/TS could be privately or publicly operated. The MRF/TS would allow for all materials that are recyclable to be sorted and compacted for shipment to an off-site recycling processing facility. The Developer shall encourage a waste management company to build these facilities within the Project site by grading, improving, and providing utility hookups by the end of the first phase of construction. The CC&R for the MRF/TS will require that the lot provided within the site remain as a Non-Disposal Solid Waste Processing Facility.
CATEGORY 5: LAND CONSERVATION AND TREE PLANTING	
Existing Initiatives	
Implementation of the urban forestry plan and oak woodlands conservation management plan.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total 23,547 acres, for a combined total of 28,663 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimizes disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. Open spaces will be provided within the Business Park that allow for wildlife movement between the southern portion of the Project site through to the drainage located on the northern side of SR 138.

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
New CCAP Actions	
LC-1: Develop Urban Forests. Support and expand urban forest programs within the unincorporated areas.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent ($MTCO_2e$). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance.
LC-2: Create New Vegetated Open Space. Restore and revegetate previously disturbed land and/or unused urban and suburban areas.	This action is not directly applicable to new development projects. However, the Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat. Additionally, the Project would plant an estimated 35,123 new trees, as required by the County Tree Planting Ordinance. This would result in an estimated long-term sequestration of 24,867 $MTCO_2e$. This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance

TABLE 5.21-11
CENTENNIAL PROJECT COMPLIANCE WITH THE LOS ANGELES COUNTY COMMUNITY CLIMATE ACTION PLAN

Existing Initiatives and New CCAP Actions	Centennial Implementation Actions
LC-3: Promote the Sale of Locally Grown Foods and/or Products. Establish local farmers markets and support locally grown food.	The Project will include a weekly Farmer's Market sponsored by the homeowners association (HOA) or other entity selected by the Master Applicant/Developer, and will allow for community gardens as a permitted use in ~~commercial and~~ residential, mixed use, park, recreation/ entertainment, and institutional/civic areas. The Project also accommodates a total of 50-acres for on-site food-growing and agriculture-related uses in places such as community gardens, orchards, groves, and greenhouses.
LC-4: Protect Conservation Areas. Encourage the protection of existing land conservation areas.	The Project's Natural Resources/Open Space Management Plan includes both on-site and off-site preserve areas. Approximately 5,116 acres of open space are available for use as on-site mitigation and off-site mitigation areas total ~~23,547~~ 39,213 acres, for a combined total of ~~28,663~~ 44,329 acres of preserved open space resulting from Project implementation. The Project avoids development within established Significant Ecological Areas, minimize disturbance of high-value biological resources, including native grasslands, oak savannas, and oak woodlands, and preserve contiguous open space areas in order to keep its viability as wildlife habitat.

As shown in Table 5.21-11, the Project would be consistent with, and would not conflict with, all applicable actions of the CCAP and its greenhouse gas reduction strategy.

The CCAP also recognizes the importance of ongoing implementation of statewide GHG reduction statutory mandates, including the following:

- **STATE-1:** Renewable Portfolio Standard, which requires California utilities to generate 50 percent of the state's electricity from renewable sources by 2030.
- **STATE-2:** CALGreen Building Code Standards (Title 24), which reduces GHG emissions through energy and water efficiency standards to be implemented in Commercial and Residential Buildings.
- **STATE-3:** Pavley/Advanced Clean Cars fuel efficiency standards, and Low Carbon Fuel Standards for on-road transportation, to reduce GHG emissions from fossil fuel use in transportation.

- **STATE 4:** Low Carbon Fuel Standard for Off-road Equipment and Vehicles, to reduce GHG emissions from fossil fuel use in construction equipment and other off-road equipment and vehicles.
- **STATE 5:** California Cap-and-Trade Program, to reduce GHG from stationary sources like factories and power plants, and from fossil fuel use.

These statewide mandates apply to Centennial-related buildings and activities, and will further reduce Project-related GHG emissions.

Consistency with the SCAG 2016–2040 RTP/SCS

The 2016-2040 RTP/SCS is the regional sustainable community strategy prepared pursuant to SB 375. The 2016–2040 RTP/SCS, prepared pursuant to SB 375 includes the same land use designations and density assumptions for Centennial Project site as the approved 2012–2035 RTP/SCS. As demonstrated in Section 5.9, Population, Housing, and Employment, the regional projections formally adopted by SCAG in its 2012–2035 RTP/SCS are used to determine Project conformity with these projections.

Demographic projections included as part of the adopted SCAG 2016–2040 RTP/SCS include development of the Project and are the most recently updated demographic projections available for the Project site and regional vicinity. The County and regional projections were formally adopted by SCAG and the Project has been analyzed to determine conformity with these projections in Section 5.9, Population, Housing, and Employment, of this EIR. Thus, the Project is consistent with, and would not conflict with, the regional blueprint prepared in accordance with SB 375 to reduce the regional share of GHG emissions attributable to the land use sector.

Off-Site Impacts

Construction of the off-site Project features (i.e., roadway improvements, water infrastructure, and utilities connections), as described in Section 4.7 of the EIR, would generate short-term GHG emissions. These construction activities and their associated emissions would be emissions would be a small part of the estimated on-site emissions, quantified above in Table 5.21-10. Upon completion of construction, the Project off-site roadway, water infrastructure, and utility improvements would not generate GHG emissions.

Impact Summary

Under AB 32, CARB, which is the agency in charge of regulating sources of emissions of GHGs in California, has been tasked with adopting regulations for reduction of GHG emission. The effects of the Project are evaluated based on whether the Project implements reduction strategies identified in applicable statutes such as AB/SB 32 and its implementing plans and regulations and other legal requirements and plans to reduce GHG to meet statutory requirements. As discussed above in Section 5.21.5, this impact analysis evaluates the Project's compliance with applicable regulatory programs designed to reduce GHG emissions and that contribute to achievement of the State's GHG reduction goals in order to

determine whether the Project would generate direct or indirect GHG emissions that may have a significant impact on the environment, a "pathway to compliance" recognized by the Supreme Court in the *Newhall* decision. As discussed under Threshold 21-1, the Project would comply with, and would be consistent with, applicable regulatory programs designed to reduce GHG emissions and would thus contribute to the achievement of AB 32's greenhouse gas reduction goals. Since the Project would comply with applicable regulatory programs designed to reduce GHG emissions, the Project-level impact related to GHG emissions could be considered less than significant under Threshold 21-1.

Furthermore, as discussed above under Threshold 21-2, this impact analysis evaluates whether the project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases by examining its consistency with the CCAP and SCAG's RTP/SCS, another "pathway to compliance" recognized by *Newhall*. As discussed above, the Project would be consistent with, and would not conflict with, the Los Angeles County CCAP, which meets the requirements for a programmatic climate action plan specified in Section 15183.5 of the State CEQA Guidelines, as well as the RTP/SCS, the regional sustainable communities strategy prepared pursuant to SB 375. Since the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and would be consistent with, and not conflict with, an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions, the Project-level impact related to GHG emissions could be considered less than significant under Threshold 21-2.

However, climate change is a global phenomenon and the significance of greenhouse gas emissions is inherently cumulative in nature. Accordingly, the Project's impact related to GHG emissions is most appropriately considered on a cumulative level, not on a project level. As described above, the Project would emit GHGs at an estimated rate of 278,577 metric tons per year that would contribute to the global inventory of GHGs.

To date, California remains a global leader in in mandating GHG emission reductions across a broad spectrum of economic sectors, and most other nations and states have not enacted regulations similar to those adopted in California. California also already has nearly the lowest level of GHG per capita of any state. The County of Los Angeles has no jurisdictional control or responsibility for GHG reductions in other parts of California (and certainly not in the context of global action), which all contribute to climate change. In addition, the County does not have jurisdiction to enforce statewide implementation of all of the applicable GHG-reducing regulatory programs with which the Project (and other statewide projects) must comply. Although many other agencies with the necessary jurisdiction are currently taking action to reduce GHG emissions, the County cannot assure that these measures would ultimately be implemented or sufficient to address climate change. In light of these considerations, as well as the global nature climate change related to GHG emissions and the Project's total estimated GHG emissions, the Project's incremental contribution to the global GHG emissions inventory would be considered cumulatively considerable and this cumulative impact is significant and unavoidable, even though the Project satisfies several "pathways to compliance" identified by the *Newhall* court.

5.21.7 – Mitigation Measures

The mitigation measures included below were informed by a review of potentially feasible GHG reduction measures identified by staff from the Attorney General of California, included on lists of potentially feasible measures from other agencies (e.g., Air Districts, planning associations), and measures suggested by the applicant.

Because the Office of Planning and Research (OPR) and other expert agencies and scientists agree that GHG emissions are inherently a cumulative impact issue relative to global climate change, the CEQA requirements for mitigating the project's contribution to a significant cumulative impact apply. The Supreme Court in the Newhall case identified several compliance pathways for assessing the significance of GHG emissions from projects, as described above. The project complies with each applicable pathway, and thus has a less than significant impact at a project level.

At a cumulative level, the project contributes GHG emissions to the global inventory of GHG emissions which are collectively causing climate change; however, on this global scale the GHG emissions of a single development project are insufficient to cause a significant adverse global climate change impact since all of California's anthropomorphic activities taken together account for only about 1% of global anthropomorphic GHG emissions based on US EPA data (2015). This conclusion that the project alone does not cause or substantially contribute to a significant adverse cumulative GHG impact is further supported by the fact that this project is designed to accommodate forecast population and economic growth based on growth allocations made by the state Department of Community Development, and assigned by regions and local jurisdictions as part of the Regional Housing Needs Assessment and Sustainable Communities Strategies programs described further in Section 5.9, and the project does not itself cause this population or economic growth. In fact, if this forecast growth does not occur on the Project site, it is likely to occur in other locations where per capita GHG emissions are equal to or higher than average per capita emissions in California. Per capita GHG emissions can vary by local jurisdiction, but locations with the lowest per capita emissions (San Francisco and New York City) also have housing costs that are among the highest in the nation as well as the state. Due to the widespread shortage and very high cost of California housing, numerous studies have confirmed that over 600,000 people have moved from California to other states over the past several years, and since most of those states (e.g., Texas, Arizona, Nevada) have much higher per capita GHG emissions than California the net effect of continuing to provide insufficient housing opportunities for California is to cause a net increase in global GHG for people who relocate to states with more housing opportunities.

Finally, courts have consistently held that single projects cannot be required to bear a greater than proportional share of mitigating a cumulative significant impact. Because GHG emissions from transportation, water and waste management and use, heating and cooling of buildings, and a myriad of other activities are common to all new and modified development projects, and are common attributes of simply residing, working or producing goods or services in California, the feasibility of the mitigation measures required for this project must be commensurate with a fair share allocation and not with a hypothetical "net

zero" or "net reduction" threshold. Within this cumulative impact mitigation measure framework, all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described below:

MM 21-1 The Project Applicant/Developer shall provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation. "Anticipated electrical energy demand" shall be determined on the basis of the anticipated loads for each building as shown in the reports submitted at the time of building permit application pursuant to the Building Energy Efficiency Standards of Title 24. "On-site renewable energy generation" includes, but is not limited to, solar, wind, geothermal, biofuel and hydroelectric systems. These systems shall be installed in connection with the development of one or more of the following: residential units, nonresidential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity.

MM 21-2 The Project's plans and specifications shall demonstrate compliance with California Green Building Standards (CALGreen) Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings. Therefore, the energy efficiency of these buildings would exceed 2016 Title 24 requirements by 15 percent. Low rise buildings are three stories or less. The Project shall incorporate the Green Development Program (Centennial Specific Plan, Appendix 2A), and the Project Applicant/Developer shall be responsible for the implementation of this requirement, which may include energy reduction measures such as use of high performance glazing, radiant heat roof barriers, insulation of all pipes, programmable thermostats, fluorescent and LED bulbs, solar access, sealed ducts, strategic placement of trees and other shading devices. All single-family homebuyers shall have the option to include a photovoltaic array system.

MM 21-3 The Project's plans and specifications shall demonstrate compliance with CALGreen voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings (e.g. hotel, high-rise residential), thereby exceeding the 2016 Title 24 energy efficiency requirements for these buildings by 10 percent. The Project shall incorporate the Green Development Program (*Centennial Specific Plan*, Appendix 2A), and the Project Applicant/Developer shall be responsible for the implementation of this requirement, which may include energy reduction measures such as high performance glazing, radiant heat roof barriers, high-efficient HVAC with hot-gas reheat, insulation of all pipes, programmable thermostats, fluorescent and LED bulbs, solar access, sealed ducts, zero use of CFC refrigerants in commercial buildings, strategic placement of trees, and other shading devices. Commercial structures shall include passive solar design techniques, such as a north-south panel orientation on buildings, and shall install operable windows designed to maximize natural ventilation by

opening into prevailing west winds at inlets and away outlets, thereby reducing use of interior climate controls.

MM 21-4 The Project Applicant/Developer shall require, in contract specifications, that contractors limit construction equipment idling to 3 minutes and include a program to ensure that equipment operators comply with the 3-minute limit.

MM 21-5 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that all ~~a minimum of 70 percent of~~ public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. The Project Applicant/Developer shall provide the proposed plan for compliance with this provision prior to obtaining a permit for the pool.

MM 21-6 Deeds, CC&Rs or similar legal documents shall contain the following requirement: The owners of all single-family and multi-family residential units shall be required, upon resale, to present to the buyer a written energy audit checklist prepared by a qualified third party at the time the seller provides the buyer with the Real Estate Transfer Disclosure Statement required by California Civil Code, Section 1102 et seq. The energy audit checklist shall certify that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. All residential pool covers shall be removable, and shall not be automatic retractable covers.

The CC&Rs of the master homeowners association or other applicable association shall require compliance with the provisions of this measure and shall provide notice to individual owners of the resale energy audit checklist requirement. The master homeowners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure.

MM 21-7 Deeds, CC&Rs, or similar legal documents shall contain the following requirement: For nonresidential buildings, within ninety (90) days after the end of the first full calendar year following the issuance of the certificate of occupancy and within ninety (90) days after each five year period thereafter, the owner or tenant in possession thereof shall submit to the master commercial owners association or other applicable association a report prepared by the owner or a qualified, independent third party that evaluates whether all major building systems such as heat furnace, air conditioner, and other mechanical fixtures are working within the design standards established for each system. The master commercial owners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure.

MM 21-8 Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements, or equivalent, shall be ~~exclusively~~ offered by residential builders. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners.

MM 21-9 The Project Applicant/Developer shall provide plans and specifications to the County that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards, demonstrating that the Project's wastewater reclamation facilities (WRFs) shall ~~include equipment to~~ capture and reuse biogas for energy production.

MM 21-10 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential or multi-family buildings shall be constructed with recycled water infrastructure to serve common areas for these facilities, except where prohibited by law. To the extent recycled water is produced within the Project and available, recycled water shall be used for landscape irrigation within those common areas. Compliance with these measures shall be established prior to the issuance of a construction permit for nonresidential and multi-family facilities and at the time of County approval of final landscaping plans submitted by the Project Applicant/Developer after final map recordation for homeowners association common areas. Covenants, conditions and restrictions (CC&Rs) shall require the owners of such common areas to maintain, repair and replace irrigation systems and plantings in accordance with County approved plans.

MM 21-11 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that non-residential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with 2016 CALGreen Tier 1 non-residential voluntary measures as prescribed in Section A5.303.2.3.1 of the code.

MM 21-12 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that single or multi-family residential building shall be constructed with kitchen faucets and appliances that comply with 2016 CALGreen code residential voluntary measures specified in Sections A4.303.1 and A4.303.3 of the code.

MM 21-13 The outdoor residential (single-family and multi-family) water budget for water-budget-based ratemaking shall be based on having no more than 25 percent turf grass allowed in landscaped areas of single-family detached residential front yards and multi-family residential common areas.

MM 21-14 Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable,

in conformance with the Affordable Housing Implementation Plan (see Appendix 3-H of the *Centennial Specific Plan*).

MM 21-15 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction. The Project Applicant/Developer shall provide a further credit of $500 to 50 percent of future homeowners (as requested by homeowner) to pay for the type of charging device then in use for electric vehicles or, with County approval, to pay for other energy conservation uses. The availability of this EV incentive benefit shall be disclosed and promoted at the time of initial sale of single family homes and shall thereafter be promoted by the TMA on its website.

MM 21-16 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating compliance with the Electric Vehicle Supply (EVS) charging station measures specified in MM 11-4. If and to the extent subsequently approved by the County, compliant with state laws, and resulting in no new significant impacts to the environment following County review and approval, EVS charging stations may be replaced by "alternative energy fueling stations" which may include other types of electric vehicle charging technology (e.g., operating at higher or lower voltages), or alternative vehicular fuel technology that results in zero or near zero (as defined by CARB) GHG emission such as hydrogen fuel cells, biofuels, or other qualifying fuel technologies. ~~that "alternative energy fueling stations" shall be installed as follows. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel.~~ An electric charging station shall allow for simultaneous charging of two electric vehicles.

- Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter.
- Multi-family residential buildings of at least seventeen ~~20~~ (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first ~~twenty~~ seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty~~ seventeen (~~20~~ 17) residential units thereafter.

- The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station.
- Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station.

MM 21-17 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs for non-residential buildings:

- Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for non-residential land uses.
- Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code.

MM 21-18 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs or specifications for multi-family residential buildings:

- Visitor parking shall include preferentially located parking spaces for ~~alternative-fueled~~ electric vehicles.
- Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by County Code Section 22.52.1225B, whichever is more stringent.

MM 21-19 For parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric~~, natural gas, or similar low-emitting technology)~~ vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 ~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated~~. Calculations for the required number of EV Spaces shall be rounded up to the nearest

whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:~~.~~

Single charging space requirements. When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electrical vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code or as required by County Code Section 22.52.1225B, whichever is more stringent.

MM 21-20 The Project Applicant/Developer shall ensure that the implementation of the Green Development Program ~~takes into account compliance with the~~ that complies with all applicable legal requirements, including but not limited to the following regulations (as may be amended):

1. Regulations that are quantified inputs into the CalEEMod analysis, resulting in GHG Reductions:
    a. Pavley Motor Vehicle Standards (AB 1493)
    b. Low Carbon Fuel Standard (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.)
    c. Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations
    d. Renewable Portfolio Standard (SB X1 2 and SB 350)
    e. Solid Waste Diversion (AB 341)
    f. Statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15)

g. Model Water Efficient Landscape Ordinance (MWELO) (California Code of Regulations, Title 23, Division 2, Chapter 2.7)

h. Los Angeles Tree Planting Ordinance (Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.)

i. Los Angeles County Green Building Standards Code (Los Angeles County Code, Title 31, Chapter 1, Sections 100 et seq.)

j. California Water Code (California Code of Regulations, Division 6, Part 2.10, Sections 10910–10915)

k. Los Angeles County Community Climate Action Plan

2. Regulations that are not quantified inputs into the CalEEMod analysis, but should be considered for incorporation as appropriate:

a. EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles (75 FR 25324–25728 and 77 FR 62624–63200) and for medium- and heavy-duty vehicles (76 FR 57106–57513)

b. Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 5, Section 95801 et seq.)

c. Advanced Clean Cars Program (California Code of Regulations, Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts); Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts); Chapter 4.4 (parts); Chapter 8 (parts).

d. Under Inflated Vehicle Tires (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.)

e. Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.)

f. Management of High Global Warming Potential Refrigerants for Stationary Sources (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.)

g. Small Containers of Automotive Refrigerant (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.)

h. High-Global Warming Potential Greenhouse Gases in Consumer Products (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 2)

i. CALGreen Code as Adopted by the Building Standards Commission (California Code of Regulations, Title 24, Part 11 Emergency Building Standard DSA-SS EF-02/15)

j. Natural Gas Cooking Stoves and Fireplaces (SCAQMD Rule 445)

MM 21-21 The Project Applicant/Developer shall require contractors to use locally available and recycled building materials, provided such materials meet all applicable Building Code and other requirements, and are readily available and comparably priced to assure that such materials do not increase the cost and decrease the affordability of housing or community infrastructure.

MM 21-22 The Project parking lots shall be designed to reduce vehicle queuing and improve pedestrian safety. Parking lot access designs shall include self-enforcement features for reducing the speeds on driveways, such as speed bumps or curved driveways. The parking lots shall include clearly marked pedestrian pathways connecting building entrances to parking, sidewalk, and transit drop-off/pick-up locations.

5.21.8 – Level of Significance After Mitigation

Although the Project would comply with various "pathways to compliance" for CEQA GHG analysis identified by the *Newhall* court, as discussed in Sections 5.21.6, even with implementation of all reasonable and feasible mitigation measures, as described in Section 5.21.7, the Project's climate change impacts would remain significant and unavoidable.

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Attachment:

Updated GHG Report

Updated Greenhouse Gas Calculations for the Centennial Project Final Environmental Impact Report

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ATTACHMENTS

Attachment

A GHG Reducing Mitigation Measures in Centennial Project Environmental Impact Report

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1.0 SUMMARY

This Report provides an additional analysis of greenhouse gas (GHG) emissions that would be generated by the proposed Centennial Specific Plan (the "Project") under full buildout conditions. This analysis compares the Project's GHG emissions calculated in Section 5.21, Climate Change, of the Draft Environmental Impact Report (DEIR) ("DEIR Quantified GHG Emissions") with an updated analysis completed at County request ("Updated GHG Calculations"). The DEIR Quantified GHG Emissions, along with the DEIR's overall analysis of GHG impacts, was consistent with the GHG compliance pathways required under the California Environmental Quality Act (CEQA) identified by the California Supreme Court in the *Newhall* case (*Center for Biological Diversity v California Dept. of Fish and Wildlife* [2015] 62 Cal.4th 204), and did not generally rely on quantifying all GHG reductions from Project mitigation measures or applicable legal requirements.

As presented below, the Updated GHG Calculations shows that Project-specific GHG emissions will be approximately 35 percent lower than the quantitative estimates included in the DEIR, based on GHG legal reduction mandates that were not in effect when the DEIR GHG emissions were calculated, more advanced GHG quantification methodologies, including newer versions of GHG emission models, and the quantification of GHG emissions from Project mitigation measures that reduce GHG emissions. The Updated GHG Calculations include: (1) emissions estimates from the most current version (16.3.2) of the California Emissions Estimator Model (CalEEMod); (2) updated information regarding applicable electric vehicle (EV) adoption rates; (3) estimated internal and external trip reductions attributable to the Project's single occupancy vehicle (SOV) mitigation measures; (4) updated estimates of the Project's water and wastewater energy use and emissions; and (5) revised estimates of the Project's solid waste GHG emissions based on applicable landfill diversion mitigation requirements. The analysis results include the following:

- Total Project GHG emissions in the Updated GHG Calculations are 157,642 metric tons of carbon dioxide equivalent per year ($MTCO_2e$/yr), a reduction of -86,736 $MTCO_2e$/yr (approximately 35 percent) from the DEIR Quantified GHG Emissions of 244,379 $MTCO_2e$/yr. See Table 1.
- Due to the combination of quantified EV charging demand, which increases Project electricity use, and reductions in electricity use associated with the new 2019 Title 24 Building Energy Efficiency Standards, which decreases Project electricity use, the Updated GHG Calculations include an overall increase GHG emissions from the use of electrical power when compared to the DEIR Quantified GHG Emissions. However, a higher rate of EV adoption reduces mobile source GHG emissions by -83,897 $MTCO_2e$/yr from the DEIR Quantified GHG Emissions. See Tables 1 and 2.
- Approximately 96 percent (150,808 $MTCO_2e$/yr) of the Updated GHG Calculations emissions are covered by, and subject to, the purchase of emission allowances under the new, expanded state Cap and Trade program approved by the Legislature after the DEIR was issued, and signed into law in 2017 (Assembly Bill 398 [AB 398]). The Cap and Trade program was designed to comprehensively regulate fossil fuels (from "wells to wheels" – from production, through refining, through ultimate consumption) and is expected to raise gasoline prices within a range of approximately 15 to 63 cents per gallon by 2021, and from 24 to 73 cents per gallon by 2031, according to the non-partisan California Legislative Analyst Office.[1] Compliance with the Cap and Trade program was upheld as a lawful CEQA mitigation measure to reduce GHG emissions to a less-than-significant-level for fossil fuels used by a refinery project for both direct refinery operations as well as indirect electricity consumption-related GHG emissions in a recent CEQA appellate court case,

[1] http://www.lao.ca.gov/letters/2017/fong-fuels-cap-and-trade.pdf

Association of Irritated Residents v. Kern County Board of Supervisors, et al. (Alon USA Energy, Inc., et al., Real Parties in Interest) (2017) 17 Cal.App.5th 708. The California Supreme Court declined to reverse, or de-publish, this case. The California Air Resources Board (CARB) has also determined that existing California law provides sufficient authority to extend the Cap and Trade program as required to meet state GHG reduction objectives.[2] See Table 3.

- GHG emissions from all Project electrical power consumption in the Updated GHG Calculations, including EV charging requirements, are 32,173 $MTCO_2e$/yr. These emissions are significantly less than the net -86,736 $MTCO_2e$/yr reduction from the DEIR Quantified GHG Emissions and the Updated GHG Calculations. Even without consideration of GHG emissions reductions associated with regulations (see Table 1), the Project's MMs account for -34,412 of the $MTCO_2e$/yr of the net reduction in GHG emissions, which is greater than the emissions associated with Project's electricity usage. Therefore, the Project achieves the "net zero carbon from the electric sector" commitment by assuring that GHG emissions from Project electricity consumption are more than offset by GHG reductions. See Table 4.
- The Project's GHG Efficiency based on the estimated service population decreased from 3.02 as presented in the DEIR Quantified GHG Emissions to 1.93 as calculated in the Updated GHG Calculations. The CARB adopted the 2017 Climate Change Scoping Plan, which recommends statewide targets of no more than 6 $MTCO_2e$ per capita by 2030, and no more than 2 $MTCO_2e$ per capita by 2050.[3] The Project's GHG Efficiency of 1.93 at Project buildout is below the Scoping Plan's 2030 and 2050 per capita targets. See Table 5.

Attachment A is included in this Report, which identifies certain mitigation measures (MM) from Appendix 2.0-C.Rev, Mitigation Monitoring and Reporting Program (Revised) in the Final EIR, which would directly or indirectly contribute to reductions in GHG emissions. MMs that contribute to quantifiable reductions in the Updated GHG Calculations are noted in Attachment A, as are those MMs that indirectly support the implementation and management of the quantified measures or are expected to further reduce Project-related GHG emissions.

The air pollutant emissions presented in the DEIR Quantified GHG Emissions and the Updated GHG Calculations are based on the California Emissions Estimator Model (CalEEMod). This model was developed by the California Air Pollution Control Officers Association with participation from numerous air pollution control districts within California. Emissions developed within CalEEMod represent estimates based on the best available information. These emissions and emissions reductions should be considered an approximation of the magnitude of emissions associated with an individual project.

[2] Respondents Brief of California Air Resources Board et al., *California Chamber of Commerce et al. v. California Air Resources Board et al.*, Case No. C075930, California Court of Appeals, Third Appellate District, filed by the California Attorney General on February 15, 2015.

[3] California Air Resource Board, November 2017, available at https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed May 2018.

2.0 UPDATED GHG CALCULATIONS

Table 1 compares the DEIR Quantified GHG Emissions with the results of the Updated GHG Calculations. Total Project emissions are -86,736 $MTCO_2e$/yr lower in the Updated GHG Calculations than in the DEIR Quantified GHG Emissions.

TABLE 1
DEIR QUANTIFIED GHG EMISSIONS AND UPDATED GHG CALCULATIONS
($MTCO_2E$/YEAR)

GHG Emission Sources	DEIR Quantified GHG Emissions	Reductions		Net Change in GHG Emissions	Updated GHG Calculations
		From Regulations and CalEEMod Update	*From Mitigation Measures*		
Mobile	160,904	-52,694[a]	-31,203[b]	-83,897	77,007
Energy	49,414	5,584	50	5,634	55,047
Electrical Power	*23,276*	*5,806*[c]	*50*[d]	*5,856*	*29,132*
Natural Gas	*26,137*	*-222*	*0*	*-222*	*25,915*
Water and Wastewater	7,387	0	-3,184[e]	-3,184	4,203
Solid Waste	10,214	-5,107[f]	0	-5,107	5,107
Area	11,297	0	-74[g]	-74	11,223
Construction	4,490	0	0	0	4,490
Vegetation	673	-108[h]	0	-108	565
Total Emissions	**244,379**	**-52,324**	**-34,412**	**-86,736**	**157,642**

Sources: DEIR Quantified GHG Emissions from DEIR Section 5.21; Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018).

a Reductions assume that 80 percent of the GHG emissions reductions attributable to the utilization of EVs at Project buildout are due to regulatory, CalEEMod and EV market development factors (see "Mobile Emissions" discussion below).

b Reductions attributable to MM 10-1, MM 10-25, MM 10-26, MM 21-14, MM 21-22, and MM 14-11, as well as 20 percent of the reductions attributable to the utilization of EVs at Project buildout (see "Mobile Emissions" discussion below).

c Overall increases attributable to combination of EV charging infrastructure emissions (increase of 11,224 $MTCO_2e$/yr allocated at 80 percent per footnote "a" above, and due to MM 11-4, MM 11-6, MM 21-15, MM 21-16, MM 21-18 and MM 21-19). GHG decreased emissions are also included, due to 2019 Title 24 Standards (reductions of -3,173 $MTCO_2e$/yr).

d Overall increases attributable to combination of EV charging infrastructure emissions (increase of 11,224 $MTCO_2e$/yr allocated at 20 percent per footnote "b" above), and due to MMs 13-2 and 13-6 (reduction of -109 $MTCO_2e$/yr) and MM 21-1 (-2,086 $MTCO_2e$/yr).

e Reductions attributable to MM 18-1, MM 21-9, and MM 21-13.

f Reductions attributable to MM 17-10 and attributed to regulatory factors.

g Reductions attributable to MM 11-3 and electric landscape equipment (Green Development Program).

h Reductions attributable to MM 7-11, MM 7-12 and MM 21-20 and attributed to regulatory factors.

Note: Total emissions may not add up exactly due to rounding.

Table 1 shows that Project GHG emissions are primarily reduced from the DEIR Quantified GHG Emissions levels in the mobile (-83,897 $MTCO_2e$/yr), water and wastewater (-3,184 $MTCO_2e$/yr), and solid waste (-5,107 $MTCO_2e$/yr) source categories. Due to the quantification of the EV charging demand, GHG emissions from electrical power consumption increased from the DEIR Quantified GHG Emissions levels in the electrical power source category. The emissions calculations for each of these categories are discussed in more detail below.

2.1 MOBILE EMISSIONS

The mobile GHG emissions estimates in the Updated GHG Calculations shown in Table 1 primarily reflect: (1) an increase in EV adoption rate from 4 percent to 50 percent at Project buildout (i.e., over at least 20 years); and (2) internal and external trip reductions from achieving

the required minimum SOV use levels by (MM 10-25). In addition, smaller mobile source reductions are attributable to the quantification of the Project's mitigations for affordable housing (MM 21-14), pedestrian facilities (MMs 21-22, 14-11, and 10-26), and telecommuting attributes (MM 10-1).

The CalEEMod default value for EV use is approximately 4 percent of all vehicles, which is a level that does not reflect reasonably foreseeable future EV adoption rates based on ongoing public and private sector efforts to develop and deploy EV technologies and products. Psomas has reviewed third-party, independent projections of EV adoption over time, including studies published by Bloomberg New Energy Finance (BNEF),[4] the International Monetary Fund (IMF),[5] the University of California Davis Institute for Transportation and Development Policy,[6] and the University of California Berkeley Center for Entrepreneurship and Technology[7].

Global projections in the BNEF report show that by 2040, it is expected that 55 percent of new car sales will be electric. The University of California, Berkeley report's estimates for EV adoption in the U.S. show EVs achieving up to "a 46% market share by 2030".[8] The IMF working paper shows that the share of EVs in the U.S. vehicle stock would be 30 percent by 2027, and by 2042 the share would be over 90 percent.[9] Although the projections from each report vary, they all point toward high levels of EV sales and adoption in the U.S. in the near future. Importantly, these reports are focused on EV sales nationwide, and are assumed to be a conservative estimate for California's electric car sales.

Projections for California also show increases in EV utilization, with California leading in U.S. for Zero-Emission Vehicle (ZEV) sales. Of all ZEVs sold in 2017 in the U.S. (through October 2017), California sales made up more than half of all U.S. sales, and as of January 2018, the number of ZEVs in California made up half of the total ZEVs in the U.S.[10] In addition to the existing trend in increasing EV market share, new state law would *require* a rapid increase in EV stock state-wide. Executive Order B-48-18, which went into effect January 2018, sets a target of 5 million ZEVs in California by 2030.[11] According to CARB, this new order would require 40 percent of all vehicles sold in 2030 in California to be clean.[12]

Based on this review, an EV use rate of 50 percent was determined to more appropriately characterize the Project's EV utilization at Specific Plan buildout. The inclusion of a 50 percent EV utilization rate accounts for approximately 78.5 percent of the Project's total -83,897 MTCO2e/yr reductions for mobile emissions when compared to the DEIR Quantified GHG

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4 Bloomberg New Energy Finance, Electric Vehicle Outlook, Executive Summary, 2018, available at https://bnef.turtl.co/story/evo2018**Error! Hyperlink reference not valid.**, accessed June 2018.

5 R. Cherif et al, Riding the Energy Transition: Oil Beyond 2040, International Monetary Fund Working Paper No. 17/120, May 22, 2017, available at https://www.imf.org/en/Publications/WP/Issues/2017/05/22/Riding-the-Energy-Transition-Oil-Beyond-2040-44932, accessed May 2018.

6 L. Fulton et al., Three Revolutions in Urban Transportation, University of California at Davis Institute for Transportation and Development Policy, May 3, 2017, available at https://www.itdp.org/2017/05/03/3rs-in-urban-transport/, accessed May 2018.

7 T, Becker et al., Electric Vehicles in the United States A New Model with Forecasts to 2030, U.C. Berkeley Center for Entrepreneurship & Technology, Technical Brief Number: 2009.1.v.2.0, August 24, 2009, available at http://globaltrends.thedialogue.org/institution/university-of-california-berkeley-center-for-entrepreneurship-technology-cet/, accessed May 2018.

8 T, Becker et al. 2009

9 R. Cherif et al. 2017

10 Next 10, The Road Ahead for Zero-Emission Vehicles in California, January 2018, available at http://next10.org/sites/default/files/ca-zev-brief.pdf, accessed June 2018.

11 State of California, Governor Brown Takes Action to Increase Zero-Emission Vehicles, Fund New Climate Investments, January 2018, available at https://www.gov.ca.gov/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/.

12 J.J. Cooper, California governor pushes for 5 million zero-emission cars, January 2018, available at https://apnews.com/6bd313487476449bb92bec62f8fa3626.

Emissions. As shown in Attachment A of this Report, Project MM 11-4, MM 21-15, MM 21-16, and MM 21-19 require that EV charging infrastructure and other EV adoption incentives be implemented throughout the development area. Other recently approved projects, such as Newhall Ranch, have determined that Project-specific mitigation measures would account for a 50 percent EV adoption rate at buildout. EV adoption rates for specific projects will vary in accordance with site characteristics, demographics and income levels, EV-related incentives and mitigation requirements, and regulatory and EV market developments. Based on these factors, the Project MMs are estimated to account for approximately 20 percent of the total EV use rate at Specific Plan buildout and 80 percent is attributed to regulatory, CalEEMod and EV market development factors (see Table 1). Attachment A also includes modifications to mitigation measures, shown with underscored text for additions and strike-outs for deletions, that further clarify and strengthen EV incentives and related support at the Project site, as well as other GHG reduction measures.

As discussed in DEIR Section 5.21, Climate Change, the DEIR Quantified GHG Emissions do not include trip reductions from achieving the minimum internal and peak period external SOV use rates (MM 10-25) in the revised Mitigation, Monitoring and Reporting Program (MMRP) (see Final EIR Appendix 2.0-C.Rev). MM 10-25 requires the implementation of transit and transportation measures to ensure that a minimum of 30 percent of total daily internal on-site trips and a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs. The Project's traffic consultant (Stantec) estimated the total trip reductions that would occur from limiting SOV use to 70 percent of internal trips and 80 percent of peak period external trips, in accordance with MM 10-25. Non-SOV internal trips were allocated to a range of alternative transportation modes, including high occupancy vehicles (HOVs), carpools, vanpools, and walking, biking and neighborhood electric vehicles. Non-SOV external trips were allocated to a range of HOVs, carpools, vanpools.

The analysis determined that total Project passenger vehicle trips would be reduced by an average of 10 percent from the levels in the DEIR Quantified GHG Emissions by meeting the minimum internal and external SOV requirements in MM 10-25. Because 96 percent of all Project vehicle trips are anticipated to be passenger vehicle trips that are subject to the SOV use reduction, while the remaining 4 percent are comprised of heavier duty commercial and similar vehicles that are not subject to this reduction, the number of Project trips in the Updated GHG Calculations was reduced by 9.6 percent. Therefore, MM 10-25 accounts for approximately 18.5 percent of the Projects' total -83,897 MTCO2e/yr reductions for mobile emissions when compared to the DEIR Quantified GHG Emissions.

CalEEMod includes input options for a project's level of affordable housing, the implementation of pedestrian facilities and telecommuting rates, which are all calculated internally in CalEEMod using quantification criteria developed by the California Air Pollution Control Officers Association (CAPCOA). The Updated GHG Calculations include CalEEMod inputs of the Project's 10 percent affordable housing commitment (MM 21-14), Project-wide pedestrian/bicycle facilities (MMs 21-22, 14-1, and 10-26), and an assumed 3 percent telecommuting rate (MM 10-1). These MMs account for approximately 3.0 percent of the Projects' total -83,897 MTCO2e/yr reductions for mobile emissions when compared to the DEIR Quantified GHG Emissions. MMs 14-3 through 14-5 and MM 15-2 support the implementation and management of these quantified MMs, but were not directly quantified.

2.2 ENERGY

The electrical power emission estimates in the Updated GHG Calculations reflect an overall increase in electricity demand due to the greater use of EVs at Project buildout. The current version of CalEEMod does not account for EV charging emissions. Therefore, Psomas estimated GHG emissions from the additional electricity demand required to charge the Project's EVs by

using: (a) the Southern California Edison GHG emission rate per unit of electrical power generation with the implementation of the state's legally mandated 50 percent renewable portfolio standard by 2030; (b) published estimates of EV power consumption per mile;[13] and (c) the total miles traveled by the Project's EVs based on the number of trips and average distance per trip with 50 percent EV adoption at buildout.

GHG emissions associated with MMs 11-4, 11-6, 21-15, 21-16, 21-18 and 21-19 for EV charging stations are included in the electricity consumption rates and GHG electrical emissions in Table 1 for the Updated GHG Calculations. MM 11-5 and MM 21-17 support the implementation and management of these quantified MMs, but were not directly quantified.

As shown in Table 1, approximately 80 percent of the GHG emissions reductions associated with a 50 percent anticipated EV utilization rate at Project buildout (-52,694 $MTCO_2e$/yr) are assumed to occur due to regulations and EV market forces, while approximately 20 percent of the GHG emissions reductions are assumed to be directly attributable to the Project's EV charging station infrastructure (see MMs 11-4, 11-6, 21-15, 21-16, 21-18 and 21-19). Similarly, approximately 80 percent of the GHG emissions increases associated EV charging station infrastructure (8,979 $MTCO_2e$/yr) are assumed to occur due to regulations and market forces affected EV adoption rates at Specific Plan buildout, while approximately 20 percent of the GHG emissions increases are assumed to be directly attributable to the Project's MMs pertaining to EV charging station infrastructure and EV adoption incentives (2,245 $MTCO_2e$/yr). This is a conservative assumption because the installation of EV charging infrastructure, including charger-ready 208/240 volt connections and preferentially-located EV parking spaces in accordance with Project MM 11-4, MM 21-15, MM 21-16, and MM 21-19 (see Attachment A) would increase the likelihood that the projected level of EV use will occur by Project buildout over at least the next 20 years. The provision of EV charging infrastructure as required by the Project's MMs is an essential requirement for achieving a successful transition to high rates of EV utilization.

Table 2 includes the changes in electricity and natural gas demands between the DEIR Quantified GHG Emissions and the Updated GHG Calculations. Three primary factors contribute to the changes shown in Table 2.

- First, 2019 Title 24 Building Energy Efficiency Standards, which were adopted after the DEIR analysis was completed, reduce the Project's electrical consumption estimates for low-density residential and non-residential uses when compared to the 2016 Title 24 Standards, and when compared to MMs 21-2 and 21-3, which required improvements beyond 2016 Title 24 Standards. GHG emissions reductions associated with 2019 Title 24 Standards are -3,173 $MTCO_2e$/yr. The Project includes MM 21-8 that requires ENERGY STAR appliances, which would result in additional reductions in electricity consumption. However, for the purposes of this analysis, the benefits of MM 21-8 are assumed to be captured within the 2019 Title 24 Standards. MMs 21-6 and 21-7 support the implementation and management of MM 21-8, but were not directly quantified.
- Second, as previously discussed, the electrical demand required for the Project's EV charging infrastructure (66,516 MWh/yr) would result in increased GHG emissions of 11,224 $MTCO_2e$/yr.
- Lastly, other factors include reductions not covered by 2019 Title 24 Standards that are attributable to the quantifiable portions of MM 21-1 related to 50 percent on-site renewables, and MMs 13-2 and 13-6 related to high-efficiency lighting, which result in reduced GHG emissions of -2,195 $MTCO_2e$/yr.

[13] See, e.g., U.S. Department of Energy, Benefits and Considerations of Electricity as a Vehicle Fuel, https://www.afdc.energy.gov/fuels/electricity_benefits.html, last accessed June 2018.

In summary, the total projected electrical demand for the Updated GHG Calculations includes the reductions associated with 2019 Title 24 Standards (-3,173 $MTCO_2e$), MM reductions (-2,195 $MTCO_2e$), and EV charging demands (11,224 $MTCO_2e$), resulting in a total increase of 5,856 $MTCO_2e$ for the Updated GHG Electrical Calculations when compared to the DEIR Quantified GHG Electrical Emissions. Therefore, the total anticipated electrical emissions for the Updated GHG Calculations is 29,132 $MTCO_2e$/yr, as shown in Table 2.

TABLE 2
ELECTRICITY AND NATURAL GAS DEMAND AND GHG EMISSIONS

	Energy Use		GHG Emissions ($MTCO_2e$/yr)		
	Electricity (MWh/yr)	**Natural Gas (MBTU/yr)**	**Electricity Use**	**Natural Gas Use**	**Total**
DEIR Quantified GHG Emissions	137,007	486,870	23,276	26,137	**49,413**
Updated GHG Calculations	173,360	482,765	29,132	25,915	**55,047**
Difference			**5,856**	**-222**	**5,634**

$MTCO_2e$/yr: Metric tons of carbon dioxide equivalent per year; MWh/yr: megawatt hours per year; MBTU/yr: million British thermal units per year

Sources: DEIR Quantified GHG Emissions from Table 5.21-6 in DEIR Section 5.21; Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018)
Note: Total emissions may not add up exactly due to rounding.

As shown in Tables 1 and 2, the -222 MTCO2e/year reduction in GHG emissions for natural gas between the DEIR Quantified GHG Emissions and the Updated GHG Calculations is due to inclusion of the energy use reductions associated with the 2019 Title 24 Standards. Because the allocation of energy reductions associated with the 2019 Title 24 Standards between electricity and natural gas is currently unknown and the majority of the reductions is expected to occur in the electricity sector, the projected reductions in energy use will occur in electricity, and natural gas was calibrated to the comparable level of emissions as reported within the DEIR.

In summary, due to the combination of quantified EV charging demand, which increases Project electricity use, and reductions in electricity use associated with the new 2019 Title 24 Standards, which decreases Project electricity use, the Updated GHG Calculations include an overall increase GHG emissions from the use of electrical power when compared to the DEIR Quantified GHG Emissions.

2.3 WATER AND WASTEWATER EMISSIONS

The water and wastewater emissions estimates in the Updated GHG Calculations reflect: (1) updated water supply and conveyance energy requirements for Project local water supplies; (2) CalEEMod wastewater treatment default adjustments to exclude treatment technologies that will not be used by the Project; and (3) the Project's recapture and use of biogas to generate power from the wastewater treatment process.

The CalEEMod defaults for water-related energy demand are based on CEC estimates of water supply and conveyance energy use to import water to southern California, or 9,727 kilowatt hours per million gallons (kWh/mg).[14] The CEC estimates are sensitive to geographic considerations. The CEC's estimated water supply and conveyance energy use for northern California locations, which are more proximate to major sources of state water supplies such as the Sacramento Delta, is just 2,117 kWh/mg, much lower than the CalEEMod default based on southern California. As

[14] Navigant Consulting, Inc. Refining Estimates Of Water- Related Energy Use In California, California Energy Commission Public Interest Energy Research Program, CEC-500-2006-118, December 2006, available at http://www.energy.ca.gov/2006publications/CEC-500-2006-118/CEC-500-2006-118.PDF, accessed May 2018.

shown in DEIR Table 5.18-10, on average approximately 37 percent of the Project's total water supply (4,290 acre-feet per year) will be imported and approximately 67 percent of the total supply (7,245 acre-feet per year) will be obtained from local, geographically proximate sources, including: (1) groundwater and imported water return flows in accordance with the Antelope Valley groundwater adjudication, (2) water stored in onsite and adjacent Project water banking facilities, and (3) recycled water collected, treated, and distributed onsite. The Updated GHG Calculations uses the default CalEEMod water supply and conveyance energy demand rate (9,727 kWh/mg) for Project water supply imports, and uses the CEC northern California water supply and conveyance energy demand rate (2,117 kWh/mg) for the Project's local supplies.

This analysis is conservative because the Project's local supplies are either located onsite or in adjacent locations. In contrast, the CEC northern California water supply and conveyance energy use factor includes imports to the Bay Area from Hetch Hetchy reservoir in Yosemite National Park, east of the Sacramento Delta though the Mokelumne Aqueduct and other relatively lengthy conveyance facilities.

The CalEEMod defaults for wastewater treatment include the use of facultative lagoon and septic tank technologies. Neither of these technologies will be used by the Project. The CalEEMod defaults also assume that biogas generated by wastewater treatment process will be combusted for disposal rather than used to generate energy for other purposes. The Project will utilize treatment process biogas to produce energy. The use of the northern California water supply and conveyance energy factor for Project local water supplies and CalEEMod input adjustments for wastewater technology and biogas reuse collectively reduce water and wastewater GHG emissions by -3,184 $MTCO_2e$/yr from the DEIR Quantified GHG Emissions. MM 18-1 and MMs 21-9 through 21-13 were used to quantify the water and wastewater reductions in the Updated GHG Calculations. MM 18-2 and MMs 19-1 through 19-5 support the implementation and management of these quantified MMs, but were not directly quantified.

2.4 SOLID WASTE EMISSIONS

MM 17-10 in the revised MMRP (see Final EIR Appendix 2.0-C.Rev) requires that at least 75 percent of Project operational waste be diverted from landfill disposal, which is consistent with the implementation of the AB 341 goals for statewide recycling. CalEEMod calculates GHG emissions based on the volume of waste subject to landfill decomposition. The 75 percent waste diversion requirement in MM 17-10 reduces solid waste GHG emissions by -5,107 $MTCO_2e$/yr from the DEIR Quantified GHG Emissions.

2.5 OTHER EMISSIONS

MM 7-11 and MM 7-12, which require restoration of impacted woodlands and jurisdictional drainages pursuant to County and regulatory agency permit requirements, as well as MM 21-20 related to County landscaping requirements, contribute to vegetation quantification reductions for the Updated GHG Calculations. MMs 4-4, 7-1, 7-13, and 7-19 support the implementation and management of these quantified MM, but were not directly quantified. For construction sources GHG emissions, MM 11-2 contributes to emission reductions for air quality purposes, but does not directly contribute to GHG emissions reductions. Project related construction emissions were conservatively assumed to be diesel/gasoline and do not include any GHG emission reductions for electrically powered construction equipment. For area sources GHG emissions, MM 11-3 related to fireplace restrictions and reductions associated with the electrification of landscaping equipment supports GHG reductions of -74 $MTCO_2e$/yr.

In summary, Project GHG emissions in the Updated GHG Calculations are 157,642 $MTCO_2e$/yr, which are -86,736 $MTCO_2e$/yr (35 percent) lower than the DEIR Quantified GHG Emissions of 244,379 $MTCO_2e$/yr.

2.6 METHANE EMISSIONS

The grasslands on Tejon Ranch, including portions of the Project site, have been grazed by cattle for approximately 150 years continuously. The grazing management regime on Tejon Ranch has been season-long “continuous” grazing, and the intensity and duration of grazing, including areas within the Project’s Mitigation Preserve, have fluctuated from year to year and month to month dependent on availability of forage. Forage availability is closely correlated with weather conditions, particularly precipitation quantity and timing, which also fluctuates according to periods of drought. As such, cattle grazing is considered to be a baseline environmental condition on the Project site and within Tejon Ranch as a whole.

Cattle grazing results in cow belches/flatulence, which produce methane emissions. Methane has a substantially higher global warming potential than carbon dioxide. Upon Project implementation, cattle grazing will be eliminated within the majority of the grassland areas of the Project site. However, as a requirement of Project implementation (see MM 7-10 and MM 7-23), the Project Applicant must prepare a Native Perennial Grassland and Wildflower Field Mitigation Plan that preserves grasslands, and also allows cattle grazing to continue to protect resource (grassland) values. This continued grazing will occur on portions of the Project site and within the Mitigation Preserve, as appropriate.

Because all of the lands within the Mitigation Preserve are currently grazed, the continuation of grazing, (as directed by results of long term biological monitoring per the Native Perennial Grassland and Wildflower Field Mitigation Plan), is expected to be approximately the same as in the existing condition. Existing grassland conditions have occurred in conjunction with the current grazing regime. To avoid potential disruption of existing conditions, the current grazing regime is expected to continue under the Native Perennial Grassland and Wildflower Field Mitigation Plan. However, cattle grazing will be eliminated within the majority of the grassland areas of the Project site due to development, resulting in an anticipated net reduction of cattle across Tejon Ranch as a whole. The reduction in the level of grazing is strictly due to the removal of grazing lands within the Project development areas. As such, the level of grazing, both intensity and duration, is expected to decrease as a result of the Project, and any methane emissions from cattle grazing would be similarly reduced in the future buildout condition.

The amount of reduction in GHG emissions has not been quantified due to the historic fluctuations of cattle grazing across Tejon Ranch coupled with the uncertain amount of cattle required to maintain the Tejon Ranch grasslands in the future. As such, the GHG analysis conservatively assumes no change from the baseline condition related to methane emissions from cattle grazing, even though reductions in cattle grazing are expected to occur at Project buildout.

3.0 UPDATED GHG CALCULATIONS EMISSIONS SUBJECT TO CAP AND TRADE

California has enacted the only state program in the United States for capping GHG emissions and requiring the purchase of emission allowances for covered activities. The state extended the duration of the Cap and Trade program from 2020 to 2030 in July 2017 (AB 398). The current Cap and Trade program was imposed as a tax by a two-thirds vote of the Legislature in 2017, following issuance of the DEIR. AB 398 includes numerous requirements for administering the Cap and Trade program, and disbursing funds collected from that program. Prior to AB 398, California had imposed a cap and trade program pursuant to other statutory authorities, one of which required that the Cap and Trade program be phased out by 2020. There was a legal disagreement as to whether additional statutory authority was needed to extend the Cap and Trade program beyond 2020. CARB, the state's expert air quality regulatory agency, and the California Attorney General representing CARB in the litigation, concluded that CARB did have the authority to continue to implement the Cap and Trade program under its general air quality and climate statutory authorities even if no new legislation was enacted:

> In AB 32 the Legislature declared that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." To address this threat the Legislature established an initial target to reduce the state's greenhouse gas emissions to 1990 levels by 2020 and called for the state to maintain and continue reductions in emissions beyond 2020. AB 32 charges ARB with "monitoring and regulating sources of emissions of greenhouse gases that cause global warming in order to reduce the emissions of greenhouse gases." To guide ARB in its new role the Legislature established a series of milestones for ARB to meet in developing a regulatory program requiring ARB to: establish mandatory reporting and verification of greenhouse gas emissions, prepare and approve a scoping plan, and adopt greenhouse gas emission reduction measures into regulation. Regarding this last responsibility--the adoption of regulations--the Legislature did not require the adoption of specific emission reduction measures nor did it attempt to design such measures... While the Legislature did not mandate specific emission reduction measures it expressly allowed ARB to adopt market-based compliance mechanisms such as cap and trade.[15]

In December 2017 CARB adopted a new Scoping Plan, setting forth measures to reduce GHG emissions to achieve state GHG emission reduction targets for 2030 as prescribed by statute, and by 2050 as set forth in Executive Orders issued by the California governor's office.[16] The Cap and Trade program is included in the Scoping Plan, without a termination date of 2030. Based on CARB's expert opinion that specific statutory authorization for a Cap and Trade program is not required, the inclusion of a Cap and Trade program through 2050 in the CARB 2017 Scoping

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[15] Respondents Brief of California Air Resources Board et al., *California Chamber of Commerce et al. v. California Air Resources Board et al.*, Case No. C075930, California Court of Appeals, Third Appellate District, filed by the California Attorney General on February 15, 2015, pages 3 and 4, citations and paragraph formatting omitted. References to "ARB" in the Respondent's Brief are to CARB.

[16] California Air Resources Control Board, California's 2017 Climate Change Scoping Plan (November 2017), accessed at https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm June 2018). See, e.g., page 99 (CARB 2030 and 2050 per-capita "local plan-level" GHG reduction goals); page 18 (discussion of 2050 "path" to state emissions that are 80% below 1990 levels); and Table 1: Scoping Plan Scenario on page 25, which refers to the "Post-2020 Cap-and-Trade Program" and does not identify an implementation time frame for the program in the last column. Implementation time frames are identified for all other Scoping Plan policies in Table 1, and the reference in Table 1 to a "Post-2020 Cap-and-Trade Program" without a fixed termination date is used throughout the Scoping Plan.

Plan, and other relevant climate laws, regulations, and policies, there is substantial evidence of the Cap and Trade program's continued existence beyond 2030.

As shown in Table 3, the Updated GHG Calculations emissions are 157,642 $MTCO_2e$/yr. Table 3 identifies the Updated GHG Calculations emissions that are subject to the state Cap and Trade program.

TABLE 3
UPDATED GHG CALCULATIONS EMISSIONS SUBJECT TO CAP-AND-TRADE
(MTCO2E/YEAR)

GHG Emission Sources	Updated GHG Calculations	Subject to Cap and Trade?	Amount Subject to Cap-and-Trade	Remaining Emissions After Cap-and-Trade Offsets
Area	11,223	Yes: natural gas for fireplaces and electricity for landscaping equipment	-11,223	0
Energy				
Electrical Power	29,132	Yes: emissions from generating electrical power	-29,132	0
Natural Gas	25,915	Yes: Natural gas used for building heating, cooking, etc.	-25,915	0
Mobile	77,007	Yes: transportation fuels	-77,007	0
Solid Waste	5,107	No: landfill decomposition emissions	0	5,107
Water and Wastewater				
Wastewater Electricity	277	Yes: emissions from generating electrical power	-277	0
Water Electricity	2,764	Yes: emissions from generating electrical power	-2,764	0
Bio-Gas	1,162	No: biogas recovered from treatment process	0	1,162
Construction	4,490	Yes: transportation fuels	-4,490	0
Vegetation				
Vegetation Loss	814	No	0	814
New Trees	-249	No	0	-249
Total	**157,642**		**-150,808**	**6,834**
Source: Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018)				

Table 3 shows that approximately 96 percent, or 150,808 $MTCO_2e$/yr of the total Updated GHG Calculations emissions are covered by the Cap and Trade program. Only approximately 4 percent of the total emissions, or 6,834 $MTCO_2e$/yr, largely from landfill waste and wastewater treatment process biogas reuse for energy production, would not be subject to the purchase of emission allowances under the Cap and Trade program.

4.0 NET ZERO CARBON FROM THE ELECTRIC SECTOR

"Net zero carbon from the electric sector" means that carbon emissions created to produce electricity that is consumed within the Specific Plan area will be offset with an equivalent amount of carbon emission reductions that result from quantified GHG reductions.

As discussed above, due to the quantification of EV charging electrical use, Project electricity increases in the Updated GHG Calculations. GHG emissions from electrical use are 5,856 $MTCO_2e$/yr higher than the DEIR Quantified GHG Emissions. Table 4 shows that the Project's total GHG emissions from electrical energy use for all sources are 32,173 $MTCO_2e$/yr.

TABLE 4
ADDITIONAL REDUCTION ANALYSIS ELECTRICAL POWER EMISSIONS AND NET EMISSIONS REDUCTIONS FROM DEIR

GHG Emission Sources	Electrical Power GHG Emissions ($MTCO_2e$/yr)
Area	0
Energy	29,132
Electrical Power	*29,132*
Natural Gas	*0*
Mobile	0
Solid Waste	0
Water and Wastewater	
Water (Supply, Treatment, Distribution)	2,764
Wastewater Electricity	277
Construction	0
Vegetation	0
Total Electrical Power GHG Emissions	**32,173**
Updated GHG Calculations Electrical Power and Total GHG Emissions Summary	
Total Electrical Power GHG Emissions	**32,173**
Total Reduction from DEIR Quantified GHG Emissions (Mitigation Measures Only- See Table 1)	**-34,412**
GHG Emission Reductions Net of Electrical Power Emissions	**-2,239**
Sources: DEIR Quantified GHG Emissions from DEIR Section 5.21; Updated GHG Calculations from Psomas using CalEEMod version 16.3.2 (June 2018).	

Table 4 also compares the total reduction from the DEIR Quantified GHG Emissions with the total electrical power emissions in the Updated GHG Calculations. Total Project emissions are -86,736 $MTCO_2e$/yr lower in the Updated GHG Calculations than the DEIR Quantified GHG Emissions. The total level of emission reductions is nearly three times larger than the total GHG emissions from electrical power consumption in the Updated GHG Calculations. Even without consideration of GHG emissions reductions associated with regulations (see Table 1), the Project's MMs reduce GHG emissions by -34,412 $MTCO_2e$/yr, which is greater than the emissions associated with Project's electricity usage at Specific Plan buildout. Consequently, Table 4 demonstrates that, net of GHG emissions attributable to electrical power use, the Updated GHG Calculations reduces emissions by -2,239 $MTCO_2e$/yr from the DEIR Quantified GHG Emissions counting only reductions attributable to Project mitigation requirements. Therefore, the Updated GHG Calculations shows that the Project achieves net-zero electricity emissions. As shown in Table 1, the Updated GHG Calculations reduce total GHG emissions attributable to regulatory, CalEEMod as well as Project mitigation requirements by -86,736 $MTCO_2e$/yr from the DEIR Quantified GHG

Emissions, about 2.7 times the amount of emissions from electrical power use at Specific Plan buildout.

5.0 SERVICE POPULATION

Table 5.21-10 of the DEIR Section 5.21, Climate Change, included a GHG Project Efficiency of 3.02 $MTCO_2e$ per Service Population (SP) per year ($MTCO_2e$/SP/yr) based on an SP of 80,825 and GHG emissions of 244,379 $MTCO_2e$/yr. The Updated GHG Calculations summarized in Table 5 below show a GHG Efficiency of 1.93 $MTCO_2e$/SP/year based on an SP of 81,848 and GHG emissions of 157,642 $MTCO_2e$/yr. The Updated GHG Calculations consider residents, non-resident employees, and non-resident/non-employee visitors to the Project site. The California Air Resources Board (CARB) adopted the 2017 Climate Change Scoping Plan, which recommends statewide targets of no more than 6 $MTCO_2e$ per capita by 2030, and no more than 2 $MTCO_2e$ per capita by 2050. The GHG Efficiency of the Updated GHG Calculation, 1.93 $MTCO_2e$/SP/year, is below the statewide Scoping Plan recommended targets for 2030 and 2050.

TABLE 5
UPDATED GHG CALCULATIONS
SERVICE POPULATION GHG EFFICIENCY

	Factors
Residents at Buildout	57,150
Non-Resident Employees	15,783
Non-Resident/Non-Employee Visitors	8,915
Service Population (SP)	**81,848**
Project GHG Emissions ($MTCO_2e$/yr)	**157,642**
GHG Efficiency ($MTCO_2e$/SP/yr)	**1.93**
Sources: DEIR Section 5.9, Population and Housing and Stantec.	

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ATTACHMENT A

GHG REDUCING MITIGATION MEASURES IN CENTENNIAL PROJECT ENVIRONMENTAL IMPACT REPORT PROJECT NO. 02-232 (Revised Mitigation Measures Showing Underlined/Strikeout Text, August 13, 2018)

#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
5.10	**Traffic, Access and Circulation**	**MM 10-1** The Project shall provide internet infrastructure and a community intranet with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. The intranet shall also provide education about greenhouse gas (GHG) emissions; GHG reduction opportunities; energy and water conservation opportunities; financial incentives (e.g., rebates and low-interest loans) for energy-efficiency improvements; and energy-efficiency technology systems, including those suitable for large commercial and industrial users.	Provide internet infrastructure and a community intranet	Prior to issuance of applicable construction permits	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**
5.10	**Traffic, Access and Circulation**	**MM 10-25** *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and	Verification of compliance with Specific Plan requirements for the Mobility Plan on the Tentative Maps	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

[1] In the last column of the Table, "Quantified" means that the mitigation measure (MM) results in a quantifiable reduction in GHG emissions identified in the Updated GHG Calculations based on the California Emissions Estimator Model (CalEEMod) results. MM "Support" means that the MM is not directly quantified, but rather it provides a mechanism for ensuring the implementation of the quantified MM. For example, MM 18-1 requires the implementation of the water-reducing Project features, including the use of recycled water, water efficient appliances and irrigation, indoor/outdoor water use standards, and requires a water budget-based rate system, which resulted in quantifiable reductions in GHG emissions. In support of MM 18-1, the implementation of water use efficiencies must be monitored and confirmed through compliance with MM 18-2. Therefore, MM 18-2 supports the implementation and management of MM 18-1 but is not directly responsible for a quantified GHG emissions reduction.

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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
		programs. The Project Applicant/Developer, through the required implementation of the Mobility Plan, shall: • Reinforce and serve the Land Use Plan; • Provide future residents, visitors and employees with multiple modes of transit/non-single occupancy vehicle (non-SOV) accessibility for internal and external trips; • Provide options to reduce vehicle trips and emissions by linking effective travel demand management with transportation systems and parking policies; • Provide residents and employees on the Project site with multiple modes of transportation options (i.e., walk, bike, public transit, private auto, car share, bike share, etc.); • Provide for 80 percent on average, but no less than 50 percent of each Village's residential units to be located within one-half mile of a Village Center that includes retail and service uses; • Provide parks within a 5-minute walk (0.25 mile) of 80 percent of all residential units; • Provide a transit route easement no less than 25 feet wide in the Centennial Commerce District connecting the Town Center, Business Park, and Industrial/Civic areas and also northerly connecting to the Village Five Core; • Require TMA implementation of a combination of transit and transportation					

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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
		measures to ensure that a minimum of 30 percent of total daily internal on-site trips are completed by using transit modes other than SOV use, including on-demand pooled car or multi-passenger vehicle service; • Require TMA implementation of a combination of transit and transportation measures to ensure that a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are completed by using transit modes other than SOVs, which shall include requiring the TMA to provide am and pm peak hour demand-based multi-passenger transit services for Project residents and employees that link the Project to the nearest Metrolink station and commuter transit hub to the south (currently Santa Clarita) and the east (currently Palmdale), and to the north (Tejon Mountain Village, Tejon Commerce Center, and Grapevine), and to other commuter destinations as warranted by consumer demand; • Require TMA implementation of a program to coordinate with automotive dealers on the Project site to promote ~~CNG,~~ battery electric or hydrogen fuel cell (collectively "electric") ~~, and hybrid electric~~ vehicles; at minimum, this program shall include preferences for dealers offering bulk discounts or other financial incentives; • Require TMA oversight of requirement for service fleet vehicles for agencies or businesses located on-site to be electric ~~alternative fuel~~ vehicles to the maximum extent feasible, as determined by the Project Applicant/Developer in consultation with the					

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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
		<u>County, or other future vehicle technologies as may be developed and comply with California's air quality, greenhouse gas, and climate change mandates, and which meet the performance and affordability needs of Project employees and residents as determined by the Project Applicant/Developer in consultation with the County (collectively, "Future Vehicle Fleet" or "FVF")</u>; and • Require TMA implementation of a combination of measures to provide adequate temporary bike <u>or personal electric vehicle (e.g., scooter)</u> parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure. The Circulation Plan sets forth requirements for roadway classifications; intersection controls; and traffic calming measures. Where approved by the California Department of Transportation (Caltrans) and the County and where maintenance and durability costs are comparable to traditional materials, use "cool" pavement materials, which reduce heat island effect.					

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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
5.10	**Traffic, Access and Circulation**	**MM 10-26** *(Traffic Study MM-24)* Each component of the Mobility Plan incorporates Transportation Demand Management (TDM) features to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and thereby reduce pollutant emissions. Related to this is the creation and ongoing operation of a Transportation Management Association (TMA) to fund and manage the operation of ongoing transportation programs, including but not limited to transit and on-demand services. The key TDM elements that are inherent in the overall Mobility Plan are: • Sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas; • Small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations; • Pedestrian environments incorporated with public streets; • Transit route easement connecting the residential and commerce areas; • Parking behind buildings to encourage walking in retail areas along street frontage; and • Parks within 0.25 mile of 80 percent of all residential units.	Verification of compliance with Specific Plan requirements for Transportation Demand Management on the Tentative Maps	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
5.11	**Air Resources**	**MM 11-1** The Project's plans and specifications shall require stationary sources to comply with the parameters stated in Stationary Source Types, Size Limits, and Quantity Estimates, which is included as Attachment A to the Project's Mitigation Monitoring and Reporting Program. Should there be a need for a stationary source exceeding the prescribed limits, the Project Applicant/Developer shall apply for source-specific permit from the Antelope Valley Air Quality Management District (AVAQMD) or South Coast Air Quality Management District (SCAQMD), as applicable.	Require stationary sources to comply with the parameters stated in Attachment A	Prior to issuance of applicable construction permits	Project Applicant/ Developer and AVAQMD and SCAQMD	County Department of Regional Planning	
5.11	**Air Resources**	**MM 11-2** The Project's plans and specifications shall include the following measures to minimize nitrogen oxide (NOx) and volatile organic compound (VOC) emissions during construction: • All off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency (USEPA) Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). Any emissions-control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If Tier 4 Final equipment is not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability.	Require measures to minimize NOx and VOC emissions	Prior to issuance of applicable construction permits and During grading activities	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
		• Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach. These policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). • Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). If the Project Applicant/Developer determines that 2010 model year or newer diesel trucks cannot be obtained, trucks that meet USEPA 2007 model year NOx emissions requirements shall be required. If 2010 model year or newer diesel trucks are not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. • A copy of each unit's certified tier specification, BACT documentation, and CARB or District operating permit shall be provided to the County at the first occurrence of mobilization of each applicable unit of equipment.					

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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
		• Construction contractors shall ensure construction equipment is properly serviced and maintained to the manufacturer's standards. • Construction contractors shall limit non-essential idling of construction equipment to no more than five consecutive minutes. • Construction contractors shall use Super-Compliant Architectural/Industrial (AIM) Coatings to the extent that they are commercially available and certified to meet the applicable requirements of Antelope Valley Air Quality Management District Rule 1113 and South Coast Air Quality Management District Rule 1113.					
5.11	**Air Resources**	**MM 11-3** The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954.	Prohibit wood burning fireplaces and Limit total fireplaces to 13,954	Prior to issuance of applicable construction permits	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
5.11	**Air Resources**	**MM 11-4** The Project's plans and specifications for non-residential buildings shall demonstrate that the following features have been incorporated into the building designs. Proof of compliance shall be provided to the County prior to the issuance of occupancy permits. • For buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupant. • Preferential parking for <u>electric vehicles, other FVF vehicles,</u> ~~low emitting, fuel efficient,~~ and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces. • Electric Vehicle Charging Spaces (EV Space), as defined by CALGreen Code Section 202, shall be installed to support future installation of Electric Vehicle Supply Equipment (EVSE), as defined by CALGreen Code Section 202, at each non-residential building with 10 or more	Demonstrate that plans and specifications include features have been incorporated into the building designs	Prior to issuance of applicable building permits	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

GHG REDUCING MITIGATION MEASURES IN CENTENNIAL PROJECT ENVIRONMENTAL IMPACT REPORT
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<table>
<tr><th>#</th><th>Environmental Factor</th><th>Mitigation</th><th>Action Required</th><th>When Monitoring to Occur</th><th>Responsible Agency or Party</th><th>Monitoring Agency or Party</th><th>Quantified/ Support[1]</th></tr>
<tr><td></td><td></td><td>parking spaces. Installation of each EV Space shall be consistent with Sections A5.106.5.3 and A5.106.5.3.1, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code. The EV Space facilities shall meet Section 406.9 (Electric Vehicle) of the California Building Code and as follows:

<table>
<tr><th>Total Number of Actual Parking Spaces</th><th>Tier 1 Number of Required EV Spaces</th></tr>
<tr><td>0-9</td><td>0</td></tr>
<tr><td>10-25</td><td>2</td></tr>
<tr><td>26-50</td><td>3</td></tr>
<tr><td>51-75</td><td>5</td></tr>
<tr><td>76-100</td><td>7</td></tr>
<tr><td>101-150</td><td>10</td></tr>
<tr><td>151-200</td><td>14</td></tr>
<tr><td>>200</td><td>8 percent of total spaces rounded up to nearest whole number</td></tr>
</table>

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles (EV) at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Provide raceways from the electrical service panel to the designated parking areas which are required to be installed at the time of construction.

<u>Increased EVSE Installations.</u> <u>Changes to EVSE parking shall be allowed to the extent allowed under state laws, and the duration of vehicular occupancy of EV spaces may be</u></td><td></td><td></td><td></td><td></td><td></td></tr>
</table>

GHG REDUCING MITIGATION MEASURES IN CENTENNIAL PROJECT ENVIRONMENTAL IMPACT REPORT
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#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party	Quantified/ Support[1]
		restricted as authorized by state law to allow charging of multiple vehicles each day. Demand for EV Space facilities shall be monitored biennially by the TMA, additional EV parking spaces shall be made available at lots where demand exceeds supply. The TMA biennial survey shall also consider future transportation technology and practices, including for example changes in vehicular electric charging technology, other FVF changes, or other transportation practices and services changes (e.g., with lower-automobile ownership rates leading to reduced parking demand and/or reduced private ownership of vehicles requiring daily electric charging).					
5.11	**Air Resources**	**MM 11-5** The Project's plans and specifications for residential buildings shall demonstrate that the following features have been incorporated. • Visitor parking shall include preferentially located parking spaces for electric ~~alternative-fueled~~ vehicles. • Exterior electrical receptacles and natural gas or propane hookups. • Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by Section 22.52.1225B of the County Code, whichever is more stringent. The requirements under the Residential Voluntary Measures of the CALGreen Code are as follows: **Short-term bicycle parking.** Provide permanently anchored bicycle racks within 100 feet of the visitor's entrance, readily visible to passers-by, for five percent of	Demonstrate that plans and specifications include visitor parking and bicycle parking features in the building designs	Prior to issuance of applicable building permits	Project Applicant/ Developer	County Department of Regional Planning	**Support**

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		visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. **Long-term bicycle parking for multifamily buildings.** Provide on-site bicycle parking for at least one bicycle per every two dwelling units. Acceptable parking facilities shall be conveniently reached from the street and may include, but not limited to: 1. Covered, lockable enclosures with permanently anchored racks for bicycles. 2. Lockable bicycle rooms with permanently anchored racks. 3. Lockable, permanently anchored bicycle lockers. **Long-term bicycle parking for hotel and motel buildings.** Provide one on-site bicycle parking space for every 25,000 square feet, but not less than two. Acceptable parking facilities shall be conveniently reached from the street and may include, but not be limited to: 1. Covered, lockable enclosures with permanently anchored racks for bicycles. 2. Lockable bicycle rooms with permanently anchored racks. 3. Lockable, permanently anchored bicycle lockers. **Bicycle parking areas may also be used by small electric vehicles such as scooters.**					

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5.11	**Air Resources**	**MM 11-6** The Project's plans and specifications for parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, shall demonstrate that the following features have been incorporated into the parking facility. • The parking facility shall include a minimum of five percent preferentially located parking spaces for <u>electric</u> ~~alternative-fueled (electric, natural gas, or similar low-emitting technology)~~ vehicles. • Five percent of the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202. Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and the design and installation of each EV Space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows: **Single charging space requirements.** When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the	Demonstrate that plans and specifications include preferential parking and electric vehicle charging features in the building designs	Prior to issuance of applicable building permits	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

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		proposed location of the charging system into a listed cabinet, box or enclosure. **Multiple charging spaces required.** When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction. • For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent. • Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for nonresidential land uses or as required by Section 22.52.1225B of the County Code, whichever is more stringent.					
5.11	**Air Resources**	**MM 11-7** The Project's plans and specifications for business park or water reclamation facility land uses shall demonstrate that buffer areas adjacent to proposed business parks in compliance with the Air Quality Analysis for Stationary Sources Allowed by the Centennial Specific Plan, (see Appendix 5.11-B of this EIR) have been incorporated into the design plans. The buffer areas shall prohibit uses that are potential sources of toxic air contaminants and shall prohibit uses that include sensitive	Demonstrate that the map includes buffer areas that prohibit toxic air contaminant sources and sensitive receptors	Prior to the approval of Final Maps that include a business park or water reclamation facility	Project Applicant/ Developer	County Department of Regional Planning and County Department of Public Health	

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		receptors, except as allowed through written evidence that the sensitive use would not be exposed to Toxic Air Contaminants with pollutant concentrations resulting in a cancer risk greater than or equal to 10 in 1 million for health risks and 1.0 for non-cancer chronic and acute hazard indices (HIs).					
5.13	**Visual Resources**	**MM 13-6** An Exterior Lighting Plan shall be prepared in coordination with a qualified Biologist, be reviewed by an Electrical Engineer who is registered in the State of California, and then approved by the County prior to the submittal of each building permit. The Lighting Plan shall apply to all proposed structures and for development areas that border natural open space resources. The Lighting Plan shall be consistent with County Rural Outdoor Lighting District requirements for the Antelope Valley and shall provide guidelines for the outdoor lighting to be used throughout the Project site. Final lighting orientation and design shall be approved by the County. The Lighting Plan shall include, but not be limited to, the following: a. All lighting within 300 feet of natural open space areas shall only be implemented where needed for safety and shall be directed away from these areas and shielded so that light is not directed into open space and riparian areas. Where possible, these safety lights shall be motion sensor activated with infrared light sensors to prevent daytime lighting. b. Mercury vapor and halide lighting shall not be used on the perimeter of the developed areas or adjacent to designated open space.	Prepare an Exterior Lighting Plan for review and approval	Prior to approval of improvement plans for Final Maps	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

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		c. Illumination levels should be compatible with the character and use of surrounding development as determined by national lighting organizations. The Illuminating Engineering Society of North America publishes recommendations for the lighting industry that include illumination levels for outdoor lighting. d. Low-pressure sodium lighting fixtures or flashing lights shall not be used except in emergency situations. e. Exterior lighting standards and fixtures shall be located and designed to minimize direct glare beyond the site boundaries. Lighting shall be fully shielded and directed downwards to confine light spread solely within necessary locations. Illumination or glare from the exterior lighting system onto adjacent properties or streets should be minimized. f. Security lighting fixtures shall not project above the roof line of the building on which they are mounted. g. Where applicable, time-control devices shall be utilized on exterior lighting sources. h. Street, parking lot, and structural lighting fixtures shall provide adequate illumination for safety and comfort of vehicular and pedestrian traffic while minimizing light spillover.					

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5.14	**Parks and Recreation**	**MM 14-1** The Project shall implement the following components of the Green Development Program to provide healthy outdoor parks and recreational resources on the Project site: • Provide a functional system of community trails, greenway trails, and natural corridors to serve as recreational opportunities and as alternative means of transportation to reduce vehicular traffic. • Provide "complete streets" throughout the community to provide alternative modes of transport (walking, biking, low-speed vehicles (LSVs) such as neighborhood electric scooters, bikes and other low-speed electric vehicles (NEVs). • Incorporate sidewalks (separated by a parkway from streets) and trees to be the main street elements to create a walking environment, promoting pedestrian activity. • Provide Class I – IV bike lanes throughout the Project to ensure a variety of alternative transportation options. • Provide permanently anchored bicycle racks within 200 feet of visitors' entrance of nonresidential buildings, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of two-bike capacity rack. • For new nonresidential buildings with over 10 tenant-occupants or for additions or alterations that add 10 or more tenant vehicular parking spaces, provide secure bicycle parking spaces at a rate of 5 percent of tenant parking being added, with a minimum	Implement the components of the Green Development Program	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Regional Planning and County Department of Parks and Recreation	**Quantified**

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		of one space. • For residential buildings, provide permanently anchored bicycle racks within 100 feet of the visitor's entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity with a minimum of one two-bike capacity rack. • Nonresidential buildings within the Business Park and Commercial areas with 75,000 or more square feet of gross floor area shall provide locker rooms and shower facilities. • For multifamily buildings, provide on-site bicycle parking for at least one bicycle per every two dwelling units • Include planned green space, which are integrated pockets of open space (including greenways, tree stands, hillsides, and community parks) with minimal developed amenities. Planned green space reduces evapotranspiration; allows natural percolation of runoff from adjacent lands; reduces the heat island effect; and adds aesthetic value to a site. Planned green space can provide habitat as well as linkages to other habitat areas.					

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5.17	**Other Public Services**	**MM 17-9** The Project Applicant/Developer shall be responsible for implementing the following construction waste reduction requirements to ensure that 100 percent of soil is diverted during grading activities, and that at least 75 percent of nonhazardous construction and demolition waste is diverted from landfill disposal. During all construction phases, wastes would be managed with the use of recycling bins for various debris materials which would be sent to existing recycling and/or processing facilities in accordance with all provisions of the County Construction and Demolition Debris Ordinance. This would include submitting and implementing a Recycling and Reuse Plan to Public Works in connection with obtaining a building or grading permit.	Provide copy of waste management contract for review and approval	Prior to issuance of applicable construction permits	Project Applicant/ Developer	County Department of Public Works	
			Maintain a log book documenting the percent diversion of construction waste	During construction of all development phases	Project Applicant/ Developer	County Department of Public Works	
5.17	**Other Public Services**	**MM 17-10** The Project shall incorporate the Solid Waste Management Plan (Section 3.7 of the Centennial Specific Plan) and the Property Owner/Developer shall be responsible for implementation of the following operational waste reduction requirements to ensure that at least 75 percent of operational waste is diverted from landfill disposal: • The Property Owner/Developer shall process an on-site contract with a waste management company and/or recyclers/composters, and/or self-haul to waste and recycling facilities to properly recycle, divert, compost, and dispose of solid waste generated on-site. Throughout the Project's operation, the waste hauler shall be required by contract to maintain records showing the diversion of not less than 75 percent of the operational waste generated by the Project.	Verification of compliance with Specific Plan requirements	Prior to approval of Tentative Maps	Project Applicant/ Developer and Homeowners Association	County Department of Public Works	**Quantified**

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		• The waste management contract will establish dedicated cans for green waste and a Green Waste Recycling Plan that must be adhered to by landscape maintenance companies as part of the CC&Rs. The CC&Rs will require the use of mulching mowers or mowers with mulching blades for common lawn area, use of California Air Resources Board- (CARB) approved or electric maintenance equipment; placing three to five inches of mulch in common areas' planting beds each year as part of the Landscape Maintenance Plan for all non-residential and multi-family buildings; and diverting organic wastes to a mulching and composting facility or anaerobic digestion facility.	Verification of compliance with Specific Plan requirements	Prior to approval of Tentative Maps	Project Applicant/ Developer and Homeowners Association	County Department of Public Works	
		• The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal and on recycling and composting will be provided to Property Owners.	Verification of compliance with Specific Plan requirements	Prior to approval of Tentative Maps	Project Applicant/ Developer and Homeowners Association	County Department of Public Works	
		• Household hazardous wastes and less commonly disposed materials (such as electronics and appliances) shall have seasonal pickup (at least two times a year) and residents would be notified of upcoming events.	Verification of compliance with Specific Plan requirements	Report of seasonal pick up at least two times a year	Project Applicant/ Developer and Homeowners Association	County Department of Public Works	

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		• Semi-annual "exchange days" shall be organized, publicized, and paid for by the Master Homeowners Association (HOA).	Verification of compliance with Specific Plan requirements	Report of exchange days at least two times a year	Project Applicant/ Developer and Homeowners Association	County Department of Public Works	
		• The Project Applicant/Master Developer shall set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station (MRF/TS) that includes a household hazardous waste permanent collection and reuse center and allows for mulching/composting operations. The site shall be located in a suitable location with the capacity to manage the nonhazardous solid waste and household hazardous waste generated by the Centennial Development Project at buildout. The Project Applicant/Master Developer shall prepare and grade the site, and install basic mainline infrastructure fronting the property prior to the issuance of any occupancy permits associated with the first phase of project implementation. The Master Developer shall continually encourage a waste management company to build these facilities on this build ready site. The CC&R for the future MRF/TS site shall require the land to be set aside for the MRF/TS in perpetuity.	Verification of compliance with Specific Plan requirements for an MRF/TS site on the Tentative Map	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Public Works	
			Application for grading permit for the MRF/TS site and CUP and other necessary building permits for the construction of an MRF/TS	Prior to the issuance of any occupancy permits associated with the first phase of project implementation	Project Applicant/ Developer	County Department of Public Works	

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		• The Smart Gardening Learning Center specifications will be provided by County Public Works.	Contact County Public Works for specifications of a Smart Gardening Learning Center	Prior to approval of Tentative Maps	Project Applicant/ Developer and Homeowners Association	County Department of Public Works	
		• Parking for the Learning Center and the MRF/TS may be shared with adjacent uses with the consent of the property owners and County Public Works.	Submit draft Construction Agreement for the Smart Gardening Learning Center and MRF/TS with adjacent uses	Prior to approval of Tentative Maps	Project Applicant/ Developer and Homeowners Association	County Department of Public Works	
5.18	**Water Resources**	**MM 18-1** In addition to complying with the water efficiency and conservation set forth in Divisions 4.3 and 5.3 of the California Green Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent, the Project Applicant/Developer shall implement the measures listed below. **Meter Water Use.** Install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site. **Reduce Potable Water Use with On-Site Recycled Water.** Install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater. Recycled water shall be used to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation	Implement water resources measures during design, construction and operation	Prior to issuance of applicable construction permits for Tentative Maps and During construction for each development phase and During future operations	Project Applicant/ Developer	County Department of Public Works	**Quantified**

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		demand in 50 percent of the total very low and low density residential lot landscaped area. **Water Efficient Appliances**. Require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star®, or other applicable standards. **Water Efficient Irrigation**. Require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses. Water Smart/Evapotranspiration-based controllers shall be used. Low water use plants and shrubs shall be used in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance. **Water Budget Based Water Rates**. Require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District). The water budget based rates shall incorporate and be designed to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: 1. Indoor Water Use Standards (a) Residential indoor water use – 55 gallons per capita per day (b) Commercial indoor water use – 200 gallons per day per thousand square feet					

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		(c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias) (d) Institutional indoor water use – 50 gallons per day per thousand square feet (e) Hotel indoor water use – 125 gallons per day per room. 2. Outdoor Water Use Standards (a) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site (b) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site <u>3. Water meters shall be required to measure potable water use and may be required to measure recycled water usage at commercial, recreational, and institutional uses; and to monitor single family home lots via sample home survey selection criteria.</u>					

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5.18	**Water Resources**	**MM 18-2** The Project Applicant/Developer shall submit to the County Water Use Reports prepared by a qualified specialist to the satisfaction of the County to verify that projected water use efficiencies are being achieved (1) at the end of the 5th year following first occupancy or occupancy of the 4,000th dwelling unit, whichever occurs later and (2) at the end of the 10th year following first occupancy or occupancy of the 10,000th dwelling unit, whichever occurs later. In the event that a Water Use Report indicates that consumption exceeds projected levels, response measures must be implemented to ensure that available supplies will be sufficient to meet future demand. No further development will be approved until additional measures are implemented to achieve the required efficiencies and/or provide additional water supplies, as confirmed by the Project Water Purveyor. No subsequent Tentative Maps shall be approved until the Project Water Purveyor has demonstrated to the satisfaction of the County that the implementation of specific water demand and supply response measures will ensure that available supplies will meet future Project demand.	Prepare Water Use Reports for review and approval	At the end of the 5th year following first occupancy or occupancy of the 4,000th dwelling unit and At the end of the 10th year following first occupancy or occupancy of the 10,000th dwelling unit, whichever occurs later	Project Applicant/ Developer and Project Water Purveyor	County Department of Public Works	**Support**
5.19	**Wastewater Collection**	**MM 19-1** The Project Applicant/Developer shall provide documentation to the County that it has completed all required procedures and has paid all applicable fees associated with establishing the Project Water Purveyor, or an alternate qualified public utility district, as the operator of the WRFs.	Provide documentation for establishment of the Project Water Purveyor, or an alternate qualified public utility district, as the operator of the WRFs, and verification of	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Public Works	**Support**

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			operating procedures and policies				
5.19	**Wastewater Collection**	**MM 19-2** The Project Applicant/Developer shall demonstrate that the Project has either been annexed into an existing qualified public utility district (e.g. Golden Valley Municipal Water District) or that a new public utility district (e.g. Project Water Purveyor) has been created to serve the Project. The Project Water Purveyor or alternate qualified public utility district shall be responsible for the design, construction, and operation of the wastewater facilities, and shall ensure compliance with all applicable standards and regulations, including all Lahontan RWQCB and Title 22 requirements of the California Code of Regulations. Wastewater treatment facilities, effluent facilities, and sewer lift stations shall be designed with emergency backup power sources and spill containment features, which shall be provided to the satisfaction of the Lahontan RWQCB.	Provide proof of Project annexation or that a new Project Water Purveyor has been created accompanied by a statement that indicates the District/Water Purveyor will be responsible for the design construction, and operation of the wastewater facilities.	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Public Works	**Support**
5.19	**Wastewater Collection**	**MM 19-3** The Project shall incorporate the Wastewater Management Plan (*Centennial Specific Plan*, Section 3.5), and the Project Applicant/Developer shall prepare a Facilities Report, a Pump Station Feasibility Report, and a Sewer Area Study consistent with County Policies and Requirements.	Verification of compliance with Specific Plan requirements for the Wastewater Management Plan on the Tentative Maps	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Public Works	**Support**

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5.19	**Wastewater Collection**	**MM 19-4** The Project Applicant/Developer shall provide the County with plans and specifications that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards that demonstrate that the WRF West shall serve the Project site west of the West Branch of the California Aqueduct. The facility shall be located on an approximate 3-acre site and shall treat an average flow of approximately 0.34 million gallon per day. Biosolids shall be hauled to a suitable landfill or used for conversion into fertilizer products.	Design and submit plans and gain approval for the WRF West to serve the Project site west of the West Branch of the California Aqueduct	Prior to approval of Final Map that includes WRF West	Project Applicant/ Developer	County Department of Public Works	**Support**
5.19	**Wastewater Collection**	**MM 19-5** The Project Applicant/Developer shall provide the County with plans and specifications that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards that demonstrate that the WRF East shall serve the Project site east of the West Branch of the California Aqueduct. WRF East will be located near the northeasterly corner of the Project and shall treat an average flow of 4.28 million gallons per day. Biosolids shall be hauled to a suitable landfill or used for conversion into fertilizer products. Lined seasonal recycled water storage ponds shall be implemented as required to temporarily store recycled water during times of low demand. The ponds shall implement feasible and applicable wastewater treatment facility best management practices for mosquito and health vector recommended in the California Department of Public Health's 2012 *Best Management Practices for Mosquito Control in California: Recommendations of the California Department of Public Health and the Mosquito and Vector Control Association of California.*	Design and submit plans and gain approval for the WRF East to serve the Project site east of the West Branch of the California Aqueduct	Prior to approval of Final Map that includes WRF East	Project Applicant/ Developer	County Department of Public Works	**Support**

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5.20	**Dry Utilities**	**MM 20.2-1** The Project Applicant/Developer shall coordinate with Southern California Edison (SCE) to ensure that there are no prolonged disruptions to the existing transmission lines that extend through the Project study area and to coordinate in the design and implementation of future electrical service and facilities (e.g., transmission lines, access road) in the Project study area. This will ensure that: (1) no prolonged service disruptions during the extension and upgrading of these services would arise; (2) the nature, design, and timing of electrical system improvements are in accordance with all SCE requirements; and (3) the improvements are adequate to serve the proposed land uses and are available for the first occupied land uses.	Coordinate with SCE in the design and implementation of future electrical service and facilities	Prior to recordation of each Final Map	Project Applicant/ Developer	County Department of Public Works and Southern California Edison	
5.20	**Dry Utilities**	**MM 20.2-2** The Project Applicant/Developer shall provide the County with plans and specifications that demonstrate a future substation shall be constructed in the eastern half of the Project site to serve Project development in the easterly portion of the Project site. To provide adequate capacity for electrical services for the Project, SCE would select one or both of the following two options to implement: (1) reconfigure the Bailey Substation or (2) upgrade the Gorman Substation and retrofit the existing overhead power lines. An electrical infrastructure shall be constructed as part of the main utility corridors for dry utilities. The timing of construction, as well as specific facility location and sizing, shall be coordinated with SCE.	Coordinate with SCE to determine the location of the substation	Prior to recordation of the Final Map that require service from the new substation	Project Applicant/ Developer	County of Department of Public Works and Southern California Edison	
			Construct electrical generation and distribution system improvements	During construction activities	Project Applicant/ Developer	County of Department of Public Works and Southern California Edison	

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5.20	**Dry Utilities**	**MM 20.3-1** The Project Applicant/Developer shall coordinate with the Southern California Gas Company (SoCalGas) in the design and implementation of future natural gas service and facilities in the Project study area to ensure that (1) no prolonged service disruptions during the extension and upgrade of these services would arise; (2) the nature, design, and timing of natural gas system improvements are in accordance with SoCalGas requirements; and (3) the improvements are adequate to serve the Project, to be in place for the first occupied land uses.	Coordinate with SoCalGas in the design and implementation of future natural gas service and facilities	Prior to recordation of each Final Map	Project Applicant/ Developer	County Department of Public Works and Southern California Gas Company	
5.20	**Dry Utilities**	**MM 20.3-2** The Project Applicant/Developer shall install, bond for, or otherwise provide on-site natural gas facilities in coordination with SoCalGas.	Provide on-site natural gas facilities in coordination with SoCalGas	Prior to recordation of each Final Map	Project Applicant/ Developer	County Department of Public Works and Southern California Gas Company	
5.20	**Dry Utilities**	**MM 20.3-3** An additional regulator station shall be constructed by SoCalGas to loop the distribution system for increased reliability. The timing for development of this station shall be determined by SoCalGas through an assessment of the system's operational needs. The timing for construction of this facility, as well as the specific location and sizing, shall be coordinated with SoCalGas.	Construct additional regulator station by SoCalGas	Prior to approval of Final Map with regulator station	Project Applicant/ Developer	County of Los Angeles Department of Public Works and Southern California Gas Company	

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5.21	**Climate Change**	**MM 21-1** The Project Applicant/Developer shall provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation. "Anticipated electrical energy demand" shall be determined on the basis of the anticipated loads for each building as shown in the reports submitted at the time of building permit application pursuant to the Building Energy Efficiency Standards of Title 24. "On-site renewable energy generation" includes, but is not limited to, solar, wind, geothermal, biofuel and hydroelectric systems. These systems shall be installed in connection with the development of one or more of the following: residential units, nonresidential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity.	Provide plans and specifications that demonstrate 20 percent of energy demand at buildout will be from on-site renewable energy generation	Prior to issuance of applicable construction permits	Project Applicant/ Developer	County Department of Public Works	**Quantified**
			Submit annual progress reports for review and approval	Annually until buildout completion	Project Applicant/ Developer	County Department of Public Works	
5.21	**Climate Change**	**MM 21-2** The Project's plans and specifications shall demonstrate compliance with California Green Building Standards (CALGreen) Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings. Therefore, the energy efficiency of these buildings would exceed 2016 Title 24 requirements by 15 percent. Low rise buildings are three stories or less. The Project shall incorporate the Green Development Program (*Centennial Specific Plan*, Appendix 2A), and the Project Applicant/Developer shall be responsible for the implementation of this requirement, which may include energy reduction measures such as use of high performance glazing, radiant heat roof barriers, insulation of all pipes, programmable thermostats, fluorescent and LED bulbs, solar access, sealed ducts, strategic placement of trees	Provide plans and specifications demonstrating compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings	Prior to issuance of applicable construction permits	Project Applicant/ Developer	County Department of Public Works	**Quantified**

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		and other shading devices. All single-family homebuyers shall have the option to include a photovoltaic array system.					
5.21	**Climate Change**	**MM 21-3** The Project's plans and specifications shall demonstrate compliance with CALGreen voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings (e.g. hotel, high-rise residential), thereby exceeding the 2016 Title 24 energy efficiency requirements for these buildings by 10 percent. The Project shall incorporate the Green Development Program (Centennial Specific Plan, Appendix 2A), and the Project Applicant/Developer shall be responsible for the implementation of this requirement, which may include energy reduction measures such as high performance glazing, radiant heat roof barriers, high-efficient HVAC with hot-gas reheat, insulation of all pipes, programmable thermostats, fluorescent and LED bulbs, solar access, sealed ducts, zero use of CFC refrigerants in commercial buildings, strategic placement of trees, and other shading devices. Commercial structures shall include passive solar design techniques, such as a north-south panel orientation on buildings, and shall install operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, thereby reducing use of interior climate controls.	Provide plans and specifications demonstrating compliance with CALGreen voluntary measure A4.203.1.2.1 for non-residential buildings	Prior to issuance of applicable construction permits	Project Applicant/ Developer	County Department of Public Works	**Quantified**
5.21	**Climate Change**	**MM 21-4** The Project Applicant/Developer shall require in contract specifications, that contractors limit construction equipment idling to 3 minutes and include a program to ensure that equipment operators comply with the 3-minute limit.	Limit construction equipment idling through contractor's specifications	Prior to issuance of applicable construction permits for Tentative Maps	Project Applicant/ Developer	County Department of Regional Planning	

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5.21	**Climate Change**	**MM 21-5** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that <u>all</u> ~~a minimum of 70 percent of~~ public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. The Project Applicant/Developer shall provide the proposed plan for compliance with this provision prior to obtaining a permit for the pool.	Provide plans and specifications demonstrating that <u>100</u>~~70~~ percent of public and community pools and spas would be equipped with active solar heating systems	Prior to approval of pool permit	Project Applicant/ Developer	County Department of Regional Planning	
5.21	**Climate Change**	**MM 21-6** Deeds, CC&Rs or similar legal documents shall contain the following requirement: The owners of all single-family and multi-family residential units shall be required, upon resale, to present to the buyer a written energy audit checklist prepared by a qualified third party at the time the seller provides the buyer with the Real Estate Transfer Disclosure Statement required by California Civil Code, Section 1102 et seq. The energy audit checklist shall certify that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. All residential pool covers shall be removable, and shall not be automatic retractable covers. The CC&Rs of the master homeowners association or other applicable association shall require compliance with the provisions of this measure and shall provide notice to individual owners of the resale energy audit checklist requirement. The master homeowners association or other applicable association shall monitor compliance	Contain requirements in deeds, CC&Rs, or similar legal documents to provide an energy audit at the time of property sale and Provide Annual Report with compliance for review and approval	Upon resale	Project Applicant/ Developer and Homeowner's Association	County Department of Regional Planning	**Support**

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		and provide the County with an annual report of compliance with this measure.					
5.21	**Climate Change**	**MM 21-7** Deeds, CC&Rs, or similar legal documents shall contain the following requirement: For nonresidential buildings, within ninety (90) days after the end of the first full calendar year following the issuance of the certificate of occupancy and within ninety (90) days after each five year period thereafter, the owner or tenant in possession thereof shall submit to the master commercial owners association or other applicable association a report prepared by the owner or a qualified, independent third party that evaluates whether all major building systems such as heat furnace, air conditioner, and other mechanical fixtures are working within the design standards established for each system. The master commercial owners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure.	Contain requirements in deeds, CC&Rs, or similar legal documents to provide an audit of building systems	Within 90 days after end of first calendar year following issuance of occupancy permit	Project Applicant/ Developer and Homeowner's Association	County Department of Regional Planning	**Support**
			Provide Annual Report with compliance for review and approval	Within 90 days of each five-year period	Project Applicant/ Developer and Homeowner's Association	County Department of Regional Planning	
5.21	**Climate Change**	**MM 21-8** Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements, or equivalent, shall be offered by residential builders. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners.	Require in contractors plans and specifications that only Energy Star®-compliant residential appliances are offered	Prior to issuance of construction permits	Project Applicant/ Developer	County Department of Public Works	**Quantified**
5.21	**Climate Change**	**MM 21-9** The Project Applicant/Developer shall provide plans and specifications to the County that have been prepared in accordance with the Project Water Purveyor or alternate qualified public utility district requirements and standards, demonstrating that the Project's wastewater reclamation facilities (WRFs) shall ~~include~~	Provide plans and specifications demonstrating that biogas is captured for	Prior to approval of Final Maps	Project Applicant/ Developer	County Department of Public Works	**Quantified**

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		~~equipment to~~ capture and reuse biogas for energy production.	energy production				
5.21	**Climate Change**	**MM 21-10** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential or multi-family buildings shall be constructed with recycled water infrastructure to serve common areas for these facilities, except where prohibited by law. To the extent recycled water is produced within the Project and available, recycled water shall be used for landscape irrigation within those common areas. Compliance with these measures shall be established prior to the of a construction permits for nonresidential and multi-family facilities and at the time of County approval of final landscaping plans submitted by the Project Applicant/Developer after final map recordation for homeowners association common areas. Covenants, conditions and restrictions (CC&Rs) shall require the owners of such common areas to maintain, repair and replace irrigation systems and plantings in accordance with County approved plans.	Provide plans and specifications demonstrating that recycled water infrastructure is incorporated	Prior to issuance of applicable construction permits and Upon approval of final landscaping plans for common areas	Project Applicant/ Developer and Homeowner's Association	County Department of Regional Planning	**Quantified**
5.21	**Climate Change**	**MM 21-11** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with 2016 CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code.	Provide plans and specifications demonstrating that appropriate indoor plumbing fixtures and fixture fittings are incorporated	Prior to issuance of applicable construction	Project Applicant/ Developer	County Department of Public Works	**Quantified**

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5.21	**Climate Change**	**MM 21-12** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that single or multi-family residential buildings shall be constructed with kitchen faucets and appliances that comply with 2016 CALGreen code residential voluntary measures specified in Sections A4.303.1 and A4.303.3 of the code.	Provide plans and specifications demonstrating that kitchen faucets and appliances comply with CALGreen residential voluntary measures	Prior to issuance of applicable construction permits	Project Applicant/ Developer	County Department of Public Works	**Quantified**
5.21	**Climate Change**	**MM 21-13** The outdoor residential (single-family and multi-family) water budget for water budget based ratemaking shall be based on having no more than 25 percent turf grass allowed in landscaped areas of single-family detached residential front yards and multi-family residential common areas.	Install no more than 25 percent turf in landscaped areas of single-family residential front yards and multi-family residential common areas	Prior to issuance of applicable construction permits	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**
5.21	**Climate Change**	**MM 21-14** Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan (see Appendix 3-H of the Centennial Specific Plan).	Provide affordable housing units in conformance with the Affordable Housing Implementation Plan	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Regional Planning and Community Development Commission	**Quantified**

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5.21	**Climate Change**	**MM 21-15** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction. The Project Applicant/Developer shall provide a further credit of $500 to 50 percent of future homeowners (as requested by homeowner) to pay for the type of charging device then in use for electric vehicles or, with County approval, to pay for other energy conservation uses. The availability of this EV incentive benefit shall be disclosed and promoted at the time of initial sale of single family homes and shall thereafter be promoted by the TMA on its website.	Provide plans and specifications demonstrating that 208/240-volt outlets at each single-family residence are incorporated	Prior to finalizing the last building permit inspection and issuing the certificate of occupancy	Project Applicant/ Developer	County Department of Public Works	**Quantified**
5.21	**Climate Change**	**MM 21-16** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating compliance with the Electric Vehicle Supply (EVS) charging station measures specified in MM 11-4. If and to the extent subsequently approved by the County, compliant with state laws, and resulting in no new significant impacts to the environment following County review and approval, EVS charging stations may be replaced by "alternative energy fueling stations" which may include other types of electric vehicle charging technology (e.g., operating at higher or lower voltages), or alternative vehicular fuel technology that results in zero or near zero (as defined by CARB) GHG emission such as hydrogen fuel cells, biofuels, or other qualifying fuel technologies. ~~that "alternative energy fueling stations" shall be installed as follows. An~~	Provide plans and specifications demonstrating that alternative energy vehicle fueling stations are incorporated	Prior to approval of applicable construction permits	Project Applicant/ Developer	County Department of Public Works	**Quantified**

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		~~"alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel.~~ An electric charging station shall allow for simultaneous charging of two electric vehicles. • Business Park and Institutional land use designations shall provide a minimum of one EVS on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least seventeen (17) residential units shall provide a minimum of one EVS for the first seventeen (17) residential units and an additional EVS for each additional seventeen (17) residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one EVS. • Designated Transit Hubs shall provide a minimum of one EVS.					

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5.21	**Climate Change**	**MM 21-17** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs for non-residential buildings: • Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for nonresidential land uses. • Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code.	Provide plans and specifications demonstrating that bicycle parking and preferential parking are incorporated	Prior to finalizing the last building permit inspection and issuing the certificate of occupancy	Project Applicant/ Developer	County Department of Regional Planning	**Support**
5.21	**Climate Change**	**MM 21-18** The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the building designs or specifications for multi-family residential buildings: • Visitor parking shall include preferentially located parking spaces for ~~alternative-fueled~~ electric vehicles. • Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by County Code Section 22.52.1225B, whichever is more stringent.	Provide plans and specifications demonstrating that parking features are incorporated	Prior to the approval of construction permits	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

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5.21	**Climate Change**	**MM 21-19** For parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility: • The parking facility shall include a minimum of five percent preferentially located parking spaces for ~~alternative-fueled (~~electric~~, natural gas, or similar low-emitting technology)~~ vehicles. • Five percent of the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows: **Single charging space requirements**. When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall	Provide plans and specifications demonstrating that dedicated parking spaces and electric vehicle charging stations have been incorporated	Prior to the approval of construction permits	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

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		terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure. **Multiple charging spaces required**. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electrical vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction. • For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code or as required by County Code Section 22.52.1225B, whichever is more stringent.					
5.21	**Climate Change**	**MM 21-20** The Project Applicant/Developer shall ensure that the implementation of the Green Development Program ~~takes into account compliance with the~~ that complies with all applicable legal requirements, including but not limited to the following regulations (as may be amended)~~.~~: 1) Regulations that are quantified inputs into the CalEEMod analysis, resulting in GHG Reductions: a) Pavley Motor Vehicle Standards (AB 1493)	Verification of compliance with Specific Plan requirements for the Green Development Program on the Tentative Maps	Prior to approval of Tentative Maps	Project Applicant/ Developer	County Department of Regional Planning	**Quantified**

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		b) Low Carbon Fuel Standard (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.) c) Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations d) Renewable Portfolio Standard (SB X1 2 and SB 350) e) Solid Waste Diversion (AB 341) f) Statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15) g) Model Water Efficient Landscape Ordinance (MWELO) (California Code of Regulations, Title 23, Division 2, Chapter 2.7) h) Los Angeles Tree Planting Ordinance (Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.) i) Los Angeles County Green Building Standards Code (Los Angeles County Code, Title 31, Chapter 1, Sections 100 et seq.) j) California Water Code (California Code of Regulations, Division 6, Part 2.10, Sections 10910–10915) k) Los Angeles County Community Climate Action Plan					

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		2) Regulations that are not quantified inputs into the CalEEMod analysis, but should be considered for incorporation as appropriate: a) EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles (75 FR 25324–25728 and 77 FR 62624–63200) and for medium- and heavy-duty vehicles (76 FR 57106–57513) b) Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 5, Section 95801 et seq.) c) Advanced Clean Cars Program (California Code of Regulations, Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts); Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts); Chapter 4.4 (parts); Chapter 8 (parts). d) Under Inflated Vehicle Tires (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.) e) Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.) f) Management of High Global Warming Potential Refrigerants for Stationary Sources (California Code of Regulations, Title 17, Division 3, Chapter 1,					

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		Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.) g) Small Containers of Automotive Refrigerant (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.) h) High-Global Warming Potential Greenhouse Gases in Consumer Products (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 2) i) CALGreen Code as Adopted by the Building Standards Commission (California Code of Regulations, Title 24, Part 11 Emergency Building Standard DSA-SS EF-02/15) j) Natural Gas Cooking Stoves and Fireplaces (SCAQMD Rule 445)					

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